



PUBLIC DISCLOSURE

January 3, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Tri City National Bank
Charter Number: 15738

6400 South 27th Street
Oak Creek, WI 53154

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of Tri City National Bank (TCNB or bank) with respect to the Lending, Investment, and Service Tests:

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

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on TCNB’s lending levels which reflect excellent responsiveness to the credit needs in its assessment areas (AAs), considering the number and amount of home mortgage and small business loans in its AAs. A substantial majority of the bank’s loans are in its AAs. The bank is a leader in making Community Development (CD) loans that are responsive to community needs.
- The Investment Test rating is based on the significant level of qualified community development investments and good responsiveness to community needs, especially in the Milwaukee metropolitan statistical area (MSA). Investments primarily supported various affordable housing and economic development needs.
- The Service Test rating is based on service delivery systems which are accessible to geographies and individuals of different income levels in the bank’s AAs. The bank also provides a relatively high level of CD services.

Lending in Assessment Area

A substantial majority of the bank’s loans are in its AAs.

The bank originated and purchased 95.2 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	561	94.1	35	5.9	596	91,378	83.7	17,771	16.3	109,148
2019	576	93.2	42	6.8	618	105,138	91.1	10,292	8.9	115,430
2020	698	94.2	43	5.8	741	150,799	93.1	11,112	6.9	161,911
Subtotal	1,835	93.9	120	6.1	1,955	347,315	89.9	39,175	10.1	386,489
Small Business										
2018	440	96.1	18	3.9	458	92,626	96.1	3,787	3.9	96,413
2019	384	95.3	19	4.7	403	86,504	93.1	6,401	6.9	92,905
2020	1,433	96.8	48	3.2	1,481	136,008	94.6	7,740	5.4	143,748
Subtotal	2,257	96.4	85	3.6	2,342	315,138	94.6	17,928	5.4	333,066
Small Farm										
2018	4	80.0	1	20.0	5	877	78.2	244	21.8	1,121
2020	2	100.0	0	0.0	2	247	100.0	0	0.0	247
Subtotal	6	85.7	1	14.3	7	1,124	82.2	244	17.8	1,368
Total	4,098	95.2	206	4.8	4,304	663,577	92.0	57,347	8.0	720,923

We used loans made inside the bank's AAs to determine the bank's performance in the geographic distribution of loans and making loans to individuals of different income levels and businesses of different sizes. The bank originated or purchased enough home mortgage and small business loans to analyze, but the number of small farm and consumer loans was too low to sufficiently analyze.

Description of Institution

TCNB is a federally chartered intrastate bank headquartered in Oak Creek, Wisconsin. As of January 3, 2022, the bank has 31 banking offices and 29 automated teller machines (ATMs) across its footprint. There are nine branches in moderate-income census tracts (CTs), representing 29.0 percent of total branches. ATMs are located in all but two branch locations. TCNB is a wholly owned subsidiary of Tri City Bankshares Corporation. The bank has five wholly owned subsidiaries, including Title Service of Southeast Wisconsin, Tri City Capital Corp, Tri City Whole Health Investment Fund LLC, Aurora Investment Fund LLC, and FIRE Loan Pool IF LLC. Tri City Whole Health Investment Fund LLC, Aurora Investment Fund LLC, and FIRE Loan Pool IF LLC are economic development entities established for a public welfare investment that utilized New Market Tax Credits (NMTCs). As of September 30, 2021, TCNB had total assets of \$2.0 billion, total loans of \$1.0 billion, and tier 1 capital of \$189.9 million.

TCNB has focused on meeting the general banking and credit needs of small businesses and residents in its market area. The bank offers traditional lending and deposit products and services to individual and business customers. Additionally, the bank offers loan products through several lending programs including Wisconsin Housing and Economic Development Authority (WHEDA), the US Department of Veterans Affairs, Federal Housing Authority, and Small Business Administration (SBA). As of September 30, 2021, the bank's total loans represent 49.85 percent of total assets. The loan portfolio consists of 84.0 percent commercial loans, 15.6 percent residential real estate loans, 0.3 percent consumer loans, and 0.1 percent agricultural loans.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received an Outstanding rating in its previous Large Bank Community Reinvestment Act (CRA) evaluation dated November 14, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

TCNB was evaluated using the Large Bank procedures to assess the bank's record of meeting the credit needs of its community. Large Bank procedures include a Lending Test, Investment Test, and Service Test. The evaluation period spanned from November 14, 2018 to January 3, 2022.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans including home purchase, home improvement, refinance, and multifamily loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. These loan types were reviewed during the period of January 1, 2018 to December 31, 2020. The bank made a limited number of reportable consumer and farm loans during the evaluation period, which resulted in the level of loans not being sufficient to provide a meaningful analysis. No affiliate activity was included in this analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings and, where applicable, multistate ratings.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs;
- The bank exhibits an excellent geographic distribution of loans in its AAs;
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank;
- The bank is a leader in making CD loans that are responsive to community needs;
- The bank has a significant level of qualified CD investments, grants, and donations. The bank exhibited good responsiveness to credit and CD needs;
- The bank's services do not vary in any way that inconveniences portions of the bank's AA, particularly low- and moderate-income (LMI) geographies and;
- The bank has made a relatively high level of CD services responsible to community needs.

Description of Institution's Operations in Wisconsin

TCNB has designated three AAs within the state of Wisconsin. The Milwaukee-Waukesha-West Allis, WI MSA consists of Milwaukee, Ozaukee, Washington, and Waukesha counties. The Lake County-Kenosha County, Illinois-Wisconsin metropolitan division (MD) consists of portions of Kenosha County. The Racine, WI MSA consists of Racine County. All of the AAs meet the requirements of CRA regulations and do not arbitrarily exclude LMI tracts.

Milwaukee-Waukesha-West Allis (Milwaukee) MSA

The Milwaukee MSA is comprised of all of Milwaukee, Ozaukee, Washington, and Waukesha Counties. The number of CTs within the AA represent 100 percent of the total number of CTs in the MSA. TCNB operates 25 branches in the AA. Seven branches are located in moderate-income CTs, 12 branches are located in middle-income CTs, and six branches are located in upper-income CTs.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 431 CTs, of which 99 (23.0 percent) are low-income, 68 (15.8 percent) are moderate-income, 139 (32.3 percent) are middle-income, 121 (28.3 percent) are upper-income, and one (0.7 percent) is designated as NA. The total

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

population of the AA is 1,570,006, which is comprised of 388,209 families. The number of families at each income level is: 91,229 low-income families (23.5 percent), 62,889 moderate-income families (16.2 percent), 75,313 middle-income families (19.4 percent), and 158,777 upper-income families (40.9 percent). The average median family income is \$71,764. The percentage of families below the poverty level is 11.1 percent. Owner-occupied units comprise 56.1 percent of total housing units. Based on 2020 demographic data, the total number of businesses with reported revenues in this AA was 92,032.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2021, there is strong competition within the Milwaukee MSA. TCNB ranks eighth among 46 deposit-taking institutions with 1.6 percent of the deposit market share. U.S. Bank and BMO Harris are the largest competitors in the market, holding a combined 53.4 percent of the deposit market share. The Milwaukee MSA accounted for approximately 82.0 percent of the bank's total deposits as of June 30, 2021. Based upon 2020 peer mortgage data, TCNB achieved a 0.6 percent market share of home mortgage loans, ranking 42nd among 576 reporting lenders.

Employment and Economic Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate as of October 2021 for Milwaukee County was 3.5 percent, Ozaukee County was 1.9 percent, and Waukesha County was 1.9 percent. Unemployment for the state of Wisconsin was 2.3 percent. According to Moody's Analytics (February 2021), the Milwaukee MSA's economy's recovery from recession has been slow. The payroll count has marginally risen from June to December 2020, and only half of lost jobs have been recovered to date. Joblessness has declined at a slower pace than in the rest of the state. The Milwaukee MSA is expected to return to its pre-pandemic employment level by 2023 in large part due to growth in durable goods manufacturing and healthcare. The top six employment sectors in the Milwaukee MSA are education, health services, professional and business services, manufacturing, government, and leisure and hospitality services. The top five employers in the Milwaukee MSA are Aurora Health Care Inc., Froedtert Health, Ascension Wisconsin, the Kroger Company, and Quad Graphics Inc.

Affordability

Assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,004.

For the Milwaukee-Waukesha MSA, a mortgage is not affordable for low-income families and is affordable for moderate-income families. Based upon the annual median income for a low-income family making less than \$35,882 per year (or less than 50 percent of the 2020 FFIEC adjusted median family income in the AA) an affordable monthly mortgage payment would be \$897 per month. Based upon the annual median income for a moderate-income family making less than \$57,411 (or less than 80 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a monthly payment of \$1,435.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tri City Milwaukee MSA AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	431	23.0	15.8	32.3	28.3	0.7
Population by Geography	1,570,006	16.7	14.9	33.7	34.7	0.0
Housing Units by Geography	671,468	16.1	15.1	35.4	33.4	0.0
Owner-Occupied Units by Geography	376,569	7.3	11.9	36.2	44.5	0.0
Occupied Rental Units by Geography	247,577	25.6	20.0	36.1	18.3	0.0
Vacant Units by Geography	47,322	35.9	15.3	25.0	23.9	0.0
Businesses by Geography	92,032	10.9	11.8	34.8	42.4	0.0
Farms by Geography	2,088	5.6	7.2	37.8	49.4	0.0
Family Distribution by Income Level	388,209	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	624,146	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$186,990
			Median Gross Rent			\$841
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Lake County-Kenosha County, Illinois-Wisconsin (Kenosha) MD

The Kenosha MSA is comprised of 27 CTs in Kenosha County. The number of CTs within the AA represent 14.2 percent of the total number of CTs in the MSA. TCNB operates one branch in the AA. The branch is located in a moderate-income CT.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 27 CTs, of which 6 (22.2 percent) are low-income, 13 (48.1 percent) are moderate-income, 8 (29.6 percent) are middle-income, zero are upper-income, and zero are designated as NA. The total population of the AA is 128,840, which is comprised of 30,893 families. The number of families at each income level is: 9,793 low-income families (31.7 percent), 6,765 moderate-income families (21.9 percent), 6,641 middle-income families (21.5 percent), and 7,692 upper-income families (24.9 percent). The average median family income is \$87,137. The percentage of families below the poverty level is 12.5 percent. Owner-occupied units comprise 57.1 percent of total housing units. Based on 2020 demographic data, the total number of businesses with reported revenues in this AA was 5,950.

Based on FDIC Deposit Market Share data for Kenosha County, as of June 30, 2021, TCNB had deposits totaling \$22.6 million, resulting in a 0.7 percent share of deposits and ranking last among 11 financial institutions in the county. Based upon 2020 peer mortgage data, TCNB achieved a 0.4 percent market share of home mortgage loans, ranking 44th among 287 reporting lenders.

Employment and Economic Factors

According to the U.S. Department of Labor, BLS report, the unemployment rate for Kenosha County was 2.7 percent as of October 2021 compared to the Wisconsin average of 2.3 percent. According to Moody's Analytics (June 2021), the Kenosha AA economy's recovery from recession has been slow. The payroll count has marginally risen from June to December 2020, and only half of lost jobs have been recovered to date. The Kenosha AA is expected to return to its pre-pandemic employment level by 2023 in large part due to warehousing job growth. The top six employment sectors in the Kenosha AA

are professional and business services, manufacturing, government, education, health services, and leisure and hospitality services. The top five employers in the Kenosha AA are Abbvie Inc., Naval Station Great Lakes, Baxter Healthcare Corp., Walgreens Boot Alliance, and Abbott Laboratories.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners’ insurance, real estate taxes, or any additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$828.

For the Kenosha AA, a mortgage is affordable for both low-income families and moderate-income families. Based upon the annual median income for a low-income family making less than \$43,568 per year (or less than 50 percent of the 2020 FFIEC adjusted median family income in the AA) an affordable monthly mortgage payment would be \$1,089 per month. Based upon the annual median income for a moderate-income family making less than \$69,709 (or less than 80 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a monthly payment of \$1,742.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tri City Kenosha MSA AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	22.2	48.1	29.6	0.0	0.0
Population by Geography	128,840	16.9	45.2	37.9	0.0	0.0
Housing Units by Geography	52,080	15.9	48.2	36.0	0.0	0.0
Owner-Occupied Units by Geography	29,750	11.2	44.6	44.1	0.0	0.0
Occupied Rental Units by Geography	18,093	22.7	52.5	24.8	0.0	0.0
Vacant Units by Geography	4,237	19.5	54.3	26.1	0.0	0.0
Businesses by Geography	5,950	11.5	44.1	44.4	0.0	0.0
Farms by Geography	138	13.8	33.3	52.9	0.0	0.0
Family Distribution by Income Level	30,893	31.7	21.9	21.5	24.9	0.0
Household Distribution by Income Level	47,843	35.4	19.0	18.5	27.1	0.0
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Housing Value			\$154,211
			Median Gross Rent			\$838
			Families Below Poverty Level			12.5%
<i>Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed a full-scope review of the Milwaukee MSA and the Kenosha MD AAs. We completed a limited-scope review of the Racine MSA AA. The Milwaukee MSA was selected for full-scope review based on the higher percentage of deposits and lending activity. The Milwaukee MSA accounted for 81.4 percent of deposits. The Kenosha MD was selected for full-scope review as it had not yet been evaluated using full-scope Large Bank procedures. The greatest weight was given to the Milwaukee MSA because the majority of deposit and lending activity for TNCB is from this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee MSA and Kenosha MD AAs is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
Kenosha MD	80	64	7	151	3.6	1.3
Milwaukee MSA	1,312	1,753	32	3,097	74.8	82.0
Racine MSA	443	440	9	892	21.5	16.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State* Loans	%State Deposits
Kenosha MD	11,647	8,819	16,619	35,187	4.4	1.3
Milwaukee MSA	272,272	251,577	106,116	629,964	78.9	82.0
Racine MSA	63,396	55,372	14,675	133,443	16.7	16.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Milwaukee MSA

Based on the FDIC Market Share data as of June 30, 2021, TCNB had a 1.6 percent market share of deposits, ranking eighth among 46 reporting banks in the Milwaukee MSA. The bank with the top market share is a larger national bank with 38.7 percent deposit market share. Overall, the top five have a combined deposit market share of 74.6 percent.

TCNB's market share for home mortgage loans is excellent considering the significant competition in the AA. Based on 2020 Peer Mortgage Data, the top five lenders originated or purchased 26.7 percent of home loans during the review period. TCNB had a 0.6 percent market share in number of home mortgage loans originated or purchased, ranking 42nd out of 576 reporting banks and institutions. This market share placed TCNB in the top 7.3 percent of banks for this product line.

The small business lending activity is excellent given the bank's ranking compared to the small business lending competition within the AA. TCNB achieved a 3.4 percent market share of small loans to businesses, ranking ninth among 180 reporting lenders.

Kenosha MD

Based on the FDIC Market Share data as of June 30, 2021, TCNB had a 1.3 percent market share of deposits, ranking last among 11 reporting banks in the Kenosha MD.

TCNB's market share for home mortgage loans is excellent considering the significant competition and compared to the bank's deposit market share in the AA. Based on 2020 Peer Mortgage Data, the top five lenders originated or purchased 38.6 percent of home loans during the review period. TCNB had a 0.4 percent market share in number of home mortgage loans originated or purchased, ranking 44th out of 287 reporting banks and institutions. This market share placed TCNB in the top 15.3 percent of banks for this product line.

The small business lending activity is excellent given the bank's ranking compared to the deposit market share. TCNB achieved a 1.0 percent market share of small loans to businesses, ranking 20th among 88 reporting lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent.

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

Milwaukee MSA

The distribution of the bank's home mortgage loans in LMI geographies is excellent. The percentage of the bank's loans originated in low-income geographies is below the percentage of owner-occupied housing units but exceeds aggregate peer lending in low-income geographies. The percentage of home mortgage loans originated in moderate-income geographies exceeds both the percentage of owner-occupied housing units and aggregate peer lending in moderate-income geographies.

Kenosha MD

The distribution of the bank's home mortgage loans in LMI geographies is good. The percentage of the bank's loans originated in low-income geographies is below both the percentage of owner-occupied housing units and aggregate peer lending in low-income geographies. The percentage of home mortgage loans originated in moderate-income geographies exceeds both the percentage of owner-occupied housing units and aggregate peer lending in moderate-income geographies.

Small Loans to Businesses

The geographic distribution of small business loans is excellent.

Refer to table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Milwaukee MSA

The distribution of the bank's small business loans in LMI geographies is excellent. The percentage of small loans to businesses in low-income geographies exceeds both the percentage of businesses in low-income geographies and aggregate peer lending data. The percentage of small loans to businesses in moderate-income geographies exceeds both the percentage of businesses in moderate-income geographies and aggregate peer lending data.

Kenosha MD

The distribution of the bank's small business loans in LMI geographies is excellent. The percentage of small loans to businesses in low-income geographies exceeds both the percentage of businesses in low-income geographies and aggregate peer lending data. The percentage of small loans to businesses in moderate-income geographies exceeds both the percentage of businesses in moderate-income geographies and aggregate peer lending data.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. As part of this review, we did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is excellent.

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

Milwaukee MSA

The distribution of the bank's home mortgage loans to LMI borrowers in the Milwaukee MSA is excellent. The percentage of bank home mortgage loans to low-income borrowers was significantly lower than the percentage of low-income families but far exceeded the aggregate percentage of home mortgages to low-income borrowers. While the percentage of mortgage loans to low-income borrowers was low due to unaffordability, TCNB surpassed peer performance. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families as well as the aggregate percentage of home mortgage loans.

Kenosha MD

The distribution of the bank's home mortgage loans to LMI borrowers in the Kenosha MD is excellent. The percentage of bank home mortgage loans to low-income borrowers was lower than the percentage of low-income families but exceeded the aggregate percentage of home mortgages to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of home mortgage loans.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is adequate.

Refer to table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Milwaukee MSA

The distribution of the bank's small loans to businesses in the Milwaukee MSA is adequate. The percentage of the bank's small loans to businesses was significantly below the percentage of small loans to businesses and below the aggregate percentage.

Kenosha MD

The distribution of the bank's small loans to businesses in the Kenosha MD is good. The percentage of the bank's small loans to businesses was below the percentage of small loans to businesses, but significantly above the aggregate percentage.

Community Development Lending

The bank is a leader in making CD loans that are responsive to community needs. This performance had a significant positive impact on the Lending Test.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Milwaukee MSA

The volume of CD lending in the Milwaukee MSA is relatively high and had a significant positive impact on its overall lending performance in the Milwaukee MSA. The bank originated 32 loans in the AA during the evaluation period, totaling \$106.1 million. This amount represented 69.0 percent of tier 1 capital allocated to the AA. The majority of the community development loans were directed towards affordable housing, totaling \$78.4 million. Additional loans were dedicated to revitalization and stabilization efforts, totaling \$18.3 million, and the remaining were dedicated to economic development, totaling \$9.4 million.

Examples of CD loans in the rating area include:

- The bank originated 19 loans, totaling \$78.4 million, to refinance or acquire affordable housing properties.
- The bank originated a \$2.3 million loan to construct a new school campus located in a low-income CT.

Kenosha MD

The volume of CD lending in the Kenosha MD is relatively high and had a significant positive impact on its overall lending performance in the Kenosha MD. The bank originated seven loans in the AA during the evaluation period, totaling \$16.6 million. This amount represented 672.3 percent of tier 1 capital allocated to the AA. The majority of the community development loans were directed towards

revitalization and stabilization efforts, totaling \$12.3 million. The remaining were dedicated to affordable housing, totaling \$4.3 million.

Examples of CD loans in the rating area include:

- The bank originated a new \$1.9 million line of credit to assist with the build out of space for a nonprofit organization which provides services such as crisis intervention, homeless assistance, and mental health and addiction services in a moderate-income CT.
- The bank originated a \$1.9 million loan to refinance an affordable housing property.

Product Innovation and Flexibility

TCNB makes extensive use of innovative and/or flexible lending practices in serving AA credit needs. The bank's lending provided flexibility for affordable housing and small businesses throughout the AAs. TCNB supported affordable housing through products which offer flexibility for borrowers who do not qualify for, or would have difficulty obtaining, traditional financing. During the evaluation period, the bank originated 34 WHEDA loans and 52 FHA loans, totaling \$4.6 million and \$8.9 million, respectively. Additionally, the bank made 39 loans totaling \$29.8 million using government guaranty or government loan programs. In response to the COVID-19 pandemic, the bank made 1,093 PPP loans totaling approximately \$53.7 million in the AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review the bank's performance under the Lending Test in the Racine MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The geographic distribution of home mortgage loans and small loans to businesses is excellent. The borrower distribution of home mortgage loans is excellent, while the borrower distribution of small loans to businesses is adequate. CD lending had a significantly positive impact on the overall rating in the limited-scope AA. During the evaluation period, the bank originated nine CD loans, totaling \$14.7 million, in the Racine MSA.

Refer to tables O through V in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Based on full-scope reviews, the bank's performance is good in the Milwaukee MSA, and adequate in the Kenosha MD. The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kenosha MD	0	0	3	\$10	3	4.7	\$10	0.1		0
Milwaukee MSA	4	\$4,003	48	\$4,806	52	81.2	\$8,809	98.0		0
Racine MSA	1	\$142	8	\$26	9	14.1	\$168	1.9		0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Milwaukee MSA

TCNB had a significant level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The investments and grants were occasionally in a leadership position. There are significant investment opportunities in the Milwaukee MSA. The dollar volume of current- and prior-period investments totaled \$8.8 million, representing 5.7 percent of tier 1 capital allocated to the AA.

Examples of qualified investments in the Milwaukee MSA include:

- The bank has four prior period investments, with a current book value of \$4 million, which includes a government sponsored, mortgage-backed security and two prior NMTCs used for the construction of health care facilities in a LMI area.
- TCNB invested \$159,425 through 44 donations to organizations that support affordable housing initiatives, economic development, revitalization/stabilization, and/or community services targeted towards LMI individuals and geographies over the evaluation period.

In the Milwaukee MSA, the bank took a leadership role in developing and participating in investments that were large, complex, and/or involved multiple partners with both public and private funding. The following are examples of these investments:

- The bank made a \$2.0 million NMTC investment to support development of the Notre Dame School campus in Milwaukee.
- The bank also made two investments for a FCI Loan Pool totaling \$1.37 million. The loan pools provide financing towards nonprofit groups and cooperatives that benefit LMI areas and people through projects that expand affordable housing, economic development, and human services.

Kenosha AA

TCNB has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Investment opportunities are limited in the Kenosha MD based on the bank's limited presence. The dollar volume of current-period investments represents 0.5 percent of tier 1 capital allocated to the AA.

Examples of qualified investments in the Kenosha MD include:

- TCNB invested \$10,000 through three donations to organizations that support economic development and community services targeted towards LMI individuals and geographies over the evaluation period.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Racine MSA is weaker than the bank’s overall performance under the Investment Test in the full-scope areas due to a lower volume of qualified investments as a percentage of tier 1 capital allocated to the AA. The bank’s performance under the Investment Test in the limited-scope area did not have a significant impact on the bank’s overall Investment Test rating for the State of Wisconsin.

SERVICE TEST

The bank’s performance under the Service Test in Wisconsin is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Milwaukee MSA and Kenosha MD is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kenosha MD	1.1	1	3.2	0	100.0	0	0	16.9	45.2	37.9	0
Milwaukee MSA	81.4	25	80.6	0	28.0	48.0	24.0	16.7	14.9	33.7	34.7
Racine MSA	17.6	5	16.1	0	20.0	40.0	40.0	6.7	20.3	53.3	18.9

Milwaukee-Waukesha MSA

TCNB has 25 branches in the Milwaukee MSA. There are no branches in low-income geographies, compared to 16.7 percent of the AA’s population is located in low-income geographies. There are seven branches located in moderate-income geographies, which significantly exceeded the percentage of the population in moderate-income geographies.

TCNB provided additional access to its retail banking services through alternative delivery systems including ATMs and digital banking platforms (online banking/mobile banking). The bank operated 23 ATMs in the Milwaukee MSA. There are no ATMs in low-income geographies compared to 16.7 percent of the population in low-income geographies. There are six ATMs, or 26.1 percent of its ATM distribution in the AA, located in moderate-income geographies, where 14.9 percent of the population resides. ATMs offer balance inquiries, account to account transfers, and cash disbursements.

Kenosha MD

TCNB has one branch in the Kenosha MD. There are no branches in low-income geographies, compared to 16.9 percent of the AA's population is located in low-income geographies. There is one branch located in a moderate-income geography, which significantly exceeds the percentage of the population in moderate-income geographies.

TCNB provided additional access to its retail banking services through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). The bank operates one ATM in the Kenosha MD. There are no ATMs in low-income geographies compared to 16.9 percent of the population in low-income geographies. There is one ATM located in a moderate-income geography, where 45.2 percent of the population resides. The ATM in this AA is available 24 hours every day and offers balance inquiries, account to account transfers, and cash disbursements.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Kenosha MD	0	0	0	0	0	0
Milwaukee-Waukesha MSA	0	2	0	0	-1	-1
Racine MSA	0	1	0	0	-1	0

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Milwaukee-Waukesha MSA

During the evaluation period, TCNB did not open any branches and two three branches. One branches was closed in middle-income CTs and one was closed in an upper CT.

Kenosha MD

The bank did not open or close any branches during the evaluation period.

Services & Hours

Milwaukee-Waukesha MSA

Services, including business hours where appropriate, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Additionally, pricing and availability of services do not differ across branch locations within the AA.

Kenosha MD

Services do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Additionally, pricing and availability of services do not differ across branch locations.

Community Development Services

The bank provides a relatively high level of CD services.

Milwaukee-Waukesha MSA

In the Milwaukee MSA, TCNB’s performance for providing CD services is good. CD services are responsive to community needs. Within the AA, employees provided services to 53 organizations. These organizations supported affordable housing, community services, and economic development. Employees demonstrated leadership and served on the board of directors or as committee members of 37 organizations.

Examples of CD Services within the rating area include:

- A Senior Vice President currently serves as Chairperson for WHEDA.
- One bank employee serves as a financial literacy coach for Wisconsin Works. This organization provides training, support services, and financial incentives to help low-income parents find permanent employment.
- One bank employee serves as a planning committee member of Revitalize Milwaukee. This nonprofit organization provides free, critical home repairs and comprehensive services to low-income seniors, veterans, and people with disabilities.

Kenosha MD

In the Kenosha MD, TCNB’s performance for providing CD services is good. CD services are responsive to community needs, especially considering the bank’s limited presence in the AA. Within the AA, three employees provided services to six organizations. These organizations supported community services and economic development. Employees demonstrated leadership and served on the board of directors or as committee members of four organizations.

Examples of CD Services within the rating area include:

- One bank employee serves as a steering committee member of the Kenosha Creative Economy Strategic Plan. The committee developed four initiatives including: Business Partnerships & Philanthropy, Community Marketing, Neighborhood Revitalization Through the Arts, and Downtown Revitalization & Entrepreneurship.
- One bank employee serves as a board member and committee member of Downtown Kenosha, Inc. (DKI). The nonprofit organization manages the day-to-day economic development efforts, business support, and promotional activities for the district.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Racine MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. Performance in the Racine MSA is good.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	(01/01/2018 to 12/31/2020)	
Bank Products Reviewed:	Home mortgage; Small business; Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State		
Wisconsin		
Lake County-Kenosha County, IL-WI MD	Full Scope	Kenosha County
Milwaukee-Waukesha-West Allis MSA	Full Scope	All of Milwaukee, Ozaukee, Washington, and Waukesha Counties
Racine MSA	Limited Scope	Racine County

Appendix B: Summary of MMSA and State Ratings

RATINGS		TRI CITY NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Tri City National Bank	Outstanding	High Satisfactory	High Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to

businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-2020		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Tri City Kenosha MSA AA 2020	80	11,647	4.4	6,334	11.2	5.0	8.5	44.6	53.8	39.8	44.1	41.3	51.7	0.0	0.0	0.0	0.0	0.0	0.0		
Tri City Milwaukee MSA AA 2020	1,312	272,272	71.5	94,690	7.3	3.6	2.7	11.9	12.9	8.1	36.2	36.9	34.1	44.5	46.6	55.0	0.0	0.0	0.0		
Tri City Racine MSA AA 2020	443	63,396	24.1	11,510	2.7	2.7	1.0	16.1	21.0	12.2	57.4	53.0	59.6	23.6	22.8	27.0	0.2	0.5	0.2		
Total	1,835	347,315	100.0	112,534	7.0	3.4	2.8	14.5	16.6	10.3	39.2	41.0	37.7	39.2	38.9	49.1	0.0	0.1	0.0		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income			Middle-Income			Upper-Income Borrowers			Not Available-Income		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Tri City Kenosha MSA AA 2020	80	11,647	4.4	6,334	31.7	16.3	14.1	21.9	23.8	22.3	21.5	18.8	21.7	24.9	23.8	19.0	0.0	17.5	22.9
Tri City Milwaukee MSA AA 2020	1,312	272,272	71.5	94,690	23.5	10.2	4.9	16.2	21.7	17.2	19.4	18.6	22.2	40.9	33.8	43.6	0.0	15.7	12.1
Tri City Racine MSA AA 2020	443	63,396	24.1	11,510	20.0	14.9	8.1	17.8	19.0	19.5	21.9	22.1	24.0	40.3	32.1	33.3	0.0	12.0	15.0
Total	1,835	347,315	100.0	112,534	23.6	11.6	5.8	16.7	21.1	17.7	19.8	19.5	22.3	39.8	32.9	41.2	0.0	14.9	13.0

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-2020

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines	% Bank Loans	Aggregate	% Busines	% Bank Loans	Aggregate	% Busines	% Bank Loans	Aggregate	% Busines	% Bank Loans	Aggregate	% Busines	% Bank Loans	Aggregate
Tri City Kenosha MSA AA 2020	64	8,189	2.8	2,256	11.5	23.4	10.3	44.1	51.6	43.2	44.4	25.0	46.5	0.0	0.0	0.0	0.0	0.0	0.0
Tri City Milwaukee MSA AA 2020	1,753	251,577	77.7	33,143	10.9	14.0	9.3	11.8	21.3	10.7	34.8	34.3	32.9	42.4	30.4	47.0	0.0	0.0	0.0
Tri City Racine MSA AA 2020	440	55,372	19.5	3,347	5.2	8.9	4.7	18.6	33.0	19.1	53.5	43.0	52.9	19.6	12.7	20.3	3.0	2.5	3.0
Total	2,257	315,138	100.0	38,746	10.4	13.2	8.9	14.2	24.4	13.4	37.1	35.8	35.5	38.0	26.1	42.0	0.3	0.5	0.3

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-2020	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Tri City Kenosha MSA AA 2020	64	8,189	2.8	2,256	80.5	53.1	36.2	6.0	26.6	13.5	20.3	
Tri City Milwaukee MSA AA 2020	1,753	251,577	77.7	33,143	80.6	27.7	38.1	8.1	29.0	11.3	43.4	
Tri City Racine MSA AA 2020	440	55,372	19.5	3,347	82.6	31.8	35.5	6.5	30.0	10.9	38.2	
Total	2,257	315,138	100.0	38,746	80.8	29.2	37.8	7.9	29.1	11.4	41.7	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "-" data not available.