

# **PUBLIC DISCLOSURE**

September 14, 2015

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Union Bank and Trust Company  
RSSD# 68840

2 East Main Street  
Evansville, Wisconsin 53536

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.

## TABLE OF CONTENTS

<b>PERFORMANCE EVALUATION .....</b>	<b>2</b>
<b>SCOPE OF EXAMINATION .....</b>	<b>2</b>
<b>DESCRIPTION OF INSTITUTION.....</b>	<b>3</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA .....</b>	<b>5</b>
<b>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>11</b>
<b>JANESVILLE – BELOIT, WI MSA #27500 ASSESSMENT AREA – FULL REVIEW .....</b>	<b>12</b>
DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE JANESVILLE – BELOIT, WI MSA #27500 .....	12
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JANESVILLE – BELOIT, WIMSA #27500 .....	18
DESCRIPTION OF INSTITUTION’S OPERATIONS IN MADISON, WI MSA #31540 .....	28
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MADISON, WI MSA #31540 .....	34
<b>APPENDIX A – MAPS OF ASSESSMENT AREA .....</b>	<b>39</b>
<b>APPENDIX B – SCOPE OF EXAMINATION .....</b>	<b>40</b>
<b>APPENDIX C - GLOSSARY .....</b>	<b>41</b>

## BANK'S CRA RATING

Union Bank and Trust Company is rated Satisfactory.

Union Bank and Trust Company provides credit consistent with its size, location, and the local economic conditions within the assessment area. The average loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. The bank's assessment area concentration reveals a majority of loans are originated within the assessment area. The geographic distribution of loans reflects reasonable distribution throughout the assessment area and the borrower's profile reflects reasonable distribution among individuals of different income levels and businesses of different revenue sizes. There were no CRA-related complaints received by the institution or the Federal Reserve Bank of Chicago since the previous evaluation.

## SCOPE OF EXAMINATION

Union Bank and Trust Company's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) Small Institution Community Reinvestment Act (CRA) Examination Procedures. The evaluation was performed in the context of information about the bank and its assessment area, such as asset size, financial condition, competition, and economic and demographic characteristics.

The review of Union Bank and Trust Company consisted of a full review of the bank's two assessment areas: the Janesville – Beloit, WI Metropolitan Statistical Area (MSA) #27500 (Janesville – Beloit MSA) and the Madison, WI MSA #31540 (Madison assessment area). The Janesville – Beloit MSA is comprised of the entirety of Rock County, Wisconsin while the Madison assessment area is comprised of parts of both Green County and Dane County, a portion of the Madison, WI MSA #31540. Lending activities for the bank's major loan products were reviewed and included small business and small farm loans originated in 2014, and Home Mortgage Disclosure Act (HMDA)-reportable loans originated in 2013 and 2014. Given the lack of low- and moderate-income tracts in the Madison assessment area, geographic distribution is not being considered as part of this evaluation.

Performance in the assessment area was evaluated using the streamlined assessment method for small banks based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 16-quarter average loan-to-deposit (LTD) ratio was calculated for the bank and compared to its national peer and a sample of local competitors.
- ***Lending in the Assessment Area*** –HMDA-reportable loans originated from January 1, 2013 through December 31, 2014, as well as small business and small farm loans originated from

January 1, 2014 through December 31, 2014 were reviewed to determine the percentage of loans originated within the assessment areas.

- ***Geographic Distribution of Lending in the Assessment Area*** - HMDA-reportable loans originated within the assessment areas, from January 1, 2013 through December 31, 2014, as well as small business and small farm loans originated within the assessment areas from January 1, 2014 through December 31, 2014 were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate- income.
- ***Lending to Borrowers of Different Income and to Businesses of Different Sizes*** - HMDA-reportable loans originated within the assessment areas, from January 1, 2013 through December 31, 2014, as well as small business and small farm loans originated within the assessment area from January 1, 2014 through December 31, 2014 were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses with different revenue sizes.
- ***Response to Substantiated Complaints*** – Neither Union Bank and Trust Company or this Reserve Bank received any CRA-related complaints since the previous evaluation.

## DESCRIPTION OF INSTITUTION

Union Bank and Trust Company is a wholly-owned subsidiary of Union Bancorp of Evansville, Incorporated, a one-bank holding company headquartered in Evansville, Wisconsin. The bank is located approximately 22 miles south of Madison, Wisconsin. In addition to its main office, the bank delivers its products and services through a network of four intrastate branches and four automated teller machines (ATMs); three full-service and one cash-only. All branches maintain drive-up services and the main office maintains a motor bank. No new branches have been opened, closed, or acquired since the previous evaluation.

The bank offers a traditional line of loan and deposit products to meet the credit needs of consumers, businesses, and farms operating within their assessment area. Loan products include, but are not limited to: commercial loans (Small Business Administration , lines of credit, seasonal lines); agricultural loans (Farm Service Agency Guaranteed Loans, farm real estate, annual crop operating loans); residential real estate (Fixed Rate Purchases/Refinances, Home Possible – low down payment loans, home equity lines of credit, Federal Housing Administration (FHA) Loans, USDA Rural Development Loans, Veterans Administration Loans); and consumer loans (new and used automobile loans, personal loans, private student loans). Deposit products include, but are not limited to: personal checking, personal savings (traditional savings account, money market, and CDs), and business/commercial checking, as well as business savings and money market

accounts. Furthermore, the bank offers overdraft protection and travel cards. Customers may perform banking transactions such as account transfers and bill pay, online or via mobile devices. In addition, customers can apply for mortgage and private student loans online.

According to the Uniform Bank Performance Report, the bank had total assets of \$212 million as of June 30, 2015. Commercial loans make up the largest percentage of the bank's loan portfolio; however, agricultural and residential real estate loans make up a considerable portion of their loan portfolio. Outstanding commercial loans represent 36.8 percent of the bank's total assets, with agricultural and residential real estate loans representing 31.7 percent and 28.9 percent of total loans, respectively.

<b>Composition of Loan Portfolio as of June 30, 2015 (\$ are in 000s)</b>		
<b>Type</b>	<b>\$</b>	<b>%</b>
Residential Real Estate	\$40,736	28.9
Commercial	\$51,914	36.8
Agricultural	\$44,731	31.7
Consumer	\$1,372	1.0
Other	\$2,200	1.6
Total	\$140,953	100.0

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

*Note: Percentages may not equal exactly 100.0% due to rounding.*

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

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on May 2, 2011.

## **DESCRIPTION OF ASSESSMENT AREA**

Union Bank and Trust Company maintains two adjacent assessment areas, which are located in south central Wisconsin. The Janesville - Beloit MSA is made up of Rock County in its entirety, which consists of 38 census tracts (four low-income, eight moderate-income tracts, nineteen middle-income tracts, and seven upper-income tracts). The Madison assessment area is made up of the southern portions of Dane and northern portions of Green County, and consists of 13 census tracts (none are categorized as low- or moderate-income; eight are middle-income and five are upper-income).

The bank's peer group includes all insured commercial banks with assets between \$100 million and \$300 million, with three or more full service banking offices, located in a metropolitan statistical area. According to FDIC market share data from June 30<sup>th</sup>, 2015, Union Bank and Trust Company ranked 23<sup>rd</sup> out of 47 FDIC-insured institutions in the Madison MSA, with a market

share of 0.8 percent. For perspective, BMO Harris Bank National Association, a federally-chartered institution, had the greatest market share with 16.9 percent amongst its 25 offices. Of the state-chartered institutions, First Business Bank had the greatest market share in the Madison MSA with 6.6 percent market share.

According to FDIC market share data from June 30<sup>th</sup>, 2015, Union Bank and Trust Company ranked 10<sup>th</sup> out of 18 FDIC-insured institutions in the Janesville – Beloit MSA, with a market share of 2.9 percent. BMO Harris Bank National Association had the top market share with 26.4 percent amongst its 9 offices. The state-chartered institution with the greatest market share was Johnson Bank, which had 13.2 percent amongst its five offices. The competitors identified within the county have a broader presence in the cities of Evansville, Janesville and Beloit, with Janesville and Beloit representing the top two largest communities, by population, within the MSA. The Bank of New Glarus, Middleton Community Bank, Oregon Community Bank & Trust, and the State Bank of Cross Plains have been identified as some of the bank’s main competitors.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Loan-to-Deposit Ratio

Union Bank and Trust Company’s average loan-to-deposit ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs, though it is somewhat lower than its national peer group and a majority of its local competitors. A review of the bank’s UBPR over the previous 16-quarters showed that the bank’s LTD ratio was trending upward, indicative of the bank’s efforts to provide credit within its assessment area. Additionally, given the bank’s significant agricultural portfolio, the LTD is impacted by the seasonality of this industry. Table 1A illustrates the LTD for Union Bank and Trust Company, the national peer group to which the bank belongs, and a sample of local competitors for comparative purposes.

<b>Table 1A</b>	
<b>Comparative Loan-to-Deposit Ratios</b>	
<b>Institution</b>	<b>Loan-to-Deposit Ratio (%)</b>
	<b>16 – Quarter Average</b>
Union Bank and Trust Company	68.9
National Peer Group 4	73.3
<b>Competitors</b>	
Bank of New Glarus	90.3
BMO Harris Bank, NA	68.5
Greenwoods State Bank	84.3
Middleton Community Bank	71.2
Oregon Community Bank	97.9

### Assessment Area Concentration

The concentration of small business, small farm, and HMDA-reportable loans originated within the assessment area is reasonable given the bank’s size, financial condition, and assessment area needs. As displayed in Table 1, a majority of the bank’s lending is concentrated within its assessment area. The bank originated 84.6 percent of total loans within the combined assessment area. Of the total loans, the bank originated 90.1 percent by volume and 93.7 percent by dollar of small business loans within the assessment areas. Likewise, 89.7 percent by volume and 83.0 percent dollar of small farm loans were originated within the assessment areas. Of the 473 HMDA-reportable loans originated, 83.1 percent by volume and 76.0 percent by dollar were originated within the assessment area.

**Table 1 – Lending Inside and Outside the Assessment Areas**

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	41	85.4	\$5,359	86.6	7	14.6	\$828	13.4
Home Purchase - Conventional	138	79.3	\$18,903	74.1	36	20.7	\$6,601	25.9
Home Purchase - FHA	15	78.9	\$1,814	82.2	4	21.1	\$393	17.8
Multi-Family Housing	8	88.9	\$1,911	71.8	1	11.1	\$750	28.2
Refinancing	271	85.0	\$43,323	75.7	48	15.0	\$13,904	24.3
<b>Total HMDA-reportable</b>	<b>473</b>	<b>83.1</b>	<b>\$71,310</b>	<b>76.0</b>	<b>96</b>	<b>16.9</b>	<b>\$22,476</b>	<b>24.0</b>
<b>Small Business</b>	<b>73</b>	<b>90.1</b>	<b>\$9,041</b>	<b>93.7</b>	<b>8</b>	<b>9.9</b>	<b>\$609</b>	<b>6.3</b>
<b>Small Farm</b>	<b>70</b>	<b>89.7</b>	<b>\$7,473</b>	<b>83.0</b>	<b>8</b>	<b>10.3</b>	<b>\$1,535</b>	<b>17.0</b>
<b>TOTAL LOANS</b>	<b>616</b>	<b>84.6</b>	<b>\$87,824</b>	<b>78.1</b>	<b>112</b>	<b>15.4</b>	<b>\$24,620</b>	<b>21.9</b>

### Geographic and Borrower Distribution

Overall, the geographic distribution of Union Bank and Trust Company’s loans throughout the combined assessment area is less than reasonable. However, the bank had reasonable distribution among borrowers of different income levels, as well as businesses and farms of different sizes throughout the combined assessment area. Union Bank and Trust Company’s performance within each assessment area and relevant demographic data will be discussed in subsequent individual assessment area sections of this evaluation.

<b>Geographic Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Combined Assessment Area</b>								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2013						
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$ (000s)	%					
Home Purchase	Low	2	2.8	1.7	158	1.7	0.6	3.2
	Moderate	1	1.4	7.4	62	0.7	4.1	11.0
	Middle	31	43.1	57.2	3,498	38.4	52.7	56.3
	Upper	38	52.8	33.6	5,389	59.2	42.5	29.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>72</b>	<b>100.0</b>	<b>100.0</b>	<b>9,107</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	1.6	0	0.0	0.7	3.2
	Moderate	2	1.1	7.5	88	0.3	3.7	11.0
	Middle	57	31.8	56.0	10,787	38.3	58.0	56.3
	Upper	120	67.0	35.0	17,271	61.4	37.6	29.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>28,146</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	3.2	0	0.0	1.0	3.2
	Moderate	0	0.0	9.2	0	0.0	2.6	11.0
	Middle	8	38.1	54.6	1,092	35.1	54.2	56.3
	Upper	13	61.9	32.9	2,016	64.9	42.2	29.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>3,108</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	2	33.3	12.3	255	16.9	31.4	<b>Multi-Family</b> 9.3
	Moderate	0	0.0	10.5	0	0.0	2.7	18.0
	Middle	1	16.7	47.4	451	29.8	38.5	43.5
	Upper	3	50.0	29.8	805	53.3	27.5	29.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,511</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	4	1.4	1.8	413	1.0	1.9	3.2
	Moderate	3	1.1	7.6	150	0.4	3.8	11.0
	Middle	97	34.9	56.3	15,828	37.8	55.4	56.3
	Upper	174	62.6	34.4	25,481	60.9	38.9	29.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>278</b>	<b>100.0</b>	<b>100.0</b>	<b>41,872</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2013 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								



<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2014 Combined Assessment Area</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	5.2
	Moderate	0	0.0	0	0.0	11.8
	Middle	39	53.4	4,735	52.4	51.5
	Upper	34	46.6	4,306	47.6	31.6
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>9,041</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2014 Combined Assessment Area</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Farms
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.8
	Middle	50	71.4	5,046	67.5	81.7
	Upper	20	28.6	2,427	32.5	17.5
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>70</b>	<b>100.0</b>	<b>7,473</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Combined Assessment Area</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2013			Dollar			
		Count		Agg %	Bank		Agg \$ %	
		Bank #	%	%	Bank \$(000s)	\$ %	Agg \$ %	
Home Purchase	Low	4	5.6	8.9	570	6.3	4.5	17.2
	Moderate	19	26.4	23.0	2,236	24.6	17.4	17.8
	Middle	14	19.4	26.1	1,655	18.2	25.8	23.3
	Upper	27	37.5	33.5	3,513	38.6	44.5	41.7
	Unknown	8	11.1	8.6	1,133	12.4	7.8	0.0
	<b>Total</b>		<b>72</b>	<b>100.0</b>	<b>100.0</b>	<b>9,107</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	15	8.4	8.0	1,525	5.4	4.2	17.2
	Moderate	24	13.4	17.4	2,340	8.3	11.4	17.8
	Middle	41	22.9	25.5	6,353	22.6	20.5	23.3
	Upper	69	38.5	38.8	13,296	47.2	42.0	41.7
	Unknown	30	16.8	10.4	4,632	16.5	22.0	0.0
	<b>Total</b>		<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>28,146</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	10.4	0	0.0	4.1	17.2
	Moderate	6	28.6	18.7	623	20.0	11.7	17.8
	Middle	1	4.8	27.2	6	0.2	25.1	23.3
	Upper	13	61.9	39.6	2,335	75.1	54.9	41.7
	Unknown	1	4.8	4.1	144	4.6	4.1	0.0
	<b>Total</b>		<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>3,108</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	17.2
	Moderate	0	0.0	0.0	0	0.0	0.0	17.8
	Middle	0	0.0	0.0	0	0.0	0.0	23.3
	Upper	0	0.0	0.0	0	0.0	0.0	41.7
	Unknown	6	100.0	100.0	1,511	100.0	100.0	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,511</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	19	6.8	8.4	2,095	5.0	4.1	17.2
	Moderate	49	17.6	19.3	5,199	12.4	12.9	17.8
	Middle	56	20.1	25.6	8,014	19.1	21.6	23.3
	Upper	109	39.2	36.7	19,144	45.7	41.4	41.7
	Unknown	45	16.2	10.0	7,420	17.7	20.0	0.0
	<b>Total</b>		<b>278</b>	<b>100.0</b>	<b>100.0</b>	<b>41,872</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2013 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Small Businesses Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Combined Assessment Area</b>							
Product Type		Bank & Demographic Comparison					
		Count Bank		2014 Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	57	78.1	6,610	73.1	90.6
		Over \$1 Million or Unknown	16	21.9	2,431	26.9	9.4
		Total	73	100.0	9,041	100.0	100.0
	Loan Size	\$100,000 or Less	50	68.5	2,080	23.0	
		\$100,001 - \$250,000	15	20.5	2,037	22.5	
		\$250,001 - \$1 Million	8	11.0	4,924	54.5	
		Total	73	100.0	9,041	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	38	66.7	1,356	20.5	
		\$100,001 - \$250,000	14	24.6	1,930	29.2	
		\$250,001 - \$1 Million	5	8.8	3,324	50.3	
		Total	57	100.0	6,610	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

<b>Small Farms Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Combined Assessment Area</b>							
Product Type		Bank & Demographic Comparison					
		Count		2014		Total Farms	
		Bank		Dollar	Bank		
#	%	\$ 000s	\$ %	%			
Small Farms	Revenue	\$1 Million or Less	65	92.9	6,522	87.3	98.6
		Over \$1 Million or Unknown	5	7.1	951	12.7	1.4
		Total	70	100.0	7,473	100.0	100.0
	Loan Size	\$100,000 or Less	46	65.7	1,987	26.6	
		\$100,001 - \$250,000	15	21.4	2,569	34.4	
		\$250,001 - \$500,000	9	12.9	2,917	39.0	
		Total	70	100.0	7,473	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	44	67.7	1,924	29.5	
		\$100,001 - \$250,000	14	21.5	2,369	36.3	
		\$250,001 - \$500,000	7	10.8	2,229	34.2	
		Total	65	100.0	6,522	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

### Response to Complaints

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

### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Union Bank and Trust Company is in compliance with the anti-discrimination statutes and regulations, specifically the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## JANESVILLE – BELOIT, WI MSA #27500 ASSESSMENT AREA – FULL REVIEW

### SCOPE OF EXAMINATION

The scope for this assessment area is consistent with that previously defined in the overall section. Please refer to the general scope of examination section for a more detailed description of the scope.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JANESVILLE – BELOIT, WI MSA #27500

Union Bank and Trust Company's main office is located in the city of Evansville, which is in the northwestern section of Rock County, Wisconsin. The main office is the only branch in Rock County and does not have an ATM; however, it maintains a motor bank across the street from the main office that serves as a detached drive-up with a cash-only ATM.

Since the previous evaluation, the bank expanded its assessment area to include all of Rock County, which holds the Janesville – Beloit MSA in its entirety; previously, the bank only included the 4 census tracts in the northwest corner of Rock County (0028.00, 0029.00, 0030.01, and 0030.02). Additionally, the Janesville – Beloit MSA was revised and now is made up of 38 census tracts: four low-income, eight moderate-income, nineteen middle-income, and seven upper-income census tracts. Previously, the Janesville MSA was made up of 36 census tracts: zero low-income, eight moderate-income, twenty-three middle, and five upper-income census tracts. Union Bank and Trust Company's main office is located in an upper-income census tract. Table 8 below provides detailed demographic information regarding the Janesville – Beloit MSA.

<b>Table 8 – Combined Assessment Area Demographics Janesville-Beloit MSA 27500</b>								
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
<b>Total Assessment Area</b>	<b>38</b>	<b>100.0</b>	<b>42,852</b>	<b>100.0</b>	<b>4,035</b>	<b>9.4</b>	<b>42,852</b>	<b>100.0</b>
	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
<b>Total Assessment Area</b>	<b>68,027</b>	<b>46,005</b>	<b>100.0</b>	<b>67.6</b>	<b>16,593</b>	<b>24.4</b>	<b>5,429</b>	<b>8.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	459	7.8	401	7.6	39	9.3	19	10.4
Moderate-income	1,049	17.9	938	17.9	90	21.4	21	11.5
Middle-income	2,747	47.0	2,493	47.5	172	41.0	82	44.8
Upper-income	1,593	27.2	1,413	26.9	119	28.3	61	33.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5,848</b>	<b>100.0</b>	<b>5,245</b>	<b>100.0</b>	<b>420</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>
	Percentage of Total Businesses:			89.7		7.2		3.1

	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	1.8	7	1.8	0	0.0	0	0.0
Middle-income	311	77.9	306	78.3	5	62.5	0	0.0
Upper-income	81	20.3	78	19.9	3	37.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>399</b>	<b>100.0</b>	<b>391</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
	<b>Percentage of Total Farms:</b>			<b>98.0</b>		<b>2.0</b>		<b>0.0</b>

2014 FFIEC Census Data and 2014 D&B Information  
Note: Percentages may not add to 100.0 percent due to rounding.

### Population Characteristics

According to the 2000 and the 2010 U.S. Census, the population in the Janesville – Beloit MSA assessment area increased by 5.3 percent, from 152,307 to 160,331. The rate of increase was just slightly less than that observed by the state of Wisconsin, which saw its population increase by 6.0 percent. Information obtained from a community representative indicated that there have been recent initiatives to build additional housing developments in Rock County to help attract new homeowners and renters in hopes to increase the overall population.

Area	2000 Population	2010 Population	Percentage Change
<b>Janesville – Beloit MSA</b>	152,307	160,331	5.3
<b>Wisconsin</b>	5,363,675	5,686,986	6.0

Source(s): 2000—U.S. Census Bureau: Decennial Census  
2010—U.S. Census Bureau: Decennial Census

### Income Characteristics

The median family income observed throughout the state of Wisconsin significantly outpaced the growth observed in the Janesville – Beloit MSA. At the time of the 2000 Census, the median family income in the assessment area was slightly greater than the state average; \$53,380 per year compared to \$52,911 per year, respectively. However, at the time of the 2006-2010 U.S. Census

Bureau, American Community Survey, the median family income in the state increased by 22.6 percent to \$64,869, while the median family income within the assessment area increased by 14.6 percent to \$61,165. A community representative indicated wages have recently begun to rebound to pre-recession rates due to the expanding economy; however, are still impacted by the General Motors plant closure.

Table 10 Median Family Income Change 2000 and 2010			
Area	2000 Median Family Income	2006-2010 Median Family Income	Percentage Change
Janesville – Beloit MSA	53,241	61,165	14.9
Wisconsin	52,911	64,869	22.6

*Source: 2000—U.S. Census Bureau: Decennial Census  
 2006-2010—U.S. Census Bureau: American Community Survey*

### Housing Characteristics

Housing costs are generally lower in the assessment area versus the state of Wisconsin. Median housing values, from 2000 to 2010, increased significantly in both geographies: 40.4 percent in Rock County to \$138,000 and 53.8 percent in Wisconsin to \$169,000. A community representative indicated Rock County is one of only eight Wisconsin counties that have reported property valuation increases of four percent or greater from 2008 to 2014. Gross median rents within the assessment area and for the state of Wisconsin have increased in a similar manner and are generally comparable. Median rents increased by 28.6 percent in Rock County from \$543 to \$698, while in Wisconsin, median rents increased by 32.0 percent from \$540 to \$713.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix C – Glossary. A higher rate supports more affordable housing opportunities. In 2010, the affordability ratio within Rock County was .36. Meanwhile, the State of Wisconsin’s affordability ratio was .31; indicating housing within the bank’s assessment area is lightly more affordable. This is further supported by the median housing values and gross rents as previously stated.



Table 11 Trends in Housing Costs 2000 and 2010				
Location	2000 Median Housing Value	2006-2010 Median Housing Value	2000 Median Gross Rent	2006-2010 Median Gross Rent
Rock County	98,336	138,023	543	698
Wisconsin	109,900	169,000	540	713

Source: 2000—U.S. Census Bureau: Decennial Census  
2006-2010—U.S. Census Bureau: American Community Survey

### Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on the change in the foreclosure inventory rate at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle.

The foreclosure inventory rate has decreased within the assessment area in a similar fashion as the state of Wisconsin. The rate in Rock County decreased from a high of 5.1 percent in January 2011 to 1.6 percent in December 2014. These foreclosure rates are in line with the state of Wisconsin’s rate changes of 3.6 percent in January 2011 to 1.2 percent in December 2014.

### Unemployment Conditions

According to the U.S. Bureau of Labor Statistics, the unemployment rate in Rock County has been greater than the unemployment rate observed for the state of Wisconsin. The most recent unemployment data available from 2013 reveals the unemployment rate in Wisconsin was 6.7 percent while the unemployment rate in Rock County was 7.9 percent. The table below provides more detailed information about unemployment rates from 2010 through 2013.

A community representative indicated that Rock County residences were impacted by the General Motors factory closure in 2009. Additionally, a community representative stated that the county has been slowly recovering since the closure, though more job opportunities are becoming available in Rock County.

Table 12 Unemployment Rates				
Region	2010	2011	2012	2013
Wisconsin	8.5	7.5	6.9	6.7
Rock County	11.2	9.5	8.4	7.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

## Employment Conditions

Healthcare is the largest employment sector in the Janesville – Beloit MSA assessment area. The table below provides additional information on the top 20 employers in the assessment area. Approximately 49.0 percent of those employed in the top 20 employers work in an industry related to healthcare (Physicians & Surgeons, Hospitals, and Mental Health Services).

Table 13 Largest Employers in the Assessment Area		
Company	Number of Employees	Industry
Beloit Clinic Sc	2500	Physicians & Surgeons
Beloit Health System	1517	Hospitals
Mercy Hospital-Inpatient Psyc	1500	Mental Health Services
James Macneal Mph Do Ofc	1000	Hospitals
Ben Meadows Co	900	Internet & Catalog Shopping
Lab Safety Supply Inc	800	Safety Equipment & Clothing (Wholesales)
Frito-Lay Inc	701	Potato Chips (Whls)
Kerry Ingredients & Flavours	700	Food Products (Whls)
Blackhawk Technical College	501	Schools
Le Mans Corp	500	Outdoor Sports
Prent Corp	500	Plastics-Vacuum/Pressure Forming (Manufacturers)
Rock Haven	500	Government Offices-County
St Mary's Janesville Hospital	500	Hospitals
Stoughton Trailers	475	Trailers-Industrial-Manufacturers
Walmart Supercenter	350	Department Stores
Walmart Supercenter	300	Department Stores
Woodman's Food Market Inc	300	Grocers-Retail
Simmons Manufacturing Co	260	Mattresses-Manufacturers
SSI Technologies Inc	250	Measuring/Controlling Devices NEC (Manufacturers)
Woodman's Food Market	250	Grocers-Retail

Source: AMLIS Database

## Community Representatives

Information obtained from two community representatives within the assessment area was considered for this assessment area and evaluation to provide perspective regarding the communities where the bank operates. Both community representatives expressed favorable opinions of the local banks' efforts to meet the community's credit needs, including a willingness to get involved in a number of community development projects. A community representative also indicated there are some long-term redevelopment projects in Janesville; however, they will be at market rate and will need subsidized financing to be more affordable.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JANESVILLE – BELOIT, WIMSA #27500**

### **LENDING TEST**

#### **Geographic Distribution of Loans**

The bank's geographic distribution of loans to throughout the Janesville – Beloit MSA assessment area needs to improve given the bank's size, financial condition, and assessment are credit needs. The Janesville – Beloit MSA is comprised of 38 total census tracts: four low-income, eight moderate-income, nineteen middle-income, and seven upper-income census tracts. Aggregate data is not available for 2014.

#### *HMDA-Reportable Loans*

Union Bank and Trust Company originated a total of 166 and 118 HMDA-reportable loans in 2013 and 2014, respectively. Refinance and home purchase loans accounted for a vast majority of the bank's HMDA-reportable loan activity, with refinance loans accounting for 108 of the originations in 2013 and 55 originations in 2014. Home purchase loans accounted for 45 originations in 2013 and 50 originations in 2014. In 2013, the bank originated a substantial majority of loans to individuals from middle- and upper -income census tracts; 93.3 percent of home purchase loans and 98.2 percent of refinance loans. In 2014, 92.2 percent of home purchase loans and 94.5 percent of refinance loans went to individuals in middle- and upper-income census tracts. A further analysis of lending patterns revealed the bank's distribution of loans is consistent with its physical location in the assessment area, as it is located in an area comprised primarily of middle- and upper-income census tracts. The area reflects the lending distribution and ability to serve based upon the nearest banking location.

#### *Refinance Loans*

In 2013, the geographic distribution of the Union Bank and Trust Company's refinance loans within low-income census tracts needs to improve as the bank did not originate any refinance loans in low-income tracts. By comparison, aggregate competitors originated 2.5 percent of their originations by volume and 1.2 percent by dollar in low-income tracts. While the bank's greater physical distance, as well as local competitors' proximity to these tracts are impediments,, the bank's lending needs to improve to meet the needs within the low-income census tracts of its assessment area. It should be noted that both the bank and aggregate lenders underperformed assessment area demographics since 4.6 percent of owner-occupied units are located in low-income census tracts.

In 2014, aggregate geographic distribution data is not available; however, Union Bank and Trust Company's refinance lending performance was consistent with its performance in 2013 within the low-income census tracts and needs to improve. Again, the bank did not originate any refinance loans in low-income census tracts.

In 2013, the geographic distribution of the Union Bank and Trust Company's refinance loans within moderate-income census tracts needs to improve. The bank originated only 1.9 percent by volume and 0.6 percent by dollar of refinance loans in moderate-income tracts. By comparison, aggregate competitors originated 11.9 percent of their originations by volume and 6.4 percent by dollar in moderate-income tracts. While the bank's lack of proximity to these tracts may be a limitation, improvement is warranted to meet the credit needs within the moderate-income census tracts of the assessment area. The table below provides more in-depth data on Union Bank and Trust Company's performance in 2013. It should be noted that 15.7 percent of owner-occupied units are located in moderate-income census tracts. Both the bank and aggregate lenders underperformed when considering assessment area demographics; however, the aggregate is slightly below demographics, while the bank is significantly below assessment area demographics..

In 2014, aggregate geographic distribution data is not available; likewise, Union Bank and Trust Company's performance of refinance loans within moderate-income census tracts needs to improve. Though some improvement was noted, the bank only originated 5.5 percent by volume and 2.5 percent by dollar of refinance loans in moderate-income tracts.

#### *Home Purchase Loans*

In 2013, Union Bank and Trust Company's home purchase loan originations were reasonable in low-income census tracts. The bank originated 4.4 percent by volume and 3.1 percent by dollar versus 2.8 percent by volume of home purchase loans in moderate-income census tracts. By comparison, aggregate lenders only originated 2.8 percent by volume and 1.2 percent by dollar of home purchase loans in these tracts. Additionally, the bank's performance and was comparable to the assessment area demographics as 4.6 percent of owner-occupied units within the assessment area are in low-income census tracts.

In 2014, Union Bank and Trust Company's home purchase loan originations were reasonable in low-income census tracts. The bank originated 4.0 percent by volume and 1.6 percent by dollar of home purchase loans in moderate-income census tracts. This performance is comparable to its performance in 2013.

In 2013, the bank's home purchase loan originations in moderate-income census tracts needs to improve. Union Bank and Trust Company originated 2.2 percent by volume and 1.2 percent by dollar in these tracts. By comparison, aggregate lenders originated 11.9 percent by volume and 8.4 percent by dollar of home purchase loans in moderate-income census tracts. Additionally, 15.7

percent of owner occupied units are located within moderate-income census tracts.

In 2014, the bank's home purchase loan originations in moderate-income census tracts needs to improve. Union Bank and Trust Company originated 4.0 percent by volume and 1.6 percent by dollar of home purchase loans in these tracts.

<b>Geographic Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Janesville, WI MSA 27500</b>								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2013						
		Count		Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	4.4	2.8	158	3.1	1.2	4.6
	Moderate	1	2.2	11.9	62	1.2	8.4	15.7
	Middle	20	44.4	58.1	1,866	36.8	54.1	55.9
	Upper	22	48.9	27.3	2,986	58.9	36.3	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,072</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	2.5	0	0.0	1.2	4.6
	Moderate	2	1.9	11.9	88	0.6	6.4	15.7
	Middle	38	35.2	57.0	6,346	42.5	61.2	55.9
	Upper	68	63.0	28.6	8,513	57.0	31.2	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>108</b>	<b>100.0</b>	<b>100.0</b>	<b>14,947</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	5.7	0	0.0	2.9	4.6
	Moderate	0	0.0	16.4	0	0.0	7.6	15.7
	Middle	3	33.3	57.8	421	38.4	65.7	55.9
	Upper	6	66.7	20.1	674	61.6	23.8	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	2	50.0	18.4	255	43.4	50.7	<b>Multi-Family</b> 11.5
	Moderate	0	0.0	15.8	0	0.0	4.3	22.4
	Middle	0	0.0	36.8	0	0.0	24.4	38.7
	Upper	2	50.0	28.9	333	56.6	20.5	27.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>588</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	4	2.4	2.8	413	1.9	3.6	4.6
	Moderate	3	1.8	12.1	150	0.7	6.9	15.7
	Middle	61	36.7	57.3	8,633	39.8	57.4	55.9
	Upper	98	59.0	27.8	12,506	57.6	32.1	23.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>166</b>	<b>100.0</b>	<b>100.0</b>	<b>21,702</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2013 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

**Small Business Lending**

Union Bank and Trust Company’s geographic distribution of small business loans in 2014 reflects a very poor distribution throughout the assessment area. The bank did not originate any small business loans in either low- or moderate-income census tracts; though 7.8 percent of small businesses are located in low-income tracts and 17.9 percent are located in moderate-income tracts in the Janesville – Beloit MSA assessment area.

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Businesses	Low	0	0.0	0	0.0	7.8
	Moderate	0	0.0	0	0.0	17.9
	Middle	4	15.4	221	11.3	47.0
	Upper	22	84.6	1,733	88.7	27.2
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>1,954</b>	<b>100.0</b>
2014 FFIEC Census Data & 2014 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 bank did not originate any small farm loans within either assessment area. There are only 1.8 percent of small farms located in moderate-income tracts; no small farms are located in low-income census tracts. Given the lack of proximity and opportunities to lend in these tracts, the bank’s performance is reasonable.

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Farms
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.8
	Middle	21	56.8	3,252	60.5	77.9
	Upper	16	43.2	2,126	39.5	20.3
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>5,378</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

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

Union Bank and Trust Company’s lending demonstrates reasonable distribution among borrowers of different income levels, as well as businesses and farms of different sizes throughout the assessment area. There was no aggregate data available for 2014.

***HMDA-Reportable Lending***

In 2013, Union Bank and Trust Company’s total HMDA-reportable lending to low- and moderate-income borrowers was reasonable. The bank originated 6.8 percent by volume and 5.0 percent by dollar of total HMDA-reportable loans to low-income borrowers and 17.6 percent by volume and 12.4 percent by dollar in 2014. By comparison, aggregate lenders originated 8.4 percent by volume and 4.1 percent by dollar to low-income borrowers and 19.3 percent by volume and 12.9 percent by dollar to moderate-income borrowers. Refinance and home purchase loans accounted for a vast majority of the bank’s HMDA-reportable loan activity, with refinance loans accounting for 108 of the originations in 2013 and 55 originations in 2014. Home purchase loans accounted for 45 originations in 2013 and 50 originations in 2014. It should be noted that both the bank and aggregate lenders underperformed assessment area demographics as 19.7 percent of families by family income are considered low-income.

***Refinance Loans***

In 2013, Union Bank and Trust Company’s refinance lending to low-income borrowers was reasonable when compared with aggregate lenders. The bank originated 8.3 percent by volume and 5.5 percent by dollar of refinance loans to low-income borrowers. By comparison, aggregate lenders originated 8.7 percent by volume and 4.3 percent by dollar.



In 2014, Union Bank and Trust Company's refinance lending to low-income borrowers was reasonable. While 2014 aggregate data is not available, the bank's performance was comparable to its 2013 performance as it originated 7.3 percent by volume and 8.9 percent by dollar of refinance loans to low-income borrowers.

In 2013, Union Bank and Trust Company's refinance lending to moderate-income borrowers was reasonable. The bank originated 13.0 percent by volume and 8.2 percent by dollar of refinance loans to moderate-income borrowers. By comparison, aggregate lenders originated slightly more by volume at 18.0 percent and the same by dollar at 10.7 percent of loans. While the bank's performance was somewhat less than the aggregate, it is considered reasonable.

In 2014, Union Bank and Trust Company's refinance lending to moderate-income borrowers needs to improve. While aggregate data is not available, the bank's performance relative to its 2013 performance had declined. The bank originated 10.9 percent by volume and 5.2 percent by dollar of refinance loans to moderate-income borrowers.

#### *Home Purchase Loans*

In 2013, Union Bank and Trust Company's home purchase loan originations is considered needs to improve to low-income borrowers. The bank originated 6.7 percent by volume and 4.9 percent by dollar of home purchase loans to low-income borrowers. This does not compare favorably with aggregate lenders who originated 10.8 percent by volume and 6.1 percent by dollar of home purchase loans to these same borrowers.

In 2014, Union Bank and Trust Company's home purchase loan originations were reasonable in low-income census tracts. The bank originated 4.0 percent by volume and 1.6 percent by dollar of home purchase loans in moderate-income census tracts. This performance is comparable to its performance in 2013.

In 2013, the bank's home purchase loan originations to moderate-income borrowers is considered reasonable. Union Bank and Trust Company originated 28.9 percent by volume and 28.2 percent by dollar to moderate-income borrowers. By comparison, aggregate lenders originated 24.8 percent by volume and 19.6 percent by dollar of home purchase loans to moderate-income borrowers.

In 2014, the bank's home purchase loan originations to moderate-income borrowers is considered needs to improve. While aggregate data is not available for 2014, Union Bank and Trust Company's performance declined significantly from 2013, as the bank only originated 14.0 percent by volume and 10.6 percent by dollar of home purchase loans to moderate-income borrowers.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Janesville, WI MSA 27500</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2013			2013			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$(000s)	\$ %					
Home Purchase	Low	3	6.7	10.8	250	4.9	6.1	19.7
	Moderate	13	28.9	24.8	1,429	28.2	19.6	18.5
	Middle	6	13.3	24.6	650	12.8	25.4	22.3
	Upper	19	42.2	30.2	2,201	43.4	39.9	39.5
	Unknown	4	8.9	9.6	542	10.7	9.1	0.0
	<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>5,072</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	9	8.3	8.7	828	5.5	4.3	19.7
	Moderate	14	13.0	18.0	1,232	8.2	10.7	18.5
	Middle	26	24.1	25.2	3,553	23.8	18.8	22.3
	Upper	40	37.0	37.3	6,785	45.4	36.9	39.5
	Unknown	19	17.6	10.8	2,549	17.1	29.2	0.0
	<b>Total</b>	<b>108</b>	<b>100.0</b>	<b>100.0</b>	<b>14,947</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	13.1	0	0.0	6.3	19.7
	Moderate	2	22.2	20.9	159	14.5	16.7	18.5
	Middle	0	0.0	22.5	0	0.0	16.3	22.3
	Upper	6	66.7	37.3	792	72.3	52.2	39.5
	Unknown	1	11.1	6.1	144	13.2	8.6	0.0
	<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
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	4	100.0	100.0	588	100.0	100.0	0.0
	<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>588</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	12	7.2	9.6	1,078	5.0	4.7	19.7
	Moderate	29	17.5	20.4	2,820	13.0	13.0	18.5
	Middle	32	19.3	24.7	4,203	19.4	19.8	22.3
	Upper	65	39.2	34.6	9,778	45.1	36.3	39.5
	Unknown	28	16.9	10.7	3,823	17.6	26.2	0.0
	<b>Total</b>	<b>166</b>	<b>100.0</b>	<b>100.0</b>	<b>21,702</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2013 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

**Small Business Lending**

Union Bank and Trust Company’s lending reflects reasonable distribution to small businesses, which is defined as businesses reporting revenue equal to or less than \$1 million. The bank originated 80.8 percent by volume of its small business loans to businesses with stated revenues of \$1 million or less. This is consistent with the demographics given 89.7 percent of the small businesses in the assessment area reported revenues of \$1 million or less. Furthermore, of the small business loans originated, 69.2 percent were \$100,000 or less, which indicates the bank makes credit available to small businesses and regularly makes credit available to small businesses. Accordingly, a higher volume of loans in smaller amounts is considered indicative of stronger performance in meeting the credit needs of small businesses.

Small Businesses Lending By Revenue & Loan Size								
Assessment Area: 2014 Janesville-Beloit, WI MSA 27500								
Product Type		Bank & Demographic Comparison						
		2014		2014		Total Businesses %		
Revenue	Loan Size	Count Bank		Dollar Bank				
		#	%	\$ 000s	\$ %			
Small Businesses	\$1 Million or Less		21	80.8	1,404	71.9	89.7	
		Over \$1 Million or Unknown	5	19.2	550	28.1		10.3
		Total	26	100.0	1,954	100.0		100.0
	\$100,000 or Less		18	69.2	608	31.1	100.0	
		\$100,001 - \$250,000	7	26.9	997	51.0		
		\$250,001 - \$1 Million	1	3.8	350	17.9		
		Total	26	100.0	1,955	100.0		
	Loan Size & Rev \$1 Mill	\$100,000 or Less	14	66.7	407	29.0	100.0	
		\$100,001 - \$250,000	7	33.3	997	71.0		
		\$250,001 - \$1 Million	0	0.0	0	0.0		
		Total	21	100.0	1,404	100.0		
	Originations & Purchases							
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

**Small Farm Lending**

Union Bank and Trust Company’s lending distribution showed reasonable distribution to farms, which is defined as farms reporting revenue equal to or less than \$1 million. The bank originated 89.2 percent by volume of small farm loans to farms reporting revenues of \$1 million dollars or less. By comparison, 98.0 percent of small farms within the assessment area reported revenues of

\$1 million or less. The distribution of farm loans by loan size reveals the bank is making most of its small farm loans available to small farms as 54.5 percent of loans were \$100,000 or less.

<b>Small Farms Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Farms	
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Farms	Revenue	\$1 Million or Less	33	89.2	4,457	82.9	98.0
		Over \$1 Million or Unknown	4	10.8	921	17.1	2.0
		Total	37	100.0	5,378	100.0	100.0
	Loan Size	\$100,000 or Less	19	51.4	928	17.3	
		\$100,001 - \$250,000	9	24.3	1,534	28.5	
		\$250,001 - \$500,000	9	24.3	2,917	54.2	
		Total	37	100.0	5,379	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	18	54.5	894	20.1	
		\$100,001 - \$250,000	8	24.2	1,334	29.9	
		\$250,001 - \$500,000	7	21.2	2,229	50.0	
		Total	33	100.0	4,457	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

## MADISON, WI MSA #31540 ASSESSMENT AREA – FULL REVIEW

### SCOPE OF EXAMINATION

The scope for this assessment area is consistent with that previously defined in the overall section. A limited analysis was conducted for geographic distribution given no low- or moderate-income census tracts are located within this assessment area. Please refer to the general scope of examination section for a more detailed description of the scope.

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

Union Bank and Trust Company operates four full-service branches in the Madison assessment area in the cities of Belleville, Brooklyn, New Glarus, and Oregon, Wisconsin; all branches operate full-service ATMs with the exception of the Brooklyn branch, which does not have an ATM. There have been no branch openings or closings in the Madison MSA assessment area since the previous evaluation; however, the bank closed one ATM at the Brooklyn Mini Mart in 2014 due to lack of use and increasing costs of upkeep. The Madison assessment area includes a portion of the Madison, WI MSA #31540 and is made up of 12 census tracts in Dane County and Green County. None of the census tracts are categorized as low- or moderate-income; eight are middle-income and four are categorized as upper-income. The bank's offices are located south of Madison and include communities on Dane County's southern borders and Green County's north central border. The city of Madison, its residents and businesses are not proximate to the bank's offices.

During the previous evaluation, Union Bank and Trust Company maintained separate assessment areas for each of Dane County and Green County. Dane County in its entirety was the bank's Madison assessment area and comprised of 93 census tracts (five low-income, thirteen moderate-income, fifty-five middle-income, eighteen upper-income, and two unknown). The Green County assessment area was a Non-MSA assessment area and consisted of eight census tracts (seven middle-income and one upper-income). In 2014, Green County was absorbed into the Madison MSA. The bank changed its assessment area to align with its market area and now consists of nine of Dane County's 107 census tracts (0106.00, 0107.01, 0107.02, 0121.00, 0123.00, 0124.00, 0125.01, 0125.02, and 0126.00) and three of Green County's eight census tracts (9601.00, 9602.00, 9603.00), none of which are low- or moderate-income geographies.

Demographic information for the Madison assessment area is presented in the following table.

Assessment Area(s) : 2014 Madison, WI MSA 31540 (selected year - 2014)

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	2,225	13.0
Moderate-income	0	0.0	0	0.0	0	0.0	2,937	17.1
Middle-income	8	66.7	11,252	65.6	434	3.9	4,562	26.6
Upper-income	4	33.3	5,892	34.4	78	1.3	7,420	43.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>12</b>	<b>100.0</b>	<b>17,144</b>	<b>100.0</b>	<b>512</b>	<b>3.0</b>	<b>17,144</b>	<b>100.0</b>
	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	17,187	12,792	65.5	74.4	3,047	17.7	1,348	7.8
Upper-income	8,225	6,726	34.5	81.8	1,318	16.0	181	2.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>25,412</b>	<b>19,518</b>	<b>100.0</b>	<b>76.8</b>	<b>4,365</b>	<b>17.2</b>	<b>1,529</b>	<b>6.0</b>
	Total Businesses by 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	1,839	60.1	1,717	60.7	79	48.8	43	59.7
Upper-income	1,222	39.9	1,110	39.3	83	51.2	29	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>3,061</b>	<b>100.0</b>	<b>2,827</b>	<b>100.0</b>	<b>162</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.4</b>		<b>5.3</b>		<b>2.4</b>

Based on 2010 ACS Information

Note: Percentages may not total to 100 percent due to rounding.

## Population Characteristics

According to the U.S. Census, between 2000 and 2010, the overall population increased within the assessment area significantly by 54.0 percent, nine times that which was experienced by the state of Wisconsin of 6.0 percent. The significant increase in population within the assessment area is attributed to the growth primarily within two cities, Fitchburg and Verona, south of Madison. Dane County and the Madison MSA experienced the highest growth rates at 14.4 percent and 13.1 percent, respectively. According to a community representative, Dane County has the fastest growing population of any county in Wisconsin due to its robust economy and was identified as one of the ten best places to live in the U.S. by Money Magazine (2007-2009).

Area	2000 Population	2010 Population	Percentage Change
Assessment Area	40,998	63,126	54.0
Dane County	426,526	488,073	14.4
Green County	33,647	36,842	9.5
Madison MSA	535,421	605,435	13.1
Wisconsin	5,363,675	5,686,986	6.0

Source: 2000—U.S. Census Bureau: Decennial Census  
2010—U.S. Census Bureau: Decennial Census

## Income Characteristics

The table below provides detailed statistics for the changes in median family income between the 2000 U. S. Census and the 2006-2010 U. S. Census, American Community Survey. Throughout the bank's assessment area and the broader Madison MSA, income increased by comparable amounts, at 24.0 percent and 28.6 percent, respectively. This is slightly higher than the rate the state of Wisconsin experienced for the same time period. A community representative indicated Dane County has a robust economy, though income disparities exist within the county.

Area	2000 Median Family Income	2006-2010 Median Family Income	Percentage Change
Assessment Area	66,583	82,584	24.0
Dane County,	62,964	80,995	28.6
Green County	50,521	64,092	26.9
Madison MSA	61,050	76,735	25.7
Wisconsin	52,911	64,869	22.6

Source: 2000—U.S. Census Bureau: Decennial Census  
2006-2010—U.S. Census Bureau: American Community Survey

## Housing Characteristics

According to the 2006-2010 U.S. Census Bureau, American Community Study, the median housing value within the assessment area has increased and is \$233,635, which is higher than Dane and Green County’s median housing values of \$230,800 and \$150,300, respectively. Across the broader Madison MSA and the state of Wisconsin, housing values have also increased to \$219,147 and \$169,000 respectively, but trail those within the bank’s assessment area. Gross rents within the assessment area are notably higher versus the state of Wisconsin, with the highest gross rents occurring in Dane County. The table below provides additional information on median housing values and gross rents.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix C – Glossary. A higher rate supports more affordable housing opportunities. In 2010, the affordability ratios within Dane and Green Counties were .26 and .35, respectively. Meanwhile, the Madison MSA and State of Wisconsin’s affordability ratios were .27 and .31 respectively. This indicates housing within the Green County is more affordable than Dane County, the Madison MSA and the state of Wisconsin. Accordingly, Green County is primarily agriculture based, while Dane County is home to the capital city of Madison, WI.

Table 23

### Trends in Housing Costs 2000 and 2010

Location	2000 Median Housing Value	2006-2010 Median Housing Value	2000 Median Gross Rent	2006-2010 Median Gross Rent
<b>Assessment Area</b>	157,391	233,635	646	810
<b>Dane County</b>	146,600	230,800	641	832
<b>Green County</b>	102,700	150,300	464	644
<b>Madison MSA</b>	142,430	219,147	632	812
<b>State of Wisconsin</b>	109,900	169,000	540	713

Source: 2000—U.S. Census Bureau: Decennial Census  
2006-2010—U.S. Census Bureau: American Community Survey

## Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on the change in the foreclosure inventory rate at the county level. The foreclosure inventory rate measures the number of residential



properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle.

The foreclosure inventory rate has decreased within the assessment area in a similar fashion as the state of Wisconsin. The rate in Dane County decreased from a high of 2.7 percent in January 2011 to 0.7 percent in December 2014. The rate in Green County decreased from a high of 4.6 percent to 0.9 percent in December 2014. These foreclosure rates for the state of Wisconsin declined from 3.6 percent in January 2011 to 1.2 percent in December 2014.

### Unemployment Conditions

According to the U.S. Census, unemployment rates in both Dane County and Green County declined steadily between 2010 and 2013. Year-over-year, both Dane County and Green County maintained an unemployment rate lower than the state average.

Since the previous evaluation, there have been 36 layoffs or closings that have affected 2,367 workers; the three largest events affected approximately 670 workers. The most recent closing impacting a large number of employees was American TV and Appliance of Madison, Inc. in April 2014, which resulted in a loss of 201 jobs. The table below provides additional unemployment statistics.

Table 24				
Unemployment Rates				
Region	2010	2011	2012	2013
State of Wisconsin	8.5	7.5	6.9	6.7
Madison MSA	6.1	5.4	5.1	4.9
Dane County, WI	5.7	5.0	4.7	4.6
Green County, WI	8.3	7.0	6.4	5.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

### Employment Conditions

The top 20 employers account for approximately 68,900 employees, with the largest employer being the University of Wisconsin, which employs approximately 24,400 individuals. The State of Wisconsin, including the Wisconsin Transportation Department, is the second largest employer with approximately 11,000 employees.

Table 25 Largest Employers in the Assessment Area		
Company	Number of Employees	Industry
University Of WI-Madison	14464	Schools-Universities & Colleges Academic
State Of Wisconsin	10001	Government
Epic Systems Corp	7400	Physicians & Surgeons Equip & Supls-Mfrs
Kraft Foods	5000	Food Products (Whls)
U W Health Hospital & Clinic	5000	Hospitals
University Of Wisconsin	4900	Schools-Universities & Colleges Academic
WPS Health Insurance Corp	3500	Insurance
St Mary's Hospital	2800	Hospitals
Wheeler Reports	2700	Court & Convention Reporters
QBE	1500	Insurance
Seventh Avenue	1500	Internet & Catalog Shopping
Wick Buildings	1400	Building Contractors
Sub-Zero Inc	1200	Refrigerators-Manufacturers
Telephone & Data Systems Inc	1200	Non-classified Establishments
Walgreens Distribution Ctr	1200	Distribution Centers (Whls)
Workforce Development Dept	1100	State Government-General Offices
S & L Hospitality	1001	Non-classified Establishments
Wisconsin Transportation Dept	1001	Transit Lines
Oakwood Foundation	1000	Foundation-Educ Philanthropic Research
TDS Telecommunications Corp	1000	Telephone Companies

Source: AMLIS Database

### Community Representatives

Information obtained from two community representatives within the assessment area was considered for this assessment area and evaluation to provide perspective regarding the communities where the bank operates. One community representative stated that Dane County is a robust economy for some, but not all of its residents. There are clear income disparities that exist within the county. The representative also indicated there is a tremendous amount of development in Madison that reduces unemployment and creates an opportunity for banks to assist with small start-up financing.

Another community representative stated Green County's economic conditions are stable. Agriculture provides about 28.0 percent of the jobs in the county. The representative also indicated local financial institutions are very active in the community, though opportunities exist in community development and credit-related projects for small business development projects.

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

### LENDING TEST

#### **Geographic Distribution of Loans**

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the different census tract types within the assessment area. The assessment area contains eight middle-income and four upper-income census tracts based on the 2010 U.S. Census. The bank's HMDA-reportable, small business, and small farm loans reflect a reasonable dispersion among census tracts throughout the assessment area.

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

Union Bank and Trust Company's lending demonstrates reasonable distribution among borrowers of different income levels, as well as businesses and farms of different sizes throughout the assessment area. Given the low volume of lending activity, total HMDA-reportable loans were evaluated. There was no aggregate data available for 2014.

#### ***HMDA-Reportable Lending***

In 2013, Union Bank and Trust Company's total HMDA-reportable lending to low-income borrowers was reasonable. The bank originated 8.9 percent by volume and 5.2 percent by dollar of total HMDA-reportable loans to low-income borrowers. In comparison, aggregate lenders originated 7.2 percent by volume and 3.9 percent by dollar amount to this same group of borrowers. The bank performed better than the aggregate when compared with the assessment area demographics in which 10.6 percent of families by family income are considered low-income.

In 2014, Union Bank and Trust Company's total HMDA-reportable lending to low-income borrowers was reasonable. Using 2013 as a benchmark, the bank has enhanced its performance as the bank originated 11.7 percent by volume and 5.1 percent by dollar of total HMDA-reportable loans to low-income borrowers.

Also in 2013, Union Bank and Trust Company's total HMDA-reportable lending to moderate-income borrowers was reasonable. The bank originated 20.0 percent by volume and 12.5 percent by dollar of total HMDA-reportable loans to moderate-income borrowers. By comparison, aggregate lenders originated 18.4 percent by volume and 13.5 percent by dollar of loans to this same group of borrowers. Again, the bank performed better than the aggregate when compared with the assessment area demographics in which 16.5 percent of families by family income are considered moderate-income.

In 2014, Union Bank and Trust Company's total HMDA-reportable lending to moderate-income borrowers was excellent. Using 2013 as a benchmark, the bank significantly enhanced its performance as the bank originated 29.0 percent by volume and 22.3 percent by dollar of total HMDA-reportable loans to moderate-income borrowers.

The bank's performance in both low- and moderate-income census tracts is an indicator of the bank's willingness to meet the credit needs within the assessment area.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2013 Madison, WI MSA 31540</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2013			2013			
		Count		Agg	Dollar		Agg	
		Bank #	%	%	Bank \$(000s)	\$ %	\$ %	
Home Purchase	Low	1	9.1	6.6	320	17.9	3.4	10.6
	Moderate	3	27.3	20.8	459	25.6	16.2	16.5
	Middle	3	27.3	28.9	560	31.3	27.0	27.8
	Upper	2	18.2	37.0	215	12.0	47.3	45.1
	Unknown	2	18.2	6.7	237	13.2	6.1	0.0
	<b>Total</b>		<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,791</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	3	11.5	7.5	193	3.2	4.5	10.6
	Moderate	3	11.5	17.3	399	6.7	12.9	16.5
	Middle	8	30.8	27.9	2,054	34.5	25.1	27.8
	Upper	8	30.8	37.7	2,148	36.1	45.2	45.1
	Unknown	4	15.4	9.6	1,155	19.4	12.3	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>5,949</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	8.6	0	0.0	4.2	10.6
	Moderate	3	50.0	16.4	367	32.2	9.5	16.5
	Middle	0	0.0	38.3	0	0.0	37.1	27.8
	Upper	3	50.0	35.2	772	67.8	48.3	45.1
	Unknown	0	0.0	1.6	0	0.0	0.9	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,139</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	10.6
	Moderate	0	0.0	0.0	0	0.0	0.0	16.5
	Middle	0	0.0	0.0	0	0.0	0.0	27.8
	Upper	0	0.0	0.0	0	0.0	0.0	45.1
	Unknown	2	100.0	100.0	923	100.0	100.0	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>923</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	4	8.9	7.2	513	5.2	3.9	10.6
	Moderate	9	20.0	18.4	1,225	12.5	13.5	16.5
	Middle	11	24.4	28.6	2,614	26.7	25.1	27.8
	Upper	13	28.9	37.1	3,135	32.0	44.2	45.1
	Unknown	8	17.8	8.8	2,315	23.6	13.3	0.0
	<b>Total</b>		<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>9,802</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
 2013 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

### Small Business Lending

Union Bank and Trust Company’s lending reflects reasonable distribution to small businesses, which is defined as businesses reporting revenue equal to or less than \$1 million. The bank originated 76.6 percent by volume of its loans to businesses with stated revenues of \$1 million or less. This is consistent with the demographics given 92.4 percent of the small businesses in the assessment area reported revenues of \$1 million or less. Furthermore, of the small business loans originated, 66.7 percent were \$100,000 or less, which indicates small loans are provided to small businesses and indicative of the bank meeting the credit needs of small businesses. Small businesses typically seek loans in smaller amounts than large businesses. Accordingly, a higher volume of loans in smaller amounts is considered indicative of a stronger performance in meeting the credit needs of small businesses.

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2014 Madison, WI MSA 31540							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Businesses %	
		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	36	76.6	5,207	73.5	92.4
		Over \$1 Million or Unknown	11	23.4	1,880	26.5	7.6
		Total	47	100.0	7,087	100.0	100.0
	Loan Size	\$100,000 or Less	32	68.1	1,473	20.8	
		\$100,001 - \$250,000	8	17.0	1,041	14.7	
		\$250,001 - \$1 Million	7	14.9	4,574	64.5	
		Total	47	100.0	7,088	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	24	66.7	949	18.2	
		\$100,001 - \$250,000	7	19.4	934	17.9	
		\$250,001 - \$1 Million	5	13.9	3,324	63.8	
		Total	36	100.0	5,207	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

### Small Farm Lending

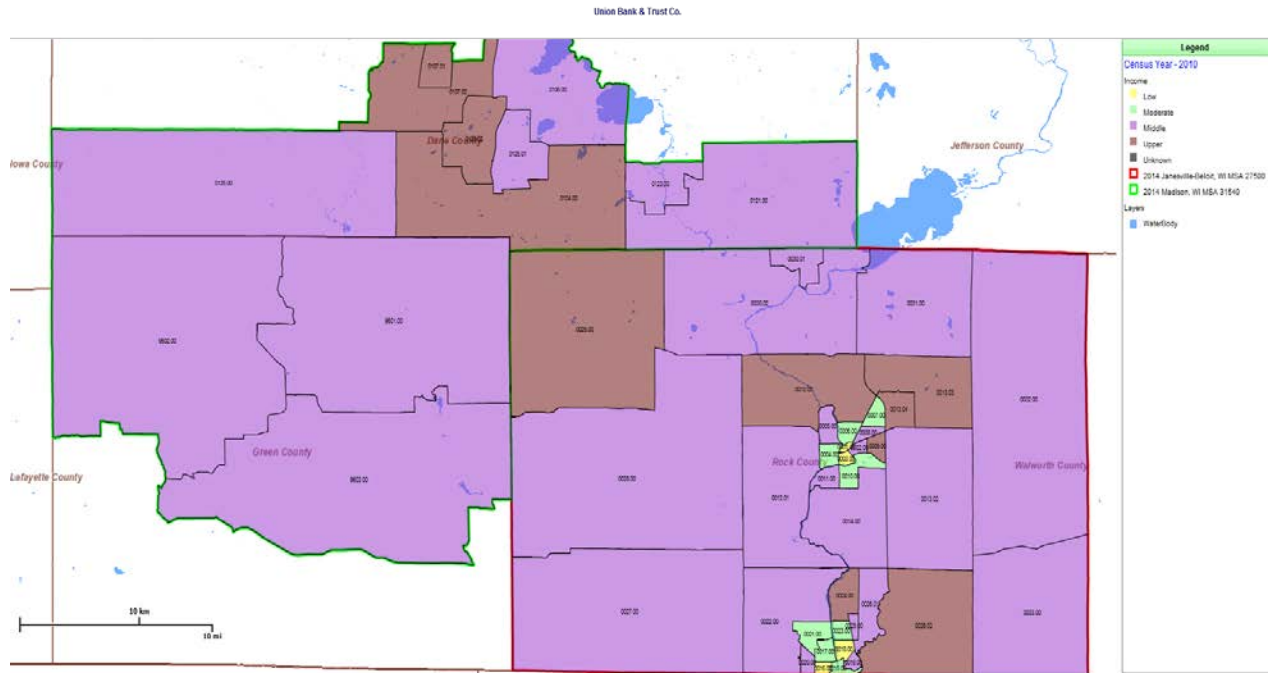
Union Bank and Trust Company’s lending distribution showed excellent distribution to small farms, which is defined as farms reporting revenue equal to or less than \$1 million). The bank

originated 97.0 percent by volume of small farm loans to farms reporting revenues of \$1 million dollars or less. By comparison, 99.2 percent of small farms within the assessment area reported revenues of \$1 million or less. The distribution of farm loans by loan size reveals the bank is making most of its loans in smaller amounts as 81.3 percent of loans were \$100,000 or less.

<b>Small Farms Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Farms	
		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %	%	
Small Farms	Revenue	\$1 Million or Less	32	97.0	2,066	98.7	99.2
		Over \$1 Million or	1	3.0	28	1.3	0.8
		Total	33	100.0	2,094	100.0	100.0
	Loan Size	\$100,000 or Less	27	81.8	1,060	50.6	
		\$100,001 - \$250,000	6	18.2	1,035	49.4	
		\$250,001 - \$500,000	0	0.0	0	0.0	
		Total	33	100.0	2,095	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	26	81.3	1,031	49.9	
		\$100,001 - \$250,000	6	18.8	1,035	50.1	
		\$250,001 - \$500,000	0	0.0	0	0.0	
		Total	32	100.0	2,066	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 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 Area

#### 2014 Combined Assessment Area





**APPENDIX B – Scope of Examination**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>	1. HMDA-Reportable loans: January 1, 2013 – December 31, 2014 2. Small Business loans: January 1, 2014 – December 31, 2014 3. Small Farm loans: January 1, 2014 – December 31, 2014		
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
Union Bank and Trust Company			1. HMDA-reportable loans 2. Small Business loans 3. Small Farm loans
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Janesville-Beloit, WI MSA #27500	Full Review	None	N/A
Madison, WI MSA #31540	Full Review	None	N/A

## APPENDIX C - Glossary

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

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

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

**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.

**Consumer loan:** A loan 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, home equity, other secured loan, and other unsecured loan.

**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.

**Geography:** A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

**Home mortgage loans:** Include home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**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.

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

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/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 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 (**MMSA**). Performance within each MMSA is analyzed separately as a full-scope review and receives its own ratings under the Lending, Investment and Service Tests provided the financial institution has its main office, branch, or deposit-taking ATM located in each applicable state making up the MMSA.

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

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

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

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

**Small loans to business:** A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small loans to farms:** A loan included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500 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.

**Upper-income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent in the case of a geography.

**APPENDIX D – 2014 LENDING TABLES JANESVILLE-BELOIT, WI MSA #27500**

<b>Geographic Distribution of HMDA Reportable Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2014		Dollar		
		Count Bank		Bank		
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	2	4.0	94	1.6	4.6
	Moderate	2	4.0	98	1.6	15.7
	Middle	11	22.0	1,193	20.0	55.9
	Upper	35	70.0	4,592	76.8	23.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>50</b>	<b>100.0</b>	<b>5,977</b>	<b>100.0</b>
Refinance	Low	0	0.0	0	0.0	4.6
	Moderate	3	5.5	201	2.5	15.7
	Middle	13	23.6	2,283	28.1	55.9
	Upper	39	70.9	5,651	69.5	23.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>55</b>	<b>100.0</b>	<b>8,135</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0	0.0	4.6
	Moderate	0	0.0	0	0.0	15.7
	Middle	8	66.7	792	74.0	55.9
	Upper	4	33.3	278	26.0	23.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>12</b>	<b>100.0</b>	<b>1,070</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0	0.0	<b>Multi-Family</b> 11.5
	Moderate	0	0.0	0	0.0	22.4
	Middle	0	0.0	0	0.0	38.7
	Upper	1	100.0	168	100.0	27.3
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>168</b>	<b>100.0</b>
HMDA Totals	Low	2	1.7	94	0.6	4.6
	Moderate	5	4.2	299	1.9	15.7
	Middle	32	27.1	4,268	27.8	55.9
	Upper	79	66.9	10,689	69.6	23.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>		<b>118</b>	<b>100.0</b>	<b>15,350</b>	<b>100.0</b>
Originations & Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Borrower Distribution of HMDA Reportable Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2014		Dollar		
		Count				
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	2	4.0	102	1.7	19.7
	Moderate	7	14.0	633	10.6	18.5
	Middle	9	18.0	1,454	24.3	22.3
	Upper	18	36.0	2,279	38.1	39.5
	Unknown	14	28.0	1,509	25.2	0.0
	<b>Total</b>		<b>50</b>	<b>100.0</b>	<b>5,977</b>	<b>100.0</b>
Refinance	Low	4	7.3	722	8.9	19.7
	Moderate	6	10.9	426	5.2	18.5
	Middle	12	21.8	1,935	23.8	22.3
	Upper	17	30.9	2,799	34.4	39.5
	Unknown	16	29.1	2,253	27.7	0.0
	<b>Total</b>		<b>55</b>	<b>100.0</b>	<b>8,135</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0	0.0	19.7
	Moderate	2	16.7	90	8.4	18.5
	Middle	0	0.0	0	0.0	22.3
	Upper	7	58.3	580	54.2	39.5
	Unknown	3	25.0	400	37.4	0.0
	<b>Total</b>		<b>12</b>	<b>100.0</b>	<b>1,070</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0	0.0	19.7
	Moderate	0	0.0	0	0.0	18.5
	Middle	0	0.0	0	0.0	22.3
	Upper	0	0.0	0	0.0	39.5
	Unknown	1	100.0	168	100.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>168</b>	<b>100.0</b>
Mortgage Totals	Low	6	5.1	824	5.4	19.7
	Moderate	15	12.7	1,149	7.5	18.5
	Middle	21	17.8	3,389	22.1	22.3
	Upper	42	35.6	5,658	36.9	39.5
	Unknown	34	28.8	4,330	28.2	0.0
	<b>Total</b>		<b>118</b>	<b>100.0</b>	<b>15,350</b>	<b>100.0</b>
Originations and Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	7.8
	Moderate	0	0.0	0	0.0	17.9
	Middle	4	15.4	221	11.3	47.0
	Upper	22	84.6	1,733	88.7	27.2
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>1,954</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
 Note: Percentages may not add to 100.0 percent due to rounding

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Farms
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.8
	Middle	21	56.8	3,252	60.5	77.9
	Upper	16	43.2	2,126	39.5	20.3
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>5,378</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
 Note: Percentages may not add to 100.0 percent due to rounding

<b>Small Businesses Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Businesses %	
Count Bank	%	Dollar Bank \$ 000s	\$ %				
				#	%		
Small Businesses	Revenue	\$1 Million or Less	21	80.8	1,404	71.9	89.7
		Over \$1 Million or Unknown	5	19.2	550	28.1	10.3
		Total	26	100.0	1,954	100.0	100.0
	Loan Size	\$100,000 or Less	18	69.2	608	31.1	
		\$100,001 - \$250,000	7	26.9	997	51.0	
		\$250,001 - \$1 Million	1	3.8	350	17.9	
		Total	26	100.0	1,955	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	14	66.7	407	29.0	
		\$100,001 - \$250,000	7	33.3	997	71.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	21	100.0	1,404	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							



<b>Small Farms Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Janesville-Beloit, WI MSA 27500</b>							
Product Type		Bank & Demographic Comparison					
		Count		2014		Total Farms	
		Bank		Dollar	Bank		
#	%	\$ 000s	\$ %	%			
Small Farms	Revenue	\$1 Million or Less	33	89.2	4,457	82.9	98.0
		Over \$1 Million or Unknown	4	10.8	921	17.1	2.0
		Total	37	100.0	5,378	100.0	100.0
	Loan Size	\$100,000 or Less	19	51.4	928	17.3	
		\$100,001 - \$250,000	9	24.3	1,534	28.5	
		\$250,001 - \$500,000	9	24.3	2,917	54.2	
		Total	37	100.0	5,379	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	18	54.5	894	20.1	
		\$100,001 - \$250,000	8	24.2	1,334	29.9	
		\$250,001 - \$500,000	7	21.2	2,229	50.0	
		Total	33	100.0	4,457	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

**MADISON, WI MSA #31540**

<b>Geographic Distribution of HMDA Reportable Loans</b>						
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Owner Occupied % of Units
		2014		Dollar		
		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	27	87.1	4,436	78.8	65.5
	Upper	4	12.9	1,197	21.2	34.5
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>5,633</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	32	86.5	5,678	80.6	65.5
	Upper	5	13.5	1,364	19.4	34.5
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>37</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	6	75.0	442	37.4	65.5
	Upper	2	25.0	739	62.6	34.5
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>1,181</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0	0.0	<b>Multi-Family</b> 0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	232	100.0	66.8
	Upper	0	0.0	0	0.0	33.2
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	66	85.7	10,788	76.6	65.5
	Upper	11	14.3	3,300	23.4	34.5
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>77</b>	<b>100.0</b>	<b>14,088</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Borrower Distribution of HMDA Reportable Loans</b>						
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>						
Product Type	Borrower Income Levels	Bank & Demographic Comparison				Families by Family Income %
		2014		Dollar		
		Count				
		#	%	\$ (000s)	\$ %	
Home Purchase	Low	4	12.9	381	6.8	13.0
	Moderate	9	29.0	1,256	22.3	17.1
	Middle	7	22.6	1,235	21.9	26.6
	Upper	8	25.8	2,164	38.4	43.3
	Unknown	3	9.7	597	10.6	0.0
	<b>Total</b>		<b>31</b>	<b>100.0</b>	<b>5,633</b>	<b>100.0</b>
Refinance	Low	5	13.5	339	4.8	13.0
	Moderate	6	16.2	705	10.0	17.1
	Middle	7	18.9	1,219	17.3	26.6
	Upper	11	29.7	2,837	40.3	43.3
	Unknown	8	21.6	1,942	27.6	0.0
	<b>Total</b>		<b>37</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0	0.0	13.0
	Moderate	0	0.0	0	0.0	17.1
	Middle	4	50.0	891	75.4	26.6
	Upper	3	37.5	195	16.5	43.3
	Unknown	1	12.5	95	8.0	0.0
	<b>Total</b>		<b>8</b>	<b>100.0</b>	<b>1,181</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0	0.0	13.0
	Moderate	0	0.0	0	0.0	17.1
	Middle	0	0.0	0	0.0	26.6
	Upper	0	0.0	0	0.0	43.3
	Unknown	1	100.0	232	100.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>
Mortgage Totals	Low	9	11.7	720	5.1	13.0
	Moderate	15	19.5	1,961	13.9	17.1
	Middle	18	23.4	3,345	23.7	26.6
	Upper	22	28.6	5,196	36.9	43.3
	Unknown	13	16.9	2,866	20.3	0.0
	<b>Total</b>		<b>77</b>	<b>100.0</b>	<b>14,088</b>	<b>100.0</b>
Originations and Purchases						
2014 FFIEC Census Data						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	35	74.5	4,514	63.7	60.1
	Upper	12	25.5	2,573	36.3	39.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>7,087</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
 Note: Percentages may not add to 100.0 percent due to rounding

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2014 Dollar Bank		Small Farms
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	29	87.9	1,793	85.6	84.8
	Upper	4	12.1	301	14.4	15.2
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>2,094</b>	<b>100.0</b>	<b>100.0</b>

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS  
 Note: Percentages may not add to 100.0 percent due to rounding

<b>Small Businesses Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2014 Madison, WI MSA 31540</b>							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Businesses %	
#	%	\$ 000s	\$ %	%	%		
						Small Businesses	Revenue
Over \$1 Million or Unknown	11	23.4	1,880	26.5	7.6		
Total	47	100.0	7,087	100.0	100.0		
Loan Size	\$100,000 or Less	32	68.1	1,473	20.8		
	\$100,001 - \$250,000	8	17.0	1,041	14.7		
	\$250,001 - \$1 Million	7	14.9	4,574	64.5		
	Total	47	100.0	7,088	100.0		
Loan Size & Rev \$1 Mill	\$100,000 or Less	24	66.7	949	18.2		
	\$100,001 - \$250,000	7	19.4	934	17.9		
	\$250,001 - \$1 Million	5	13.9	3,324	63.8		
	Total	36	100.0	5,207	100.0		
Originations & Purchases							
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2014 Madison, WI MSA 31540							
Product Type		Bank & Demographic Comparison					
		Count Bank		2014 Dollar Bank		Total Farms %	
		#	%	\$ 000s	\$ %		
Small Farms	Revenue	\$1 Million or Less	32	97.0	2,066	98.7	99.2
		Over \$1 Million or	1	3.0	28	1.3	0.8
		Total	33	100.0	2,094	100.0	100.0
	Loan Size	\$100,000 or Less	27	81.8	1,060	50.6	
		\$100,001 - \$250,000	6	18.2	1,035	49.4	
		\$250,001 - \$500,000	0	0.0	0	0.0	
		Total	33	100.0	2,095	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	26	81.3	1,031	49.9	
		\$100,001 - \$250,000	6	18.8	1,035	50.1	
		\$250,001 - \$500,000	0	0.0	0	0.0	
		Total	32	100.0	2,066	100.0	
	Originations & Purchases						
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							