

PUBLIC DISCLOSURE

April 6, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Calumet County Bank
RSSD# 37743

103 North Main St.
Brillion, Wisconsin 54110

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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BANK'S CRA RATING

Calumet County Bank is rated **Satisfactory**.

Calumet County Bank provides credit consistent with its size, location, and the local economic conditions within its assessment area. The average loan-to-deposit (LTD) ratio is reasonable given the bank's size, its competitors, and assessment area credit needs. A majority of the bank's loans were originated in its delineated assessment area. The geographic distribution of loans reflects a reasonable lending distribution throughout the assessment area and a reasonable distribution of loans among individuals of different income levels and to businesses and farms of different sizes. There were no CRA-related complaints received by the institution or the Federal Reserve Bank of Chicago since the previous examination.

SCOPE OF EXAMINATION

Calumet County Bank's performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) Small Institution 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.

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

- ***Loan-to-Deposit Ratio*** – A 16-quarter average loan-to-deposit ratio was calculated for the bank and compared to its national peer and a sample of local competitors.
- ***Lending in the Assessment Area – Home Mortgage Disclosure Act (HMDA)***-reportable loans originated in from January 1, 2010 to December 31,2013, and small business and small farm loans originated from January 1, 2010 to December 31,2014 were reviewed to determine the percentage of loans originated in the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** - HMDA-reportable loans originated from January 1,2010 to December 31,2013, and small business and small farm loans originated from January 1, 2010 to 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 moderate- income.
- ***Lending to Borrowers of Different Income and to Businesses and Farms of Different Sizes*** - HMDA-reportable loans originated from January 1, 2010 to December 31,2013, and small business and small farm loans originated from January 1, 2010 to 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 and farms with

different revenue sizes.

- **Response to Substantiated Complaints** – Neither Calumet County Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

DESCRIPTION OF INSTITUTION

Calumet County Bank is a wholly-owned subsidiary of Calumet Bancshares, Inc., a one-bank holding company located in Brillion, Wisconsin. In addition to the bank's main office, the bank operates one other full service location in Sherwood, Wisconsin. The bank also operates five automated teller machines (ATMs) within its assessment area, two onsite cash-only ATMs (one at each banking office) and three offsite cash-only ATMs located in Brillion and Sherwood. All banking offices and ATMs are located in Calumet County.

Calumet County Bank offers a full range of deposit and loan products to meet the banking needs of consumers and businesses in its assessment area. Deposit products include checking (Free Checking, Select Checking, Basic Checking with Interest, Money Market Accounts, Beyond Checking), savings accounts (Basic, Premium, Christmas Club), certificates of deposit (various terms), individual retirement accounts (various terms), and negotiable order of withdrawal (NOW) accounts. Loan products include vehicle loans (including recreational vehicle), personal loans (single payment and installment), business loans, agriculture loans, and numerous real estate mortgage loan options, including fixed-rate, balloon, home improvement, and home equity. The bank also offers electronic account features, such as direct deposit, online banking and bill pay. In addition, the bank offers credit cards (third party), which can also be paid online. Additionally, Calumet County Bank is involved with the Wisconsin Housing and Economic Development Authority loan program, which helps first time home buyers with the purchase of a home.

The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2014, ranked the bank eighth of 19 FDIC-insured deposit financial institutions operating in the assessment area with a market share of 3.6 percent. By comparison, the top two financial institutions in the area are Investors Community Bank with 25.3 percent and Bank First National with 21.4 percent of the market share.

According to the Uniform Bank Performance Report, bank assets totaled \$91.9 million as of December 31, 2014. The bank's loan portfolio is primarily comprised by commercial loans (57.9 percent) followed by residential real estate loans (19.8 percent). The table below depicts the bank's loan portfolio composition.

Composition of Loan Portfolio as of December 31, 2014 (000's)			
Category	Type	\$	%
Real Estate Secured	1-4 Family and Multi-Family Residential	\$11,822	19.8
	Farmland	\$6,285	10.5
	Non-farm, Non-residential	\$20,601	34.4
	Total Real Estate Secured	\$42,014	70.2
Agricultural	Agricultural	\$1,264	2.1
Commercial	Commercial and Industrial	\$14,033	23.5
Consumer	Loans to Individuals	\$916	1.5
Other	Other	\$1615	2.7
	Total	\$59,842	100.0

Note: Percentages may not total to 100.0 percent 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 February 7, 2011.

DESCRIPTION OF ASSESSMENT AREA

Calumet County Bank's assessment area consists of twelve census tracts located in Calumet and Manitowoc counties in Wisconsin. The bank has delineated Calumet County in its entirety and one census tract (of 20) in Manitowoc County. The bank includes one census tract in its assessment area from Manitowoc County due to its proximity to the county line of its main branch. Of the eleven census tracts located in Calumet County, which is part of the Appleton, Wisconsin, Metropolitan Statistical Area(MSA) #11540, one is moderate-, six are middle-, and four are upper-income census tracts. In Manitowoc County, which is part of a non-metropolitan statistical area, there is one middle-income census tract. There are no distressed or underserved nonmetropolitan middle-income census tracts in the assessment area. As stated above, the main office is located in the city of Brillion and its only branch office is located in Sherwood, Wisconsin. The bank's main office is located in a middle-income census tract, while the bank's branch office is located in an upper-income census tract.

Census-Related Changes

HMDA-reportable, small business, and small farm loans originated prior to 2012, the point at which new census tract definitions became effective, the 2000 census demographic data was used in the analysis to define the bank's assessment area, which consisted of seven middle-income and one upper-income census tracts. For HMDA-reportable, small business, and small farm loans originated in calendar year 2012 or later, the 2010 census demographic data was used in the analysis of the bank's assessment area. Thus, while the bank has not changed its assessment area since the last performance evaluation, the delineated assessment area now contains one moderate-

income, seven middle-income, and four upper-income census tracts. Previously, the bank did not have any moderate-income census tracts within its assessment area.

The following table presents demographic data specific to the institution's assessment area.

Assessment Area 2000 Census:

Assessment Area: 2011 Appleton, WI 11540 MSA								
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	1,537	12.3
Moderate-income	0	0.0	0	0.0	0	0.0	2,427	19.4
Middle-income	7	87.5	9,376	75.1	284	3.0	3,877	31.0
Upper-income	1	12.5	3,115	24.9	48	1.5	4,650	37.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8	100.0	12,491	100.0	332	2.7	12,491	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	13,542	10,019	75.0	74.0	2,766	20.4	757	5.6
Upper-income	3,949	3,337	25.0	84.5	413	10.5	199	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	17,491	13,356	100.0	76.4	3,179	18.2	956	5.5
	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	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	1,644	73.3	1,502	72.6	85	81.0	57	82.6
Upper-income	599	26.7	567	27.4	20	19.0	12	17.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,243	100.0	2,069	100.0	105	100.0	69	100.0
	Percentage of Total Businesses:			92.2		4.7		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	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	354	93.2	346	93.3	7	87.5	1	100.0
Upper-income	26	6.8	25	6.7	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	380	100.0	371	100.0	8	100.0	1	100.0
	Percentage of Total Businesses:			97.6		2.1		0.3

2011 FFIEC Census Data & 2011 Dun & Bradstreet information according to 2000 Census

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

Assessment Area 2010 Census:

Assessment Area: 2014 Appleton, WI 11540 MSA								
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	2,111	13.9
Moderate-income	1	8.3	1,588	10.5	49	3.1	2,921	19.3
Middle-income	7	58.3	8,334	55.1	504	6.0	4,045	26.7
Upper-income	4	33.3	5,213	34.4	67	1.3	6,058	40.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12	100.0	15,135	100.0	620	4.1	15,135	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,401	1,818	10.8	75.7	459	19.1	124	5.2
Middle-income	12,490	9,299	55.4	74.5	2,251	18.0	940	7.5
Upper-income	6,382	5,659	33.7	88.7	531	8.3	192	3.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	21,273	16,776	100.0	78.9	3,241	15.2	1,256	5.9
	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	
Moderate-income	210	12.9	190	12.9	12	11.4	8	13.6
Middle-income	983	60.2	873	59.4	72	68.6	38	64.4
Upper-income	441	27.0	407	27.7	21	20.0	13	22.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,634	100.0	1,470	100.0	105	100.0	59	100.0
	Percentage of Total Businesses:			90.0		6.4		3.6
	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	
Moderate-income	22	7.1	21	7.0	1	12.5	0	0.0
Middle-income	267	86.1	261	86.4	6	75.0	0	0.0
Upper-income	21	6.8	20	6.6	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	310	100.0	302	100.0	8	100.0	0	0.0
	Percentage of Total Businesses:			97.4		2.6		0.0

2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS

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

According to 2010 U.S Census data, Calumet County has a population of 48,971; see the following

table. The population of the assessment area has increased by 20.5 percent from 2000 to 2010. This far exceeds the population growth of the state of Wisconsin, with an increase of 6.0 percent. Conversely, Manitowoc County experienced a slight decrease of 1.7 percent in population from the 2000 census. The Appleton, WI MSA #11540 grew by 11.9 percent between 2000 and 2010. The community representative contacted during this review indicated that Calumet County's population growth can be attributed to its expanding economy. The representative indicated that Calumet County was the second fastest growing economy in Wisconsin.

Population Change 2000 and 2010			
Area	2000 Population	2010 Population	Percentage Change
Calumet County, WI	40,631	48,971	20.5
Manitowoc County, WI	82,887	81,442	-1.7
Appleton, WI MSA #11540	201,602	225,666	11.9
State of Wisconsin	5,363,675	5,686,986	6.0
<i>Source: 2000—U.S. Census Bureau: Decennial Census 2010—U.S. Census Bureau: Decennial Census</i>			

The following table presents average incomes for families living in the assessment area by individual counties, and the state of Wisconsin. According to U.S. Census 2006-2010 estimates, the median family income for the Calumet County was \$72,208. The median family income remains well above the state average of \$64,869, and median family income in Calumet County has increased by 23.1 percent since 2000, which is comparable with the state. Median family income in Manitowoc County has increased at comparable rates (19.0 percent) but remains below the state average.

Median Family Income Change 2000 and 2010			
Area	2000 Median Family Income	2006-2010 Median Family Income	Percentage Change
Calumet County, WI	58,654	72,208	23.1
Manitowoc County, WI	51,995	61,849	19.0
Appleton, WI MSA #11540	57,592	69,972	21.5
State of Wisconsin	52,911	64,869	22.6
<i>Source: 2000—U.S. Census Bureau: Decennial Census 2006-2010—U.S. Census Bureau: American Community Survey</i>			

Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on changes in foreclosure inventory rates at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle. The foreclosure inventory rates in the state of Wisconsin have fluctuated over the review period. Foreclosure inventory rates increased from February 2010 to March 2011 and then decreased from

April 2011 to March 2013. The foreclosure inventory rate decreased from 3.6 percent in March 2011 to 2.7 percent in March 2013. Comparable increases and decreases were found for both counties in the assessment area. Calumet County and Manitowoc County have generally maintained a slightly lower foreclosure inventory rate during this time period with an average rate of 0.022 and 0.023 respectively, whereas the state of Wisconsin averaged 0.027.

Housing Characteristics

Below are the recent housing cost trends within the assessment area and the state of Wisconsin based on 2010 U.S. Census data. For Calumet County, the median housing value is \$158,700 and median gross rent is \$643 per month, which is slightly below state average. In Manitowoc County, the median housing value is \$124,000 and median gross rent is \$547 per month, which is well below state average. The state of Wisconsin has a median housing value of \$169,000 and a median gross rent of \$713. Statewide, there has been an increase in demand for housing through 2012 as seen by the rising home prices; this is attributed to a recovering economy and low interest rates being offered by financial institutions.

While housing values within the assessment area are below state average, the affordability ratios for the counties that make up the assessment area are above the affordability ratio for the State of Wisconsin (0.31). Specifically, Calumet County has an affordability ratio of 0.39, while Manitowoc County’s affordability ratio is 0.47. Both are significantly higher than the statewide affordability ratio. An area with a higher affordability ratio indicates that housing is generally more affordable than an area with a lower ratio.

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
Calumet County	108,200	158,700	491	643
Manitowoc County	91,200	124,000	433	547
Appleton, WI MSA	106,471	154,600	527	661
State of Wisconsin	109,900	169,000	540	713

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

Unemployment Conditions

The U.S Bureau of Labor Statistics provided unemployment statistics displayed in the table below and include the counties in the bank’s assessment area, state of Wisconsin, and the United States from 2010 to 2013. The unemployment rate in Calumet County has dropped from 6.6 percent in 2010 to 5.3 percent in 2013. Both Manitowoc County and the State of Wisconsin have seen similar drops; please refer to the table below. Calumet County has maintained an unemployment rate

lower than the state, whereas Manitowoc has remained higher than the state of Wisconsin. According to a community representative, Calumet County has the second lowest unemployment rate in Wisconsin, which the contact attributed to large business expansion throughout Calumet County. Conversely, the contact indicated Manitowoc County has not seen the level of business growth or expansion that Calumet County has seen.

Unemployment Rates				
Region	2010	2011	2012	2013
Calumet County	6.6	5.7	5.4	5.3
Manitowoc County	9.7	8.1	7.6	7.3
Appleton, WI MSA	7.8	6.8	6.3	6.1
State of Wisconsin	8.5	7.5	6.9	6.7

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

Employment Conditions

The largest employers in the assessment area are listed in the following table. Based on data collected by the U.S. Department of Labor, the majority of the assessment area's employment is in manufacturing, hospitals, suppliers, colleges, and power plants. There are two organizations in the assessment area with more than 1,000 employees. Five separate layoffs were identified by the Warn Report for Manitowoc County since 2010, which helps to explain the high unemployment rate compared to Calumet County and the State of Wisconsin. Calumet County did not have any layoffs reported during this same time period. A community contact indicated that the area was largely insulated from the economic downturn. The contact stated that while the economy declined slightly, economic development is beginning to pick up again, especially with business expansion. The contact also stated this has actually caused a workforce issue of there being more jobs available than skilled workers to fill these positions.

Largest Employers in the Assessment Area		
Company	Number of Employees	Industry
Lakeside Foods Incorporated	1700	Food Products & Manufacturers
Holy Family Memorial	1400	Hospitals
Ariens Corporation	900	Garden & Lawn Equipment Supplier
Brillion Iron Works Incorporated	700	Foundries-Gray Iron Manufacturer
Lakeshore Technical College	700	Schools-Universities & Colleges Academic
POINT Beach Nuclear Plant	700	Power Plants
Franciscan Sisters-Christian	541	Churches
Kaytee Products Incorporated	500	Feed-Manufacturers
Manitowoc Ice Machine	400	Ice Making Equipment & Machines
Kimberly-Clark	370	Sanitary Paper Products Manufacturer

Source: America's Labor Market Information System (ALMIS), United States Department of Labor

Community Representatives

Information obtained from a community representative within the assessment area was considered to better understand the credit needs and economic condition of the communities where the bank operates. The community representative indicated that the economy was largely stable and that the county had weathered the recession better than most areas. Further, the contact stated businesses are attempting to expand, but are having trouble finding both skilled and unskilled workers to fill the expanded positions. The contact indicated that the unemployment rate was down and financial institutions, were strongly involved with the county's revolving fund which helps local businesses with low interest rate loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Performance standards for small banks consist of the following, as applicable: the bank's loan-to-deposit (LTD) ratio, the percentage of loans and other lending-related activities located in the bank's assessment area, the record of lending to borrowers of different income levels and businesses of different sizes, the geographic distribution of loans, and the record of taking action in response to written complaints. To determine CRA performance, the preceding standards are analyzed and evaluated within the assessment area context, which includes, but is not limited to, comparative analyses of the assessment area and the state and the non-metropolitan portions of the state demographic data on median income, nature of housing stock, housing costs, and other relevant data pertaining to the bank's assessment area.

LENDING TEST

Calumet County Bank's performance relative to the Lending Test is Satisfactory based on the bank's loan-to-deposit ratio, assessment area concentration, geographic distribution of loans, lending to borrowers of different income levels and to businesses and farms of different sizes, and the bank's response to complaints.

Loan-to-Deposit Ratio

Calumet County Bank's average loan-to-deposit (LTD) ratio was calculated from data contained in the Consolidated Reports of Condition and was evaluated considering the bank's capacity to lend, its competitors, and its peer LTD ratios. Also considered were demographic factors, economic conditions, and lending opportunities present in the assessment area.

Calumet County Bank's average LTD is reasonable given the bank's size, current economic environment, and assessment area credit needs. The bank's most recent LTD ratio was 74.9 percent with a 16-quarter average of 71.2 percent ending September 30, 2014. The table also compares this data with similar data for other competitors in the assessment area and the nationwide peer group, which is defined in the Uniform Bank Performance Report as all insured commercial banks with assets between \$50 million and \$100 million, with two or fewer full-service

banking offices, located in a metropolitan statistical area. Although the bank's LTD is lower than its local competitors, the bank has a higher LTD than its national peer group. The following table summarizes the bank's average LTD ratio for the 16- quarters since the previous evaluation dated February 7, 2011

Comparative Loan-to-Deposit Ratios	
Institution	Loan-to-Deposit Ratio (%)
	16 - Quarter Average
Calumet County	71.2%
National Peer Group	69.6%
Competitors	
Bank Mutual	78.1%*
Community Bank and Trust Company	88.6%
State Bank of Chilton	92.0%

*Bank Mutual changed regulators and data was not available prior; therefore an 11 quarter average was utilized.

Assessment Area Concentration

A majority of loans were made in the bank's assessment area. During the evaluation period, the bank originated 75.7 percent of total HMDA-related loans by number and 78.2 percent by dollar amount in its assessment area.

Similarly, the majority of small business loans were originated within the assessment area, as 75.4 percent by number and 69.5 percent by dollar amount of the total originations were issued within the bank's assessment area. Small farm loans accounted for 57.6 percent of the loans by number and 55.2 percent of the loans by dollar were originated within the bank's assessment area. With Calumet County's business industry growing, agricultural loan opportunities are limited within the county. When HMDA loans, small business, and small farm are combined, the bank originated 72.0 percent of loans by number and 72.9 percent of loans by dollar within the assessment area. The table below summarizes the number and corresponding percentages of the bank's HMDA loans originated during the sample period; as well as commercial loans and agricultural loans originated during the same period.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	9	100.0	\$678	100.0	0	0.0	\$0	0.0
Home Purchase - Conventional	19	67.9	\$1,916	56.8	9	32.1	\$1,457	43.2
Multi-Family Housing	2	100.0	\$2,055	100.0	0	0.0	\$0	0.0
Refinancing	26	74.3	\$4,446	80.6	9	25.7	\$1,073	19.4
Total HMDA related	56	75.7	\$9,095	78.2	18	24.3	\$2,530	21.8
Small Business	43	75.4	\$9,421	69.5	14	24.6	\$4,128	30.5

Total Small Bus. related	43	75.4	\$9,421	69.5	14	24.6	\$4,128	30.5
Small Farm	19	57.6	\$545	55.2	14	42.4	\$442	44.8
Total Small Farm related	19	57.6	\$545	55.2	14	42.4	\$442	44.8
TOTAL LOANS	118	72.0	\$19,061	72.9	46	28.0	\$7,100	27.1

Geographic Distribution of Loans

An analysis of HMDA-reportable, small business, and small farm loans was conducted to determine the level of geographic distribution of loans. Loan distribution reflects a reasonable distribution among moderate-income census tracts with regards to HMDA-reportable, small business, and small farm loans. Only one moderate-income census tract lies within the bank's assessment area and is located in the southern portion of Calumet County. Therefore, geographic distribution was given minimal weight when determining the overall CRA rating of the institution. The counties are described below separately as Calumet County is part of the Appleton, Wisconsin, MSA #11540, whereas Manitowoc County is not part of an MSA.

HMDA-Reportable Loans

During the entire review period the bank did not originate any loans within the one moderate-income census tract. While this compares less than favorably to the percentage of owner occupied housing of 11.9 percent and the aggregate lending data, it should be noted that census tract income levels changed as a result of the 2010 census, as no moderate-income census tracts existed in the bank's assessment area prior to the census change. Further, the newly designated moderate-income census tract in Calumet County is located at the southern border of the county. Calumet County Bank's primary operations are in the northern part of the county with both the main branch and secondary location located well north of the moderate-income census tract. Due to the proximity of the branch locations and relative low number of owner occupied housing, the loan distribution for HMDA-reportable loans is reasonable.

The bank did not originate any HMDA-reportable loans within the moderate-income census tract in its assessment area; therefore, individual products will not be discussed. The following table presents the bank's home mortgage loan data by the income level of the census tract and compares it to owner occupied housing units in 2013.

Calumet County:

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Appleton, WI 11540 MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2013				
		Bank	Agg	Dollar		Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.0	0	0.0	5.1	11.9
	Middle	5	83.3	38.1	508	77.8	31.4	51.0
	Upper	1	16.7	53.9	145	22.2	63.5	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	6	100.0	100.0	653	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.4	0	0.0	31.0	11.9
	Middle	8	100.0	40.2	764	100.0	26.6	51.0
	Upper	0	0.0	50.5	0	0.0	42.4	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	8	100.0	100.0	764	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	16.1	0	0.0	11.8	11.9
	Middle	5	100.0	47.8	370	100.0	47.5	51.0
	Upper	0	0.0	36.1	0	0.0	40.7	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	5	100.0	100.0	370	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	14.6
	Middle	0	0.0	80.0	0	0.0	62.0	69.9
	Upper	0	0.0	20.0	0	0.0	38.0	15.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.4	0	0.0	23.0	11.9
	Middle	18	94.7	40.2	1,642	91.9	28.9	51.0
	Upper	1	5.3	50.4	145	8.1	48.1	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	19	100.0	100.0	1,787	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
Note: Percentages may not add to 100.0 percent due to rounding								

Manitowoc County:

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Non MSA Wisconsin								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2013 Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	100.0	168	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	168	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	68	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	68	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	100	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	100	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	100.0	336	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	336	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending

Calumet County:

The bank did not originate any of its small business loans in the one moderate-income census tract during the review period. In 2014, according to area demographics, 14.5 percent of the businesses are located in the moderate-income census tract in Calumet County. The bank’s lending is below the percentage of businesses located in the moderate- income census tract. However, as noted above, the moderate-income census tract is not largely accessible to the institution. Additionally, the bank originates a low volume overall. Given these factors, Calumet County Bank’s lending distribution to small businesses is reasonable. The following table presents the bank’s small business loan data compared to the presence of businesses by the income level of the census tract.

Geographic Distribution of Small Business Loans						
Assessment Area: 2014 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		2014				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	14.5
	Middle	6	75.0	2,266	93.8	54.4
	Upper	2	25.0	150	6.2	31.1
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	8	100.0	2,416	100.0	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Manitowoc County:

The bank did not originate any small business loans within the one middle-income census tract during 2014. During the entire review period, the bank did make four small business loans in the county. However, given that the bank’s assessment area does not contain any low- or moderate-income census tracts, no weight was given to geographic distribution in Manitowoc County.

Small Farm

The bank did not originate any of its small farm loans in the one moderate-income census tract located in Calumet County during the review period. For 2014, according to area demographics, 10.0 percent of the small farms are located in the moderate-income census tract. The bank’s

lending is below the percentage of farms located in the moderate-income census tract. However, as noted above, the moderate-income census tract is not largely accessible to the institution. Given this factor, Calumet County Bank’s lending to small farms is reasonable. The following table presents the bank’s small farm loan data compared to the presence of farms by the income level of the census tract.

Calumet County:

Geographic Distribution of Small Farm Loans						
Assessment Area: 2014 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Small Farms
		2014				
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	10.0
	Middle	2	33.3	0	0.0	80.6
	Upper	4	66.7	73	100.0	9.5
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total		6	100.0	73	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Manitowoc County:

Geographic Distribution of Small Farm Loans						
Assessment Area: 2014 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison				Small Farms
		2014				
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	2	100.0	116	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total		2	100.0	116	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

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

An analysis of HMDA-reportable, small business, and small farm loans was conducted to determine the level of lending to borrowers of different income levels and business and farms of different revenue size. Loan distribution reflects a reasonable distribution among individuals of different income levels, including moderate-income individuals, and businesses and farms of different sizes.

HMDA-Reportable Loans

The following narrative is based on the most recent year since aggregate lending data was available, though lending was consistent across the entire review period. The tables below summarize the bank's home mortgage lending distribution for 2013. In 2013, the bank originated 31.6 percent and 50.0 percent of its HMDA-related loans to low- and moderate-income borrowers in Calumet and Manitowoc Counties, respectively. The bank's performance is excellent considering aggregate lenders originated 20.4 percent and 29.2 percent to low- and moderate-income borrowers in Calumet and Manitowoc Counties, respectively. For perspective, Calumet County is made up of 25.7 percent of low- and moderate-income families while Manitowoc County has 33.9 percent low- and moderate-income families residing within the county. While the low number of overall loans originated in the sample period can cause large shifts in percentages, half of the bank's HMDA-reportable loans by number and dollar amount were originated to low- and moderate income borrowers. Within Calumet County, the bank has been above aggregate lenders with originations to low- and moderate-income borrowers for total HMDA-reportable loans each year since 2011. Similarly, the bank has been above aggregate lenders with originations to low- and moderate-income borrowers for total HMDA-reportable loans each year since 2012 in Manitowoc County.

A discussion of individual products follows. Home improvement loans and multifamily loans are not discussed individually due to the particularly low levels of origination.

Home Purchase Loans

Calumet County Bank's home purchase loans reflect a reasonable borrower distribution. During the review period 19 of the bank's 56 originations of HMDA-reportable loans were home purchase loans. Originations to low-income borrowers have remained under aggregate in each year of the review period with the exception of 2011. In 2011, the bank originated two home purchase loans to low-income borrowers which accounted for 33.3 percent of the bank's home purchase loans by number in Calumet County and 24.3 percent of the bank's dollar volume of home purchase loans. However, in 2013, the bank did not make any home purchase loans to low-income borrowers in either county, while aggregate lenders originated approximately 12.8 percent by number and 7.5 percent and dollar volume in Calumet County. Similarly, aggregate lenders originated 5.1 percent

by number and 2.8 percent by dollar volume in Manitowoc County.

In 2013, in Calumet County, lending to moderate-income borrowers by the bank was better than aggregate, as the bank originated 33.3 percent of its home purchase loans to moderate-income borrowers. This accounted for 38.7 percent of the dollar volume of the bank's home purchase loans. Aggregate lender home purchase originations accounted for only 22.9 percent by number and 17.7 percent by dollar volume in Calumet County. While the bank only made two home purchase loans in Manitowoc County, both loans were to moderate-income borrowers. By comparison, aggregate lenders originated 25.6 percent by number and 16.2 percent by dollar volume to moderate-income borrowers.

Refinances

Calumet County Bank's refinance loans reflect a reasonable borrower distribution. During the review period, 22 of the bank's 56 originations of HMDA-reportable loans were refinances. Originations to low-income borrowers have remained under aggregate in each year of the review period with the exception of 2011. In 2011, the bank originated one refinance loan to a low-income borrower which accounted for 25.0 percent of the bank's refinances by number in Calumet County and 8.0 percent of the bank's dollar volume of refinances. However, in 2013, the bank did not make any refinances to low-income borrowers in either county, while aggregate lenders originated approximately 7.2 percent by number and 3.4 percent and dollar volume in Calumet County. Similarly, aggregate lenders originated 3.8 percent by number and 1.4 percent by dollar volume in Manitowoc County.

In 2013, in Calumet County, lending to moderate-income borrowers by the bank was better than aggregate, as the bank originated 25.0 percent of its refinances to moderate-income borrowers. This accounted for 26.7 percent by dollar volume of the bank's refinances. Aggregate lender refinances accounted for only 19.2 percent by number and 11.1 percent by dollar volume in Calumet County. The bank did not originate any refinances in Manitowoc County in 2013 to moderate-income borrowers. By comparison, aggregate lenders originated 12.3 percent by number and 8.4 percent by dollar volume to moderate-income borrowers.

Calumet County:

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Appleton, WI 11540 MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2013 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Agg \$ %		
Home Purchase	Low	0	0.0	12.8	0	0.0	7.5	14.3
	Moderate	2	33.3	22.9	253	38.7	17.7	19.6
	Middle	2	33.3	29.4	153	23.4	30.3	26.7
	Upper	2	33.3	28.5	247	37.8	38.8	39.4
	Unknown	0	0.0	6.5	0	0.0	5.7	0.0
	Total	6	100.0	100.0	653	100.0	100.0	100.0
Refinance	Low	0	0.0	7.2	0	0.0	3.4	14.3
	Moderate	2	25.0	19.2	204	26.7	11.1	19.6
	Middle	2	25.0	24.5	125	16.4	16.6	26.7
	Upper	2	25.0	39.5	214	28.0	34.8	39.4
	Unknown	2	25.0	9.7	221	28.9	34.1	0.0
	Total	8	100.0	100.0	764	100.0	100.0	100.0
Home Improvement	Low	1	20.0	11.7	131	35.4	7.7	14.3
	Moderate	1	20.0	16.1	67	18.1	12.2	19.6
	Middle	1	20.0	30.6	85	23.0	25.6	26.7
	Upper	1	20.0	38.9	39	10.5	50.5	39.4
	Unknown	1	20.0	2.8	48	13.0	4.0	0.0
	Total	5	100.0	100.0	370	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	14.3
	Moderate	0	0.0	0.0	0	0.0	0.0	19.6
	Middle	0	0.0	0.0	0	0.0	0.0	26.7
	Upper	0	0.0	0.0	0	0.0	0.0	39.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	1	5.3	9.2	131	7.3	4.6	14.3
	Moderate	5	26.3	20.0	524	29.3	12.8	19.6
	Middle	5	26.3	26.3	363	20.3	20.5	26.7
	Upper	5	26.3	36.0	500	28.0	35.9	39.4
	Unknown	3	15.8	8.4	269	15.1	26.2	0.0
	Total	19	100.0	100.0	1,787	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Manitowoc County:

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Non MSA Wisconsin								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2013 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Agg \$ %		
Home Purchase	Low	0	0.0	5.1	0	0.0	2.8	9.7
	Moderate	2	100.0	25.6	168	100.0	16.2	16.0
	Middle	0	0.0	25.6	0	0.0	25.7	27.4
	Upper	0	0.0	38.5	0	0.0	52.5	46.9
	Unknown	0	0.0	5.1	0	0.0	2.9	0.0
	Total	2	100.0	100.0	168	100.0	100.0	100.0
Refinance	Low	0	0.0	3.8	0	0.0	1.4	9.7
	Moderate	0	0.0	12.3	0	0.0	8.4	16.0
	Middle	0	0.0	24.5	0	0.0	24.2	27.4
	Upper	1	100.0	52.8	68	100.0	60.3	46.9
	Unknown	0	0.0	6.6	0	0.0	5.8	0.0
	Total	1	100.0	100.0	68	100.0	100.0	100.0
Home Improvement	Low	0	0.0	6.3	0	0.0	1.2	9.7
	Moderate	0	0.0	18.8	0	0.0	20.5	16.0
	Middle	0	0.0	37.5	0	0.0	17.2	27.4
	Upper	1	100.0	37.5	100	100.0	61.1	46.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	100	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	9.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.0
	Middle	0	0.0	0.0	0	0.0	0.0	27.4
	Upper	0	0.0	0.0	0	0.0	0.0	46.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	4.3	0	0.0	1.7	9.7
	Moderate	2	50.0	16.1	168	50.0	11.1	16.0
	Middle	0	0.0	26.1	0	0.0	24.2	27.4
	Upper	2	50.0	47.8	168	50.0	58.3	46.9
	Unknown	0	0.0	5.6	0	0.0	4.7	0.0
	Total	4	100.0	100.0	336	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business

Small business lending reflects reasonable distribution among businesses of different revenue sizes. Loans originated to businesses with revenues of \$1 million or less comprised 87.5 percent of the originations by number and 78.8 percent by dollar in Calumet County. Lending activity is indicative of the total businesses with 89.8 percent of total businesses with revenues under \$1 million. Additionally, 42.9 percent of loans to small businesses were made in the loan amount of less than \$100,000. Loans in the amount of \$100,000 or less are typically considered most beneficial to small businesses. The bank did not originate any loans in the one Manitowoc County census tract. Further, small business lending was consistent across the entire review period. Overall, the bank is meeting the needs of its assessment area through its small business lending.

Calumet County:

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2014 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		2014		2014		Total Businesses	
		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	7	87.5	1,904	78.8	89.8
		Over \$1 Million	1	12.5			6.6
		<i>Total Rev. available</i>	8	100.0			96.4
		Rev. Not Known	0	0.0			3.6
		Total	8	100.0			100.0
	Loan Size	\$100,000 or Less	3	37.5	88	3.6	
		\$100,001 - \$250,000	1	12.5	150	6.2	
		\$250,001 - \$1 Million	4	50.0	2,179	90.2	
		Total	8	100.0	2,416	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	3	42.9	88	4.6	
\$100,001 - \$250,000		1	14.3	150	7.9		
\$250,001 - \$1 Million		3	42.9	1,666	87.5		
Total		7	100.0	1,904	100.0		

Based on 2013 D&B information according to 2010 ACS Boundaries
 Note: Percentages may not add to 100.0 percent due to rounding

Manitowoc County:

The bank did not originate any small business loans in the one census tract in Manitowoc County..

Small Farm

Small farm lending reflects reasonable distribution among farms of different revenue sizes. Loans originated to farms with revenues of \$1 million or less comprised 100.0 percent of the originations by number and by volume in Calumet and Manitowoc Counties in 2014. This compares favorably as the total farms with revenues under \$1 million are 96.8 percent and 98.9 percent in Calumet and Manitowoc Counties, respectively. Additionally, 100.0 percent of loans to small farms were made in the loan amount of less than \$100,000 in both counties. Loans in the amount of \$100,000 or less are typically considered most beneficial to small businesses. Further, small farm lending was consistent across the entire review period. Overall, the bank is meeting the needs of its assessment area through its small farm lending.

Calumet County:

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2014 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison				Total Farms	
		2014		2014			
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	6	100.0	73	100.0	96.8
		Over \$1 Million	0	0.0			3.2
		<i>Total Rev. available</i>	6	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	6	100.0			100.0
	Loan Size	\$100,000 or Less	6	100.0	73	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	6	100.0	73	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	6	100.0	73	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	6	100.0	73	100.0	

Based on 2013 D&B information according to 2010 ACS Boundaries

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

Manitowoc County:

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2014 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		Count		Dollar		Total Farms	
		Bank		Bank			
#	%	\$ 000s	\$ %	%			
Small Businesses	Revenue	\$1 Million or Less	2	100.0	116	100.0	98.9
		Over \$1 Million	0	0.0			1.1
		<i>Total Rev. available</i>	2	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	2	100.0			100.0
	Loan Size	\$100,000 or Less	2	100.0	116	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	2	100.0	116	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	2	100.0	116	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
Total		2	100.0	116	100.0		

Based on 2013 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Response to Complaints

The bank or this Reserve Bank has not received any CRA-related complaints since the previous examination.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – Lending Tables

Calumet County:

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2010 Appleton, WI 11540 MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	53.6	100	100.0	43.2	72.2
	Upper	0	0.0	46.4	0	0.0	56.8	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	100	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	46.8	1,123	100.0	41.2	72.2
	Upper	0	0.0	53.2	0	0.0	58.8	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	1,123	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	54.4	0	0.0	53.5	72.2
	Upper	0	0.0	45.6	0	0.0	46.5	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	60.0	2,055	100.0	20.5	83.1
	Upper	0	0.0	40.0	0	0.0	79.5	16.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	2,055	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	7	100.0	48.3	3,278	100.0	41.2	72.2
	Upper	0	0.0	51.7	0	0.0	58.8	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	7	100.0	100.0	3,278	100.0	100.0	100.0

Originations & Purchases
Information based on 2000 Census data
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2010 Appleton, WI 11540 MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2010 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	0	0.0	13.6	0	0.0	8.6	12.4
	Moderate	0	0.0	29.0	0	0.0	24.4	19.8
	Middle	0	0.0	24.2	0	0.0	26.0	31.5
	Upper	0	0.0	23.3	0	0.0	32.6	36.3
	Unknown	1	100.0	9.9	100	100.0	8.4	0.0
	Total	1	100.0	100.0	100	100.0	100.0	100.0
Refinance	Low	0	0.0	6.9	0	0.0	4.3	12.4
	Moderate	2	50.0	20.1	64	5.7	16.0	19.8
	Middle	0	0.0	26.2	0	0.0	23.3	31.5
	Upper	2	50.0	37.3	1,059	94.3	44.8	36.3
	Unknown	0	0.0	9.5	0	0.0	11.6	0.0
	Total	4	100.0	100.0	1,123	100.0	100.0	100.0
Home Improvement	Low	0	0.0	8.2	0	0.0	6.7	12.4
	Moderate	0	0.0	17.7	0	0.0	19.2	19.8
	Middle	0	0.0	34.8	0	0.0	33.8	31.5
	Upper	0	0.0	36.7	0	0.0	35.6	36.3
	Unknown	0	0.0	2.5	0	0.0	4.7	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	12.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.8
	Middle	0	0.0	0.0	0	0.0	0.0	31.5
	Upper	0	0.0	0.0	0	0.0	0.0	36.3
	Unknown	2	100.0	100.0	2,055	100.0	100.0	0.0
	Total	2	100.0	100.0	2,055	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	8.1	0	0.0	4.9	12.4
	Moderate	2	28.6	21.4	64	2.0	17.0	19.8
	Middle	0	0.0	26.2	0	0.0	23.3	31.5
	Upper	2	28.6	34.9	1,059	32.3	41.3	36.3
	Unknown	3	42.9	9.4	2,155	65.7	13.4	0.0
	Total	7	100.0	100.0	3,278	100.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2010 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2010				
		Count Bank		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	9	100.0	1,484	100.0	67.5
	Upper	0	0.0	0	0.0	32.5
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	9	100.0	1,484	100.0	100.0
Based on 2011 D&B information according to 2000 Census Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2010 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2010				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	90.2
	Upper	0	0.0	0	0.0	9.8
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	0	0.0	0	0.0	100.0
Based on 2011 D&B information according to 2000 Census Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2010 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		Count		2010		Total	
		Bank		Dollar	Bank		
#	%	\$ 000s	\$ %	Businesses	%		
Small Businesses	Revenue	\$1 Million or Less	9	100.0	1,484	100.0	92.1
		Over \$1 Million	0	0.0			4.5
		<i>Total Rev. available</i>	9	100.0			96.6
		Rev. Not Known	0	0.0			3.4
		Total	9	100.0			100.0
	Loan Size	\$100,000 or Less	4	44.4	288	19.4	
		\$100,001 - \$250,000	4	44.4	655	44.2	
		\$250,001 - \$1 Million	1	11.1	541	36.4	
		Total	9	100.0	1,484	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	4	44.4	288	19.4	
		\$100,001 - \$250,000	4	44.4	655	44.2	
		\$250,001 - \$1 Million	1	11.1	541	36.4	
		Total	9	100.0	1,484	100.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2010 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		2010					
		Count Bank		Dollar Bank		Total Fams	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	0	0.0	0	0.0	96.9
		Over \$1 Million	0	0.0			1.9
		<i>Total Rev. available</i>	0	0.0			98.8
		Rev. Not Known	0	0.0			1.1
		Total	0	0.0			99.9
	Loan Size	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2011 Appleton, WI 11540 MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2011				
		Bank	Agg	Bank		Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	6	100.0	50.6	522	100.0	41.4	72.2
	Upper	0	0.0	49.4	0	0.0	58.6	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	6	100.0	100.0	522	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	46.9	750	100.0	39.7	72.2
	Upper	0	0.0	53.1	0	0.0	60.3	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	750	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	52.8	0	0.0	43.7	72.2
	Upper	0	0.0	47.2	0	0.0	56.3	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	83.1
	Upper	0	0.0	0.0	0	0.0	0.0	16.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	10	100.0	48.3	1,272	100.0	41.6	72.2
	Upper	0	0.0	51.7	0	0.0	58.4	27.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	10	100.0	100.0	1,272	100.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2011 Appleton, WI 11540 MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2011				
		#	%	Agg %	Dollar		Agg \$ %	
Bank \$(000s)	Bank \$ %							
Home Purchase	Low	2	33.3	16.4	127	24.3	9.6	12.4
	Moderate	3	50.0	29.4	227	43.5	24.1	19.8
	Middle	0	0.0	24.1	0	0.0	26.7	31.5
	Upper	0	0.0	22.0	0	0.0	31.3	36.3
	Unknown	1	16.7	8.1	168	32.2	8.2	0.0
	Total	6	100.0	100.0	522	100.0	100.0	100.0
Refinance	Low	1	25.0	6.7	60	8.0	3.7	12.4
	Moderate	0	0.0	20.2	0	0.0	15.9	19.8
	Middle	0	0.0	26.1	0	0.0	23.9	31.5
	Upper	3	75.0	36.5	690	92.0	44.1	36.3
	Unknown	0	0.0	10.4	0	0.0	12.4	0.0
	Total	4	100.0	100.0	750	100.0	100.0	100.0
Home Improvement	Low	0	0.0	10.0	0	0.0	6.6	12.4
	Moderate	0	0.0	20.0	0	0.0	19.3	19.8
	Middle	0	0.0	36.7	0	0.0	34.7	31.5
	Upper	0	0.0	32.2	0	0.0	37.5	36.3
	Unknown	0	0.0	1.1	0	0.0	1.9	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	12.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.8
	Middle	0	0.0	0.0	0	0.0	0.0	31.5
	Upper	0	0.0	0.0	0	0.0	0.0	36.3
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	3	30.0	8.9	187	14.7	5.0	12.4
	Moderate	3	30.0	22.1	227	17.8	17.3	19.8
	Middle	0	0.0	26.3	0	0.0	24.3	31.5
	Upper	3	30.0	33.1	690	54.2	40.2	36.3
	Unknown	1	10.0	9.6	168	13.2	13.3	0.0
	Total	10	100.0	100.0	1,272	100.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2011 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2011				
		Count Bank		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	7	87.5	2,180	91.6	69.3
	Upper	1	12.5	200	8.4	30.7
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	8	100.0	2,380	100.0	100.0
Based on 2011 D&B information according to 2000 Census Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2011 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2011				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	0	0.0	90.1
	Upper	0	0.0	0	0.0	9.9
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	1	100.0	0	0.0	100.0
Based on 2011 D&B information according to 2000 Census Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2011 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		Count		2011		Total	
		Bank		Dollar	Bank		Businesses
#	%	\$ 000s	\$ %	%			
Small Businesses	Revenue	\$1 Million or Less	7	87.5	2,180	91.6	92.4
		Over \$1 Million	1	12.5			4.8
		<i>Total Rev. available</i>	8	100.0			97.2
		Rev. Not Known	0	0.0			2.8
		Total	8	100.0			100.0
	Loan Size	\$100,000 or Less	1	12.5	53	2.2	
		\$100,001 - \$250,000	3	37.5	569	23.9	
		\$250,001 - \$1 Million	4	50.0	1,758	73.9	
		Total	8	100.0	2,380	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	1	14.3	53	2.4	
		\$100,001 - \$250,000	2	28.6	369	16.9	
		\$250,001 - \$1 Million	4	57.1	1,758	80.7	
		Total	7	100.0	2,180	100.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2011 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		2011					
		Count Bank		Dollar Bank		Total Fams	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	1	100.0	0	0.0	96.9
		Over \$1 Million	0	0.0			2.7
		<i>Total Rev. available</i>	1	100.0			99.6
		Rev. Not Known	0	0.0			0.4
		Total	1	100.0			100.0
	Loan Size	\$100,000 or Less	1	100.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	0	0.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	1	100.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	0	0.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2012 Appleton, WI 11540 MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2012				
		Bank	Agg	Dollar		Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	5.6	0	0.0	3.7	11.9
	Middle	3	100.0	40.8	353	100.0	33.0	51.0
	Upper	0	0.0	53.7	0	0.0	63.3	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	3	100.0	100.0	353	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.1	0	0.0	6.9	11.9
	Middle	6	100.0	36.9	1,338	100.0	32.5	51.0
	Upper	0	0.0	54.0	0	0.0	60.5	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	6	100.0	100.0	1,338	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.7	0	0.0	7.8	11.9
	Middle	2	100.0	44.7	138	100.0	45.2	51.0
	Upper	0	0.0	43.6	0	0.0	46.9	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	138	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	25.0	0	0.0	10.9	14.6
	Middle	0	0.0	62.5	0	0.0	65.4	69.9
	Upper	0	0.0	12.5	0	0.0	23.7	15.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.6	0	0.0	6.5	11.9
	Middle	11	100.0	38.1	1,829	100.0	34.4	51.0
	Upper	0	0.0	53.3	0	0.0	59.1	37.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	11	100.0	100.0	1,829	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2012 Appleton, WI 11540 MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2012				
		#	%	Dollar		Agg \$ %		
Bank	Agg			Bank \$(000s)	Agg \$ %			
Home Purchase	Low	0	0.0	13.0	0	0.0	6.9	14.3
	Moderate	1	33.3	22.1	200	56.7	19.1	19.6
	Middle	0	0.0	27.3	0	0.0	28.3	26.7
	Upper	1	33.3	27.8	135	38.2	36.1	39.4
	Unknown	1	33.3	9.8	18	5.1	9.6	0.0
	Total	3	100.0	100.0	353	100.0	100.0	100.0
Refinance	Low	0	0.0	5.9	0	0.0	3.4	14.3
	Moderate	1	16.7	19.8	157	11.7	15.1	19.6
	Middle	0	0.0	26.8	0	0.0	24.7	26.7
	Upper	3	50.0	36.7	872	65.2	44.4	39.4
	Unknown	2	33.3	10.8	309	23.1	12.5	0.0
	Total	6	100.0	100.0	1,338	100.0	100.0	100.0
Home Improvement	Low	0	0.0	5.9	0	0.0	3.1	14.3
	Moderate	0	0.0	23.4	0	0.0	17.9	19.6
	Middle	1	50.0	31.4	101	73.2	29.5	26.7
	Upper	1	50.0	38.8	37	26.8	48.4	39.4
	Unknown	0	0.0	0.5	0	0.0	1.1	0.0
	Total	2	100.0	100.0	138	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	14.3
	Moderate	0	0.0	0.0	0	0.0	0.0	19.6
	Middle	0	0.0	0.0	0	0.0	0.0	26.7
	Upper	0	0.0	0.0	0	0.0	0.0	39.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	7.2	0	0.0	3.9	14.3
	Moderate	2	18.2	20.4	357	19.5	15.3	19.6
	Middle	1	9.1	27.1	101	5.5	24.4	26.7
	Upper	5	45.5	35.1	1,044	57.1	41.0	39.4
	Unknown	3	27.3	10.3	327	17.9	15.4	0.0
	Total	11	100.0	100.0	1,829	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2012 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2012				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	13.9
	Middle	5	71.4	853	43.5	55.1
	Upper	2	28.6	1,109	56.5	31.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	7	100.0	1,962	100.0	100.0
Based on 2012 D&B information according to 2010 ACS Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Geographic Distribution of Small Farm Loans						
Assessment Area: 2012 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2012				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	8.9
	Middle	2	66.7	162	100.0	79.9
	Upper	1	33.3	0	0.0	11.2
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	3	100.0	162	100.0	100.0
Based on 2012 D&B information according to 2010 ACS Boundaries						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2012 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		Count		Dollar		Total	
		Bank		Bank		Businesses	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	5	71.4	853	43.5	91.2
		Over \$1 Million	2	28.6			5.3
		<i>Total Rev. available</i>	7	100.0			96.5
		Rev. Not Known	0	0.0			3.5
		Total	7	100.0			100.0
	Loan Size	\$100,000 or Less	3	42.9	185	9.4	
		\$100,001 - \$250,000	1	14.3	191	9.7	
		\$250,001 - \$1 Million	3	42.9	1,586	80.8	
		Total	7	100.0	1,962	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	3	60.0	185	21.6	
		\$100,001 - \$250,000	1	20.0	191	22.4	
		\$250,001 - \$1 Million	1	20.0	477	55.9	
		Total	5	100.0	853	100.0	

Based on 2012 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2012 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		2012		2012		Total Farms	
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	3	100.0	162	100.0	97.4
		Over \$1 Million	0	0.0			2.6
		<i>Total Rev. available</i>	3	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	3	100.0			100.0
	Loan Size	\$100,000 or Less	2	66.7	0	0.0	
		\$100,001 - \$250,000	1	33.3	162	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	3	100.0	162	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	2	66.7	0	0.0	
		\$100,001 - \$250,000	1	33.3	162	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
Total		3	100.0	162	100.0		

Based on 2012 D&B information according to 2010 ACS Boundaries

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

Geographic Distribution of Small Business Loans						
Assessment Area: 2013 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		2013		2013		Small Businesses
		Count		Dollar		
		Bank		Bank		
		#	%	\$ 000s	\$ %	%
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	13.6
	Middle	6	85.7	627	82.6	55.1
	Upper	1	14.3	132	17.4	31.3
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total		7	100.0	759	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries

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

Geographic Distribution of Small Farm Loans						
Assessment Area: 2013 Appleton, WI 11540 MSA						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2013				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	9.3
	Middle	1	33.3	10	14.4	80.5
	Upper	2	66.7	57	85.6	10.2
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	3	100.0	66	100.0	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries
 Note: Percentages may not add to 100.0 percent due to rounding

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2013 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison 2013					
		Count Bank		Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	6	85.7	727	95.8	90.9
		Over \$1 Million	1	14.3			5.7
		<i>Total Rev. available</i>	7	100.0			96.6
		Rev. Not Known	0	0.0			3.5
		Total	7	100.0			100.1
	Loan Size	\$100,000 or Less	3	42.9	169	22.2	
		\$100,001 - \$250,000	4	57.1	590	77.8	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	7	100.0	759	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	2	33.3	137	18.9	
\$100,001 - \$250,000		4	66.7	590	81.1		
\$250,001 - \$1 Million		0	0.0	0	0.0		
Total		6	100.0	727	100.0		

Based on 2013 D&B information according to 2010 ACS Boundaries
 Note: Percentages may not add to 100.0 percent due to rounding

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2013 Appleton, WI 11540 MSA							
Product Type		Bank & Demographic Comparison					
		2013		2013		Total Fams	
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	3	100.0	66	100.0	97.2
		Over \$1 Million	0	0.0			2.8
		<i>Total Rev. available</i>	3	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	3	100.0			100.0
	Loan Size	\$100,000 or Less	3	100.0	66	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	3	100.0	66	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	3	100.0	66	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
Total		3	100.0	66	100.0		

Based on 2013 D&B information according to 2010 ACS Boundaries

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

Manitowoc County:

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2010 Non MSA Wisconsin								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0

Originations & Purchases
Information based on 2000 Census data
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2010 Non MSA Wisconsin								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2010 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	0	0.0	25.0	0	0.0	17.7	11.3
	Moderate	0	0.0	25.0	0	0.0	20.1	16.3
	Middle	0	0.0	20.8	0	0.0	28.5	26.4
	Upper	0	0.0	16.7	0	0.0	26.1	46.0
	Unknown	0	0.0	12.5	0	0.0	7.7	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	2.7	0	0.0	1.8	11.3
	Moderate	0	0.0	17.5	0	0.0	14.5	16.3
	Middle	0	0.0	32.2	0	0.0	28.9	26.4
	Upper	0	0.0	42.1	0	0.0	48.9	46.0
	Unknown	0	0.0	5.5	0	0.0	6.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement	Low	0	0.0	6.7	0	0.0	3.4	11.3
	Moderate	0	0.0	33.3	0	0.0	37.8	16.3
	Middle	0	0.0	20.0	0	0.0	12.4	26.4
	Upper	0	0.0	40.0	0	0.0	46.5	46.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	11.3
	Moderate	0	0.0	0.0	0	0.0	0.0	16.3
	Middle	0	0.0	0.0	0	0.0	0.0	26.4
	Upper	0	0.0	0.0	0	0.0	0.0	46.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	5.4	0	0.0	3.3	11.3
	Moderate	0	0.0	19.4	0	0.0	15.4	16.3
	Middle	0	0.0	30.2	0	0.0	28.6	26.4
	Upper	0	0.0	39.2	0	0.0	46.7	46.0
	Unknown	0	0.0	5.9	0	0.0	6.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2010 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2010				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	28	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	1	100.0	28	100.0	100.0

Based on 2011 D&B information according to 2000 Census Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Farm Loans						
Assessment Area: 2010 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2010				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	0	0.0	0	0.0	100.0

Based on 2011 D&B information according to 2000 Census Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2010 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		Count		Dollar		Total	
		Bank		Bank			
#	%	\$ 000s	\$ %	%			
Small Businesses	Revenue	\$1 Million or Less	1	100.0	28	100.0	92.7
		Over \$1 Million	0	0.0			3.2
		<i>Total Rev. available</i>	1	100.0			95.9
		Rev. Not Known	0	0.0			4.1
		Total	1	100.0			100.0
	Loan Size	\$100,000 or Less	1	100.0	28	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	28	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	1	100.0	28	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	28	100.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2010 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		2010					
		Count Bank		Dollar Bank		Total Fams	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	0	0.0	0	0.0	99.2
		Over \$1 Million	0	0.0			0.8
		<i>Total Rev. available</i>	0	0.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	0	0.0			100.0
	Loan Size	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2011 Non MSA Wisconsin								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2011 Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	100.0	253	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	253	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	100.0	253	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	253	100.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2011 Non MSA Wisconsin								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2011 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	0	0.0	11.5	0	0.0	9.3	11.3
	Moderate	0	0.0	34.6	0	0.0	31.2	16.3
	Middle	0	0.0	26.9	0	0.0	17.3	26.4
	Upper	0	0.0	19.2	0	0.0	34.4	46.0
	Unknown	0	0.0	7.7	0	0.0	7.8	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	5.2	0	0.0	3.7	11.3
	Moderate	2	100.0	9.0	253	100.0	8.5	16.3
	Middle	0	0.0	20.9	0	0.0	17.7	26.4
	Upper	0	0.0	58.2	0	0.0	65.1	46.0
	Unknown	0	0.0	6.7	0	0.0	5.1	0.0
	Total	2	100.0	100.0	253	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	11.3
	Moderate	0	0.0	0.0	0	0.0	0.0	16.3
	Middle	0	0.0	25.0	0	0.0	18.9	26.4
	Upper	0	0.0	75.0	0	0.0	81.1	46.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	11.3
	Moderate	0	0.0	0.0	0	0.0	0.0	16.3
	Middle	0	0.0	0.0	0	0.0	0.0	26.4
	Upper	0	0.0	0.0	0	0.0	0.0	46.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	5.8	0	0.0	4.4	11.3
	Moderate	2	100.0	12.2	253	100.0	11.5	16.3
	Middle	0	0.0	22.1	0	0.0	17.6	26.4
	Upper	0	0.0	53.5	0	0.0	61.2	46.0
	Unknown	0	0.0	6.4	0	0.0	5.3	0.0
	Total	2	100.0	100.0	253	100.0	100.0	100.0
Originations & Purchases								
Information based on 2000 Census data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2011 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2011				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	124	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	1	100.0	124	100.0	100.0

Based on 2011 D&B information according to 2000 Census Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Farm Loans						
Assessment Area: 2011 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2011				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	30	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	1	100.0	30	100.0	100.0

Based on 2011 D&B information according to 2000 Census Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2011 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		Count		2011		Total	
		Bank		Dollar	Bank		Businesses
#	%	\$ 000s	\$ %	%			
Small Businesses	Revenue	\$1 Million or Less	1	100.0	124	100.0	91.3
		Over \$1 Million	0	0.0			3.7
		<i>Total Rev. available</i>	1	100.0			95.0
		Rev. Not Known	0	0.0			5.0
		Total	1	100.0			100.0
	Loan Size	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	1	100.0	124	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	124	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	1	100.0	124	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	124	100.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2011 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		Count		Dollar		Total Farms	
		Bank		Bank			
#	%	\$ 000s	\$ %	%			
Small Businesses	Revenue	\$1 Million or Less	1	100.0	30	100.0	99.2
		Over \$1 Million	0	0.0			0.8
		<i>Total Rev. available</i>	1	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	1	100.0			100.0
	Loan Size	\$100,000 or Less	1	100.0	30	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	30	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	1	100.0	30	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	30	100.0	

Based on 2011 D&B information according to 2000 Census Boundaries

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2012 Non MSA Wisconsin								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		2012 Dollar				
		Bank	Agg	Bank	Agg	Bank	Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	120	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	120	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	150	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	150	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	70	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	70	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	3	100.0	100.0	340	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	3	100.0	100.0	340	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2012 Non MSA Wisconsin								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2012 Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	0	0.0	11.1	0	0.0	6.3	9.7
	Moderate	1	100.0	52.8	120	100.0	38.9	16.0
	Middle	0	0.0	11.1	0	0.0	13.5	27.4
	Upper	0	0.0	19.4	0	0.0	35.3	46.9
	Unknown	0	0.0	5.6	0	0.0	6.0	0.0
	Total	1	100.0	100.0	120	100.0	100.0	100.0
Refinance	Low	0	0.0	2.7	0	0.0	1.5	9.7
	Moderate	0	0.0	12.9	0	0.0	8.9	16.0
	Middle	1	100.0	24.7	150	100.0	20.9	27.4
	Upper	0	0.0	53.8	0	0.0	63.9	46.9
	Unknown	0	0.0	5.9	0	0.0	4.8	0.0
	Total	1	100.0	100.0	150	100.0	100.0	100.0
Home Improvement	Low	0	0.0	10.0	0	0.0	19.2	9.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.0
	Middle	0	0.0	70.0	0	0.0	54.4	27.4
	Upper	1	100.0	20.0	70	100.0	26.4	46.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	70	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	9.7
	Moderate	0	0.0	0.0	0	0.0	0.0	16.0
	Middle	0	0.0	0.0	0	0.0	0.0	27.4
	Upper	0	0.0	0.0	0	0.0	0.0	46.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	4.3	0	0.0	2.4	9.7
	Moderate	1	33.3	18.5	120	35.3	12.7	16.0
	Middle	1	33.3	24.6	150	44.1	20.6	27.4
	Upper	1	33.3	47.0	70	20.6	59.4	46.9
	Unknown	0	0.0	5.6	0	0.0	4.9	0.0
	Total	3	100.0	100.0	340	100.0	100.0	100.0
Originations & Purchases								
Information based on 2010 ACS data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2012 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2012				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	0	0.0	0	0.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	0	0.0	0	0.0	100.0

Based on 2012 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Farm Loans						
Assessment Area: 2012 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison 2012				Small Businesses %
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	2	100.0	62	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	2	100.0	62	100.0	100.0

Based on 2012 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2012 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		Count		Dollar		Total	
		Bank		Bank		Businesses	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	0	0.0	0	0.0	92.1
		Over \$1 Million	0	0.0			3.9
		<i>Total Rev. available</i>	0	0.0			96.0
		Rev. Not Known	0	0.0			3.9
		Total	0	0.0			99.9
	Loan Size	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	0	0.0	0	0.0	

Based on 2012 D&B information according to 2010 ACS Boundaries
Note: Percentages may not add to 100.0 percent due to rounding

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2012 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		2012		2012		Total Farms	
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	2	100.0	62	100.0	99.1
		Over \$1 Million	0	0.0			0.9
		<i>Total Rev. available</i>	2	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	2	100.0			100.0
	Loan Size	\$100,000 or Less	2	100.0	62	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	2	100.0	62	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	2	100.0	62	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	2	100.0	62	100.0	

Based on 2012 D&B information according to 2010 ACS Boundaries

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

Geographic Distribution of Small Business Loans						
Assessment Area: 2013 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		2013		2013		Small Businesses
		Count		Dollar		
		Bank		Bank		
		#	%	\$ 000s	\$ %	%
Small Businesses	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	2	100.0	269	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total		2	100.0	269	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries

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

Geographic Distribution of Small Farm Loans						
Assessment Area: 2013 Non MSA Wisconsin						
Product Type	Tract Income Levels	Bank & Demographic Comparison				
		2013				
		Count Bank		Dollar Bank		Small Businesses
		#	%	\$ 000s	\$ %	%
Small Farms	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	1	100.0	37	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Tr Unknown	0	0.0	0	0.0	
	Total	1	100.0	37	100.0	100.0

Based on 2013 D&B information according to 2010 ACS Boundaries
 Note: Percentages may not add to 100.0 percent due to rounding

Small Businesses Lending By Revenue & Loan Size							
Assessment Area: 2013 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		2013					
		Count Bank		Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	2	100.0	269	100.0	92.2
		Over \$1 Million	0	0.0			3.4
		<i>Total Rev. available</i>	2	100.0			95.6
		Rev. Not Known	0	0.0			4.4
		Total	2	100.0			100.0
	Loan Size	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	2	100.0	269	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	2	100.0	269	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	0	0.0	0	0.0	
		\$100,001 - \$250,000	2	100.0	269	100.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	2	100.0	269	100.0	

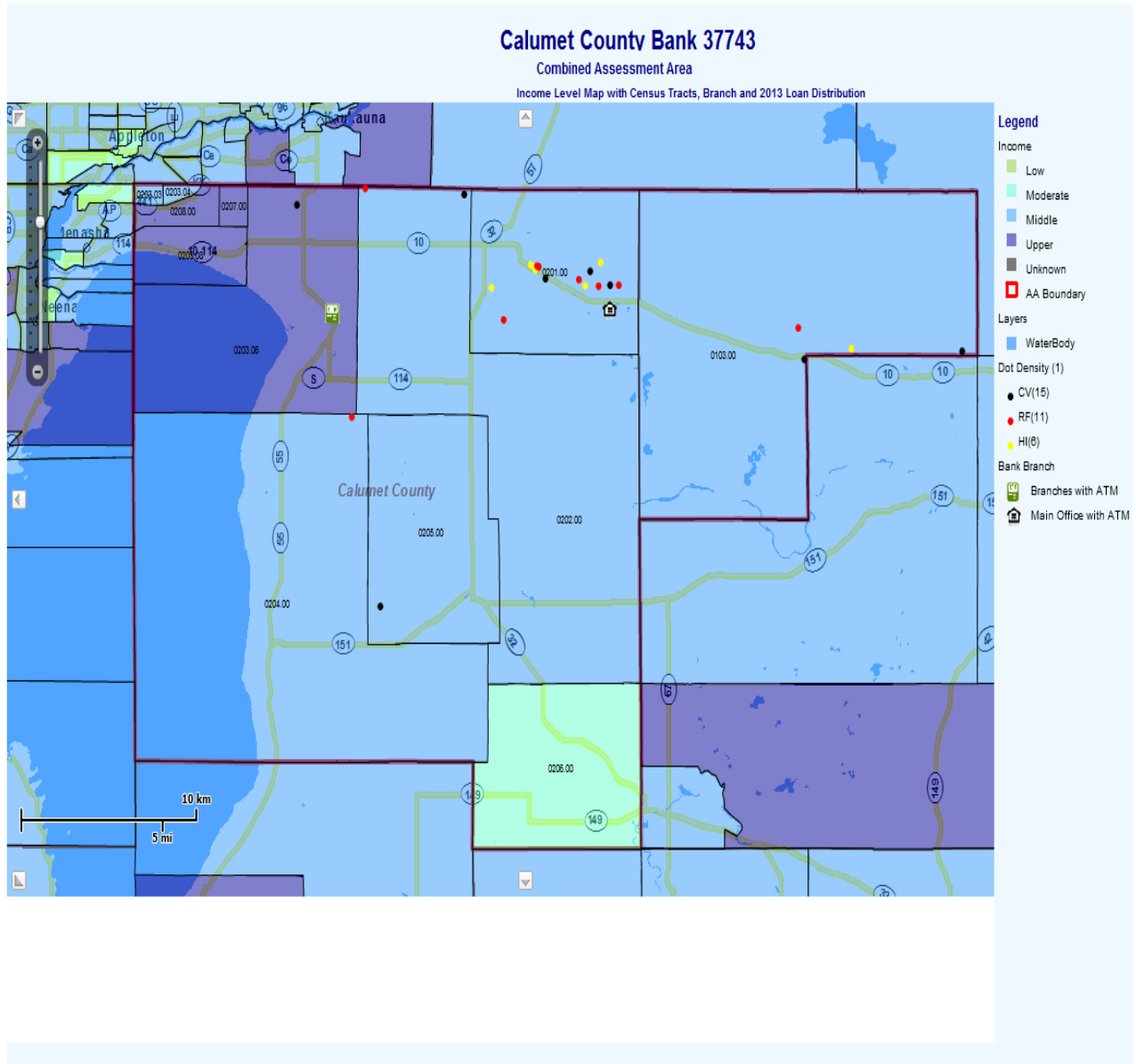
Based on 2013 D&B information according to 2010 ACS Boundaries
 Note: Percentages may not add to 100.0 percent due to rounding

Small Farms Lending By Revenue & Loan Size							
Assessment Area: 2013 Non MSA Wisconsin							
Product Type		Bank & Demographic Comparison					
		2013		2013		Total Farms	
		Count		Dollar			
		Bank		Bank			
		#	%	\$ 000s	\$ %	%	
Small Businesses	Revenue	\$1 Million or Less	1	100.0	37	100.0	99.0
		Over \$1 Million	0	0.0			1.0
		<i>Total Rev. available</i>	1	100.0			100.0
		Rev. Not Known	0	0.0			0.0
		Total	1	100.0			100.0
	Loan Size	\$100,000 or Less	1	100.0	37	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	37	100.0	
	Loan Size & Rev \$1 Mill	\$100,000 or Less	1	100.0	37	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	1	100.0	37	100.0	

Based on 2013 D&B information according to 2010 ACS Boundaries

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

APPENDIX B – Map of Assessment Area



APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		HMDA-Reportable 2010-2013 and Small Business and Small Farm 2010-2014	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Calumet County Bank			HMDA-Reportable, Small Business, & Small Farm
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Appleton, Wisconsin MSA# 11540 (Calumet County) Non-MSA Wisconsin (Manitowoc County)	Full scope review	None	N/A

APPENDIX D - Glossary

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

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

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

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.