

PUBLIC DISCLOSURE

October 1, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Town Bank
RSSD# 2693264

850 West North Shore Drive
Hartland, Wisconsin 53029

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 RATING

Town Bank’s Overall CRA Rating: Outstanding

Performance Test Rating Table

The following table indicates the performance level of Town Bank with respect to the lending, investment, and service tests.

Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

** Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating*

Summary of Major Factors that Support the Rating

Lending Test:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes;
- Lending exhibits an excellent record of serving the credit needs of low-income individuals and very small businesses;
- The bank is a leader in making community development loans; and
- The bank makes extensive use of flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank provides a significant level of qualified community development investments, particularly those not routinely provided by private investors, occasionally in a leadership position;
- The bank makes extensive use of innovative and complex investments to support community development initiatives; and
- The bank exhibits excellent responsiveness to credit and community development needs.

Service Test:

- Delivery systems are readily accessible to all portions of the bank's assessment areas;
- The bank's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and to low- and moderate-income individuals;
- Services do not vary in a way that inconveniences the bank's assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals; and
- The bank provides a relatively high level of community development services.

TOWN BANK

DESCRIPTION OF INSTITUTION

Town Bank, a subsidiary of Wintrust Financial Corporation (WTFC), is headquartered in Hartland, Wisconsin, and has \$2.0 billion in assets as of September 30, 2018. WTFC holds 15 separately chartered banks operating in metropolitan Chicago and southern Wisconsin. WTFC also operates a mortgage subsidiary, Wintrust Mortgage Corporation (WMC), which processes most home mortgage applications for Town Bank and all other subsidiary banks of WTFC.

Town Bank provides a comprehensive range of banking and related financial products and services to meet the needs of individuals, families, farms and businesses in the communities it serves. These products and services include, but are not limited to, business and personal checking accounts, savings and individual retirement accounts, time deposit instruments, commercial real estate financing, commercial lending, consumer financing, debit cards, safe deposit box services, and investment products. Town Bank continues to refer all residential real estate mortgage loan applications to WMC. The bank also participates in federally guaranteed loan programs with the Small Business Administration (SBA) and Farm Service Agency (FSA).

The bank offers several additional retail delivery services including mobile banking, internet banking, and telephone banking. The bank's website, www.townbank.us, provides customers with the ability to open deposit accounts, pay bills, and make account transfers. The bank's mobile banking features include remote deposit capture, peer-to-peer payments, and cardless cash withdrawals.

Town Bank is primarily a commercial lender, with 55.8 percent of its loan portfolio concentrated in commercial loans as of September 30, 2018. Consumer lending represents the second largest portion of the bank's loan portfolio, totaling 29.7 percent. Direct residential real estate lending and agricultural lending are not major product lines, as they represent only 8.5 percent and 5.5 percent, respectively, of total loans as of September 30, 2018. Details of the allocation of the bank's loan portfolio are provided in the following table.

Loan Portfolio Composition as of September 30, 2018		
Loan Type	Dollar Volume (\$ in 000s)	% of Portfolio
Agricultural	88,377	5.5
Commercial, including real estate secured	898,515	55.8
Consumer	477,774	29.7
Residential Real Estate	136,225	8.5
Other	9,405	0.6
Total	1,610,296	100.0
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>		

Town Bank currently has one main office, 24 branches and 30 automated teller machines (ATM) located throughout six assessment areas. Since the previous examination on June 22, 2015, Town Bank

expanded its geographical presence with a modest increase in the number of branches. The assessment area was expanded in the Milwaukee-Waukesha-West Allis, WI MSA #33340 (Milwaukee MSA) to include Ozaukee and Washington Counties, in addition to the previously included Milwaukee and Waukesha Counties. The bank has opened six new branches since the previous examination, five in the Milwaukee MSA and one in the Racine, WI MSA #39540. Two branches, one in the Milwaukee MSA and one in the Non-MSA Wisconsin Southeast (Jefferson and Walworth Counties), were consolidated into existing branches. There have been no branch closings since the previous examination. The following tables provide a breakdown of the bank's main office, branches and ATMs by census tract income level and detail which individual assessment areas will receive full and limited scope reviews.

Town Bank													
Branch Location Census Tract Designation as of July 30, 2018													
Scope	Assessment Area	Low Income		Moderate Income		Low- and Moderate-Income		Middle Income		Upper Income		Total	
		#	%	#	%	#	%	#	%	#	%	#	%
Full	Janesville MSA	0	0.0	0	0.0	0	0.0	1	100.0	0	0.0	1	100.0
	Milwaukee MSA	3	27.3	0	0.0	3	27.3	2	18.2	6	54.5	11	100.0
	Southeast Non-MSA	0	0.0	0	0.0	0	0.0	5	100.0	0	0.0	5	100.0
	Total Full Scope	3	17.6	0	0.0	3	17.6	8	47.1	6	35.3	17	100.0
Limited	Madison MSA	0	0.0	1	33.3	1	33.3	1	33.3	1	33.3	3	100.0
	Racine MSA	0	0.0	1	25.0	1	25.0	2	50.0	1	25.0	4	100.0
	South Central Non-MSA	0	0.0	0	0.0	0	0.0	1	100.0	0	0.0	1	100.0
	Total Limited	0	0.0	2	25.0	2	25.0	4	50.0	2	25.0	8	100.0
Total		3	12.0	2	8.0	5	20.0	12	48.0	8	32.0	25	100.0

Town Bank									
ATM Services and Locations as of July 30, 2018									
Scope	Assessment Area	Full-Service		Cash Only		Total		Low- and Moderate-Income	
		#	%	#	%	#	%	#	%
Full	Janesville MSA	0	0.0	1	100.0	1	100.0	0	0.0
	Milwaukee MSA	11	64.7	6	35.3	17	100.0	6	35.3
	Southeast Non-MSA	3	60.0	2	40.0	5	100.0	0	0.0
	Total Full Scope	14	60.9	9	39.1	23	100.0	6	26.1
Limited	Madison MSA	3	100.0	0	0.0	3	100.0	1	33.3
	Racine MSA	3	100.0	0	0.0	3	100.0	0	33.3
	South Central Non-MSA	1	100.0	0	0.0	1	100.0	0	0.0
	Total Limited Scope	7	100.0	0	0.0	7	100.0	1	14.3
Total		21	70.0	9	30.0	30	100.0	7	23.3

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

At its previous evaluation conducted on June 22, 2015, the bank was rated Satisfactory under the CRA.

SCOPE OF THE EXAMINATION

Town Bank's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) Interagency Large Institution CRA Examination Procedures. The evaluation considered the CRA performance context, including the bank's asset size, financial condition and market competition, the demographics of the bank's assessment areas, and credit and community development needs. While the performance in the bank's assessment areas are evaluated using the Interagency CRA Examination Procedures, the bank's CRA rating is based on assessment areas that received a full scope review. Assessment areas that received a limited scope review are evaluated as to whether their performance was consistent, above, or below the performance of the full scope review assessment areas.

CRA-reportable small business and HMDA-reportable loan originations were reviewed for all assessment areas, while CRA-reportable small farm loans were reviewed for the Janesville-Beloit, WI MSA and Non-MSA Wisconsin Southeast assessment areas, because the volume was significant enough to draw conclusions about the bank's lending performance. Affiliate lending data for HMDA-reportable loans was used as part of this performance evaluation. Aggregate lending data comparisons utilized in the evaluation consist of all institutions originating HMDA- and CRA-reportable loans within the assessment area in 2016. Data for the bank's 2017 HMDA- and CRA-reportable lending excludes aggregate lending comparisons and can be referenced in Appendix B of the evaluation. For this evaluation, greater weight is placed on CRA-reportable loans, considering commercial lending is the bank's primary focus.

The composition of the bank's six delineated assessment areas and the scope of review for each assessment area are shown in the following table. Full scope assessment areas were selected based on an analysis of the number of bank offices, loans and deposits, size of the assessment area, demographic factors such as the number of low- and moderate-income families and families with income below the poverty level, and in consideration of when assessment areas were last subject to a full scope review. The analysis places the greatest weight on the Milwaukee MSA assessment area given it maintains the highest number of branches and ATMs, as well as the largest volume of deposits and loan originations among all assessment areas. The Milwaukee MSA also contains a majority of the low- and moderate-income census tracts and families within the bank's combined assessment area, and is an area where there is a significant need for affordable housing and revitalization/stabilization of blighted commercial areas.

Assessment Areas, with Descriptions for Non-MSAs and Partial MSAs or MDs	Report Designation
Full Scope Reviews	
1. Janesville-Beloit, WI MSA #27500	Janesville MSA
2. Milwaukee-Waukesha-West Allis, WI MSA #33340	Milwaukee MSA
3. Non-MSA Wisconsin Southeast - Jefferson and Walworth Counties	Southeast Non-MSA
Limited Scope Reviews	
4. Madison, WI MSA#31540 (Dane and Green Counties)	Madison MSA
5. Racine, WI MSA #39540	Racine MSA
6. Non-MSA Wisconsin- South Central - Lafayette County	South Central Non-MSA

The bank's performance was evaluated using the following performance standards:

- **Lending Activity** – HMDA-reportable and CRA-reportable loans originated from January 1, 2016, through December 31, 2017, were reviewed to determine the bank's responsiveness to credit needs in the bank's assessment area.
- **Lending in the Assessment Area** – HMDA-reportable and CRA-reportable loans from January 1, 2016, through December 31, 2017, were reviewed to determine the percentage of loans originated in the assessment area.
- **Geographic Distribution of Lending in the Assessment Area** – HMDA-reportable and CRA-reportable loans from January 1, 2016, through December 31, 2017, were reviewed to determine the extent to which the bank makes loans in census tracts of different income levels, including low- or moderate-income tracts.
- **Lending to Borrowers of Different Incomes and Businesses and Farms of Different Sizes** – HMDA-and CRA- reportable loans from January 1, 2016, through December 31, 2017, were reviewed to assess the loan distribution among borrowers of different income levels and businesses and farms of different sizes. Farm loans were not included for all assessment areas.
- **Community Development Lending** – The number, dollar volume, innovativeness, and complexity of community development loans originated from June 22, 2015, through October 1, 2018, were reviewed to determine the bank's responsiveness to community development needs.
- **Innovative or Flexible Lending Practices** – The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals, small businesses, and geographies was assessed from January 1, 2016, through December 31, 2017.
- **Investments** – Qualified investments, grants and donations made from June 22, 2015,

through October 1, 2018, were reviewed to determine the bank's responsiveness to community development needs. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.

- *Services* – The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services were reviewed. The review included community development activities conducted from June 22, 2015, through October 1, 2018.

Six community representatives were contacted in connection with this examination to better understand the credit needs of the assessment area. The contacts specialized in the areas of affordable housing and economic development. Details of the information provided by the organization representatives are provided in the individual assessment area analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Town Bank's performance relative to the lending test is rated Outstanding. Lending levels reflect excellent responsiveness to the credit needs of the assessment areas and the geographic distribution of the bank's lending reflects good penetration throughout the assessment areas, including in low- and moderate-income census tracts. The distribution of the bank's borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and to businesses and farms of different sizes. The bank exhibits an excellent record of serving the credit needs of low-income individuals and very small businesses and farms. The bank is a leader in making community development loans within its assessment area and makes extensive use of innovative and flexible lending practices in serving assessment area credit needs.

The bank's geographic and borrower distribution of lending discussed in the lending test conclusions relies upon 2016 aggregate comparisons and demographic data based on the 2010 U.S. Census. Tables containing the bank's 2017 geographic and borrower distribution of loans are provided in Appendix B.

Level of Lending Activity

Town Bank's lending levels reflect excellent responsiveness to assessment area credit needs. The bank is primarily a commercial lender, and the largest portion of its portfolio consists of small business related loans. Small farm related loans, a business line that was new to the bank at the time of the previous examination, comprised only 2.0 percent of all loan originations during the sample period.

Town Bank originated significantly more HMDA- and CRA-reportable loans since the previous evaluation. The increase in HMDA-reportable loans can be primarily attributed to the sample period of 2012-2014 that was used for the previous evaluation, as the majority of the bank's acquisitions, and

hence growth, were completed in the middle of 2014 and beginning of 2015. Town Bank’s current business strategy is to continue referring a large portion of home purchase loans to Wintrust Mortgage Corporation. This is evidenced by the decline of HMDA-reportable loans from 2016 to 2017. A comparison of the bank’s CRA-reportable lending levels between this evaluation period and the prior evaluation period is limited by the inclusion of purchased affiliate loans for this evaluation period. The bank has focused on commercial lending as part of its growth strategy, especially in the Milwaukee assessment area where there is significant competition, but also opportunity to penetrate new market segments. In particular, Town Bank is positioning itself as a small business lender.

The following table presents the bank’s lending activity from January 1, 2016, through December 31, 2017.

Summary of Lending Activity				
HMDA- and CRA-Reportable Loan Originations in 2016 and 2017				
Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0.0	\$0	0.0
Home Improvement	23		\$6,779	
Home Purchase	688		\$157,661	
Multi-Family Housing	38		\$63,437	
Refinancing	539		\$106,470	
Total HMDA related	1,288	3.0	\$334,347	22.0
Small Business related	34,567	95.0	\$1,107,570	73.0
Small Farm related	633	2.0	\$78,494	5.0
Total CRA-reportable	35,200	97.0	\$1,186,064	78.0
Total Loans	36,488	100.0	\$1,520,411	100.0

Assessment Area Concentration

A very small percentage of loans were made inside Town Bank’s assessment area during the evaluation period; the bank made only 9.0 percent of total loans by number and 39.8 percent by dollar within the assessment area. This is due to the majority of the bank’s small business loans being originated outside the assessment area. In 2016, the bank made a change to the reporting of loans purchased from an affiliate originating a large volume of small business insurance financing, which resulted in a substantial increase in loans purchased from outside the assessment area. When these loans are excluded, the bank’s assessment area concentration increases to 93.5 percent of total loans by number and 88.8 percent by dollar, which is consistent with the bank’s performance in the previous examination period. Because the concentration rate is influenced so greatly by the purchase of affiliate loans, this component of the lending test received lesser weight than the other lending test components. The following table presents the bank’s lending inside and outside of the assessment area during the evaluation period.

Assessment Area Concentration 2016 and 2017 Originations								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	15	100.0	\$5,527	100.0	0	0.0	\$0	0.0
Home Purchase - Conventional	132	95.7	\$33,781	91.8	6	4.3	\$3,000	8.2
Home Purchase - FHA	1	100.0	\$178	100.0	0	0.0	\$0	0.0
Multi-Family Housing	26	68.4	\$43,469	68.5	12	31.6	\$19,968	31.5
Refinancing	200	93.0	\$27,546	93.0	15	7.0	\$2,084	7.0
Total HMDA-reportable	374	91.9	\$110,501	81.5	33	8.1	\$25,052	18.5
Small Business	2,312	6.7	\$352,351	31.8	32,255	93.3	\$755,219	68.2
Small Farm	534	84.4	\$63,450	80.8	99	15.6	\$15,044	19.2
Total CRA-reportable	2,846	8.0	\$415,801	35.1	32,354	92.0	\$770,263	64.9
Total Loans	3,220	9.0	\$526,302	39.8	32,387	91.0	\$795,315	60.2

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

Geographic and Borrower Distribution

The geographic distribution of loans reflects good penetration throughout the combined assessment area. The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses and farms of different sizes.

One assessment area, the Janesville MSA, had excellent geographic penetration throughout the assessment area; however, for the remaining two assessment areas, penetration was good, including for the more heavily weighted Milwaukee MSA. Further, the dispersion of loans throughout the assessment areas was adequate or better in all assessment areas. For the borrower distribution of lending, all three assessment areas had excellent penetration among borrowers of different income levels and businesses of different sizes.

When analyzing geographic and borrower distribution lending rates in individual assessment areas, CRA-reportable loans were weighted more significantly than HMDA-reportable loans because they comprised 88.4 percent of all originations in 2016 and 2017. For HMDA lending analysis, home purchase and refinance activity were weighted more heavily because these loans comprised 35.3 percent and 53.4 percent, respectively, of all HMDA-reportable loans. Unless otherwise stated, all comparisons to aggregate lender performance are made to the number of loans originated.

Further discussion with respect to the geographic and borrower distribution of lending can be found in the individual assessment area analyses.

Innovative and Flexible Lending Programs

Town Bank makes extensive use of innovative and flexible lending practices to low-and moderate-income geographies and borrowers, and small farms and businesses. Loan programs with significant volume in the evaluation period are described below.

Money Smart Loan Program products: The “Everyday Loan” is a payday alternative featuring up to \$2,500 in unsecured credit with a fixed interest rate and amortization between 6 and 24 months. There is also a Money Smart CD Secured Loan product, which is an alternative product for those unable to qualify for the unsecured Everyday Loan, but who need a product to help build credit. This CD secured alternative is a \$500 minimum loan secured by a CD funded by a portion of the loan proceeds. The product acts as a savings plan, and borrowers receive interest on the CD. Town Bank has been actively promoting these low dollar payday alternative products, along with training curriculum provided by the FDIC. The bank originated 176 Money Smart loans for \$337,070.

Small Business “Easy Access” Line of Credit and Installment Loans: These products have a simplified application and underwriting process designed to be clear and accessible to small businesses. The Easy Access Line of Credit is a revolving line up to \$75,000 that helps provide working capital, while the installment loan provides a solution for longer term financing, such as equipment upgrades, for up to \$75,000. The bank originated 190 Small Business “Easy Access” loans for \$4.4 million.

Small Business Administration (SBA) loans: The SBA assists qualified small businesses in obtaining financing when it is not otherwise available through normal lending channels. The bank originated 15 SBA loans for \$10.5 million.

Farm Service Agency (FSA) guaranteed loans: Town Bank continues to be a FSA preferred lender, a status conferred upon experienced lenders that allows streamlined and more flexible application and servicing requirements, as well as expedited loan approval. The bank originated 19 FSA loans for \$6.3 million.

A summary of innovative and flexible product offerings extended during the evaluation review period is listed in the following table.

Innovative and Flexible Product Offerings 2016-2017		
Loan Type	#	\$
Small Business Administration (SBA)	15	10,540,368
Small Business Easy Access (LOC and Installment)	190	4,443,149
Farm Service Administration (FSA)	19	6,313,200
Money Smart - Everyday unsecured	153	307,370
Money Smart - CD secured	23	29,700
Total Money Smart Loans	176	337,070
Total Innovative and Complex	400	21,633,787

The bank makes use of these products throughout its assessment areas; however, certain products are more impactful upon certain areas. Assessment area breakouts for most products can be found under the relevant sections.

Community Development Lending

Town Bank is a leader in making community development loans. The bank originated 196 loans for \$112.2 million in full scope assessment areas, with total originations of 242 loans totaling \$179.9 million. The majority of loan dollars, at 60.2 percent, were originated for affordable housing purposes. Community development lending increased significantly since the previous evaluation period, when the bank made 117 loans totaling \$56.4 million; this represents a 218.9 percent increase in total community development loans in the current period.

The increase in the dollar level of community development loans, coupled with the dollar amount for affordable housing, shows excellent responsiveness to assessment area credit needs. The Milwaukee assessment area, specifically within the city of Milwaukee, was the assessment area with the largest amount of loans. The Milwaukee assessment area has been amended since the previous examination to include the MSA in its entirety. Milwaukee County, which has more low- and moderate-income tracts than any other county in Wisconsin, provides a wealth of opportunities for community development lending. The bank purposefully originates impactful loans in its assessment areas and actively seeks lending opportunities. Town Bank is a new institution in many of the lower-income parts of its assessment area, and the bank undergoes significant effort to form relationships in these new markets. Refer to the individual assessment area analyses for further details.

Qualified Community Development Loans										
\$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Full Scope Review										
Janesville MSA	86	4,820	0	0	0	0	9	317	95	5,137
Milwaukee MSA	34	53,597	36	17,363	14	3,450	8	11,950	92	86,360
Southeast Non-MSA	2	853	6	19,469	1	400	0	0	9	20,722
Full Total	122	59,270	42	36,832	15	3,850	17	12,267	196	112,219
Limited Scope Review										
Madison MSA	10	47,880	14	1,420	6	3,873	0	0	30	53,173
Racine MSA	2	1,183	0	0	0	0	1	810	3	1,993
South Central Non-MSA	0	0	0	0	12	12,443	1	123	13	12,566
Limited Total	12	49,063	14	1,420	18	16,316	2	933	46	67,732
Grand Total	134	108,333	56	38,252	33	20,166	19	13,200	242	179,951

INVESTMENT TEST

Town Bank's performance relative to the investment test is High Satisfactory based on a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. Further, Town Bank makes extensive use of innovative and complex investments to support community development initiatives and exhibits excellent responsiveness to credit and community development needs.

The bank made or maintained 13 investments for \$11.3 million in full scope assessment areas and 26 investments for \$20.2 million in total, including in limited scope assessment areas and in statewide and regional organizations. The bank made eight investments totaling \$5.8 million dollars in the broader statewide or regional area. All investments in the broader statewide and regional areas were considered when assessing the bank's performance. Investments were made in all assessment areas with the exception of the Madison assessment area. The minority of the investments, at 41.2 percent, were made in the current evaluation period. The majority of the bank's investments, at 52.4 percent, provided funding to small businesses typically through intermediaries such as Community Development Financial Institutions, although investments also include municipal securities and a mortgage backed security. Current evaluation investment dollars grew 54.2 percent in total from the previous evaluation when the bank had investments totaling \$13.1 million. Further details are provided in the individual assessment area analyses.

Community Development Investments										
\$ in 000s										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Full Scope Review										
Janesville MSA	0	0	1	850	0	0	2	1,120	3	1,970
Milwaukee MSA	0	0	1	1,470	6	4,500	0	0	7	5,970
Southeast Non-MSA	0	0	1	2,050	1	310	1	1,000	3	3,360
Full Total	0	0	3	4,370	7	4,810	3	2,120	13	11,300
Limited Scope Review										
Madison MSA	0	0	0	0	0	0	0	0	0	0
Racine MSA	1	1,000	2	1,250	0	0	0	0	3	2,250
South Central Non-MSA	0	0	0	0	0	0	2	880	2	880
Limited Total	1	1,000	2	1,250	0	0	2	880	5	3,130
Other										
Broader Statewide/Regional Area	0	0	0	0	8	5,789	0	0	8	5,789
Grand Total	1	1,000	5	5,620	15	10,599	5	3,000	26	20,219

The bank also made 226 donations totaling \$551,545 during the evaluation period, compared to 112 donations totaling \$270,000 at the time of the previous evaluation. This represents an increase of 104.3 percent, by dollar amount, in community development donations, which significantly outpaced the bank's 33.3 percent growth in assets over the same duration. Donations were largely

responsive to area needs, focusing on economic development and community services, although donations evidence broad support in all areas of community development. Please refer to the individual assessment areas for further information on qualified investments and donations.

Community Development Grants										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Full Scope Review										
Janesville MSA	1	250	13	7,950	0	0	0	0	14	8,200
Milwaukee MSA	14	19,300	87	236,330	34	106,608	13	24,950	148	387,188
Southeast Non-MSA	0	0	17	69,537	6	5,215	0	0	23	74,752
Full Scope Total	15	19,550	117	313,817	40	111,823	13	24,950	185	470,140
Limited Scope Review										
Madison MSA	0	0	8	15,780	6	38,703	0	0	14	54,483
Racine MSA	2	1,250	6	7,547	5	7,450	1	750	14	16,997
South Central Non-MSA	0	0	8	5,900	5	4,025	0	0	13	9,925
Limited Scope Total	2	1,250	22	29,227	16	50,178	1	750	41	81,405
Grand Total	17	20,800	139	343,044	56	162,001	14	25,700	226	551,545

SERVICE TEST

Town Bank’s performance relative to the service test is rated Outstanding. Delivery systems are readily accessible to the bank’s geographies and individuals of different income levels in its assessment area. The bank’s record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low- and moderate- income geographies and to low- and moderate-income individuals. Services do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals. Additionally, the bank provides a relatively high level of community development services.

Retail Services

The bank operates a main office and 24 branch locations throughout its assessment areas. Of these, three branches are located in low-income census tracts, two are in moderate-income census tracts, 12 are in middle-income tracts, and seven branches and the main office are in upper-income tracts. Most branches have full-service ATMs, with the exception of three middle-income branches and one upper-income branch that have a cash-only ATM. The bank has a total of 21 full-service and nine cash-only ATM locations.

Delivery systems are readily accessible to the bank’s geographies and individuals of different income levels in its assessment area. The bank has grown modestly since the previous evaluation; however, the bank has significantly increased its presence in low- or moderate- income census tracts. Town Bank has been growing mostly through organic branch openings, which is a change from the

previous examination where most of the growth was through acquisitions. Town Bank has continued to engage in significant outreach efforts and community development initiatives to penetrate low- and moderate-income geographies and borrowers within the Milwaukee assessment area.

Considering branch opening, consolidation, and closing activity, Town Bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals. Since the previous examination, Town Bank has opened six new branches. Five of these branches are located in the Milwaukee assessment area, with three of the five located in low-income census tracts. The bank also opened one branch in a moderate-income tract in the Racine assessment area. This represents a significant increase in the number of branches located in low- and moderate- income census tracts since the previous examination, when the bank had just one branch located in a moderate-income census tract. The bank has not closed any branches since the previous evaluation period; however, it did consolidate two branches, one in the Milwaukee assessment area and one in the Southeast Non-MSA WI assessment area. Branches are typically open between 8:30 A.M. and 9:00 A.M. until 5:00 P.M. Monday through Friday, and 9:00 A.M. to 12:00 P.M. on Saturday. The bank's drive-up facilities are open from 8:00 A.M. to 5:00 P.M. or 6:00 P.M. Business hours and services do not vary in a way that inconveniences the assessment area, particularly low- and moderate-income geographies and individuals. Alternative delivery systems available to all customers include ATMs, debit cards, mobile banking, internet banking, and telephone banking. Alternative delivery systems, with the exception of ATMs, are accessible and do not vary across assessment area; therefore, they will not be discussed within each individual assessment area.

Community Development Services

The bank provides a relatively high level of community development services. Bank officers and personnel conduct a number of financial literacy and technical assistance programs throughout the bank's combined assessment area, although the amount and impact of those services vary by assessment area. During the review period, staff performed 4,491 hours of community development service, which represents a significant increase over the previous exam period's 3,265 hours of community development services. Programs include educational seminars in schools using the FDIC's Money Smart curriculum and numerous positions on the Board of Directors for area community development organizations.

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Full Scope Review						
Janesville MSA	0	262	0	0	262	64
Milwaukee MSA	385	1,577	789	57	2,808	372
Southeast Non-MSA	0	142	153	2	297	15
Full Scope Total	385	1,981	942	59	3,367	451
Limited Scope Review						
Madison MSA	212	334	156	0	702	39
Racine MSA	44	198	52	16	310	34
South Central Non-MSA	0	87	25	0	112	11
Limited Scope Total	256	619	233	16	1,124	84
Total	641	2,600	1,175	75	4,491	535

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.

JANESVILLE-BELOIT, WI MSA #27500- Full Review

SCOPE OF THE EXAMINATION

The scope is consistent with that presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN JANESVILLE-BELOIT, WI MSA #27500

The bank’s assessment area includes Rock County, which comprises the entirety of the Janesville-Beloit, WI Metropolitan Statistical Area #27500 (Janesville MSA). Within the assessment area, the bank maintains one branch with a cash-only ATM located in a middle-income census tract. The assessment area was added to the bank’s overall assessment area since the previous evaluation since the bank acquired the one branch in the assessment area just prior to the previous evaluation.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	0	0.0	0	0.0	2.6	1.3	1.4	0.0
Moderate	0	0.0	0	0.0	34.2	24.9	26.1	2.5
Middle	1	100.0	0	0.0	39.5	43.9	39.5	39.3
Upper	0	0.0	0	0.0	23.7	29.9	32.9	58.3
Unknown	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Total	1	100.0	0	0.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranked the bank 13th out of 18 FDIC-insured depository institutions operating in the assessment area, with 1.1 percent of total deposits. Town Bank ranked 38th in originations and purchases of HMDA-reportable loans in 2016 out of 263 HMDA-reporters originating loans in the assessment area. Town Bank ranked 10th among 55 area CRA reporters in CRA-reportable originations and purchases in 2016.

The assessment area was comprised of 38 census tracts in 2016, of which 12 were low- and moderate-income tracts. The median family income levels for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey (ACS) and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years. The income data used to calculate geographic income designations changed between 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. The following table shows the difference in census tract income designations between 2016 and 2017.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2017 Designations (#)	Net Change (#)
Low	4	1	-3
Moderate	8	13	5
Middle	19	15	-4
Upper	7	9	2
Unknown	0	0	0
Total	38	38	0

*Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010
U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015*

Additional assessment area demographic information is provided in the following table.

Assessment Area: 2016 Janesville-Beloit, WI MSA 27500									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	4	10.5	3,226	7.5	1,098	34.0	8,424	19.7	
Moderate-income	8	21.1	6,516	15.2	943	14.5	7,927	18.5	
Middle-income	19	50.0	22,796	53.2	1,552	6.8	9,562	22.3	
Upper-income	7	18.4	10,314	24.1	442	4.3	16,939	39.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	38	100.0	42,852	100.0	4,035	9.4	42,852	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	5,679	2,095	4.6	36.9	2,920	51.4	664	11.7	
Moderate-income	12,149	7,205	15.7	59.3	3,584	29.5	1,360	11.2	
Middle-income	35,216	25,701	55.9	73.0	7,177	20.4	2,338	6.6	
Upper-income	14,983	11,004	23.9	73.4	2,912	19.4	1,067	7.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	68,027	46,005	100.0	67.6	16,593	24.4	5,429	8.0	
	Total Businesses Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	416	7.9	361	7.6	49	9.9	6	12.2	
Moderate-income	928	17.6	821	17.4	102	20.6	5	10.2	
Middle-income	2,445	46.4	2,220	47.0	201	40.5	24	49.0	
Upper-income	1,478	28.1	1,320	28.0	144	29.0	14	28.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	5,267	100.0	4,722	100.0	496	100.0	49	100.0	
	Percentage of Total Businesses:			89.7		9.4		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	7	2.1	7	2.2	0	0.0	0	0.0	
Middle-income	250	76.7	246	77.1	4	57.1	0	0.0	
Upper-income	69	21.2	66	20.7	3	42.9	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	326	100.0	319	100.0	7	100.0	0	0.0	
	Percentage of Total Businesses:			97.9		2.1		0.0	
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
Note: Percentages may not add to 100.0 percent due to rounding									

Population Characteristics

According to the 2010 U.S. Decennial Census and 2011-2015 American Community Survey, the assessment area’s population slightly increased from 2010 to 2015, with a 0.2 percent growth in the assessment area. This is below the state of Wisconsin, which saw a 1.0 percent increase during the same period. A community representative stated that lack of housing supply has contributed to the slow population growth. Another representative confirmed this, stating there is a lack of new affordable housing being built in the area.

Population Change			
Area	2010 Population	2011-2015 Population	Percentage Change
Janesville-Beloit, WI MSA	160,331	160,727	0.2
State of Wisconsin	5,686,986	5,742,117	1.0

Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey

Income Characteristics

Median family income for the assessment area equaled \$60,820, based on the 2011-2015 American Community Survey, with a decline of 0.6 percent from the 2006-2010 ACS (\$61,165). This income level is well below the statewide average of \$68,064, which increased 4.9 percent from the 2006-2010 ACS (\$64,869). Of the 42,852 families living in the assessment area, 19.7 percent are designated low-income and 18.5 percent are designated moderate-income, with 9.4 percent of all families living below the poverty level. Overall, the income demographic composition of the assessment area is similar to the state of Wisconsin, where 19.6 percent of families are low-income, 18.3 percent are moderate-income, and 7.7 percent live below the poverty level. A community representative stated that family incomes are lower because area residents have lower levels of education than the state. This leads to many of the higher paying jobs, which require more technical skills, to be filled by commuters, largely from the Milwaukee suburbs.

Median Family Income Change			
Area	2006-2010 Median Family Income (In 2010 Dollars)	2011-2015 Median Family Income (In 2015 Dollars)	Percentage Change
Janesville-Beloit, WI MSA	61,165	60,820	-0.6
State of Wisconsin	64,869	68,064	4.9

Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey

Overall, the assessment area has shown improvement in its bankruptcy filings since 2013, showing a steady decrease each year. In 2016, the personal bankruptcy rate for the assessment area was 2.8 filings per 1,000 population, in comparison to the state of Wisconsin with 2.9 filings per 1,000 population.

Housing Characteristics

There are a total of 68,027 housing units in the assessment area, of which 8.3 percent are located in low-income census tracts and 17.9 percent are located in moderate-income census tracts. The largest percentage of housing units in low-income census tracts are rental units at 51.4 percent of total units. The largest percentage of housing units in moderate-income census tracts are owner-occupied at 59.3 percent of total units.

Based on 2011-2015 American Community Survey data, median housing values and median gross rents across the assessment area, at \$131,800 and \$744 respectively, are lower than the state of Wisconsin. A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 American Community Survey data, the affordability ratio for the assessment area is 0.38, which is above the state of Wisconsin affordability ratio at 0.32, indicating that it is generally more affordable to live in the Janesville MSA than the state of Wisconsin. As previously stated, a community representative also confirmed that, due to the lack of supply of housing, rent has increased at a rate that is difficult for lower-income families to afford. One notable factor identified by the community representative is that local regulations have made the ability to build multi-family housing a challenge. Another community representative noted that housing prices post-2015 are now trending upward at a significant rate as the area begins to be revitalized.

Housing Costs Change							
	Median Housing Value			Median Gross Rent			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Janesville-Beloit, WI	138,000	131,800	-4.5	698	744	6.5	0.38
State of Wisconsin	169,000	165,800	-1.9	713	776	8.8	0.32

Source: U.S. Census Bureau 2000 and 2010 Decennial Census; 2006-2010 and 2011-2015 American Community Survey

Foreclosure Trends

The Federal Reserve Bank of Chicago conducted a study on changes in foreclosure inventory rates at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. Foreclosure inventory rates in the state and assessment area have generally declined since 2011, indicating that the housing crisis that affected much of the nation has abated. As of October 2016, Rock County's rate equaled 1.5 percent, which was above the state of Wisconsin's rate of 1.0 percent.

Employment Conditions

Unemployment across the assessment area and in the state of Wisconsin declined between 2013 and 2016. Most recently in 2016, the unemployment rate in the assessment area was 4.6 percent, which is

slightly higher than the state of Wisconsin unemployment rate of 4.1 percent. A community representative stated the rate of change in the area’s type of industry has created difficulties in prospective employees having the requisite skills desired by employers. Rock County has job-retraining programs in place, but high eligibility requirements limit the number of people who can take advantage of these programs. Another community representative stated that this skills gap has led to employers hiring many commuters from surrounding areas with higher levels of education.

Unemployment Rates (%)				
Region	2013	2014	2015	2016
Janesville-Beloit, WI MSA	7.9	6.2	5.2	4.6
State of Wisconsin	6.7	5.5	4.6	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

Industry Characteristics

The following table presents the largest employers operating in the assessment area. According to location quotients developed by the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the industries of hospitals and mental services, manufacturing, wholesale food production, education, and retirement services. Dun & Bradstreet data indicates that in 2016, there were 5,267 businesses operating in the assessment area, 89.7 percent of which were small businesses with revenues \$1 million or less. A community representative stated that favorable tax rates and incentives relative to Illinois have caused some employers to leave Illinois and relocate to Rock County.

Largest Employers in the Assessment Area		
Company	# of Employees	Industry
Mercy Hospital and Trauma Center	1,636	Hospitals
Mercy Hospital – Inpatient Psych	1,500	Mental Health Services
Beloit Health System	1,135	Hospitals
General Motors	1,034	Automobiles – manufacture
Ben Meadows Co	900	Internet and Catalog Shopping
Frito-Lay Inc.	701	Potato Chips (Wholesale)
Kerry Ingredients and Flavours	601	Manufacturers
Blackhawk Technical College	501	Schools
Rock Haven Nursing Home	500	Retirement Communities and Homes

Community Representatives

Two community representatives, one from Janesville and one from Beloit, were contacted to help determine the credit and banking needs of the assessment area. The representative from Janesville stated that there is a willingness from financial institutions in the area to be innovative, but that initiatives are often limited by the regulatory environment. The contact in Beloit stated that economic conditions in Rock County have trended upward since 2015 with major redevelopment projects in the downtown area. This development, in conjunction with a favorable tax environment relative to Illinois, has attracted new employers. The contact also stated that while commercial borrowers have

easy access to credit, a more restrictive regulatory environment for residential real estate loans has prevented some lower-income borrowers from qualifying for credit.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JANESVILLE-BELOIT, WI MSA #27500

LENDING TEST

The geographic distribution of loans reflects excellent penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses and farms of different sizes. The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms. The bank makes a relatively high level of community development loans and makes extensive use of innovative or flexible lending practices. During the calendar years of 2016 and 2017, the bank originated 27 Money Smart consumer loans and seven small business "Easy Access" loans.

The bank made no multi-family loans in 2016 and only one in 2017, which is consistent with challenges in building multi-family homes indicated by the community representative. The volume of home improvement loans was also low, as the bank originated one home improvement loan in 2016 and none in 2017. Therefore, no meaningful analysis can be conducted on either of these products.

For the purposes of this review, loans made in calendar years up to and including 2016 were analyzed based on income designations from the 2006-2010 American Community Survey data¹. Loans made in calendar years 2017 and after were analyzed based on income designations from the 2011-2015 American Community Survey data.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent penetration throughout the assessment area. The bank's lending performance in 2017 could not be evaluated against aggregate lender performance for HMDA- and CRA-reportable loans as that data was not available at the time of this performance evaluation. The bank's rate of lending in low-income census tracts was significantly above aggregate lender performance and the demographic percentage with respect to HMDA-reportable loans in 2016.

The bank's small business lending in the assessment area significantly exceeded the aggregate lender performance and demographic of businesses in low-income census tracts in 2016. However, the bank's small business lending in moderate-income census tracts was well below the aggregate lenders and demographic of businesses in the same period. An analysis of the geographic penetration of small

¹ The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)

farm loans in low- and moderate-income census tracts was not conducted, as there were no farms located in low-income census tracts and only 2.1 percent of farms located in moderate-income census tracts. No CRA-reportable small farm loans were made by the bank or aggregate lenders in low- and moderate-income census tracts in 2016.

The dispersion of HMDA- and CRA-reportable loans in the bank's assessment area is good with the bank originating HMDA loans at similar rates in low- and moderate-income census tracts when compared to middle- and upper-income census tracts. The dispersion of CRA-reportable loans also had similar rates of penetration between all census tract income levels. There were no conspicuous gaps in lending identified.

HMDA-Reportable Lending

Home Purchase Loans

In 2016, Town Bank originated 10 home purchase loans in the Janesville assessment area. The bank originated no loans in low- and moderate-income census tracts. This performance was well below aggregate lender performance at 3.2 percent in low-income census tracts and 13.0 percent in moderate-income census tracts. The owner-occupancy rate is 4.6 percent for low-income census tracts and 15.7 percent in moderate-income census tracts in this assessment area, which is above both Town Bank's and aggregate lender performance. The bank originated 40.0 percent of its home purchase loans in middle-income census tracts, which is below aggregate lender performance of 56.0 percent and the 55.9 percent of owner-occupied units. The bank originated 60.0 percent of its home purchase loans in upper-income census tracts, which was above the 27.9 percent by the aggregate lenders and the 23.9 percent of owner-occupied units.

Town Bank directs most home purchase loans to its affiliate, Wintrust Mortgage Corporation. The bank did not originate any home purchase loans in 2017.

Refinance Loans

The bank originated 29 refinance loans in the assessment area for 2016. Lending in low-income census tracts was significant for the bank, as 41.4 percent of refinance loans were extended in these tracts. This far exceeded the 2.2 percent made by aggregate lenders and the 4.6 percent of owner-occupied units in low-income census tracts. The bank originated 10.3 percent of its refinance loans in moderate-income census tracts, which is consistent with the aggregate lenders level of 10.0 percent but below the owner-occupancy level of 15.7 percent. The bank originated 37.9 percent of refinance loans in middle-income census tracts, which is significantly below the aggregate lending level of 57.1 percent. The performance of aggregate lenders was consistent with the 55.9 percent of owner-occupied units for middle-income census tracts. The bank originated 10.3 percent of refinance loans in upper-income census tracts, which was significantly below the 30.8 percent by aggregate lenders and owner-occupancy rate of 23.9 percent.

The bank's performance for refinance loans in 2017 was above its performance in 2016, as the bank made 87.4 percent of its 87 refinance loans in moderate-income census tracts.

The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2016. Please refer to Appendix B for 2017 geographic distribution tables.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Janesville-Beloit, WI MSA 27500								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	3.2	0	0.0	1.6	4.6
	Moderate	0	0.0	13.0	0	0.0	8.8	15.7
	Middle	4	40.0	56.0	577	38.1	54.3	55.9
	Upper	6	60.0	27.9	938	61.9	35.3	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		10	100.0	100.0	1,515	100.0	100.0
Refinance	Low	12	41.4	2.2	535	26.3	1.1	4.6
	Moderate	3	10.3	10.0	135	6.6	6.6	15.7
	Middle	11	37.9	57.1	1,043	51.2	56.7	55.9
	Upper	3	10.3	30.8	324	15.9	35.6	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		29	100.0	100.0	2,037	100.0	100.0
Home Improvement	Low	0	0.0	5.1	0	0.0	1.7	4.6
	Moderate	0	0.0	13.1	0	0.0	9.9	15.7
	Middle	1	100.0	49.3	15	100.0	44.6	55.9
	Upper	0	0.0	32.5	0	0.0	43.8	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	15	100.0	100.0
Multi-Family	Low	0	0.0	10.3	0	0.0	5.0	Multi-Family 11.5
	Moderate	0	0.0	10.3	0	0.0	12.3	22.4
	Middle	0	0.0	55.2	0	0.0	51.7	38.7
	Upper	0	0.0	24.1	0	0.0	30.9	27.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	12	30.0	2.9	535	15.0	1.6	4.6
	Moderate	3	7.5	11.7	135	3.8	8.1	15.7
	Middle	16	40.0	56.1	1,635	45.8	54.9	55.9
	Upper	9	22.5	29.3	1,262	35.4	35.4	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		40	100.0	100.0	3,567	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

In 2016, Town Bank originated 13.0 percent of its 23 small business loans in low-income census tracts, outperforming the aggregate of lenders at 5.7 percent and total percentage of businesses located in low-income census tracts at 7.9 percent. The bank originated 4.3 percent of its small business loans in moderate-income census tracts, which is below the aggregate of lenders at 15.1 percent and percentage of total businesses located in moderate-income census tracts at 17.6 percent. The bank originated 78.3 percent of its small business loans in middle-income census tracts, which significantly exceeded both the aggregate of lenders at 45.1 percent and percentage of total businesses at 46.4 percent. One small business loan for the bank was originated in upper-income census tracts and was 4.3 percent of the bank’s total lending to small businesses. This is significantly below both the aggregate of lenders at 32.5 percent and the percentage of total businesses at 28.1 percent.

The bank’s small business lending performance in 2017 was comparable to its performance in 2016.

The following table presents the bank’s 2016 small business lending performance; 2017 small business lending data is included in Appendix B.

Geographic Distribution of Small Business Loans								
Assessment Area: 2016 Janesville-Beloit, WI MSA 27500								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses %
		2016						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Small Business	Low	3	13.0	5.7	233	16.0	12.2	7.9
	Moderate	1	4.3	15.1	67	4.6	16.6	17.6
	Middle	18	78.3	45.1	1,089	74.6	37.3	46.4
	Upper	1	4.3	32.5	70	4.8	32.5	28.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.6			1.4	
	Total		23	100.0	100.0	1,459	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

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

The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and farms and businesses of different sizes. The bank’s performance relative to HMDA-reportable loan products was generally below penetration by the

aggregate to low- and moderate-income borrowers. A review of the bank's lending to borrowers of different income levels could not be conducted for 2017 as all borrowers were of unknown-income. The bank's lending to businesses and farms reporting annual revenues of \$1 million or less was significantly higher than lending by aggregate lenders in 2016. A limited review of the bank's lending to small businesses and small farms in 2017 was conducted, as the data for aggregate lenders was not available at the time of this evaluation.

HMDA-Reportable Lending

Home Purchase Loans

Town Bank did not originate any home purchase loans to low-income borrowers, which was below the aggregate of lenders at 6.2 percent and significantly below the percentage of low-income families within the assessment area at 19.7 percent. The bank originated 30.0 percent of home purchase loans in moderate-income census tracts, which was above the aggregate of lenders at 22.5 percent and the percentage of moderate-income families within the assessment area at 18.5 percent. The bank originated 30.0 percent of its home purchase loans to middle-income borrowers, which exceeded that of aggregate lenders at 23.9 percent and the percentage of middle-income families within the assessment area at 22.3 percent. Forty percent of the bank's home purchase loans were originated to upper-income borrowers, which exceeded the aggregate of lenders at 35.5 percent and was consistent with the percentage of upper-income families within the assessment area at 39.5 percent.

Town Bank directs most home purchase loans to its affiliate, Wintrust Mortgage Corporation. The bank did not originate any home purchase loans in 2017 for this assessment area.

Refinance Loans

The bank originated 3.4 percent of its refinance loans to low-income borrowers, which is comparable to the aggregate of lenders at 4.6 percent, but well below the percentage of low-income families within the assessment area at 19.7 percent. The bank originated 6.9 percent of its refinance loans to moderate-income borrowers, which was significantly below the aggregate of lenders at 13.5 percent and the percentage of moderate-income families within the assessment area at 18.5 percent. The bank originated 3.4 percent of refinance loans to middle-income borrowers, which is significantly below both the aggregate of lenders at 21.1 percent and the percentage of middle-income families within the assessment area at 22.3 percent. The bank originated 20.7 percent of its refinance loans to upper-income borrowers, which is significantly lower than the aggregate of lenders at 43.7 percent and the percentage of upper-income families within the assessment area at 39.5 percent. Lastly, 65.5 percent of the bank's refinance loans were originated to unknown-income borrowers, which significantly exceeded the aggregate of lenders at 17.1 percent.

All of the bank's refinance loans in 2017 were originated to borrowers of unknown-income.

The following table presents the bank's 2016 HMDA-reportable data; 2017 data is in Appendix B.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Janesville-Beloit, WI MSA 27500								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	6.2	0	0.0	3.1	19.7
	Moderate	3	30.0	22.5	400	26.4	16.2	18.5
	Middle	3	30.0	23.9	387	25.5	22.7	22.3
	Upper	4	40.0	35.5	728	48.1	47.1	39.5
	Unknown	0	0.0	11.9	0	0.0	10.8	0.0
	Total		10	100.0	100.0	1,515	100.0	100.0
Refinance	Low	1	3.4	4.6	121	5.9	2.3	19.7
	Moderate	2	6.9	13.5	191	9.4	9.3	18.5
	Middle	1	3.4	21.1	85	4.2	17.7	22.3
	Upper	6	20.7	43.7	790	38.8	51.6	39.5
	Unknown	19	65.5	17.1	850	41.7	19.1	0.0
	Total		29	100.0	100.0	2,037	100.0	100.0
Home Improvement	Low	0	0.0	6.2	0	0.0	2.4	19.7
	Moderate	0	0.0	15.3	0	0.0	11.7	18.5
	Middle	0	0.0	25.2	0	0.0	17.8	22.3
	Upper	0	0.0	46.4	0	0.0	57.0	39.5
	Unknown	1	100.0	6.9	15	100.0	11.0	0.0
	Total		1	100.0	100.0	15	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.7
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.3
	Upper	0	0.0	0.0	0	0.0	0.0	39.5
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	1	2.5	5.5	121	3.4	2.6	19.7
	Moderate	5	12.5	18.2	591	16.6	12.4	18.5
	Middle	4	10.0	22.7	472	13.2	19.2	22.3
	Upper	10	25.0	39.3	1,518	42.6	46.6	39.5
	Unknown	20	50.0	14.3	865	24.3	19.2	0.0
	Total		40	100.0	100.0	3,567	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

In 2016, Town Bank originated 82.6 percent of its loans to small businesses with annual revenues of \$1 million or less, significantly outperforming the aggregate of lenders at 44.7 percent, but falling short of the percentage of small businesses operating in the assessment area at 89.7 percent. Of the 19 loans originated to these small businesses, 84.2 percent were originated in amounts of \$100,000 or less, which are considered most beneficial to small businesses.

The bank’s performance in 2017 was not as strong as its performance in 2016, as the percentage of loans to small businesses with annual revenues of \$1 million or less decreased to 65.0 percent. However, 92.3 percent of the loans to these small businesses were originated in amounts of \$100,000 or less.

The table below presents the bank’s 2016 small business lending data; 2017 data is in Appendix B.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2016 Janesville-Beloit, WI MSA 27500									
Product Type		Bank & Aggregate Lending Comparison							
		Count		2016				Total Businesses	
		#	%	Agg %	Dollar		Agg \$ %		
Bank \$ 000s	Agg \$ %								
Small Business	Revenue	\$1 Million or Less	19	82.6	44.7	1,188	81.4	27.9	89.7
		Over \$1 Million or Unknown	4	17.4	55.3	271	18.6	72.1	10.3
		Total	23	100.0	100.0	1,459	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	19	82.6	91.1	645	44.2	27.7	
		\$100,001 - \$250,000	3	13.0	4.3	467	32.0	17.6	
		\$250,001 - \$1 Million	1	4.3	4.6	347	23.8	54.7	
		Total	23	100.0	100.0	1,459	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	16	84.2		574	48.3		
		\$100,001 - \$250,000	2	10.5		267	22.5		
		\$250,001 - \$1 Million	1	5.3		347	29.2		
		Total	19	100.0		1,188	100.0		
	Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Small Farm Lending

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. In 2016, Town Bank originated 96.4 percent of its agricultural loans to small farms with annual revenues of \$1 million or less, significantly outperforming the aggregate of lenders at 52.9 percent and consistent with the percentage of small farms operating in the assessment area at 97.9 percent. Of the 27 loans originated to these small farms, 74.1 percent were originated in amounts of \$100,000 or less,

which are considered most beneficial to small farms.

The bank's lending patterns in 2017 were less concentrated to small farms than levels of 2016. However, 83.3 percent of small farm loans to farms with annual revenues of \$1 million or less were for amounts under \$100,000.

The following table presents the bank's 2016 small farm lending data; 2017 data is in Appendix B.

Small Farm Lending By Revenue & Loan Size										
Assessment Area: 2016 Janesville-Beloit, WI MSA 27500										
Product Type		Bank & Aggregate Lending Comparison								
		2016								
		Count		Dollar		Total Farms				
		Bank	Agg	Bank	Agg					
		#	%	\$ 000s	\$ %	\$ %			%	
Small Farm	Revenue	\$1 Million or Less	27	96.4	52.9	2,087	85.6	46.7	97.9	
		Over \$1 Million or Unknown	1	3.6	47.1	350	14.4	53.3	2.1	
		Total	28	100.0	100.0	2,437	100.0	100.0	100.0	
	Loan Size	\$100,000 or Less	20	71.4	61.3	962	39.5	15.5		
		\$100,001 - \$250,000	7	25.0	17.6	1,125	46.2	21.7		
		\$250,001 - \$500,000	1	3.6	21.0	350	14.4	62.8		
		Total	28	100.0	100.0	2,437	100.0	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	20	74.1		962	46.1			
		\$100,001 - \$250,000	7	25.9		1,125	53.9			
		\$250,001 - \$500,000	0	0.0		0	0.0			
		Total	27	100.0		2,087	100.0			
	Originations & Purchases									
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS										
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>										

Community Development Lending

Town Bank made a relatively high level of community development loans in the assessment area. The bank made 95 qualified loans, totaling \$5.1 million. The significant majority of lending was for affordable housing, an area of need in the community as identified by a community representative. No comparison to the previous evaluation period can be made, as this assessment area was not included in the previous evaluation.

Qualified Community Development Loans										
\$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Janesville MSA	86	4,820	0	0	0	0	9	317	95	5,137

INVESTMENT TEST

The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by a private investor, rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs in the assessment area.

During the evaluation period, the bank made one new investment of approximately \$850,000 and maintained two prior period investments totaling \$1.1 million. The current period investment was to a school district. This qualified under the community service designation and was considered responsive to community needs, as the majority of students in this district qualify for free or reduced lunch programs. Both prior period investments were for revitalization and stabilization purposes and were provided to municipal governments.

In addition, the bank made 14 qualified community development donations in the evaluation period totaling \$8,200. No comparison between this evaluation period performance and the previous evaluation period could be conducted, as this assessment area was not previously evaluated.

Community Development Investments										
\$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current Period	0	0	1	850	0	0	0	0	1	850
Prior Period	0	0	0	0	0	0	2	1,120	2	1,120
Total	0	0	1	850	0	0	2	1,120	3	1,970
Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	1	250	13	7,950	0	0	0	0	14	8,200

SERVICE TEST

Town Bank's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies or individuals. In addition, the bank provides a relatively high level of community development services.

Retail Services

The bank operates one branch with a cash-only ATM in a middle-income census tract. The branch location was acquired in January of 2015, and the bank’s performance in this assessment area was not included in the prior CRA performance evaluation because of the recency of the acquisition relative to the evaluation. The location of the bank’s full service branch is not in close proximity to the majority of the assessment area’s low- and moderate-income census tracts, which are in the cities of Janesville and Beloit. However, lending patterns indicate that the branch is still able to serve residents in Beloit. There have been no branch closings or relocations since the previous examination.

Community Development Services

The bank provides a relatively high level of community development services. Bank officers and personnel conduct a number of financial literacy and technical assistance programs throughout the bank’s assessment area. During the review period, staff performed 262 hours of community development service. Most services provided by bank staff were educational seminars in schools using the FDIC’s Money Smart curriculum, where the majority of students qualify for free or reduced lunch programs.

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/ Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Janesville MSA	0	262	0	0	262	64

MILWAUKEE-WAUKESHA-WEST ALLIS, WI MSA #33340 - Full Review

SCOPE OF THE EXAMINATION

The scope is consistent with that presented in the overall section of the Performance Evaluation. Analysis was conducted on HMDA-reportable and CRA-small business reportable loans only; due to a low volume of loans in both 2016 and 2017, farm lending was omitted from this analysis.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MILWAUKEE-WAUKESHA-WEST ALLIS, WI MSA #33340

The bank’s assessment area includes the Milwaukee-Waukesha-West Allis, WI Metropolitan Statistical Area #33340 (Milwaukee MSA) in its entirety. Ozaukee and Washington Counties are new to the bank’s assessment area as of April 2018. The Milwaukee assessment area comprises more branches and ATMs than any other assessment area and represents the largest portion of the bank’s activity. The bank’s main office and 10 branch locations are located in the Milwaukee assessment area, along with 11 full-service and six cash-only ATMs. The bank has opened five new branches since the previous evaluation; three in low-income census tracts, one in a middle-income census tract and one in an upper-income census tract. The bank consolidated a branch in a middle-income census tract into a branch in an upper-income census tract in July of 2016. The following table shows the distribution of branches and full-service ATMs in the Milwaukee MSA assessment area.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	3	27.3	4	36.4	23.0	14.3	10.3	1.5
Moderate	0	0.0	0	0.0	15.8	13.6	11.6	2.8
Middle	2	18.2	2	18.2	32.3	33.9	36.1	46.4
Upper	6	54.5	5	45.5	28.3	38.1	42.1	49.2
Unknown	0	0.0	0	0.0	0.7	0.0	0.0	0.0
Total	11	100.0	11	0.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranks the bank 8th out of 47 FDIC-insured depository institutions operating in the assessment area, with 1.5 percent of total deposits. In 2017, Town Bank only considered Milwaukee and Waukesha County as part of its Milwaukee assessment area; the bank’s ranking and market share when including only those two counties as the assessment area is higher than its ranking and market share in the Milwaukee MSA in its entirety. Town Bank ranked 116th in originations and purchases of HMDA-reportable loans in 2016 out of 502 HMDA-reporters originating loans in the assessment area. Town Bank ranked 11th among 124 area CRA reporters in CRA-reportable originations and purchases in 2016.

The assessment area was comprised of 431 census tracts in 2016, of which 163 were low- and moderate-income tracts. The median family income levels 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. The income data used to calculate geographic income designations changed between 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010.

Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. The table below shows the difference in census tract income designations between 2016 and 2017.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2017 Designations (#)	Net Change (#)
Low	86	99	13
Moderate	77	68	-9
Middle	151	139	-12
Upper	114	122	8
Unknown	3	3	0
Total	431	431	0

*Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010
U.S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015*

Additional assessment area demographic information is provided in the following table.

Assessment Area: 2016 Milwaukee-Waukesha-West Allis, WI MSA 33340								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	86	20.0	48,172	12.4	17,546	36.4	86,331	22.1
Moderate-income	77	17.9	59,413	15.2	10,149	17.1	65,849	16.9
Middle-income	151	35.0	142,274	36.5	7,501	5.3	80,333	20.6
Upper-income	114	26.5	139,966	35.9	2,567	1.8	157,312	40.4
Unknown-income	3	0.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	431	100.0	389,825	100.0	37,763	9.7	389,825	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	93,825	26,093	6.7	27.8	53,445	57.0	14,287	15.2
Moderate-income	108,395	49,876	12.9	46.0	48,802	45.0	9,717	9.0
Middle-income	257,484	154,149	39.8	59.9	88,567	34.4	14,768	5.7
Upper-income	204,949	156,788	40.5	76.5	38,127	18.6	10,034	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	664,653	386,906	100.0	58.2	228,941	34.4	48,806	7.3
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,610	8.3	4,056	8.6	538	7.2	16	4.1
Moderate-income	7,286	13.2	6,287	13.3	974	13.1	25	6.4
Middle-income	21,317	38.6	18,153	38.3	2,996	40.3	168	42.7
Upper-income	22,009	39.8	18,895	39.9	2,930	39.4	184	46.8
Unknown-income	23	0.0	19	0.0	4	0.1	0	0.0
Total Assessment Area	55,245	100.0	47,410	100.0	7,442	100.0	393	100.0
	Percentage of Total Businesses:			85.8		13.5		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	0.9	5	1.0	0	0.0	0	0.0
Moderate-income	18	3.4	17	3.3	1	7.7	0	0.0
Middle-income	247	46.8	242	47.0	5	38.5	0	0.0
Upper-income	258	48.9	251	48.7	7	53.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	528	100.0	515	100.0	13	100.0	0	0.0
	Percentage of Total Businesses:			97.5		2.5		0.0
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Population Characteristics

According to the 2010 U.S. Decennial Census and 2011-2015 ACS, the assessment area’s population increased by 0.9 percent from 2010 to 2015, which was comparable to the statewide population growth of 1.0 percent. Population growth across the four counties comprising the Milwaukee MSA were similar over the period.

Population Change			
Area	2010 Population	2011-2015 Population	Percentage Change
Milwaukee County	947,735	955,939	0.9
Ozaukee County	86,395	87,273	1.0
Washington County	131,887	132,921	0.8
Waukesha County	389,891	393,873	1.0
Milwaukee, Waukesha-West Allis, WI MSA	1,555,908	1,570,006	0.9
State of Wisconsin	5,686,986	5,742,117	1.0

Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey

Income Characteristics

Median family income for the assessment area equaled \$71,764 based on the 2011-2015 American Community Survey. This income level is above the statewide average, although the state of Wisconsin had a greater increase in median family income between 2010 and 2015 than the assessment area’s increase of 4.3 percent. Of the 389,825 families living in the assessment area, 22.1 percent are designated low-income and 16.9 percent are designated moderate-income, with 9.7 percent of families living below the poverty level. Overall, the income demographic composition of the assessment area reflects a higher concentration of low-income families and families living below poverty than the state of Wisconsin, where 19.6 percent of families are considered low-income and 7.7 percent of families live below the poverty level.

As the following table shows, there are wide disparities in median family income between the four counties that comprise the Milwaukee MSA. Community representatives stated that Milwaukee County, where the city of Milwaukee is located, continues to lag behind the three other counties in the MSA, both in terms of overall income as well as income growth. Milwaukee County also has significantly higher rate of families living in poverty (14.9 percent) than the other three counties in the Milwaukee MSA. This indicates that the city of Milwaukee is an area where there are significant opportunities for investment and development.

Median Family Income Change			
Area	2006-2010 Median Family Income (In 2010 Dollars)	2011-2015 Median Family Income (In 2015 Dollars)	Percentage Change
Milwaukee County	54,539	56,079	2.8
Ozaukee County	90,133	93,461	3.7
Washington County	77,154	83,226	7.9
Waukesha County	89,799	94,831	5.6
Milwaukee-Waukesha-West Allis, WI MSA	68,787	71,764	4.3
State of Wisconsin	64,869	68,064	4.9
<i>Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey</i>			

Illustrating the assessment area population’s challenges, bankruptcies have remained higher than the state of Wisconsin since 2013. Most recently in 2016, the personal bankruptcy rate for the Milwaukee MSA was 5.2 filings per 1,000 population in comparison to the state of Wisconsin with 2.9 filings per 1,000 population. Milwaukee County’s bankruptcy rate of 7.1 filings per 1,000 population was more than double the statewide rate.

Housing Characteristics

There are a total of 664,653 housing units in the assessment area, of which 14.1 percent are located in low-income census tracts and 16.3 percent are located in moderate-income census tracts. The largest percentage of housing units in low-income census tracts are rental units at 57.0 percent, with owner-occupied units at 27.8 percent of total units. Per community representatives, affordable housing remains a challenge, specifically in the city of Milwaukee. In contrast, the largest percentage of housing units in upper-income census tracts are owner-occupied at 76.5 percent of total units.

Based on 2011-2015 American Community Survey data, median housing values and median gross rents across the assessment area, at \$193,639 and \$827, respectively, are lower than the state of Wisconsin. A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 American Community Survey data, the affordability ratio for the assessment area is 0.28, which is below the state of Wisconsin affordability ratio at 0.32, indicating that it is generally less affordable to live in the Milwaukee MSA than the state of Wisconsin. As previously stated, a community representative also confirmed affordable housing, particularly in Milwaukee County, remains as an area of significant need.

Housing Costs Change							
	Median Housing Value			Median Gross Rent			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Milwaukee County	165,700	151,700	-8.4	752	806	7.2	0.29
Ozaukee County	255,600	245,700	-3.9	769	845	9.9	0.31
Washington County	228,000	215,400	-5.5	770	829	7.7	0.32
Waukesha County	262,200	249,300	-4.9	869	933	7.4	0.31
Milwaukee-Waukesha-West Allis, WI MSA	204,774	193,639	-5.4	769	827	7.5	0.28
State of Wisconsin	169,000	165,800	-1.9	713	776	8.8	0.32

Source: U.S. Census Bureau 2000 and 2010 Decennial Census; 2006-2010 and 2011-2015 American Community Survey

Foreclosure Trends

The Federal Reserve Bank of Chicago conducted a study on changes in foreclosure inventory rates at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. Foreclosure inventory rates in the state and assessment area have generally declined since 2011, indicating that the housing crisis that affected much of the nation has abated. As of October 2016, Milwaukee County’s rate equaled 1.6 percent, which was higher than the state of Wisconsin’s rate of 1.0 percent. The other three counties that comprise the Milwaukee MSA all had foreclosure rates as of October 2016 that were between 0.4 and 0.6 percent.

Employment Conditions

Unemployment across the assessment area and in the state of Wisconsin declined between 2013 and 2016 as the economy recovered from the recession of 2007-2009. Most recently in 2016, the unemployment rate in the Milwaukee MSA was 4.5 percent, which is slightly higher than the state of Wisconsin unemployment rate of 4.1 percent. This higher rate is driven by Milwaukee County’s unemployment rate of 5.1 percent. A community representative confirmed that employment opportunities have continued to increase along with wages, but that this wage growth is often concentrated in certain sectors such as information technology jobs. This same community representative mentioned the positive collateral effects of the Foxconn Technology Group’s announcement that they would be building a large factory in the state of Wisconsin. The table below presents employment characteristics between 2013 and 2016 in the Milwaukee MSA, the counties that comprise the MSA, and the state of Wisconsin.

Unemployment Rates (%)				
Region	2013	2014	2015	2016
Milwaukee County	8.3	7.0	5.8	5.1
Ozaukee County	5.5	4.3	3.7	3.5
Washington County	6.1	4.6	3.8	3.5
Waukesha County	5.9	4.5	3.8	3.6
Milwaukee-Waukesha-West Allis, WI	7.3	6.0	4.9	4.5
State of Wisconsin	6.7	5.5	4.6	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

Industry Characteristics

The following table presents the largest employers operating in the assessment area. According to location quotients developed by the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the industries of manufacturing, goods-producing, and education and health services. Dun & Bradstreet data indicates that, in 2016, there were 55,245 businesses operating in the assessment area, 85.8 percent of which are small businesses with revenues of \$1 million or less.

Largest Employers in the Assessment Area		
Company	# of Employees	Industry
Kohl's Corp	5,500	Department Stores
Rockwell Automation	5,000	Automation Systems & Equipment-Mfrs
River Woods Urgent Care Center	5,000	Surgical Centers
General Mitchell Intl Arprt-MK	5,000	Airports
Northwestern Mutual Life Ins	4,000	Insurance-Life (Agents)
Rockwell Automation Inc	3,500	Automation Systems & Equipment-Mfrs
WEC Energy Group Inc	3,000	Utilities-Holding Companies
US Bank	3,000	Banks
University Of WI-Milwaukee	3,000	Schools-Universities & Colleges Academic

Community Representatives

Two community representatives, both located within Milwaukee County, were contacted to help determine the credit and banking needs of the Milwaukee MSA assessment area. One representative of a housing based organization stated that, overall, the area is in an economic upswing with employers trying to hire people who live in the city of Milwaukee. The other community representative stated that the area still faces significant challenges when it comes to affordable housing along with affordable childcare. This representative also stated that lower-income people are still dependent on payday lenders to meet credit needs and believes there are more opportunities for financial literacy, especially with students.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MILWAUKEE-WAUKESHA-WEST ALLIS, WI MSA #33340

LENDING TEST

The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes. The bank has an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. The bank is a leader in making community development loans and makes extensive use of innovative or flexible lending practices. The bank originated 117 small business "Easy Access" loans, 67 Money Smart consumer loans, and 13 SBA loans in 2016 and 2017; these flexible loans are responsive to the needs of assessment area borrowers.

The bank made no multi-family loans in 2016 and eight multi-family loans in 2017. The volume of home improvement loans was also low, as the bank originated two home improvement loans in 2016 and three in 2017. Therefore, no meaningful analysis can be conducted on either of these products.

For the purposes of this review, loans made in calendar years up to and including 2016 were analyzed based on income designations from the 2006-2010 American Community Survey data². Loans made in calendar years 2017 and after were analyzed based on income designations from the 2011-2015 American Community Survey data.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good penetration throughout the assessment area. The bank's lending performance in 2017 could not be evaluated against aggregate lender performance for HMDA- and CRA-reportable loans as that data was not available at the time of this performance evaluation. The bank's rate of lending in low- and moderate-income census tracts was slightly above the aggregate lender performance with respect to HMDA-reportable loans in 2016 and significantly higher than the demographic measure in 2017.

The bank's small business lending in the Milwaukee assessment area was slightly below the demographic of businesses in low- and moderate-income census tracts in 2016 and 2017, but consistent with aggregate lenders in 2016.

The dispersion of HMDA- and CRA-reportable loans in the bank's assessment area is adequate with the bank originating HMDA-reportable loans at similar rates in low- and moderate-income census tracts when compared to middle- and upper-income census tracts. The dispersion of CRA-reportable loans also exhibited similar rates of penetration between all census tract income levels with the exception of upper-income census tracts, where a majority of tracts were penetrated. There were no conspicuous gaps in lending identified.

HMDA-Reportable Lending

Home Purchase Loans

In 2016, Town Bank originated 82 home purchase loans in the Milwaukee MSA assessment area. The bank originated 6.1 percent of these loans in low-income census tracts. This performance was above aggregate lender performance at 2.6 percent in low-income census tracts and consistent with the owner-occupancy rate of 6.7 percent. The bank made 9.8 percent of its home purchase loans in moderate-income census tracts, which is consistent with the performance of aggregate lenders at 10.4 percent and slightly below the owner-occupancy rate of 12.9 percent. The bank originated 34.1 percent of its home purchase loans in middle-income census tracts, which is below aggregate lender performance of 44.4 percent and the 39.8 percent of owner-occupied units. The bank originated 50.0

² The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)

percent of its home purchase loans in upper-income census tracts, which was above the 42.6 percent by the aggregate lenders and the 40.5 percent of owner-occupied units.

The bank originated 16 home purchase loans in 2017, as it continues to direct most home purchase loans to its affiliate, Wintrust Mortgage Corporation.

Refinance Loans

The bank originated 72 refinance loans in the assessment area for the 2016 year. Lending in low-income census tracts was marginal for the bank, as 4.2 percent of refinance loans were extended in these tracts. The bank's performance was still above the aggregate lender performance of 1.9 percent and consistent with the 6.7 percent of owner-occupied units in low-income census tracts. The bank originated 13.9 percent of its refinance loans in moderate-income census tracts, which is above the aggregate lender level of 6.9 percent and consistent with the owner-occupancy level of 12.9 percent. The bank originated 30.6 percent of refinance loans in middle-income census tracts, which is below the aggregate lender level of 37.7 percent and the owner-occupancy level of 39.8 percent. The bank originated 51.4 percent of refinance loans in upper-income census tracts, which is consistent with the 53.5 percent made by aggregate lenders, but above the owner-occupancy rate of 40.5 percent.

The bank's performance for refinance loans in 2017 was above its performance in 2016, as the bank originated a majority of its refinance loans in low-and moderate-income census tracts.

The following table presents the bank's 2016 HMDA-reportable data; 2017 data is in Appendix B.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Milwaukee-Waukesha-West Allis, WI MSA 33340								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		Dollar		Agg %	Agg %	
		Bank #	%	Bank \$ (000s)	%			
		Agg %						
Home Purchase	Low	5	6.1	2.6	389	2.4	1.2	6.7
	Moderate	8	9.8	10.4	996	6.1	5.9	12.9
	Middle	28	34.1	44.4	3,696	22.5	36.3	39.8
	Upper	41	50.0	42.6	11,320	69.0	56.6	40.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		82	100.0	100.0	16,401	100.0	100.0
Refinance	Low	3	4.2	1.9	130	0.9	0.9	6.7
	Moderate	10	13.9	6.9	1,282	8.4	3.9	12.9
	Middle	22	30.6	37.7	3,951	25.9	29.8	39.8
	Upper	37	51.4	53.5	9,878	64.8	65.3	40.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		72	100.0	100.0	15,241	100.0	100.0
Home Improvement	Low	0	0.0	5.5	0	0.0	1.4	6.7
	Moderate	0	0.0	9.4	0	0.0	3.4	12.9
	Middle	0	0.0	39.7	0	0.0	28.7	39.8
	Upper	2	100.0	45.4	1,114	100.0	66.6	40.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	1,114	100.0	100.0
Multi-Family	Low	0	0.0	19.4	0	0.0	5.2	Multi-Family 15.4
	Moderate	0	0.0	19.4	0	0.0	8.2	15.9
	Middle	0	0.0	45.4	0	0.0	45.6	45.4
	Upper	0	0.0	15.8	0	0.0	41.1	23.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	8	5.1	2.5	519	1.6	1.4	6.7
	Moderate	18	11.5	8.7	2,278	7.0	5.1	12.9
	Middle	50	32.1	41.0	7,647	23.3	33.9	39.8
	Upper	80	51.3	47.8	22,312	68.1	59.7	40.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		156	100.0	100.0	32,756	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

The geographic distribution of small business loans reflects good penetration throughout the assessment area. In 2016, Town Bank originated 6.1 percent of its small business loans in low-income census tracts, slightly outperforming the aggregate of lenders at 5.6 percent, but below the total percentage of businesses located in low-income census tracts at 8.3 percent. The bank originated 10.3 percent of its small business loans in moderate-income census tracts, once again slightly outperforming the aggregate of lenders at 9.3 percent, but below the percentage of total businesses located in moderate-income census tracts at 13.2 percent. The bank originated 29.9 percent of its small business loans in middle-income census tracts, which was below both the aggregate of lenders at 36.5 percent and percentage of total businesses at 38.6 percent. The majority of the bank’s small business loans were originated in upper-income census tracts at 53.7 percent, surpassing both the aggregate of lenders at 47.3 percent and the percentage of total businesses at 39.8 percent.

The bank’s small business lending in 2017 was generally consistent with the lending patterns of 2016, although lending to small businesses in low- and moderate-income census tracts did increase slightly.

The following table presents the bank’s 2016 small business lending performance; 2017 small business lending data is included in Appendix B.

Geographic Distribution of Small Business Loans								
Assessment Area: 2016 Milwaukee-Waukesha-West Allis, WI MSA 33340								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses %
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Small Business	Low	33	6.1	5.6	7,326	7.7	5.6	8.3
	Moderate	56	10.3	9.3	13,177	13.8	10.5	13.2
	Middle	162	29.9	36.5	36,310	38.0	39.7	38.6
	Upper	291	53.7	47.3	38,859	40.6	43.7	39.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.3			0.4	
	Total		542	100.0	100.0	95,672	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes. The bank's performance relative to HMDA-reportable loan products was above penetration by the aggregate of lenders to low-income borrowers, but below the lender aggregate for moderate-income borrowers. A review of the bank's lending to borrowers of different income levels could not be conducted for 2017 as 67.2 percent of loans were to borrowers of unknown-income. The bank's lending to businesses reporting annual revenues of \$1 million or less was higher than the lending by the aggregate of lenders in 2016. A limited review of the bank's HMDA- and CRA-reportable lending in 2017 was conducted, as the data for aggregate lenders was not available at the time of this evaluation.

HMDA-Reportable Lending

Home Purchase Loans

Town Bank originated 13.4 percent of home purchase loans to low-income borrowers, which was above the aggregate of lenders at 6.5 percent, but below the percentage of low-income families within the assessment area at 22.1 percent. The bank originated 17.1 percent of home purchase loans in moderate-income census tracts, which was slightly below the aggregate of lenders at 18.4 percent, but comparable to the percentage of moderate-income families within the assessment area at 16.9 percent. The bank originated 17.1 percent of its home purchase loans to middle-income borrowers, which was below that of aggregate lenders at 22.3 percent and the percentage of middle-income families within the assessment area at 20.6 percent. The largest percentage of bank's home purchase loans were originated to upper-income borrowers at 46.3 percent, which was above the aggregate of lenders at 41.0 percent and the percentage of upper-income families within the assessment area at 40.4 percent.

The bank's performance for home purchase loans in 2017 exceeded its performance in 2016, as half of loans were to low-income borrowers and 18.8 percent were to moderate-income borrowers.

Refinance Loans

The bank originated 1.4 percent of its refinance loans to low-income borrowers, which is below the aggregate of lenders performance at 3.6 percent and well below the percentage of low-income families within the assessment area at 22.1 percent. The bank originated 5.6 percent of its refinance loans to moderate-income borrowers, which was significantly below the aggregate of lenders at 11.6 percent and the percentage of moderate-income families within the assessment area at 16.9 percent. The bank originated 12.5 percent of refinance loans to middle-income borrowers, which is significantly below both the aggregate of lenders at 20.0 percent and the percentage of middle-income families within the assessment area at 20.6 percent. The bank originated 54.2 percent of its refinance loans to upper-income borrowers, which is above the aggregate of lenders at 48.5 percent and the percentage of upper-income families within the assessment area at 40.4 percent. Lastly, 26.4 percent of the bank's refinance loans were originated to unknown-income borrowers, which exceeded the aggregate of lenders at 16.2 percent.

The majority (83.9 percent) of the bank’s refinance loans in 2017 were originated to borrowers of unknown-income. The remaining 16.1 percent were made to upper-income borrowers.

The following table presents the bank’s 2016 HMDA-reportable data; 2017 data is in Appendix B.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Milwaukee-Waukesha-West Allis, WI MSA 33340								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			Dollar			
		Count		Agg %	Bank		Agg \$ %	
		#	%		\$(000s)	\$ %		
Home Purchase	Low	11	13.4	6.5	1,005	6.1	3.0	22.1
	Moderate	14	17.1	18.4	1,564	9.5	11.9	16.9
	Middle	14	17.1	22.3	2,003	12.2	19.0	20.6
	Upper	38	46.3	41.0	11,100	67.7	55.2	40.4
	Unknown	5	6.1	11.7	729	4.4	10.9	0.0
	Total	82	100.0	100.0	16,401	100.0	100.0	100.0
Refinance	Low	1	1.4	3.6	152	1.0	1.7	22.1
	Moderate	4	5.6	11.6	416	2.7	7.1	16.9
	Middle	9	12.5	20.0	1,312	8.6	15.8	20.6
	Upper	39	54.2	48.5	10,735	70.4	60.0	40.4
	Unknown	19	26.4	16.2	2,626	17.2	15.4	0.0
	Total	72	100.0	100.0	15,241	100.0	100.0	100.0
Home Improvement	Low	0	0.0	6.4	0	0.0	2.0	22.1
	Moderate	0	0.0	14.4	0	0.0	7.0	16.9
	Middle	0	0.0	23.4	0	0.0	18.3	20.6
	Upper	2	100.0	49.9	1,114	100.0	66.5	40.4
	Unknown	0	0.0	5.9	0	0.0	6.1	0.0
	Total	2	100.0	100.0	1,114	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	16.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.6
	Upper	0	0.0	0.0	0	0.0	0.0	40.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	12	7.7	5.1	1,157	3.5	2.1	22.1
	Moderate	18	11.5	14.8	1,980	6.0	8.7	16.9
	Middle	23	14.7	21.1	3,315	10.1	16.1	20.6
	Upper	79	50.6	44.7	22,949	70.1	53.6	40.4
	Unknown	24	15.4	14.3	3,355	10.2	19.5	0.0
	Total	156	100.0	100.0	32,756	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

In 2016, Town Bank originated 51.7 percent of its loans to small businesses with annual revenues of \$1 million or less, outperforming the aggregate of lenders at 43.0 percent, but falling short of the percentage of small businesses operating in the assessment area at 85.8 percent. Of the 280 loans originated to these small businesses, 84.3 percent were originated in amounts of \$100,000 or less, which are considered most beneficial to small businesses.

The bank’s performance in 2017 was consistent with its performance in 2016.

The table below presents the bank’s 2016 small business lending data; 2017 data is in Appendix B.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2016 Milwaukee-Waukesha-West Allis, WI MSA 33340									
Product Type		Bank & Aggregate Lending Comparison							
		2016			2016			Total Businesses %	
		Count		Agg	Dollar		Agg		
		Bank			Bank				
		#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	280	51.7	43.0	19,763	20.7	25.9	85.8
		Over \$1 Million or Unknown	262	48.3	57.0	75,909	79.3	74.1	14.2
		Total	542	100.0	100.0	95,672	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	334	61.6	90.4	8,551	8.9	27.1	
		\$100,001 - \$250,000	78	14.4	4.3	14,242	14.9	15.1	
		\$250,001 - \$1 Million	130	24.0	5.3	72,879	76.2	57.8	
		Total	542	100.0	100.0	95,672	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	236	84.3		4,084	20.7		
		\$100,001 - \$250,000	21	7.5		3,403	17.2		
		\$250,001 - \$1 Million	23	8.2		12,276	62.1		
Total		280	100.0		19,763	100.0			
Originations & Purchases									
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Community Development Lending

Town Bank is a leader in making community development loans. During the review period, the bank made 92 community development loans totaling nearly \$86.4 million. This represents a significant increase in qualified community development lending over the previous evaluation when the bank made 31 loans totaling \$32.1 million. A substantial majority of these loans were within the city of Milwaukee, which is the area in greatest need of community development efforts. Loans included those for affordable housing construction, economic development, and community service. One \$9.5 million loan was for construction of a 65-unit project in which 56 units were designated affordable housing. Town Bank was the sole financier for this project, which was constructed without low-income housing tax credit assistance. Another \$125,000 loan to a chamber of commerce was to allow

the chamber to participate in a revolving loan fund with an economic development corporation targeted towards assisting African-American-owned small businesses. This evidences Town Bank’s support for complex community development loans that layer public and private participation. The bank also employs community development lenders to build relationships in the area and find opportunities for small businesses and non-profits that serve low- and moderate-income individuals.

Qualified Community Development Loans										
\$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/ Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Milwaukee MSA	34	53,597	36	17,363	14	3,450	8	11,950	92	86,360

INVESTMENT TEST

Town Bank’s performance indicates a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank makes extensive use of innovative and complex investments to support community development initiatives and exhibits excellent responsiveness to credit and community development needs.

The bank made seven investments totaling over \$5.9 million. This represents a decrease of 4.8 percent from the previous evaluation period when the bank made 10 investments totaling \$6.2 million. During this evaluation period, the bank made one new investment in the assessment area and maintained six investments from the previous evaluation. Two of these prior period investments totaling \$500,000 are particularly innovative and complex, as well as responsive to assessment area needs. Both are equity equivalent investments with certified Community Development Financial Institutions (CDFIs) that allow these CDFIs to strengthen their capital position in order to leverage additional debt capital.

The bank made 148 grants totaling \$387,188 during the review period. This represents an increase of 64.8 percent over the bank’s previous performance evaluation, when qualified donations totaled \$235,000.

Community Development Investments										
\$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current	0	0	1	1,470	0	0	0	0	1	1,470
Prior	0	0	0	0	6	4,500	0	0	6	4,500
Total	0	0	1	1,470	6	4,500	0	0	7	5,970
Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	14	19,300	87	236,330	34	106,608	13	24,950	148	387,188

SERVICE TEST

Town Bank’s service delivery systems are readily accessible to the bank’s geographies and individuals of different income levels in the assessment area. The bank’s record of opening and closing branch offices has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies or individuals. In addition, the bank is a leader in providing community development services.

Retail Services

The bank operates 11 offices, including the main office, in the Milwaukee MSA assessment area, each of which has a full-service ATM. Significant efforts have been made to increase the bank’s presence in the low-income geographies; three branches and one loan production office were opened in low-income census tracts since the previous examination. These branch openings have improved the accessibility of bank delivery systems, particularly to low- and moderate-income geographies. Further, bank staff engages in outreach efforts to low- and moderate-income borrowers and geographies to promote penetration. Two additional branches opened since the previous examination, one location in a middle-income census tract, and the second location in an upper-income census tract.

The bank’s business hours and services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies or individuals. Branch location hours are relatively uniform throughout the assessment area; the bank is open from 8:30 A.M. or 9:00 A.M. until 5:00 P.M. Monday through Friday, and 9:00 A.M. to 12:00 P.M. on Saturday. The bank’s drive-up facilities are open from 8:00 A.M. to 5:00 P.M. or 6:00 P.M. The bank has bilingual loan staff in its Milwaukee offices to facilitate the needs of Spanish-speaking customers.

Community Development Services

Town Bank is a leader in providing community development services within the Milwaukee MSA assessment area. During the review period, bank staff provided 372 service activities totaling 2,808 hours, which is comparable to the previous exam period when bank staff provided service activities totaling 1,954 hours. Significant community outreach is conducted throughout the assessment area, particularly in the city of Milwaukee, as a means of penetrating this market. Notable service activities include participation on the boards of several prominent community development organizations. Notable among the board memberships was 178 hours that a bank staff member provided to Habitat for Humanity of Waukesha County, which is a provider of services addressing housing needs of low-income homeowners in Southeastern Wisconsin.

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Milwaukee MSA	385	1,577	789	57	2,808	372

NON-MSA WISCONSIN SOUTHEAST, JEFFERSON AND WALWORTH COUNTY - Full Review

SCOPE OF THE EXAMINATION

The scope is consistent with that presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NON-MSA WI SOUTHEAST ASSESSMENT AREA

Town Bank operates five branches and three full-service ATMs in the Non-MSA Wisconsin Southeast (Southeast Non-MSA) assessment area. All locations are in middle-income census tracts, none of which were considered underserved or distressed in 2016 or 2017, according to the Federal Financial Institutions Examination Council. The bank has not opened any branches in the assessment area since the previous examination. In July of 2015, Town Bank consolidated one branch in Lake Geneva, Wisconsin into an existing branch in the same city. The following table shows the distribution of branches and full-service ATMs in the Southeast Non-MSA assessment area.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0.0	0	0.0	2.4	1.8	3.0	0.0
Middle	5	100.0	3	100.0	57.1	60.2	65.6	42.3
Upper	0	0.0	0	0.0	38.1	37.6	30.8	57.7
Unknown	0	0.0	0	0.0	2.4	0.4	0.6	0.0
Total	5	100.0	3	100.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranks the bank second out of 24 FDIC-insured depository institutions operating in the assessment area, with 8.6 percent of total deposits. Town Bank ranked 64th in originations and purchases of HMDA-reportable loans in 2016 out of 355 HMDA reporters originating loans in the assessment area. Town Bank ranked ninth among 64 area CRA reporters in CRA-reportable originations and purchases in 2016.

The assessment area was comprised of 42 census tracts in 2016, none of which were low- or moderate-income tracts. The median family income levels 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 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. The table below shows the difference in census tract designations between 2016 and 2017.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2017 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	0	1	1
Middle	23	24	1
Upper	19	16	-3
Unknown	0	1	1
Total	42	42	0
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</i>			

Additional assessment area demographic information is provided in the following table.

Assessment Area: 2016 WI Non MSA - Jefferson and Walworth Counties								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	6,380	13.3
Moderate-income	0	0.0	0	0.0	0	0.0	7,459	15.5
Middle-income	23	54.8	26,069	54.3	2,392	9.2	10,976	22.9
Upper-income	19	45.2	21,932	45.7	830	3.8	23,186	48.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	48,001	100.0	3,222	6.7	48,001	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	48,475	26,478	52.5	54.6	13,949	28.8	8,048	16.6
Upper-income	37,189	23,947	47.5	64.4	6,150	16.5	7,092	19.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	85,664	50,425	100.0	58.9	20,099	23.5	15,140	17.7
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	3,630	55.3	3,188	55.1	400	57.2	42	51.9
Upper-income	2,939	44.7	2,601	44.9	299	42.8	39	48.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,569	100.0	5,789	100.0	699	100.0	81	100.0
	Percentage of Total Businesses:			88.1		10.6		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	165	40.3	157	39.3	8	80.0	0	0.0
Upper-income	244	59.7	242	60.7	2	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	409	100.0	399	100.0	10	100.0	0	0.0
	Percentage of Total Businesses:			97.6		2.4		0.0
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Population Characteristics

The assessment area’s population remained stable from the 2010 U.S. Decennial Census to 2011-2015 American Community Survey, with the 0.1 percent increase being below the state of Wisconsin population increase of 1.0 percent during the same period. Across the state of Wisconsin, rural areas as a whole have seen a slight decline in total population over the same time period, which indicates that the stagnant population growth in the assessment area is in line with broader trends.

Population Change			
Area	2010 Population	2011-2015 Population	Percentage Change
Assessment Area	185,914	187,384	0.1
Jefferson County	83,686	84,345	0.8
Walworth County	102,228	103,039	0.8
State of Wisconsin	5,686,986	5,742,117	1.0

Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey

Income Characteristics

Median family income for the assessment area equaled \$69,397 based on the 2011-2015 American Community Survey, slightly above the statewide average. The assessment area had a greater increase (5.6 percent) in median family income between 2010 and 2015 than the state increase of 4.9 percent. Of the 48,001 families living in the assessment area, 13.3 percent are designated low-income and 15.5 percent are designated moderate-income, with 6.7 percent of families living below the poverty level. Overall, the income demographic composition of the assessment area reflects a lower concentration of low- and moderate-income families and families living below poverty than the state of Wisconsin, where 7.7 percent of families live below the poverty level. A community representative stated that there has been upward pressure on wages because businesses have had difficulty finding qualified employees.

Median Family Income Change			
Area	2006-2010 Median Family Income (In 2010 Dollars)	2011-2015 Median Family Income (In 2015 Dollars)	Percentage Change
Assessment Area	65,695	69,397	5.6
Jefferson County	65,684	70,017	6.6
Walworth County	67,308	69,889	3.8
State of Wisconsin	64,869	68,064	4.9

Source: U.S. Census Bureau 2010 Decennial Census; 2011-2015 American Community Survey

Further illustrating the assessment area economic conditions, bankruptcies have typically remained lower than the state of Wisconsin since 2013. Most recently, in 2016, the personal bankruptcy rates for Jefferson and Walworth County were 2.3 and 2.6 filings per 1,000 population, respectively, in

comparison to the state of Wisconsin with 2.9 filings per 1,000 population.

Housing Characteristics

In 2016, there are a total of 85,664 housing units in the assessment area, none of which are located in low-or moderate-income census tracts, as the assessment area is comprised of only middle- and upper-income census tracts. Both middle- and upper-income census tracts have a majority of housing units classified as owner-occupied. In 2017, one census tract was designated as moderate-income. However, only 1.4 percent of the assessment area’s owner-occupied housing was located in this tract, limiting opportunities for lending.

Based on 2011-2015 American Community Survey data, median housing values and median gross rents across the assessment area, at \$182,036 and \$794 respectively, are higher than the state of Wisconsin. A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 American Community Survey data, the affordability ratio for the assessment area is 0.30, which is below the state of Wisconsin affordability ratio at 0.32, indicating that it is generally less affordable to live in Jefferson and Walworth Counties than the state of Wisconsin. A community representative provided support that there is a need for more affordable housing options. The representative stated that tight credit standards limit the ability of lower-income families and individuals to become homeowners. The representative also identified that the low property tax rates have driven development of mostly higher priced homes.

Housing Costs Change							
Area	Median Housing Value			Median Gross Rent			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Assessment Area	190,948	182,036	-4.6	746	794	6.4	0.30
Jefferson County	182,500	173,000	-5.2	729	775	6.3	0.33
Walworth County	198,000	189,600	-4.2	761	812	6.7	0.28
State of Wisconsin	169,000	165,800	-1.9	713	776	8.8	0.32

Source: U.S. Census Bureau 2000 and 2010 Decennial Census; 2006-2010 and 2011-2015 American Community Survey

Foreclosure Trends

The Federal Reserve Bank of Chicago conducted a study on changes in foreclosure inventory rates at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. Foreclosure inventory rates in the state and assessment area have generally declined since 2011, indicating that the housing crisis that affected much of the nation has abated. As of October 2016, Walworth County’s rate equaled 1.2 percent and Jefferson County’s rate equaled 1.0 percent, both of which were comparable to the state of Wisconsin’s rate of 1.0 percent.

Employment Conditions

Unemployment across the assessment area and in the state of Wisconsin declined between 2013 and 2016 as the economy recovered from the recession of 2007-2009. Most recently in 2016, the unemployment rate in Jefferson County was 4.0 percent, while Walworth County's unemployment rate matched that of the state of Wisconsin at 4.1 percent. A community representative stated that the unemployment rate in the area continues to decline, and that this is evidenced by the increase in open positions.

Unemployment Rates (%)				
Region	2013	2014	2015	2016
Jefferson County	7.0	5.2	4.2	4.0
Walworth County	7.0	5.7	4.7	4.1
State of Wisconsin	6.7	5.5	4.6	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

Industry Characteristics

The following table presents the largest employers operating in the assessment area. According to location quotients developed by the U.S. Bureau of Labor Statistics, the assessment area is most heavily impacted by the manufacturing and goods-producing industries. Dun & Bradstreet data indicates that in 2016, there were 6,569 businesses operating in the assessment area, 88.1 percent of which are small businesses with revenues of \$1 million or less.

Largest Employers in the Assessment Area		
Company	# of Employees	Industry
University Of WI-Whitewater	1,018	Schools-Universities & Colleges Academic
Sta-Rite Industries Incorporated	950	Pumps-Manufacturers
Pentair Flow Technologies	900	Pumps-Manufacturers
Trek Bicycle Corporation	800	Bicycles-Dealers
Birds Eye Foods	700	Frozen Food Processors
Nasco International Incorporated	645	Internet & Catalog Shopping
Fort Healthcare Specialty Clinic	610	Clinics
Nasco Farm & Home Store	600	Internet & Catalog Shopping
Generac Power Systems Incorporated	600	Generators-Electric

Community Representatives

Two community representatives, both from Jefferson County, were contacted to help determine the credit and banking needs of the Southeast Non-MSA assessment area. Both representatives stated that credit unions have outperformed the banks in meeting the credit needs of the community. This representative also stated that businesses in the manufacturing industry sometimes have difficulty in obtaining credit to assist in the funding of operational expansion. The other representative believes that there is a general lack of awareness among lower-income individuals concerning their options for homeownership, and that this could be mitigated by financial literacy seminars. This representative stated that the seminars currently provided are typically held in government buildings, which cause

lower-income families, particularly in the Hispanic community, to avoid them.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NON-MSA WISCONSIN SOUTHEAST ASSESSMENT AREA

LENDING TEST

The geographic distribution of loans reflects good penetration throughout the assessment area, while the distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses and farms of different sizes. Further, the bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank is a leader in making community development loans and makes extensive use of innovative or flexible lending practices. The bank originated flexible loans of the following types: 33 Money Smart consumer loans, 27 "Easy Access" small business loans, and two SBA loans.

The bank made one multi-family loan in 2016 and two multi-family loans in 2017, and only one home improvement loan in 2016 and none in 2017; therefore, no meaningful analysis can be conducted for these products.

For the purposes of this review, loans made in calendar years up to and including 2016 were analyzed based on income designations from the 2006-2010 American Community Survey data³. Loans made in calendar years 2017 and after were analyzed based on income designations from the 2011-2015 American Community Survey data.

Geographic Distribution of Loans

In 2016, the assessment area was comprised only of middle- and upper-income census tracts and none of the middle-income census tracts were designated as distressed or underserved. Therefore a meaningful analysis could not be performed. The dispersion of the loans in the assessment area was reviewed to determine if the bank is sufficiently serving the census tracts included in the assessment area. Examiners determined that there were no conspicuous lending gaps in contiguous census tracts.

In 2017, one census tract was designated as moderate-income. The bank made no HMDA-reportable, small-business, or small farm loans in this census tract. However, only 1.4 percent of owner-occupied housing units and 3.0 percent of small businesses are located in this census tract. There were no farms located in this census tract.

³ The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)

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

The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels, and businesses and farms of different sizes. The bank's performance relative to 2016 HMDA-reportable loan products was above the percentage of loans by aggregate lenders to low-income borrowers, but below the percentage of loans by aggregate lenders for moderate-income borrowers. A review of the bank's lending to borrowers of different income levels could not be conducted for 2017, as 90.0 percent of loans were to borrowers of unknown-income. The bank's lending to businesses and farms reporting annual revenues of \$1 million or less exceeded aggregate lenders in 2016. A limited review of the bank's HMDA- and CRA-reportable lending in 2017 was conducted, as the data for aggregate lenders was not available at the time of this evaluation.

HMDA-Reportable Lending

Home Purchase Loans

In 2016, Town Bank originated 7.1 percent of its home purchase loans to low-income borrowers, which was above the aggregate of lenders at 3.2 percent, but below the percentage of low-income families within the assessment area at 13.3 percent. The bank originated 14.3 percent of home purchase loans in moderate-income census tracts, which was consistent with the aggregate of lenders at 15.7 percent and the percentage of moderate-income families within the assessment area at 15.5 percent. The bank originated 28.6 percent of its home purchase loans to middle-income borrowers, which exceeded that of aggregate lenders at 22.0 percent and the percentage of middle-income families within the assessment area at 22.9 percent. The largest share (42.9 percent) of the bank's home purchase loans were originated to upper-income borrowers, which was below the aggregate of lenders at 46.8 percent and the percentage of upper-income families within the assessment area at 48.3 percent. Lastly, 7.1 percent of the bank's home purchase loans were originated to unknown-income borrowers, which was below the aggregate of lenders at 12.3 percent.

The bank originated just one home purchase loans in 2017, which is consistent with the bank's trend of referring home purchase loans to its affiliate, Wintrust Mortgage Corporation.

Refinance Loans

The bank originated 10.5 percent of its refinance loans to low-income borrowers, which exceeded the aggregate of lenders at 3.3 percent, but was below the percentage of low-income families within the assessment area at 13.3 percent. The bank originated 5.3 percent of its refinance loans to moderate-income borrowers, which was below the aggregate of lenders at 10.5 percent and the percentage of moderate-income families within the assessment area at 15.5 percent. The bank originated 15.8 percent of refinance loans to middle-income borrowers, which was below both the aggregate of lenders at 19.5 percent and the percentage of middle-income families within the assessment area at 22.9 percent. The bank originated 57.9 percent of its refinance loans to upper-income borrowers, which exceeded the aggregate of lenders at 49.3 percent and the percentage of upper-income families

within the assessment area at 48.3 percent. Lastly, 10.5 percent of the bank's refinance loans were originated to unknown-income borrowers, which was below the aggregate of lenders at 17.4 percent.

All of the banks refinance loans in 2017 were originated to borrowers of unknown-income.

The following table presents the bank's 2016 HMDA-reportable data; 2017 data is in Appendix B.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 WI Non MSA - Jefferson and Walworth Counties								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			2016			
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$(000s)	\$ %		
Home Purchase	Low	2	7.1	3.2	150	2.7	1.5	13.3
	Moderate	4	14.3	15.7	456	8.2	10.1	15.5
	Middle	8	28.6	22.0	1,301	23.4	18.0	22.9
	Upper	12	42.9	46.8	3,335	60.0	58.7	48.3
	Unknown	2	7.1	12.3	319	5.7	11.6	0.0
	Total	28	100.0	100.0	5,561	100.0	100.0	100.0
Refinance	Low	2	10.5	3.3	187	5.9	1.6	13.3
	Moderate	1	5.3	10.5	75	2.4	6.2	15.5
	Middle	3	15.8	19.5	357	11.3	13.7	22.9
	Upper	11	57.9	49.3	2,416	76.4	60.2	48.3
	Unknown	2	10.5	17.4	126	4.0	18.4	0.0
	Total	19	100.0	100.0	3,161	100.0	100.0	100.0
Home Improvement	Low	1	100.0	6.4	50	100.0	3.3	13.3
	Moderate	0	0.0	11.9	0	0.0	6.4	15.5
	Middle	0	0.0	25.0	0	0.0	20.4	22.9
	Upper	0	0.0	51.3	0	0.0	65.1	48.3
	Unknown	0	0.0	5.5	0	0.0	4.8	0.0
	Total	1	100.0	100.0	50	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	13.3
	Moderate	0	0.0	0.0	0	0.0	0.0	15.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.9
	Upper	0	0.0	0.0	0	0.0	0.0	48.3
	Unknown	1	100.0	100.0	496	100.0	100.0	0.0
	Total	1	100.0	100.0	496	100.0	100.0	100.0
HMDA Totals	Low	5	10.2	3.3	387	4.2	1.5	13.3
	Moderate	5	10.2	13.1	531	5.7	7.9	15.5
	Middle	11	22.4	20.8	1,658	17.9	15.4	22.9
	Upper	23	46.9	47.9	5,751	62.1	57.4	48.3
	Unknown	5	10.2	14.9	941	10.2	17.8	0.0
	Total	49	100.0	100.0	9,268	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

In 2016, Town Bank originated 63.1 percent of its loans to small businesses with annual revenues of \$1 million or less, outperforming the aggregate of lenders at 44.0 percent, but falling short of the percentage of small businesses operating in the assessment area at 88.1 percent. Of the 53 loans originated to these small businesses, 73.6 percent were originated in amounts of \$100,000 or less, which are considered most beneficial to small businesses.

The bank’s performance in 2017 was consistent with its performance in 2016.

The table below presents the bank’s 2016 small business lending data; 2017 data is in Appendix B.

Small Business Lending By Revenue & Loan Size										
Assessment Area: 2016 WI Non MSA - Jefferson and Walworth Counties										
Product Type		Bank & Aggregate Lending Comparison								
		2016			2016			Total Businesses		
		Count		Agg	Dollar		Agg			
#	%	%	\$ 000s	\$ %	\$ %	%				
Small Business	Revenue	\$1 Million or Less	53	63.1	44.0	4,508	38.3	27.1	88.1	
		Over \$1 Million or Unknown	31	36.9	56.0	7,271	61.7	72.9	11.9	
		Total	84	100.0	100.0	11,779	100.0	100.0	100.0	
	Loan Size	\$100,000 or Less	51	60.7	93.6	1,719	14.6	35.6		
		\$100,001 - \$250,000	20	23.8	3.3	3,469	29.5	17.0		
		\$250,001 - \$1 Million	13	15.5	3.1	6,591	56.0	47.4		
		Total	84	100.0	100.0	11,779	100.0	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	39	73.6		1,199	26.6			
		\$100,001 - \$250,000	9	17.0		1,599	35.5			
		\$250,001 - \$1 Million	5	9.4		1,710	37.9			
Total		53	100.0		4,508	100.0				
Originations & Purchases										
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS										
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>										

Small Farm Lending

In 2016, Town Bank originated 88.9 percent of its agricultural loans to small farms with annual revenue of \$1 million or less, significantly outperforming the aggregate of lenders at 46.1 percent, but below the percentage of small farms operating in the assessment area at 97.6 percent. Of the 16 loans originated to these small farms, 68.8 percent were originated in amounts of \$100,000 or less, which are considered most beneficial to small farms.

The bank’s small farm lending patterns in 2017 were less concentrated to small farms with annual revenue of \$1 million or less than levels of 2016; however, the percentage of these small farm loans

that were in amounts of \$100,000 or less was comparable.

The following table presents the bank’s 2016 small farm lending data; 2017 data is in Appendix B.

Small Farm Lending By Revenue & Loan Size										
Assessment Area: 2016 WI Non MSA - Jefferson and Walworth Counties										
Product Type		Bank & Aggregate Lending Comparison								
		2016								
		Count		Dollar		Total Farms				
		Bank	Agg	Bank	Agg					
		#	%	%	\$ 000s	\$ %	\$ %	%		
Small Farm	Revenue	\$1 Million or Less	16	88.9	46.1	1,602	92.5	42.7	97.6	
		Over \$1 Million or Unknown	2	11.1	53.9	130	7.5	57.3	2.4	
		Total	18	100.0	100.0	1,732	100.0	100.0	100.0	
	Loan Size	\$100,000 or Less	13	72.2	70.2	715	41.3	20.3		
		\$100,001 - \$250,000	3	16.7	18.3	460	26.6	34.4		
		\$250,001 - \$500,000	2	11.1	11.5	557	32.2	45.3		
		Total	18	100.0	100.0	1,732	100.0	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	11	68.8		585	36.5			
		\$100,001 - \$250,000	3	18.8		460	28.7			
		\$250,001 - \$500,000	2	12.5		557	34.8			
		Total	16	100.0		1,602	100.0			
	Originations & Purchases									
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS										
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>										

Community Development Lending

Town Bank is a leader in making community development loans. During the review period, the bank made nine loans totaling \$20.7 million. This represents a significant increase in community development lending from the previous examination, when the bank made five loans totaling \$5.3 million. Among loans made in this review period was a \$7.9 million loan to provide interim financing to support various energy efficiency and building maintenance projects throughout the school year for a school district with a majority student population designated as economically disadvantaged. Another loan for \$436,545 was made to build a 16-unit apartment complex constructed using affordable housing tax credits.

Qualified Community Development Loans										
\$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/ Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Southeast Non-MSA	2	853	6	19,469	1	400	0	0	9	20,722

INVESTMENT TEST

Town Bank’s performance reflects a significant level of qualified community development investments and grants, occasionally in a leadership position. The bank makes rare use of innovative and complex investments to support community development initiatives and exhibits good responsiveness to credit and community development needs. The bank made three investments totaling \$3.4 million, which represents a slight increase from the previous evaluation, when the bank made five investments totaling \$3.3 million. All investments for this assessment area were responsive to the needs of the community schools and a local government, for which the proceeds were used to construct a building located in an area designated for redevelopment.

Additionally, the bank made 23 donations totaling \$74,752. This represents a vast increase by dollar amount from the previous evaluation, when the bank made six donations totaling \$2,610.

Community Development Investments										
\$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current Period	0	0	1	2,050	1	310	0	0	2	2,360
Prior Period	0	0	0	0	0	0	1	1,000	1	1,000
Total	0	0	1	2,050	1	310	1	1,000	3	3,360
Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	0	0	17	69,537	6	5,215	0	0	23	74,752

SERVICE TEST

Town Bank’s service delivery systems are accessible to the bank’s geographies and individuals of different income levels in the assessment area. The bank’s record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies or individuals. In addition, the bank provides a relatively high level of community development services.

Retail Services

The bank operates five branches and three associated full-service ATMs in the Southeast Non-MSA assessment area. All branches and ATMs are located in middle-income census tracts. The bank consolidated a branch in Lake Geneva, Wisconsin into an existing branch located in the same area in

July 2015. This branch consolidation has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals. Delivery systems are accessible to the bank’s geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment area, particularly to low- and moderate-income individuals.

Community Development Services

Town Bank provides a relatively high level of community development services within the Southeast Non-MSA assessment area. During the review period, bank staff provided 15 service activities totaling 297 hours; this is identical to the previous exam period, when bank staff provided service activities totaling 297 hours. Notable among the services provided was a board membership position held by a bank staff member in which 133 hours of service were provided to United Way of Walworth County.

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Southeast Non-MSA	0	142	153	2	297	15

MADISON, WI MSA #31540 - Limited Review

SCOPE OF THE EXAMINATION

The scope was consistent with the overall scope of the examination described within the institution summary.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MADISON, WI MSA #31540

The bank has three retail offices in the Madison, WI MSA (Madison MSA) with a full service ATM located at each branch. The branches are located in Monroe, Green County, WI, in a moderate-income census tract; Albany, Green County, WI, in a middle-income census tract; and Madison, Dane County, WI, in an upper-income census tract. The assessment area is comprised of 115 total census tracts and has not changed since the previous evaluation.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	0	0.0	0	0.0	3.5	2.6	2.0	0.1
Moderate	1	33.3	1	33.3	19.1	13.6	16.0	12.7
Middle	1	33.3	1	33.3	47.0	55.0	48.4	59.0
Upper	1	33.3	1	33.3	25.2	28.5	32.1	28.2
Unknown	0	0.0	0	0.0	5.2	0.2	1.6	0.1
Total	3	100.0	3	100.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranks the bank 30th out of 44 institutions in the assessment area, with 0.6 percent of deposits. The bank, with a total of 33 loans, ranked 66th in originations and purchases of HMDA-reportable loans in 2016 out of 381 HMDA reporters originating loans in the assessment area. The bank, with a total of 114 loans, ranked 13th among 81 area CRA reporters in CRA-reportable originations and purchases in 2016. This indicates the bank has a rather strong commercial presence despite only having three branches in the market area.

Based on the 2016 census data, the assessment area is home to 123,725 families; of these families, 5.5 percent are living in poverty. Based on family income, low- and moderate-income families represent 35.0 percent of all families living in the assessment area. In addition, the assessment area contains 228,914 housing units, 58.2 percent of which are owner-occupied, 34.0 percent are rental units, and 7.9 percent are vacant. Based on this data, there are various opportunities within the assessment area to meet the credit needs of borrowers of different income levels.

According to 2016 Dun and Bradstreet information, businesses with \$1 million or less in total annual revenue represent 89.3 percent of all businesses in the assessment area, and small farms with revenues less than \$1 million in total annual revenue represent 98.2 percent of farms in the assessment area. This indicates ample opportunities within the assessment area to meet the credit

needs of small businesses and small farms of different revenue sizes.

The assessment area was comprised of 115 census tracts in 2016, of which 25 were low- and moderate-income tracts. The median family income levels 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 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Below is a table showing changes made between 2016 and 2017 in regard to the income designation of census tracts, followed by a table displaying 2016 demographic data for the assessment area.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2017 Designations (#)	Net Change (#)
Low	8	4	-4
Moderate	17	22	5
Middle	60	54	-6
Upper	27	29	2
Unknown	3	6	3
Total	115	115	0
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</i>			

Assessment Area: 2016 Madison, WI MSA 31540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	7.0	2,746	2.2	1,010	36.8	21,882	17.7
Moderate-income	17	14.8	16,162	13.1	1,989	12.3	21,432	17.3
Middle-income	60	52.2	72,906	58.9	3,211	4.4	30,124	24.3
Upper-income	27	23.5	31,911	25.8	600	1.9	50,287	40.6
Unknown-income	3	2.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	115	100.0	123,725	100.0	6,810	5.5	123,725	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	13,081	2,064	1.5	15.8	8,781	67.1	2,236	17.1
Moderate-income	33,631	15,520	11.7	46.1	15,013	44.6	3,098	9.2
Middle-income	128,415	79,393	59.6	61.8	40,047	31.2	8,975	7.0
Upper-income	53,762	36,212	27.2	67.4	13,869	25.8	3,681	6.8
Unknown-income	25	0	0.0	0.0	25	100.0	0	0.0
Total Assessment Area	228,914	133,189	100.0	58.2	77,735	34.0	17,990	7.9
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	993	3.9	821	3.6	163	6.4	9	3.8
Moderate-income	3,426	13.3	2,965	12.9	433	17.1	28	11.7
Middle-income	14,102	54.7	12,672	55.1	1,288	50.9	142	59.2
Upper-income	7,161	27.8	6,464	28.1	636	25.1	61	25.4
Unknown-income	101	0.4	92	0.4	9	0.4	0	0.0
Total Assessment Area	25,783	100.0	23,014	100.0	2,529	100.0	240	100.0
	Percentage of Total Businesses:		89.3		9.8		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	3	0.3	2	0.2	1	5.0	0	0.0
Moderate-income	132	11.8	130	11.8	2	10.0	0	0.0
Middle-income	754	67.3	744	67.6	10	50.0	0	0.0
Upper-income	231	20.6	224	20.3	7	35.0	0	0.0
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
Total Assessment Area	1,121	100.0	1,101	100.0	20	100.0	0	0.0
	Percentage of Total Businesses:		98.2		1.8		0.0	
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS MADISON, WI MSA #31540

Town Bank’s performance in the lending and service tests in the Madison MSA is consistent with the full scope assessment areas. The bank’s performance in the investment test is below the full scope assessment area performance due to the poor level of qualified community development investments and grants.

Assessment Area	Lending Test	Investment Test	Service Test
MADISON, WI MSA	Consistent	Below	Consistent

Qualified Community Development Loans \$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/ Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Madison MSA	10	47,880	14	1,420	6	3,873	0	0	30	53,173

Community Development Investments \$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current Period	0	0	0	0	0	0	0	0	0	0
Prior Period	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	0	0	8	15,780	6	38,703	0	0	14	54,483

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/ Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Madison MSA	212	334	156	0	702	39

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Madison, WI MSA 31540								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	1.3	0	0.0	0.9	1.5
	Moderate	19	11.7	10.2	3,112	7.5	7.2	11.7
	Middle	88	54.0	58.8	20,755	49.8	55.1	59.6
	Upper	56	34.4	29.8	17,825	42.8	36.8	27.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		163	100.0	100.0	41,692	100.0	100.0
Refinance	Low	0	0.0	0.9	0	0.0	0.8	1.5
	Moderate	1	1.2	8.0	169	0.7	5.4	11.7
	Middle	46	53.5	59.2	10,587	44.5	54.8	59.6
	Upper	39	45.3	31.8	13,056	54.8	39.0	27.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		86	100.0	100.0	23,812	100.0	100.0
Home Improvement	Low	0	0.0	0.9	0	0.0	0.5	1.5
	Moderate	0	0.0	10.7	0	0.0	5.8	11.7
	Middle	0	0.0	61.6	0	0.0	57.0	59.6
	Upper	1	100.0	26.8	278	100.0	36.6	27.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	278	100.0	100.0
Multi-Family	Low	0	0.0	12.8	0	0.0	18.1	Multi-Family 14.6
	Moderate	0	0.0	23.2	0	0.0	12.8	18.0
	Middle	3	50.0	48.8	13,555	65.4	48.3	46.9
	Upper	3	50.0	15.2	7,187	34.6	20.8	20.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		6	100.0	100.0	20,742	100.0	100.0
HMDA Totals	Low	0	0.0	1.2	0	0.0	2.6	1.5
	Moderate	20	7.8	9.3	3,281	3.8	6.9	11.7
	Middle	137	53.5	59.1	44,897	51.9	54.4	59.6
	Upper	99	38.7	30.4	38,346	44.3	36.1	27.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		256	100.0	100.0	86,524	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2016 Madison, WI MSA 31540								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2016						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	1	1.5	3.1	2	0.0	5.0	3.9
	Moderate	10	14.7	11.2	1,431	34.2	13.7	13.3
	Middle	42	61.8	53.9	2,432	58.1	51.4	54.7
	Upper	15	22.1	30.3	320	7.6	29.2	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.4
	Tr Unknown			1.4			0.8	
	Total	68	100.0	100.0	4,185	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2016 Madison, WI MSA 31540								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2016						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.6	0	0.0	0.0	0.3
	Moderate	15	32.6	15.2	1,922	33.2	10.7	11.8
	Middle	28	60.9	67.6	3,513	60.6	78.9	67.3
	Upper	3	6.5	15.9	360	6.2	10.0	20.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.1
	Tr Unknown			0.6			0.4	
	Total	46	100.0	100.0	5,795	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Madison, WI MSA 31540								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			2016			
		Count		Agg	Dollar		Agg	
		Bank			Bank			
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	15	9.2	6.8	2,120	5.1	3.6	17.7
	Moderate	31	19.0	19.7	5,182	12.4	14.1	17.3
	Middle	33	20.2	24.7	7,811	18.7	22.3	24.3
	Upper	80	49.1	40.7	25,609	61.4	51.9	40.6
	Unknown	4	2.5	8.1	970	2.3	8.2	0.0
	Total		163	100.0	100.0	41,692	100.0	100.0
Refinance	Low	3	3.5	5.3	315	1.3	2.7	17.7
	Moderate	12	14.0	14.9	2,073	8.7	9.9	17.3
	Middle	12	14.0	22.8	2,615	11.0	19.0	24.3
	Upper	54	62.8	44.6	17,569	73.8	55.3	40.6
	Unknown	5	5.8	12.5	1,240	5.2	13.1	0.0
	Total		86	100.0	100.0	23,812	100.0	100.0
Home Improvement	Low	0	0.0	6.2	0	0.0	2.7	17.7
	Moderate	0	0.0	18.9	0	0.0	11.7	17.3
	Middle	1	100.0	27.6	278	100.0	24.5	24.3
	Upper	0	0.0	43.4	0	0.0	56.6	40.6
	Unknown	0	0.0	3.9	0	0.0	4.5	0.0
	Total		1	100.0	100.0	278	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	17.7
	Moderate	0	0.0	0.0	0	0.0	0.0	17.3
	Middle	0	0.0	0.0	0	0.0	0.0	24.3
	Upper	0	0.0	0.0	0	0.0	0.0	40.6
	Unknown	6	100.0	100.0	20,742	100.0	100.0	0.0
	Total		6	100.0	100.0	20,742	100.0	100.0
HMDA Totals	Low	18	7.0	6.0	2,435	2.8	2.8	17.7
	Moderate	43	16.8	17.3	7,255	8.4	10.9	17.3
	Middle	46	18.0	23.8	10,704	12.4	18.8	24.3
	Upper	134	52.3	42.3	43,178	49.9	48.4	40.6
	Unknown	15	5.9	10.6	22,952	26.5	19.2	0.0
	Total		256	100.0	100.0	86,524	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size										
Assessment Area: 2016 Madison, WI MSA 31540										
Product Type		Bank & Aggregate Lending Comparison								
		Count			Dollar			Total Businesses		
		Bank		Agg	Bank		Agg			
#	%	%	\$ 000s	\$ %	\$ %	%				
Small Business	Revenue	\$1 Million or Less	45	66.2	42.2	744	17.8	26.5	89.3	
		Over \$1 Million or Unknown	23	33.8	57.8	3,441	82.2	73.5	10.7	
		Total	68	100.0	100.0	4,185	100.0	100.0	100.0	
	Loan Size	\$100,000 or Less	60	88.2	95.5	960	22.9	40.6		
		\$100,001 - \$250,000	2	2.9	1.7	330	7.9	9.7		
		\$250,001 - \$1 Million	6	8.8	2.8	2,895	69.2	49.7		
		Total	68	100.0	100.0	4,185	100.0	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	44	97.8		386	51.9			
		\$100,001 - \$250,000	0	0.0		0	0.0			
		\$250,001 - \$1 Million	1	2.2		358	48.1			
		Total	45	100.0		744	100.0			
	Originations & Purchases									
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS										
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>										

Small Farm Lending By Revenue & Loan Size										
Assessment Area: 2016 Madison, WI MSA 31540										
Product Type		Bank & Aggregate Lending Comparison								
		Count			Dollar			Total Farms		
		Bank		Agg	Bank		Agg			
#	%	%	\$ 000s	\$ %	\$ %	%				
Small Farm	Revenue	\$1 Million or Less	44	95.7	44.1	5,515	95.2	52.5	98.2	
		Over \$1 Million or Unknown	2	4.3	55.9	280	4.8	47.5	1.8	
		Total	46	100.0	100.0	5,795	100.0	100.0	100.0	
	Loan Size	\$100,000 or Less	29	63.0	80.6	1,075	18.6	22.4		
		\$100,001 - \$250,000	8	17.4	8.9	1,448	25.0	22.1		
		\$250,001 - \$500,000	9	19.6	10.5	3,272	56.5	55.5		
		Total	46	100.0	100.0	5,795	100.0	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	28	63.6		1,045	18.9			
		\$100,001 - \$250,000	7	15.9		1,198	21.7			
		\$250,001 - \$500,000	9	20.5		3,272	59.3			
		Total	44	100.0		5,515	100.0			
	Originations & Purchases									
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS										
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>										

RACINE, WI MSA #39540- Limited Review

SCOPE OF THE EXAMINATION

The scope was consistent with the overall scope of the examination described within the institution summary.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RACINE, WI MSA #39540

The bank has four retail offices and three full service ATMs in the Racine, WI MSA (Racine MSA). The branches are located in Racine County, WI, in a moderate-income census tract; Burlington County, WI in a middle-income census tract; and Waterford County, WI, in an upper-income census tract. The branch located in the moderate-income census tract opened on May 1, 2018, and is new since the previous evaluation. Additionally, the branch has a full service ATM. There are two branches located in a middle-income census tract. One branch does not have an ATM at its location; however, the second branch is a drive-thru only branch and has a full service ATM. The remaining branch is located in an upper-income census tract and has a full service ATM. The assessment area is comprised of 45 total census tracts and has not changed since the previous evaluation.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	0	0.0	0	0.0	6.7	5.9	5.0	1.8
Moderate	1	25.0	1	33.3	20.0	18.6	16.9	4.7
Middle	2	50.0	1	33.3	46.7	54.0	55.4	50.3
Upper	1	25.0	1	33.3	20.0	21.2	20.0	43.3
Unknown	0	0.0	0	0.0	6.7	0.3	2.7	0.0
Total	4	100.0	3	100.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranks the bank sixth out of 16 institutions in the assessment area, with 5.0 percent of deposits. The bank, with a total of two loans, ranked 62nd in originations and purchases of HMDA-reportable loans in 2016 out of 262 HMDA reporters originating loans in the assessment area. The bank, with a total of 42 loans, ranked 16th among 71 area CRA reporters in CRA-reportable originations and purchases in 2016. This is also reasonable, as the institution is primarily a commercial lender.

Based on the 2016 census data, the assessment area is home to 50,561 families; of these families, 8.1 percent are living in poverty. Based on family income, low- and moderate-income families represent 37.6 percent of all families living in the assessment area. In addition, the assessment area contains 81,565 housing units, 64.8 percent of which are owner-occupied, 27.8 percent are rental units, and 7.4 percent are vacant. Based on this data, there are various opportunities within the assessment area to meet the credit needs of borrowers of different income levels.

According to 2016 Dun and Bradstreet information, businesses with \$1 million or less in total annual revenue represent 89.2 percent of all businesses in the assessment area, and small farms

with revenues of \$1 million or less in total annual revenue represent 97.1 percent of farms in the assessment area. This indicates ample opportunities within the assessment area to meet the credit needs of small businesses and small farms of different revenue sizes.

The assessment area was comprised of 45 census tracts in 2016, of which nine were low- and moderate-income tracts. The median family income levels 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 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Below is a table showing changes made between 2016 and 2017 in regard to the income designation of census tracts, followed by a table displaying 2016 demographic data for the assessment area.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2017 Designations (#)	Net Change (#)
Low	2	3	1
Moderate	7	9	2
Middle	23	21	-2
Upper	12	9	-3
Unknown	1	3	2
Total	45	45	0
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</i>			

Assessment Area: 2016 Racine, WI MSA 39540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.4	2,012	4.0	804	40.0	10,467	20.7
Moderate-income	7	15.6	6,592	13.0	1,190	18.1	8,539	16.9
Middle-income	23	51.1	27,053	53.5	1,761	6.5	11,616	23.0
Upper-income	12	26.7	14,904	29.5	352	2.4	19,939	39.4
Unknown-income	1	2.2	0	0.0	0	0.0	0	0.0
Total Assessment Area	45	100.0	50,561	100.0	4,107	8.1	50,561	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,752	1,170	2.2	31.2	2,004	53.4	578	15.4
Moderate-income	12,340	5,677	10.7	46.0	5,515	44.7	1,148	9.3
Middle-income	43,315	29,009	54.9	67.0	11,482	26.5	2,824	6.5
Upper-income	22,158	16,977	32.1	76.6	3,712	16.8	1,469	6.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	81,565	52,833	100.0	64.8	22,713	27.8	6,019	7.4
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	264	3.9	224	3.7	39	5.8	1	1.7
Moderate-income	710	10.5	621	10.3	80	11.9	9	15.5
Middle-income	3,679	54.2	3,275	54.1	373	55.3	31	53.4
Upper-income	2,133	31.4	1,934	31.9	182	27.0	17	29.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,786	100.0	6,054	100.0	674	100.0	58	100.0
	Percentage of Total Businesses:		89.2		9.9		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1	0.6	1	0.6	0	0.0	0	0.0
Moderate-income	5	2.9	5	3.0	0	0.0	0	0.0
Middle-income	89	52.0	85	51.2	4	80.0	0	0.0
Upper-income	76	44.4	75	45.2	1	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	171	100.0	166	100.0	5	100.0	0	0.0
	Percentage of Total Businesses:		97.1		2.9		0.0	
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS RACINE, WI MSA #39540

Town Bank’s performance in the lending is below the full scope assessment areas performance due to the adequate level of qualified community development lending. The bank’s performance in the investment and service tests in the Racine MSA is consistent with the full scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
RACINE, WI MSA	Below	Consistent	Consistent

Qualified Community Development Loans \$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/ Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Racine MSA	2	1,183	0	0	0	0	1	810	3	1,993

Community Development Investments \$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current Period	1	1,000	2	1,250	0	0	0	0	3	2,250
Prior Period	0	0	0	0	0	0	0	0	0	0
Total	1	1,000	2	1,250	0	0	0	0	3	2,250

Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	2	1,250	6	7,547	5	7,450	1	750	14	16,997

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/ Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
Racine MSA	44	198	52	16	310	34

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Racine, WI MSA 39540								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.5	0	0.0	0.3	2.2
	Moderate	2	22.2	8.1	136	8.5	4.5	10.7
	Middle	6	66.7	56.8	1,236	77.0	53.6	54.9
	Upper	1	11.1	34.6	233	14.5	41.6	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		9	100.0	100.0	1,605	100.0	100.0
Refinance	Low	0	0.0	0.9	0	0.0	0.3	2.2
	Moderate	0	0.0	6.8	0	0.0	4.0	10.7
	Middle	5	83.3	51.9	1,403	81.2	47.4	54.9
	Upper	1	16.7	40.4	325	18.8	48.2	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		6	100.0	100.0	1,728	100.0	100.0
Home Improvement	Low	0	0.0	0.8	0	0.0	0.1	2.2
	Moderate	0	0.0	8.0	0	0.0	3.1	10.7
	Middle	0	0.0	53.1	0	0.0	39.2	54.9
	Upper	1	100.0	38.2	154	100.0	57.7	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	154	100.0	100.0
Multi-Family	Low	0	0.0	5.1	0	0.0	1.0	Multi-Family 2.3
	Moderate	0	0.0	15.4	0	0.0	5.1	21.9
	Middle	0	0.0	46.2	0	0.0	50.3	49.6
	Upper	0	0.0	33.3	0	0.0	43.7	26.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.7	0	0.0	0.3	2.2
	Moderate	2	12.5	7.5	136	3.9	4.3	10.7
	Middle	11	68.8	54.3	2,639	75.7	50.4	54.9
	Upper	3	18.8	37.4	712	20.4	45.0	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		16	100.0	100.0	3,487	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2016 Racine, WI MSA 39540								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2016						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	4	12.1	3.8	93	1.6	3.6	3.9
	Moderate	0	0.0	8.3	0	0.0	10.7	10.5
	Middle	7	21.2	52.4	917	16.0	51.4	54.2
	Upper	22	66.7	34.5	4,705	82.3	34.0	31.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.0			0.3	
	Total		33	100.0	100.0	5,715	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2016 Racine, WI MSA 39540								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2016						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.6
	Moderate	0	0.0	0.0	0	0.0	0.0	2.9
	Middle	3	33.3	48.9	295	40.1	53.6	52.0
	Upper	6	66.7	51.1	440	59.9	46.4	44.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total		9	100.0	100.0	735	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 Racine, WI MSA 39540								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			2016			
		Count		Agg	Dollar		Agg	
#	%	%	Bank	Agg	Bank	Agg	%	
			(\$000s)	\$ %	\$ %			
Home Purchase	Low	1	11.1	10.0	117	7.3	5.0	20.7
	Moderate	2	22.2	22.1	164	10.2	16.4	16.9
	Middle	0	0.0	24.8	0	0.0	24.8	23.0
	Upper	5	55.6	31.0	1,221	76.1	42.4	39.4
	Unknown	1	11.1	12.1	103	6.4	11.4	0.0
	Total	9	100.0	100.0	1,605	100.0	100.0	100.0
Refinance	Low	0	0.0	5.9	0	0.0	3.0	20.7
	Moderate	0	0.0	14.2	0	0.0	9.9	16.9
	Middle	0	0.0	21.2	0	0.0	19.2	23.0
	Upper	4	66.7	39.4	1,342	77.7	47.7	39.4
	Unknown	2	33.3	19.3	386	22.3	20.2	0.0
	Total	6	100.0	100.0	1,728	100.0	100.0	100.0
Home Improvement	Low	0	0.0	7.3	0	0.0	3.8	20.7
	Moderate	0	0.0	24.0	0	0.0	11.8	16.9
	Middle	1	100.0	24.0	154	100.0	21.6	23.0
	Upper	0	0.0	42.4	0	0.0	59.7	39.4
	Unknown	0	0.0	2.3	0	0.0	3.1	0.0
	Total	1	100.0	100.0	154	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.9
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	0.0	0	0.0	0.0	39.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	1	6.3	7.9	117	3.4	3.8	20.7
	Moderate	2	12.5	18.4	164	4.7	12.7	16.9
	Middle	1	6.3	23.0	154	4.4	21.1	23.0
	Upper	9	56.3	35.2	2,563	73.5	43.2	39.4
	Unknown	3	18.8	15.6	489	14.0	19.2	0.0
	Total	16	100.0	100.0	3,487	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2016 Racine, WI MSA 39540									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar			Total Businesses		
		#	%	Agg %	2016				
Bank	Agg				Bank	Agg	%		
					\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	23	69.7	44.4	1,755	30.7	29.4	89.2
		Over \$1 Million or Unknown	10	30.3	55.6	3,960	69.3	70.6	10.8
		Total	33	100.0	100.0	5,715	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	23	69.7	89.5	513	9.0	26.5	
		\$100,001 - \$250,000	2	6.1	5.2	245	4.3	17.4	
		\$250,001 - \$1 Million	8	24.2	5.3	4,957	86.7	56.0	
		Total	33	100.0	100.0	5,715	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	20	87.0		389	22.2		
		\$100,001 - \$250,000	1	4.3		120	6.8		
		\$250,001 - \$1 Million	2	8.7		1,246	71.0		
		Total	23	100.0		1,755	100.0		
	Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2016 Racine, WI MSA 39540									
Product Type		Bank & Aggregate Lending Comparison							
		Count		Dollar			Total Farms		
		#	%	Agg %	2016				
Bank	Agg				Bank	Agg	%		
					\$ 000s	\$ %	\$ %		
Small Farm	Revenue	\$1 Million or Less	8	88.9	60.0	485	66.0	54.3	97.1
		Over \$1 Million or Unknown	1	11.1	40.0	250	34.0	45.7	2.9
		Total	9	100.0	100.0	735	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	7	77.8	77.8	315	42.9	24.9	
		\$100,001 - \$250,000	2	22.2	20.0	420	57.1	64.8	
		\$250,001 - \$500,000	0	0.0	2.2	0	0.0	10.4	
		Total	9	100.0	100.0	735	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	7	87.5		315	64.9		
		\$100,001 - \$250,000	1	12.5		170	35.1		
		\$250,001 - \$500,000	0	0.0		0	0.0		
		Total	8	100.0		485	100.0		
	Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

NON-MSA WISCONSIN SOUTH CENTRAL, LAFAYETTE COUNTY - Limited Review

SCOPE OF THE EXAMINATION

The scope was consistent with the overall scope of the examination described within the institution summary.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-MSA WI SOUTH CENTRAL ASSESSMENT AREA

The bank has one retail office with a full service ATM on location in the Non-MSA South Central Wisconsin, Lafayette County (South Central Non-MSA) assessment area. The branch is located in Darlington, WI, in a middle-income census tract and has been there since the previous evaluation. The assessment area is comprised of a total of five middle-income census tracts, all of which were considered underserved due to the area's remote nature for both 2016 and 2017 according to the Federal Financial Institutions Examination Council. This assessment area has not changed since the previous evaluation.

Distribution of Branches and ATMs (Full Service ATMs Only)								
Tract Income Level	Number of Branches	Percent of Branches	Number of ATMs	Percent of ATMs	Percent of Tracts	Percent of Families	Percent of Businesses	Percent of Farms
Low	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Middle	1	100.0	1	100.0	100.0	100.0	100.0	100.0
Upper	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0	0.0	0.0	0.0
Total	1	100.0	1	100.0	100.0	100.0	100.0	100.0

The most recent available FDIC Deposit Market Share Report, as of June 30, 2017, ranks the bank sixth out of 8 institutions in the assessment area, with 6.6 percent of deposits. The bank was not ranked among the 75 HMDA reporters originating loans in the assessment area in 2016; however, the bank originated four HMDA-reportable loans that year. The bank, with a total of 69 loans, ranked first among 28 area CRA reporters in CRA-reportable originations and purchases in 2016. This is reasonable, as the institution is primarily a commercial lender.

Based on the 2016 census data, the assessment area is home to 4,522 families; of these families, 5.7 percent are living in poverty. Based on family income, low- and moderate-income families represent 34.7 percent of all families living in the assessment area. In addition, the assessment area contains 7,167 housing units, 72.2 percent of which are owner-occupied, 19.0 percent are rental units, and 8.8 percent are vacant. Based on this data, there are various opportunities within the assessment area to meet the credit needs of borrowers of different income levels.

According to 2016 Dun and Bradstreet information, businesses with \$1 million or less in total annual revenue represent 90.3 percent of all businesses in the assessment area, and small farms with revenues of \$1 million or less in total annual revenue represent 99.0 percent of farms in the assessment area. This indicates ample opportunities within the assessment area to meet the credit needs of small businesses and small farms of different revenue sizes.

The assessment area was comprised of five census tracts in 2016, none of which were low- or moderate-income tracts. The median family income levels 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 2016 and 2017. Accordingly, lending activity that took place in calendar years up to and including 2016 are evaluated based on ACS income level definitions from the five-year survey data set 2006-2010. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. However, the income designation for all five census tracts remained unchanged from 2016 to 2017. Additional 2016 demographic data for the assessment area is below.

Assessment Area: 2016 WI Non MSA - Lafayette County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	677	15.0
Moderate-income	0	0.0	0	0.0	0	0.0	892	19.7
Middle-income	5	100.0	4,522	100.0	259	5.7	1,236	27.3
Upper-income	0	0.0	0	0.0	0	0.0	1,717	38.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5	100.0	4,522	100.0	259	5.7	4,522	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	7,167	5,174	100.0	72.2	1,359	19.0	634	8.8
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	7,167	5,174	100.0	72.2	1,359	19.0	634	8.8
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	739	100.0	667	100.0	44	100.0	28	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	739	100.0	667	100.0	44	100.0	28	100.0
	Percentage of Total Businesses:			90.3		6.0		3.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
#		%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	301	100.0	298	100.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	301	100.0	298	100.0	3	100.0	0	0.0
Percentage of Total Businesses:			99.0		1.0		0.0	
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NON-MSA SOUTH CENTRAL WI ASSESSMENT AREA

Town Bank’s performance in the lending and service tests in the South Central Non-MSA is consistent with the full scope assessment areas. The bank’s performance in the investment test is below the full scope assessment area performance due to the adequate level of qualified community development investments and grants.

Assessment Area	Lending Test	Investment Test	Service Test
NON-MSA SOUTH CENTRAL WI	Consistent	Below	Consistent

Qualified Community Development Loans \$ in 000s										
Location	Affordable Housing		Community Services		Economic Development		Revitalization/ Stabilization		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
South Central Non-MSA	0	0	0	0	12	12,443	1	123	13	12,566

Community Development Investments \$ in 000s										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Current Period	0	0	0	0	0	0	2	880	2	880
Prior Period	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	2	880	2	880

Community Development Grants										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Grants	0	0	8	5,900	5	4,025	0	0	13	9,925

Qualified Community Development Services						
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/ Stabilize	Total	
	Hours	Hours	Hours	Hours	Hours	# Events
South Central Non-MSA	0	87	25	0	112	11

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2016 WI Non MSA - Lafayette County								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2016			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	160	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	160	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	65	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	65	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	100.0	225	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	225	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2016 WI Non MSA - Lafayette County								
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Businesses	
		2016						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	7	100.0	97.0	493	100.0	95.1	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			3.0			4.9	
	Total	7	100.0	100.0	493	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2016 WI Non MSA - Lafayette County								
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Farms	
		2016						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	62	100.0	100.0	7,958	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total	62	100.0	100.0	7,958	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

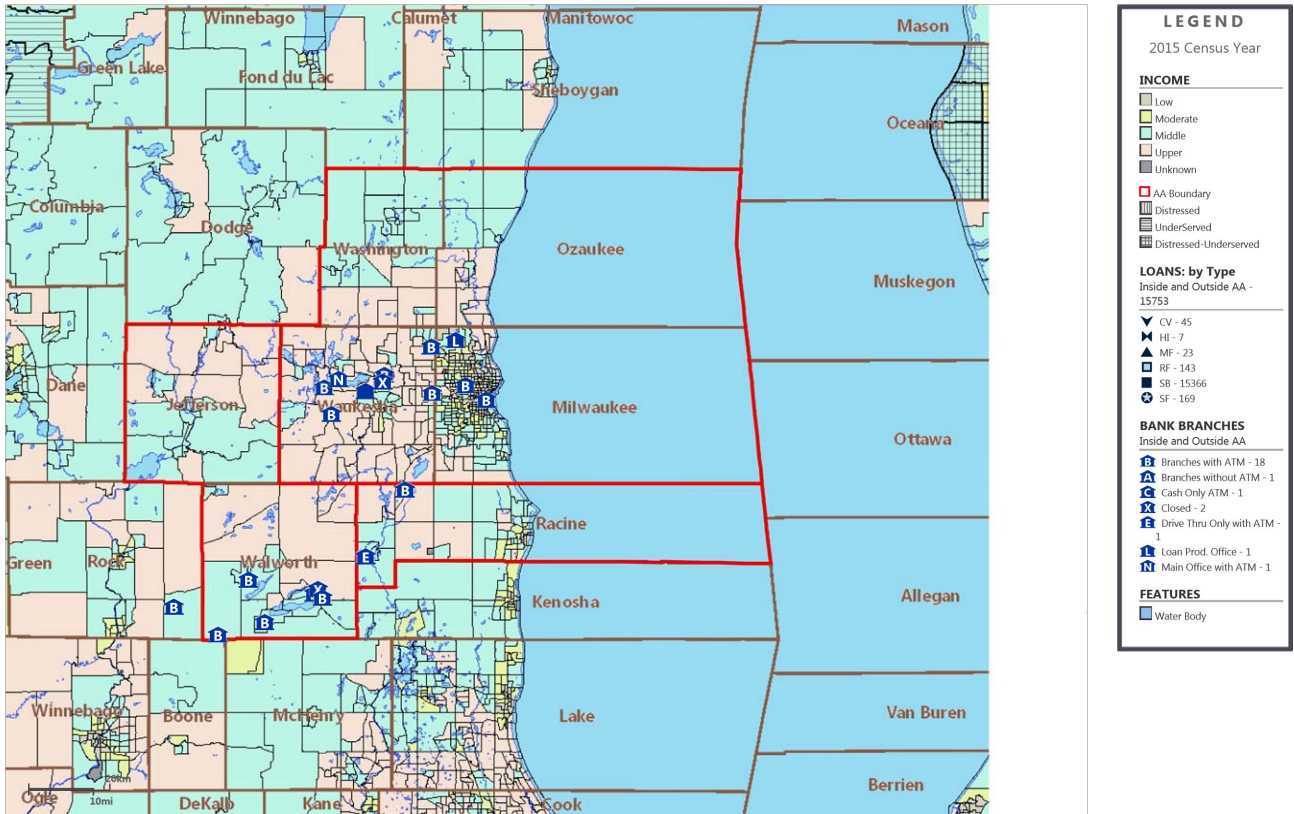
Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2016 WI Non MSA - Lafayette County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2016			2016			
		Count		Agg	Dollar		Agg	
#	%	%	Bank	Agg	Bank	Agg		
					\$(000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	8.8	0	0.0	5.2	15.0
	Moderate	0	0.0	23.1	0	0.0	16.0	19.7
	Middle	1	100.0	24.4	160	100.0	24.2	27.3
	Upper	0	0.0	36.9	0	0.0	48.0	38.0
	Unknown	0	0.0	6.9	0	0.0	6.6	0.0
	Total	1	100.0	100.0	160	100.0	100.0	100.0
Refinance	Low	0	0.0	4.7	0	0.0	1.8	15.0
	Moderate	1	100.0	13.0	65	100.0	6.7	19.7
	Middle	0	0.0	22.9	0	0.0	13.7	27.3
	Upper	0	0.0	52.6	0	0.0	68.0	38.0
	Unknown	0	0.0	6.8	0	0.0	9.7	0.0
	Total	1	100.0	100.0	65	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	15.0
	Moderate	0	0.0	30.0	0	0.0	19.6	19.7
	Middle	0	0.0	15.0	0	0.0	6.1	27.3
	Upper	0	0.0	45.0	0	0.0	67.6	38.0
	Unknown	0	0.0	10.0	0	0.0	6.6	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	15.0
	Moderate	0	0.0	0.0	0	0.0	0.0	19.7
	Middle	0	0.0	0.0	0	0.0	0.0	27.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.0
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	6.2	0	0.0	3.1	15.0
	Moderate	1	50.0	18.2	65	28.9	10.6	19.7
	Middle	1	50.0	23.1	160	71.1	17.5	27.3
	Upper	0	0.0	45.3	0	0.0	60.2	38.0
	Unknown	0	0.0	7.2	0	0.0	8.6	0.0
	Total	2	100.0	100.0	225	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2016 WI Non MSA - Lafayette County									
Product Type		Bank & Aggregate Lending Comparison							
		2016			2016			Total Businesses %	
		Count		Agg %	Dollar		Agg %		
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	4	57.1	42.9	63	12.8	24.3	90.3
		Over \$1 Million or Unknown	3	42.9	57.1	430	87.2	75.7	9.7
		Total	7	100.0	100.0	493	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	5	71.4	97.6	113	22.9	61.5	
		\$100,001 - \$250,000	2	28.6	1.8	380	77.1	16.5	
		\$250,001 - \$1 Million	0	0.0	0.6	0	0.0	22.0	
		Total	7	100.0	100.0	493	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	4	100.0		63	100.0		
		\$100,001 - \$250,000	0	0.0		0	0.0		
		\$250,001 - \$1 Million	0	0.0		0	0.0		
		Total	4	100.0		63	100.0		
	Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

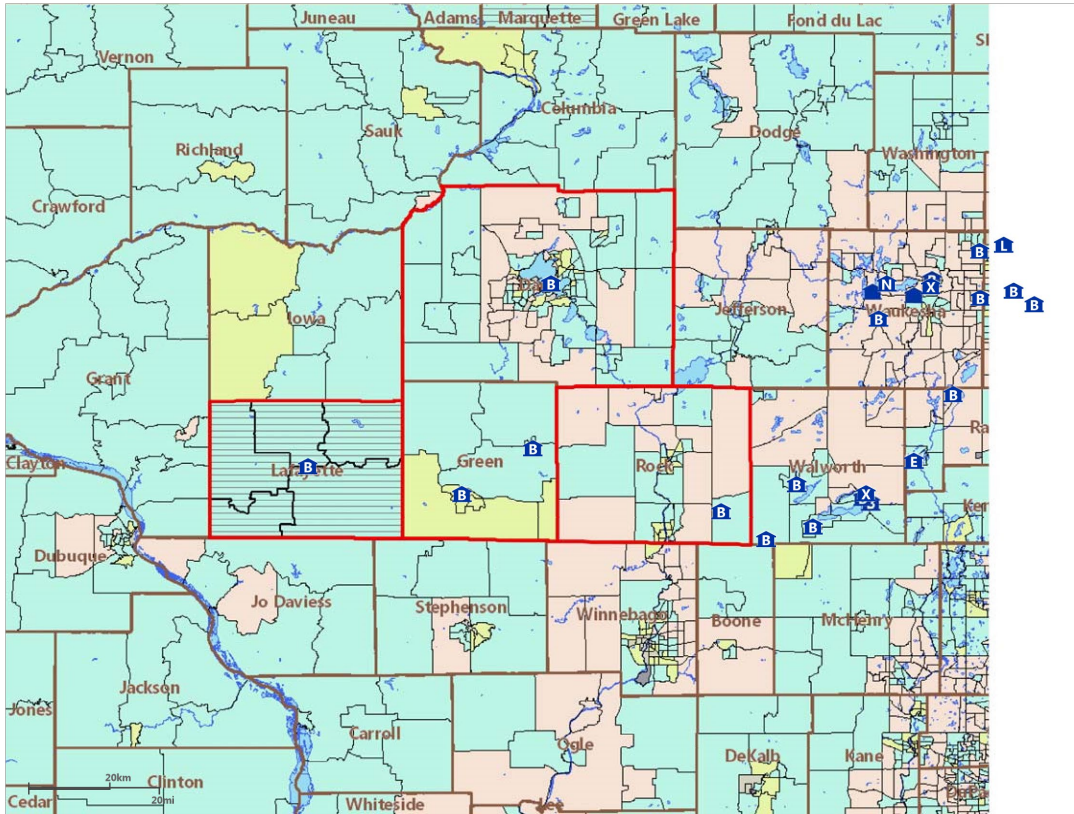
Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2016 WI Non MSA - Lafayette County									
Product Type		Bank & Aggregate Lending Comparison							
		2016			2016			Total Farms %	
		Count		Agg %	Dollar		Agg %		
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	58	93.5	65.0	7,078	88.9	72.5	99.0
		Over \$1 Million or Unknown	4	6.5	35.0	880	11.1	27.5	1.0
		Total	62	100.0	100.0	7,958	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	36	58.1	68.3	1,456	18.3	19.1	
		\$100,001 - \$250,000	14	22.6	17.5	2,357	29.6	30.7	
		\$250,001 - \$500,000	12	19.4	14.2	4,145	52.1	50.2	
		Total	62	100.0	100.0	7,958	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	35	60.3		1,443	20.4		
		\$100,001 - \$250,000	13	22.4		2,107	29.8		
		\$250,001 - \$500,000	10	17.2		3,528	49.8		
		Total	58	100.0		7,078	100.0		
	Originations & Purchases								
2016 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

APPENDIX A – Maps of Assessment Areas

Town Bank Combined Assessment Area- East Wisconsin



Town Bank Combined Assessment Area- West Wisconsin



LEGEND
2015 Census Year

INCOME

- Low
- Moderate
- Middle
- Upper
- Unknown

AA Boundary

- Distressed
- UnderServed
- Distressed-UnderServed

LOANS: by Type
Inside and Outside AA - 15753

- CV - 45
- HI - 7
- MF - 23
- RF - 143
- SB - 15366
- SF - 169

BANK BRANCHES
Inside and Outside AA

- Branches with ATM - 18
- Branches without ATM - 1
- Cash Only ATM - 1
- Closed - 2
- Drive Thru Only with ATM - 1
- Loan Prod. Office - 1
- Main Office with ATM - 1

FEATURES

- Water Body

APPENDIX B – 2017 Demographic and Lending Data

Full-Scope Assessment Areas

Janesville MSA

Assessment Area: 2017 Janesville-Beloit, WI MSA 27500								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	537	1.3	242	45.1	8,716	20.7
Moderate-income	13	34.2	10,482	24.9	2,442	23.3	7,656	18.2
Middle-income	15	39.5	18,484	43.9	1,627	8.8	9,077	21.6
Upper-income	9	23.7	12,596	29.9	555	4.4	16,650	39.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	42,099	100.0	4,866	11.6	42,099	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,124	349	0.8	31.0	577	51.3	198	17.6
Moderate-income	18,979	9,432	21.4	49.7	7,931	41.8	1,616	8.5
Middle-income	29,595	20,401	46.2	68.9	7,656	25.9	1,538	5.2
Upper-income	18,634	13,995	31.7	75.1	3,504	18.8	1,135	6.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	68,332	44,177	100.0	64.7	19,668	28.8	4,487	6.6
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	74	1.4	66	1.4	7	1.4	1	2.0
Moderate-income	1,375	26.1	1,211	25.6	154	31.0	10	20.4
Middle-income	2,083	39.5	1,914	40.5	149	30.0	20	40.8
Upper-income	1,735	32.9	1,531	32.4	186	37.5	18	36.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,267	100.0	4,722	100.0	496	100.0	49	100.0
	Percentage of Total Businesses:			89.7		9.4		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	8	2.5	8	2.5	0	0.0	0	0.0
Middle-income	128	39.3	126	39.5	2	28.6	0	0.0
Upper-income	190	58.3	185	58.0	5	71.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	326	100.0	319	100.0	7	100.0	0	0.0
	Percentage of Total Businesses:			97.9		2.1		0.0

2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017		2017		
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	0.8
	Moderate	0	0.0	0	0.0	21.4
	Middle	0	0.0	0	0.0	46.2
	Upper	0	0.0	0	0.0	31.7
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Refinance	Low	0	0.0	0	0.0	0.8
	Moderate	76	87.4	3,166	79.9	21.4
	Middle	11	12.6	798	20.1	46.2
	Upper	0	0.0	0	0.0	31.7
	Unknown	0	0.0	0	0.0	0.0
	Total		87	100.0	3,964	100.0
Home Improvement	Low	0	0.0	0	0.0	0.8
	Moderate	0	0.0	0	0.0	21.4
	Middle	0	0.0	0	0.0	46.2
	Upper	0	0.0	0	0.0	31.7
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	Multi-Family 0.7
	Moderate	1	100.0	105	100.0	36.6
	Middle	0	0.0	0	0.0	46.1
	Upper	0	0.0	0	0.0	16.6
	Unknown	0	0.0	0	0.0	0.0
	Total		1	100.0	105	100.0
HMDA Totals	Low	0	0.0	0	0.0	0.8
	Moderate	77	87.5	3,271	80.4	21.4
	Middle	11	12.5	798	19.6	46.2
	Upper	0	0.0	0	0.0	31.7
	Unknown	0	0.0	0	0.0	0.0
	Total		88	100.0	4,069	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	1	5.0	1	0.1	1.4
	Moderate	4	20.0	83	10.8	26.1
	Middle	14	70.0	585	76.1	39.5
	Upper	1	5.0	100	13.0	32.9
	Unknown	0	0.0	0	0.0	0.0
	Total		20	100.0	769	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	2.5
	Middle	9	36.0	617	20.3	39.3
	Upper	16	64.0	2,422	79.7	58.3
	Unknown	0	0.0	0	0.0	0.0
	Total		25	100.0	3,039	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	20.7
	Moderate	0	0.0	0	0.0	18.2
	Middle	0	0.0	0	0.0	21.6
	Upper	0	0.0	0	0.0	39.5
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Refinance	Low	0	0.0	0	0.0	20.7
	Moderate	0	0.0	0	0.0	18.2
	Middle	0	0.0	0	0.0	21.6
	Upper	0	0.0	0	0.0	39.5
	Unknown	87	100.0	3,964	100.0	0.0
	Total		87	100.0	3,964	100.0
Home Improvement	Low	0	0.0	0	0.0	20.7
	Moderate	0	0.0	0	0.0	18.2
	Middle	0	0.0	0	0.0	21.6
	Upper	0	0.0	0	0.0	39.5
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	20.7
	Moderate	0	0.0	0	0.0	18.2
	Middle	0	0.0	0	0.0	21.6
	Upper	0	0.0	0	0.0	39.5
	Unknown	1	100.0	105	100.0	0.0
	Total		1	100.0	105	100.0
HMDA Totals	Low	0	0.0	0	0.0	20.7
	Moderate	0	0.0	0	0.0	18.2
	Middle	0	0.0	0	0.0	21.6
	Upper	0	0.0	0	0.0	39.5
	Unknown	88	100.0	4,069	100.0	0.0
	Total		88	100.0	4,069	100.0
Originations and Purchases						
2017 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Businesses	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	13	65.0	424	55.1	89.7
		Over \$1 Million or Unknown	7	35.0	345	44.9	10.3
		Total	20	100.0	769	100.0	100.0
Small Business	Loan Size	\$100,000 or Less	18	90.0	523	68.0	
		\$100,001 - \$250,000	2	10.0	246	32.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	20	100.0	769	100.0	
Small Business	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	92.3	304	71.7	
		\$100,001 - \$250,000	1	7.7	120	28.3	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	13	100.0	424	100.0	
Originations & Purchases							
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2017 Janesville-Beloit, WI MSA 27500							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Farms	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	18	72.0	1,653	54.4	97.9
		Over \$1 Million or Unknown	7	28.0	1,386	45.6	2.1
		Total	25	100.0	3,039	100.0	100.0
Small Farm	Loan Size	\$100,000 or Less	18	72.0	747	24.6	
		\$100,001 - \$250,000	3	12.0	569	18.7	
		\$250,001 - \$500,000	4	16.0	1,723	56.7	
		Total	25	100.0	3,039	100.0	
Small Farm	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	15	83.3	638	38.6	
		\$100,001 - \$250,000	1	5.6	190	11.5	
		\$250,001 - \$500,000	2	11.1	825	49.9	
		Total	18	100.0	1,653	100.0	
Originations & Purchases							
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Milwaukee MSA

Assessment Area: 2017 Milwaukee-Waukesha-West Allis, WI MSA 33340								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	99	23.0	55,507	14.3	21,425	38.6	91,092	23.5
Moderate-income	68	15.8	52,916	13.6	9,611	18.2	62,808	16.2
Middle-income	139	32.3	131,758	33.9	8,381	6.4	75,400	19.4
Upper-income	122	28.3	148,028	38.1	3,857	2.6	158,909	40.9
Unknown-income	3	0.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	431	100.0	388,209	100.0	43,274	11.1	388,209	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	107,954	27,582	7.3	25.5	63,396	58.7	16,976	15.7
Moderate-income	101,593	44,855	11.9	44.2	49,497	48.7	7,241	7.1
Middle-income	237,589	136,495	36.2	57.5	89,277	37.6	11,817	5.0
Upper-income	224,332	167,637	44.5	74.7	45,407	20.2	11,288	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	671,468	376,569	100.0	56.1	247,577	36.9	47,322	7.0
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,668	10.3	4,892	10.3	752	10.1	24	6.1
Moderate-income	6,388	11.6	5,598	11.8	770	10.3	20	5.1
Middle-income	19,922	36.1	17,041	35.9	2,726	36.6	155	39.4
Upper-income	23,244	42.1	19,860	41.9	3,190	42.9	194	49.4
Unknown-income	23	0.0	19	0.0	4	0.1	0	0.0
Total Assessment Area	55,245	100.0	47,410	100.0	7,442	100.0	393	100.0
	Percentage of Total Businesses:		85.8		13.5		0.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
#		%	#	%	#	%	#	%
Low-income	8	1.5	8	1.6	0	0.0	0	0.0
Moderate-income	15	2.8	14	2.7	1	7.7	0	0.0
Middle-income	245	46.4	240	46.6	5	38.5	0	0.0
Upper-income	260	49.2	253	49.1	7	53.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	528	100.0	515	100.0	13	100.0	0	0.0
Percentage of Total Businesses:		97.5		2.5		0.0		
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Milwaukee-Waukesha-West Allis, WI MSA 33340						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017				
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	7	43.8	529	13.7	7.3
	Moderate	2	12.5	117	3.0	11.9
	Middle	4	25.0	377	9.8	36.2
	Upper	3	18.8	2,840	73.5	44.5
	Unknown	0	0.0	0	0.0	0.0
	Total		16	100.0	3,863	100.0
Refinance	Low	10	32.3	636	7.3	7.3
	Moderate	6	19.4	1,429	16.4	11.9
	Middle	6	19.4	1,703	19.5	36.2
	Upper	9	29.0	4,951	56.8	44.5
	Unknown	0	0.0	0	0.0	0.0
	Total		31	100.0	8,719	100.0
Home Improvement	Low	0	0.0	0	0.0	7.3
	Moderate	0	0.0	0	0.0	11.9
	Middle	1	33.3	25	1.8	36.2
	Upper	2	66.7	1,343	98.2	44.5
	Unknown	0	0.0	0	0.0	0.0
	Total		3	100.0	1,368	100.0
Multi-Family	Low	2	25.0	795	35.8	Multi-Family 17.8
	Moderate	2	25.0	308	13.9	15.1
	Middle	4	50.0	1,115	50.3	40.8
	Upper	0	0.0	0	0.0	26.2
	Unknown	0	0.0	0	0.0	0.0
	Total		8	100.0	2,218	100.0
HMDA Totals	Low	19	32.8	1,960	12.1	7.3
	Moderate	10	17.2	1,854	11.5	11.9
	Middle	15	25.9	3,220	19.9	36.2
	Upper	14	24.1	9,134	56.5	44.5
	Unknown	0	0.0	0	0.0	0.0
	Total		58	100.0	16,168	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 Milwaukee-Waukesha-West Allis, WI MSA 33340						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	51	8.9	8,397	8.1	10.3
	Moderate	66	11.5	11,590	11.2	11.6
	Middle	164	28.5	38,160	37.0	36.1
	Upper	294	51.1	45,112	43.7	42.1
	Unknown	0	0.0	0	0.0	0.0
	Total	575	100.0	103,259	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Milwaukee-Waukesha-West Allis, WI MSA 33340						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	8	50.0	569	14.7	23.5
	Moderate	3	18.8	309	8.0	16.2
	Middle	0	0.0	0	0.0	19.4
	Upper	1	6.3	2,280	59.0	40.9
	Unknown	4	25.0	705	18.3	0.0
	Total		16	100.0	3,863	100.0
Refinance	Low	0	0.0	0	0.0	23.5
	Moderate	0	0.0	0	0.0	16.2
	Middle	0	0.0	0	0.0	19.4
	Upper	5	16.1	2,102	24.1	40.9
	Unknown	26	83.9	6,617	75.9	0.0
	Total		31	100.0	8,719	100.0
Home Improvement	Low	0	0.0	0	0.0	23.5
	Moderate	0	0.0	0	0.0	16.2
	Middle	0	0.0	0	0.0	19.4
	Upper	2	66.7	1,343	98.2	40.9
	Unknown	1	33.3	25	1.8	0.0
	Total		3	100.0	1,368	100.0
Multi-Family	Low	0	0.0	0	0.0	23.5
	Moderate	0	0.0	0	0.0	16.2
	Middle	0	0.0	0	0.0	19.4
	Upper	0	0.0	0	0.0	40.9
	Unknown	8	100.0	2,218	100.0	0.0
	Total		8	100.0	2,218	100.0
HMDA Totals	Low	8	13.8	569	3.5	23.5
	Moderate	3	5.2	309	1.9	16.2
	Middle	0	0.0	0	0.0	19.4
	Upper	8	13.8	5,725	35.4	40.9
	Unknown	39	67.2	9,565	59.2	0.0
	Total		58	100.0	16,168	100.0
Originations and Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2017 Milwaukee-Waukesha-West Allis, WI MSA 33340							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Businesses %	
Revenue	Loan Size	Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	\$1 Million or Less Over \$1 Million or Unknown Total	294	51.1	26,041	25.2	85.8	
		281	48.9	77,218	74.8	14.2	
		575	100.0	103,259	100.0	100.0	
	\$100,000 or Less \$100,001 - \$250,000 \$250,001 - \$1 Million Total	336	58.4	8,240	8.0		
		98	17.0	17,659	17.1		
		141	24.5	77,360	74.9		
		575	100.0	103,259	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	227	77.2	4,605		17.7
		\$100,001 - \$250,000	32	10.9	5,352		20.6
		\$250,001 - \$1 Million	35	11.9	16,084		61.8
		294	100.0	26,041	100.0		
	Originations & Purchases						
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Non-MSA Southeast (Jefferson and Walworth Counties)

Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,136	14.9
Moderate-income	1	2.4	858	1.8	101	11.8	8,010	16.7
Middle-income	24	57.1	28,922	60.2	2,339	8.1	10,017	20.9
Upper-income	16	38.1	18,052	37.6	964	5.3	22,851	47.6
Unknown-income	1	2.4	182	0.4	106	58.2	0	0.0
Total Assessment Area	42	100.0	48,014	100.0	3,510	7.3	48,014	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,524	702	1.4	46.1	644	42.3	178	11.7
Middle-income	54,019	28,872	57.6	53.4	15,274	28.3	9,873	18.3
Upper-income	30,164	20,515	40.9	68.0	5,033	16.7	4,616	15.3
Unknown-income	1,208	69	0.1	5.7	952	78.8	187	15.5
Total Assessment Area	86,915	50,158	100.0	57.7	21,903	25.2	14,854	17.1
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	200	3.0	186	3.2	13	1.9	1	1.2
Middle-income	4,307	65.6	3,790	65.5	461	66.0	56	69.1
Upper-income	2,024	30.8	1,781	30.8	219	31.3	24	29.6
Unknown-income	38	0.6	32	0.6	6	0.9	0	0.0
Total Assessment Area	6,569	100.0	5,789	100.0	699	100.0	81	100.0
	Percentage of Total Businesses:			88.1		10.6		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	173	42.3	163	40.9	10	100.0	0	0.0
Upper-income	236	57.7	236	59.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	409	100.0	399	100.0	10	100.0	0	0.0
	Percentage of Total Businesses:			97.6		2.4		0.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017		2017		
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.4
	Middle	1	100.0	371	100.0	57.6
	Upper	0	0.0	0	0.0	40.9
	Unknown	0	0.0	0	0.0	0.1
	Total		1	100.0	371	100.0
Refinance	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.4
	Middle	6	85.7	427	84.2	57.6
	Upper	1	14.3	80	15.8	40.9
	Unknown	0	0.0	0	0.0	0.1
	Total		7	100.0	507	100.0
Home Improvement	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.4
	Middle	0	0.0	0	0.0	57.6
	Upper	0	0.0	0	0.0	40.9
	Unknown	0	0.0	0	0.0	0.1
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0	0.0	1.0
	Middle	0	0.0	0	0.0	70.5
	Upper	2	100.0	8,500	100.0	19.7
	Unknown	0	0.0	0	0.0	8.7
	Total		2	100.0	8,500	100.0
HMDA Totals	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.4
	Middle	7	70.0	798	8.5	57.6
	Upper	3	30.0	8,580	91.5	40.9
	Unknown	0	0.0	0	0.0	0.1
	Total		10	100.0	9,378	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	3.0
	Middle	64	72.7	8,648	75.0	65.6
	Upper	24	27.3	2,885	25.0	30.8
	Unknown	0	0.0	0	0.0	0.6
	Total	88	100.0	11,533	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	8	40.0	685	30.7	42.3
	Upper	12	60.0	1,545	69.3	57.7
	Unknown	0	0.0	0	0.0	0.0
	Total	20	100.0	2,230	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	14.9
	Moderate	0	0.0	0	0.0	16.7
	Middle	0	0.0	0	0.0	20.9
	Upper	1	100.0	371	100.0	47.6
	Unknown	0	0.0	0	0.0	0.0
	Total		1	100.0	371	100.0
Refinance	Low	0	0.0	0	0.0	14.9
	Moderate	0	0.0	0	0.0	16.7
	Middle	0	0.0	0	0.0	20.9
	Upper	0	0.0	0	0.0	47.6
	Unknown	7	100.0	507	100.0	0.0
	Total		7	100.0	507	100.0
Home Improvement	Low	0	0.0	0	0.0	14.9
	Moderate	0	0.0	0	0.0	16.7
	Middle	0	0.0	0	0.0	20.9
	Upper	0	0.0	0	0.0	47.6
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	14.9
	Moderate	0	0.0	0	0.0	16.7
	Middle	0	0.0	0	0.0	20.9
	Upper	0	0.0	0	0.0	47.6
	Unknown	2	100.0	8,500	100.0	0.0
	Total		2	100.0	8,500	100.0
HMDA Totals	Low	0	0.0	0	0.0	14.9
	Moderate	0	0.0	0	0.0	16.7
	Middle	0	0.0	0	0.0	20.9
	Upper	1	10.0	371	4.0	47.6
	Unknown	9	90.0	9,007	96.0	0.0
	Total		10	100.0	9,378	100.0
Originations and Purchases						
2017 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Businesses	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	51	58.0	5,367	46.5	88.1
		Over \$1 Million or Unknown	37	42.0	6,166	53.5	11.9
		Total	88	100.0	11,533	100.0	100.0
	Loan Size	\$100,000 or Less	57	64.8	1,858	16.1	
		\$100,001 - \$250,000	17	19.3	2,905	25.2	
		\$250,001 - \$1 Million	14	15.9	6,770	58.7	
		Total	88	100.0	11,533	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	38	74.5	1,165	21.7	
		\$100,001 - \$250,000	6	11.8	957	17.8	
		\$250,001 - \$1 Million	7	13.7	3,245	60.5	
		Total	51	100.0	5,367	100.0	
	Originations & Purchases						
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2017 WI Non MSA - Jefferson and Walworth Counties							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Farms	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	13	65.0	925	41.5	97.6
		Over \$1 Million or Unknown	7	35.0	1,305	58.5	2.4
		Total	20	100.0	2,230	100.0	100.0
	Loan Size	\$100,000 or Less	12	60.0	423	19.0	
		\$100,001 - \$250,000	6	30.0	1,098	49.2	
		\$250,001 - \$500,000	2	10.0	709	31.8	
		Total	20	100.0	2,230	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	69.2	218	23.6	
		\$100,001 - \$250,000	3	23.1	425	45.9	
		\$250,001 - \$500,000	1	7.7	282	30.5	
		Total	13	100.0	925	100.0	
	Originations & Purchases						
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Madison MSA (Dane and Green Counties)

Assessment Area: 2017 Madison, WI MSA 31540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.5	3,503	2.6	902	25.7	25,671	19.4
Moderate-income	22	19.1	18,030	13.6	2,593	14.4	22,576	17.1
Middle-income	54	47.0	72,714	55.0	3,975	5.5	30,300	22.9
Upper-income	29	25.2	37,733	28.5	920	2.4	53,723	40.6
Unknown-income	6	5.2	290	0.2	135	46.6	0	0.0
Total Assessment Area	115	100.0	132,270	100.0	8,525	6.4	132,270	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	7,961	1,011	0.8	12.7	6,648	83.5	302	3.8
Moderate-income	38,866	16,262	12.2	41.8	20,429	52.6	2,175	5.6
Middle-income	122,138	75,892	56.8	62.1	41,045	33.6	5,201	4.3
Upper-income	62,219	40,365	30.2	64.9	19,570	31.5	2,284	3.7
Unknown-income	5,156	20	0.0	0.4	4,691	91.0	445	8.6
Total Assessment Area	236,340	133,550	100.0	56.5	92,383	39.1	10,407	4.4
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	506	2.0	429	1.9	76	3.0	1	0.4
Moderate-income	4,134	16.0	3,563	15.5	532	21.0	39	16.3
Middle-income	12,471	48.4	11,264	48.9	1,106	43.7	101	42.1
Upper-income	8,270	32.1	7,395	32.1	778	30.8	97	40.4
Unknown-income	402	1.6	363	1.6	37	1.5	2	0.8
Total Assessment Area	25,783	100.0	23,014	100.0	2,529	100.0	240	100.0
	Percentage of Total Businesses:			89.3		9.8		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	1	0.1	1	0.1	0	0.0	0	0.0
Moderate-income	142	12.7	139	12.6	3	15.0	0	0.0
Middle-income	661	59.0	654	59.4	7	35.0	0	0.0
Upper-income	316	28.2	306	27.8	10	50.0	0	0.0
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
Total Assessment Area	1,121	100.0	1,101	100.0	20	100.0	0	0.0
	Percentage of Total Businesses:			98.2		1.8		0.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Madison, WI MSA 31540						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017				
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	2	8.7	201	2.2	0.8
	Moderate	3	13.0	514	5.7	12.2
	Middle	7	30.4	1,608	17.9	56.8
	Upper	11	47.8	6,636	74.1	30.2
	Unknown	0	0.0	0	0.0	0.0
	Total		23	100.0	8,959	100.0
Refinance	Low	1	16.7	75	3.8	0.8
	Moderate	2	33.3	983	49.4	12.2
	Middle	2	33.3	435	21.8	56.8
	Upper	1	16.7	498	25.0	30.2
	Unknown	0	0.0	0	0.0	0.0
	Total		6	100.0	1,991	100.0
Home Improvement	Low	0	0.0	0	0.0	0.8
	Moderate	1	25.0	485	24.0	12.2
	Middle	2	50.0	1,318	65.2	56.8
	Upper	1	25.0	220	10.9	30.2
	Unknown	0	0.0	0	0.0	0.0
	Total		4	100.0	2,023	100.0
Multi-Family	Low	0	0.0	0	0.0	Multi-Family 7.1
	Moderate	0	0.0	0	0.0	21.1
	Middle	2	50.0	4,005	43.0	42.1
	Upper	2	50.0	5,305	57.0	23.4
	Unknown	0	0.0	0	0.0	6.2
	Total		4	100.0	9,310	100.0
HMDA Totals	Low	3	8.1	276	1.2	0.8
	Moderate	6	16.2	1,982	8.9	12.2
	Middle	13	35.1	7,366	33.1	56.8
	Upper	15	40.5	12,659	56.8	30.2
	Unknown	0	0.0	0	0.0	0.0
	Total		37	100.0	22,283	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 Madison, WI MSA 31540						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	2.0
	Moderate	8	14.3	192	5.9	16.0
	Middle	29	51.8	1,410	43.3	48.4
	Upper	19	33.9	1,654	50.8	32.1
	Unknown	0	0.0	0	0.0	1.6
	Total	56	100.0	3,256	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2017 Madison, WI MSA 31540						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.1
	Moderate	9	25.0	477	8.5	12.7
	Middle	26	72.2	4,974	88.8	59.0
	Upper	1	2.8	150	2.7	28.2
	Unknown	0	0.0	0	0.0	0.1
	Total	36	100.0	5,601	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Madison, WI MSA 31540						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	7	30.4	527	5.9	19.4
	Moderate	1	4.3	128	1.4	17.1
	Middle	1	4.3	264	2.9	22.9
	Upper	14	60.9	8,040	89.7	40.6
	Unknown	0	0.0	0	0.0	0.0
	Total		23	100.0	8,959	100.0
Refinance	Low	0	0.0	0	0.0	19.4
	Moderate	0	0.0	0	0.0	17.1
	Middle	0	0.0	0	0.0	22.9
	Upper	1	16.7	498	25.0	40.6
	Unknown	5	83.3	1,493	75.0	0.0
	Total		6	100.0	1,991	100.0
Home Improvement	Low	0	0.0	0	0.0	19.4
	Moderate	0	0.0	0	0.0	17.1
	Middle	1	25.0	220	10.9	22.9
	Upper	3	75.0	1,803	89.1	40.6
	Unknown	0	0.0	0	0.0	0.0
	Total		4	100.0	2,023	100.0
Multi-Family	Low	0	0.0	0	0.0	19.4
	Moderate	0	0.0	0	0.0	17.1
	Middle	0	0.0	0	0.0	22.9
	Upper	0	0.0	0	0.0	40.6
	Unknown	4	100.0	9,310	100.0	0.0
	Total		4	100.0	9,310	100.0
HMDA Totals	Low	7	18.9	527	2.4	19.4
	Moderate	1	2.7	128	0.6	17.1
	Middle	2	5.4	484	2.2	22.9
	Upper	18	48.6	10,341	46.4	40.6
	Unknown	9	24.3	10,803	48.5	0.0
	Total		37	100.0	22,283	100.0
Originations and Purchases						
2017 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size						
Assessment Area: 2017 Madison, WI MSA 31540						
Product Type		Bank & Demographic Comparison				
		2017		2017		Total Businesses
#	%	\$ 000s	%	%	%	
						Revenue
Over \$1 Million or Unknown	20	35.7	2,042	62.7	10.7	
Total	56	100.0	3,256	100.0	100.0	
Loan Size	\$100,000 or Less	49	87.5	982	30.2	
	\$100,001 - \$250,000	2	3.6	374	11.5	
	\$250,001 - \$1 Million	5	8.9	1,900	58.4	
	Total	56	100.0	3,256	100.0	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	33	91.7	314	25.9	
	\$100,001 - \$250,000	1	2.8	250	20.6	
	\$250,001 - \$1 Million	2	5.6	650	53.5	
	Total	36	100.0	1,214	100.0	

Originations & Purchases

2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Small Farm Lending By Revenue & Loan Size						
Assessment Area: 2017 Madison, WI MSA 31540						
Product Type		Bank & Demographic Comparison				
		2017		2017		Total Farms
#	%	\$ 000s	%	%	%	
						Revenue
Over \$1 Million or Unknown	2	5.6	450	8.0	1.8	
Total	36	100.0	5,601	100.0	100.0	
Loan Size	\$100,000 or Less	19	52.8	869	15.5	
	\$100,001 - \$250,000	7	19.4	1,251	22.3	
	\$250,001 - \$500,000	10	27.8	3,481	62.1	
	Total	36	100.0	5,601	100.0	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	19	55.9	869	16.9	
	\$100,001 - \$250,000	6	17.6	1,101	21.4	
	\$250,001 - \$500,000	9	26.5	3,181	61.8	
	Total	34	100.0	5,151	100.0	

Originations & Purchases

2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Racine MSA

Assessment Area: 2017 Racine, WI MSA 39540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	6.7	2,978	5.9	1,224	41.1	10,031	20.0
Moderate-income	9	20.0	9,349	18.6	1,378	14.7	8,952	17.8
Middle-income	21	46.7	27,143	54.0	1,776	6.5	11,000	21.9
Upper-income	9	20.0	10,628	21.2	205	1.9	20,262	40.3
Unknown-income	3	6.7	147	0.3	33	22.4	0	0.0
Total Assessment Area	45	100.0	50,245	100.0	4,616	9.2	50,245	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	5,150	1,415	2.7	27.5	2,726	52.9	1,009	19.6
Moderate-income	17,329	8,471	16.1	48.9	6,773	39.1	2,085	12.0
Middle-income	43,651	30,124	57.4	69.0	10,702	24.5	2,825	6.5
Upper-income	15,323	12,417	23.6	81.0	1,924	12.6	982	6.4
Unknown-income	808	89	0.2	11.0	542	67.1	177	21.9
Total Assessment Area	82,261	52,516	100.0	63.8	22,667	27.6	7,078	8.6
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	
Low-income	342	5.0	282	4.7	56	8.3	4	6.9
Moderate-income	1,146	16.9	1,018	16.8	118	17.5	10	17.2
Middle-income	3,762	55.4	3,343	55.2	391	58.0	28	48.3
Upper-income	1,356	20.0	1,247	20.6	94	13.9	15	25.9
Unknown-income	180	2.7	164	2.7	15	2.2	1	1.7
Total Assessment Area	6,786	100.0	6,054	100.0	674	100.0	58	100.0
	Percentage of Total Businesses:			89.2		9.9		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	
Low-income	3	1.8	3	1.8	0	0.0	0	0.0
Moderate-income	8	4.7	8	4.8	0	0.0	0	0.0
Middle-income	86	50.3	83	50.0	3	60.0	0	0.0
Upper-income	74	43.3	72	43.4	2	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	171	100.0	166	100.0	5	100.0	0	0.0
	Percentage of Total Businesses:			97.1		2.9		0.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Racine, WI MSA 39540						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017				
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	2.7
	Moderate	1	100.0	30	100.0	16.1
	Middle	0	0.0	0	0.0	57.4
	Upper	0	0.0	0	0.0	23.6
	Unknown	0	0.0	0	0.0	0.2
	Total		1	100.0	30	100.0
Refinance	Low	0	0.0	0	0.0	2.7
	Moderate	0	0.0	0	0.0	16.1
	Middle	1	100.0	296	100.0	57.4
	Upper	0	0.0	0	0.0	23.6
	Unknown	0	0.0	0	0.0	0.2
	Total		1	100.0	296	100.0
Home Improvement	Low	0	0.0	0	0.0	2.7
	Moderate	0	0.0	0	0.0	16.1
	Middle	0	0.0	0	0.0	57.4
	Upper	0	0.0	0	0.0	23.6
	Unknown	0	0.0	0	0.0	0.2
	Total		0	0.0	0	0.0
Multi-Family	Low	1	50.0	88	11.6	Multi-Family 4.9
	Moderate	0	0.0	0	0.0	28.9
	Middle	1	50.0	672	88.4	51.5
	Upper	0	0.0	0	0.0	9.3
	Unknown	0	0.0	0	0.0	5.4
	Total		2	100.0	760	100.0
HMDA Totals	Low	1	25.0	88	8.1	2.7
	Moderate	1	25.0	30	2.8	16.1
	Middle	2	50.0	968	89.1	57.4
	Upper	0	0.0	0	0.0	23.6
	Unknown	0	0.0	0	0.0	0.2
	Total		4	100.0	1,086	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 Racine, WI MSA 39540						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	6	12.2	49	0.8	5.0
	Moderate	3	6.1	233	3.8	16.9
	Middle	25	51.0	4,783	78.8	55.4
	Upper	15	30.6	1,002	16.5	20.0
	Unknown	0	0.0	0	0.0	2.7
	Total		49	100.0	6,067	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2017 Racine, WI MSA 39540						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	1.8
	Moderate	0	0.0	0	0.0	4.7
	Middle	4	21.1	320	17.6	50.3
	Upper	15	78.9	1,503	82.4	43.3
	Unknown	0	0.0	0	0.0	0.0
	Total		19	100.0	1,823	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 Racine, WI MSA 39540						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	20.0
	Moderate	0	0.0	0	0.0	17.8
	Middle	0	0.0	0	0.0	21.9
	Upper	0	0.0	0	0.0	40.3
	Unknown	1	100.0	30	100.0	0.0
	Total		1	100.0	30	100.0
Refinance	Low	0	0.0	0	0.0	20.0
	Moderate	0	0.0	0	0.0	17.8
	Middle	0	0.0	0	0.0	21.9
	Upper	0	0.0	0	0.0	40.3
	Unknown	1	100.0	296	100.0	0.0
	Total		1	100.0	296	100.0
Home Improvement	Low	0	0.0	0	0.0	20.0
	Moderate	0	0.0	0	0.0	17.8
	Middle	0	0.0	0	0.0	21.9
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	20.0
	Moderate	0	0.0	0	0.0	17.8
	Middle	0	0.0	0	0.0	21.9
	Upper	0	0.0	0	0.0	40.3
	Unknown	2	100.0	760	100.0	0.0
	Total		2	100.0	760	100.0
HMDA Totals	Low	0	0.0	0	0.0	20.0
	Moderate	0	0.0	0	0.0	17.8
	Middle	0	0.0	0	0.0	21.9
	Upper	0	0.0	0	0.0	40.3
	Unknown	4	100.0	1,086	100.0	0.0
	Total		4	100.0	1,086	100.0
Originations and Purchases						
2017 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2017 Racine, WI MSA 39540							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Businesses	
		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	31	63.3	3,024	49.8	89.2
		Over \$1 Million or Unknown	18	36.7	3,043	50.2	10.8
		Total	49	100.0	6,067	100.0	100.0
	Loan Size	\$100,000 or Less	31	63.3	708	11.7	
		\$100,001 - \$250,000	11	22.4	1,921	31.7	
		\$250,001 - \$1 Million	7	14.3	3,438	56.7	
		Total	49	100.0	6,067	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	23	74.2	342	11.3	
		\$100,001 - \$250,000	4	12.9	795	26.3	
		\$250,001 - \$1 Million	4	12.9	1,887	62.4	
		Total	31	100.0	3,024	100.0	
	Originations & Purchases						
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2017 Racine, WI MSA 39540							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Farms	
		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	17	89.5	1,523	83.5	97.1
		Over \$1 Million or Unknown	2	10.5	300	16.5	2.9
		Total	19	100.0	1,823	100.0	100.0
	Loan Size	\$100,000 or Less	11	57.9	339	18.6	
		\$100,001 - \$250,000	7	36.8	1,144	62.8	
		\$250,001 - \$500,000	1	5.3	340	18.7	
		Total	19	100.0	1,823	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	11	64.7	339	22.3	
		\$100,001 - \$250,000	5	29.4	844	55.4	
		\$250,001 - \$500,000	1	5.9	340	22.3	
		Total	17	100.0	1,523	100.0	
	Originations & Purchases						
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Non-MSA South Central (Lafayette County)

Assessment Area: 2017 WI Non MSA - Lafayette County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	707	15.5
Moderate-income	0	0.0	0	0.0	0	0.0	918	20.2
Middle-income	5	100.0	4,550	100.0	330	7.3	1,092	24.0
Upper-income	0	0.0	0	0.0	0	0.0	1,833	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5	100.0	4,550	100.0	330	7.3	4,550	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	7,240	5,083	100.0	70.2	1,563	21.6	594	8.2
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	7,240	5,083	100.0	70.2	1,563	21.6	594	8.2
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	739	100.0	667	100.0	44	100.0	28	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	739	100.0	667	100.0	44	100.0	28	100.0
	Total Farms by Tract	Percentage of Total Businesses:		90.3		6.0		3.8
		Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	301	100.0	298	100.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	301	100.0	298	100.0	3	100.0	0	0.0
	Percentage of Total Businesses:		99.0		1.0		0.0	

2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans						
Assessment Area: 2017 WI Non MSA - Lafayette County						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2017				
		Count Bank		Dollar Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Refinance	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Home Improvement	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
HMDA Totals	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: 2017 WI Non MSA - Lafayette County						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	8	100.0	928	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	8	100.0	928	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2017 WI Non MSA - Lafayette County						
	Tract Income Levels	Bank & Demographic Comparison				
		2017				
		Count Bank		Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	42	100.0	4,329	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	42	100.0	4,329	100.0	100.0
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2017 WI Non MSA - Lafayette County						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2017				
		Count		Dollar		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	0	0.0	0	0.0	15.5
	Moderate	0	0.0	0	0.0	20.2
	Middle	0	0.0	0	0.0	24.0
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Refinance	Low	0	0.0	0	0.0	15.5
	Moderate	0	0.0	0	0.0	20.2
	Middle	0	0.0	0	0.0	24.0
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Home Improvement	Low	0	0.0	0	0.0	15.5
	Moderate	0	0.0	0	0.0	20.2
	Middle	0	0.0	0	0.0	24.0
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Multi-Family	Low	0	0.0	0	0.0	15.5
	Moderate	0	0.0	0	0.0	20.2
	Middle	0	0.0	0	0.0	24.0
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
HMDA Totals	Low	0	0.0	0	0.0	15.5
	Moderate	0	0.0	0	0.0	20.2
	Middle	0	0.0	0	0.0	24.0
	Upper	0	0.0	0	0.0	40.3
	Unknown	0	0.0	0	0.0	0.0
	Total		0	0.0	0	0.0
Originations and Purchases						
2017 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2017 WI Non MSA - Lafayette County							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Businesses	
Revenue	Loan Size	Count	Dollar				%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	4	50.0	61	6.6	90.3
		Over \$1 Million or Unknown	4	50.0	867	93.4	9.7
		Total	8	100.0	928	100.0	100.0
Small Business	Loan Size	\$100,000 or Less	6	75.0	171	18.4	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	2	25.0	757	81.6	
		Total	8	100.0	928	100.0	
Small Business	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	4	100.0	61	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	4	100.0	61	100.0	

Originations & Purchases
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2017 WI Non MSA - Lafayette County							
Product Type		Bank & Demographic Comparison					
		2017		2017		Total Farms	
Revenue	Loan Size	Count	Dollar				%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	37	88.1	3,100	71.6	99.0
		Over \$1 Million or Unknown	5	11.9	1,229	28.4	1.0
		Total	42	100.0	4,329	100.0	100.0
Small Farm	Loan Size	\$100,000 or Less	29	69.0	1,029	23.8	
		\$100,001 - \$250,000	7	16.7	1,203	27.8	
		\$250,001 - \$500,000	6	14.3	2,097	48.4	
		Total	42	100.0	4,329	100.0	
Small Farm	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	29	78.4	1,029	33.2	
		\$100,001 - \$250,000	4	10.8	696	22.5	
		\$250,001 - \$500,000	4	10.8	1,375	44.4	
		Total	37	100.0	3,100	100.0	

Originations & Purchases
2017 FFIEC Census Data & 2016 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

APPENDIX C– Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		HMDA- and CRA-reportable lending: January 1, 2016 to December 31, 2017. Community Development activities: June 22, 2015 to October 1, 2018.	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Town Bank		HMDA-Reportable Loans CRA-Reportable Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
Wintrust Mortgage	Mortgage Lending Affiliate	HMDA-Reportable Loans	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Janesville-Beloit, WI MSA #27500	Full Scope Review	None	None
Milwaukee-Waukesha-West Allis, WI MSA #33340	Full Scope Review	None	Town Bank added Ozaukee and Washington County to its assessment area on April 19, 2018.
Non-MSA, WI Walworth County and Jefferson County	Full Scope Review	None	None
Madison, WI MSA #31540 (Dane County, Green County)	Limited Review	None	None
Racine, WI MSA #39540	Limited Review	None	None
Non-MSA, WI Lafayette County	Limited Review	None	None

APPENDIX D – 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.⁴

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

⁴ Source: FFIEC press release dated October 19, 2011.

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 product office (LPO): 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).