



PUBLIC DISCLOSURE

July 16, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fox Valley Savings Bank
Charter Number 703069

51 E 1st St
Fond du Lac, WI 54935-4203

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

The Lending Test is rated: Satisfactory.

The major factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas (AAs).
- A substantial majority of loan originations are made within the institution's AAs.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels.
- The overall geographic distribution of loans reflects reasonable dispersion throughout the institution's AAs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 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 reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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 (MSA): 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

Fox Valley Savings Bank (Fox Valley) is a \$331.7 million federally chartered mutual thrift institution headquartered in Fond du Lac, Wisconsin and is located in a low-income census tract (CT).

In addition to its main office, the institution operates two full service branches located in Oshkosh, Wisconsin and Waupun, Wisconsin. These branches are in middle-income CTs. All branches are equipped with drive-up facilities and automated teller machines. The bank's business strategy is to serve the credit and depository needs of its local community. The bank offers noncomplex deposit and lending products, with the primary lending product being residential real estate loans (including Fair Housing Act (FHA), ADVOCAP, Wisconsin Housing and Economic Development Authority (WHEDA), and Veterans Affairs (VA) loans).

The bank sells a material portion of its loan originations on the secondary market to the Federal Home Loan Bank (FHLB), but does tend to retain servicing rights. Based on the total dollar volume of loans originated in each year, the bank sold 59.09 percent in 2015, 50.29 percent in 2016, and 54.25 percent in 2017. The aggregate amount of loans sold over 2015, 2016, and 2017 totals \$92.1 million, which represents more than half of the bank's total loan portfolio as of year-end 2017.

As of December 31, 2017, the institution's loan portfolio totaled \$174.9 million, representing 52.72 percent of total assets. By dollar volume, the bank's loan portfolio is comprised of 60.44 percent residential real estate loans, 38.18 percent commercial loans, and 1.38 percent consumer loans.

**Table 1 – Fox Valley Savings Bank's Loan Portfolio
12/31/2017 Call Report**

Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets*
Residential Real Estate	\$105,675	60.44%	31.86%
Commercial	\$66,765	38.18%	20.13%
Consumer	\$2,413	1.38%	0.73%
Agriculture	0	N/A	N/A
Total	\$174,853	100.00%	52.72%

**Percentage based on total assets of \$331,712,000 as of December 31, 2017.*

There are no financial constraints limiting the institution's ability to meet the community's credit needs. Fox Valley received a Satisfactory rating from the last CRA examination, dated May 18, 2015.

Fox Valley has three AAs, including two AAs in an MSA. The Fond du Lac MSA AA includes 20 CTs covering all of Fond du Lac County. The Oshkosh-Neenah MSA AA includes 24 CTs located in southern Winnebago County. The non-MSA AA includes

14 CTs in northern Dodge County. Given the institution's asset size, available resources, and limited branch locations, the designation of the entire Oshkosh-Neenah MSA and the entirety of Dodge County would be too large to reasonably serve. The AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income CTs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The institution's CRA performance was evaluated under the Small Bank Lending Test. We reviewed data from the institution's primary loan product, residential real estate loans, to evaluate the institution's lending performance.

The evaluation period covers the date of the previous CRA examination, May 18, 2015, through July 16, 2018. The lending test evaluates loans originated or purchased between January 1, 2015 and December 31, 2017.

Data Integrity

Prior to conducting this evaluation, we tested the accuracy of the institution's HMDA data for the years 2015, 2016, and 2017. We found the data to be accurate; therefore, we used all reported HMDA data from these years in our evaluation of residential real estate lending. Additionally, we obtained aggregate HMDA peer group data for the lending test.

Selection of Areas for Full-Scope Review

Our analysis included a full-scope evaluation for the institution's Fond du Lac MSA AA, which represents the majority of the institution's lending and customer deposits. A limited scope evaluation was performed for the Oshkosh-Neenah MSA and the non-MSA AAs, where there is a relatively lower volume of lending and deposits.

Please refer to the table in Appendix B that provides demographic data for the Fond du Lac MSA AA.

Ratings

The bank's overall rating is based primarily on the AA that received a full-scope review. This area, the Fond du Lac MSA AA, represents a majority of the institution's lending and customer deposits. The Oshkosh-Neenah MSA AA and the non-MSA AA were also considered, but to a lesser degree.

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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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.

Conclusions with Respect to Performance Tests

Fox Valley's performance under the Lending Test is rated Satisfactory. The institution's LTD ratio is reasonable. A substantial majority of loans are originated inside the institution's AAs. The overall distribution of borrowers reflects reasonable penetration among individuals of different income levels. The overall geographic distribution of loans reflects reasonable dispersion throughout the institution's AA.

LENDING TEST

The Lending Test is rated Satisfactory.

Loan-to-Deposit Ratio

Fox Valley's LTD ratio is reasonable given the institution's size, financial condition, and credit needs of the community.

The institution's quarterly average LTD ratio was 62.99 percent over the last 11 quarters spanning from June 30, 2015 to December 31, 2017, which ranks last in a peer group of six other similarly situated institutions with assets ranging from approximately \$127.8 million to \$694.3 million. The other institutions had average LTD ratios that ranged from 78.92 percent to 120.06 percent.

While the LTD ratio is lower than the peer group, consideration is given to Fox Valley's business strategy that includes selling a material portion of its originated residential real estate loans on the secondary market. In 2015, the institution sold 235 loans, totaling \$34.6 million, which represented 59.09 percent of total loans originated. In 2016, the institution sold 202 loans, totaling \$33.2 million, which represented 50.29 percent of total loans originated. In 2017, the institution sold 164 loans, totaling \$24.2 million, which represented 54.25 percent of total loans originated. These loans are not included in the LTD ratio calculation above.

Lending in Assessment Area

The institution originates a substantial majority of its loans to borrowers located in its AAs.

A review of the institution's primary loan product shows that loans made to individuals inside the institution's AAs represent 88.9 percent of total loans by number and 87.6 percent by dollar volume.

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										
2015	374	89.5	44	10.5	418	47,527	89.2	5,752	10.8	53,279
2016	352	86.3	56	13.7	408	49,897	83.9	9,548	16.1	59,445
2017	273	91.6	25	8.4	298	38,179	90.8	3,853	9.2	42,032
Subtotal	999	88.9	125	11.1	1,124	135,603	87.6	19,153	12.4	154,756
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Fond du Lac MSA AA:

The overall distribution of borrowers reflects reasonable penetration among individuals of different income levels.

Throughout the evaluation period, Fox Valley originated 5.97 percent of its home mortgage loans to low-income borrowers and 19.45 percent to moderate-income borrowers. This is less than the HMDA peer aggregate data which shows 6.75 percent and 22.59 percent, respectively.

Fox Valley shows a significant skew towards upper income loans, both by number and dollar volume. We took into consideration that in the moderate-income CT, only 24.53 percent of units are owner-occupied, while 79.03 percent of units in the upper-income CTs are owner-occupied. This presents less opportunities for home mortgage lending to borrowers within the moderate-income CT given more households reside in rental units than those in the upper-income CTs. Additionally, the median home value in the upper-income CTs is \$231,300 compared to \$97,900 in the moderate-income CT. The higher median home value in the upper-income CTs results in relatively higher loan amounts than those in the moderate-income CT.

Table 3: Distribution of Home Mortgage Loans by Income Category of the Borrower in the Fond du Lac MSA AA (\$000s)				
Borrower Income Level	Review Period		% of AA Families	Aggregate
	1/1/2015 - 12/31/2017			2017
By Number	#	%		% by #
Low	39	5.97%	17.01%	6.75%
Moderate	127	19.45%	18.38%	22.59%
Middle	176	26.95%	25.17%	24.52%
Upper	301	46.10%	39.44%	33.49%
Income NA	10	1.53%	0.00%	12.65%
Total	653	100.00%	100.00%	100.00%
By \$ Amount	\$	%	% of AA Families	% by #
Low	\$2,789	3.02%	17.01%	3.28%
Moderate	\$11,833	12.81%	18.38%	14.79%
Middle	\$21,546	23.33%	25.17%	21.65%
Upper	\$55,053	59.61%	39.44%	43.13%
Income NA	\$1,136	1.23%	0.00%	17.15%
Total	\$92,357	100.00%	100.00%	100.00%

*Source: Evaluation Period: 1/1/2015 – 12/31/2017 Bank Data; 2015 U.S. Census
Due to rounding, total may not equal 100.0*

Areas for limited scope review:

The findings for the two other AAs are consistent with the findings for the Fond du Lac AA.

The distribution of loans to borrowers of different income levels in the limited scope AAs is reasonable. In the Oshkosh-Neenah MSA AA, the institution originated 8.61 percent of home mortgage loans to low-income borrowers and 22.49 percent to moderate-income borrowers. The institution's originations to low and moderate-income borrowers exceeds the 2017 HMDA aggregate peer data, which were 6.80 percent and 20.38 percent, respectively. In the non-MSA AA, the institution originated 6.57 percent of home mortgage loans to low-income borrowers and 38.69 percent to moderate-income borrowers. The institution's low-income percentage slightly trails the 2017 HMDA aggregate peer data of 6.75 percent. This difference is mitigated by the substantial amount of lending to moderate-income borrowers at 38.69 percent of loans originated during the evaluation period, exceeding the 2017 HMDA aggregate peer data of 22.59 percent.

Geographic Distribution of Loans

Fond du Lac MSA AA

The overall geographic distribution of loans reflects reasonable dispersion throughout the institution's AA.

Fox Valley originated 2.14 percent of its loans in moderate-income CTs, which is only slightly lower than the 2.54 percent for the 2017 aggregate HMDA peer data for lenders within the AA. Consideration is given to the fact that there is only one low-income CT and one moderate-income CT in the bank's AA. Given these metrics, Fox Valley's dispersion is considered reasonable.

Table 4: Distribution of Home Mortgage Loans by Income Category of the Geography in the Fond du Lac MSA Assessment Area (\$000s)				
Geography Income Level	Review Period		% of Owner Occupied Units	Aggregate
	1/1/2015 - 12/31/2017			2017
By Number	#	%		% by #
Low	1	0.15%	1.18%	1.82%
Moderate	14	2.14%	2.53%	2.54%
Middle	557	85.30%	87.10%	87.49%
Upper	81	12.41%	9.19%	8.15%
Income NA	0	0.00%	0.00%	0.0%
Total	653	100.00%	100.00%	100.00%
By \$ Amount	\$	%	% of Owner Occupied Units	% by #
Low	\$58	0.06%	1.18%	0.97%
Moderate	\$1,179	1.28%	2.53%	3.50%
Middle	\$75,717	81.98%	87.10%	83.14%
Upper	\$15,403	16.68%	9.19%	12.39%
Income NA	\$0	0.00%	0.00%	0.00%
Total	\$92,357	100.00%	100.00%	100.0%

*Source: Evaluation Period: 1/1/2015 – 12/31/2017 Bank Data; 2015 U.S. Census
Due to rounding, total may not equal 100.0*

Areas for limited scope review

The findings for the Oshkosh-Neenah MSA AA are consistent with the findings for the Fond du Lac MSA AA. The geographic distribution of loans reflects reasonable dispersion throughout the AA.

The institution originated 10.05 percent of its loans in moderate-income CTs, which is slightly less than the 13.28 percent for the 2017 aggregate HMDA peer data. Consideration is given to the fact that only 11.44 percent of units in the moderate-income CTs in the AA are owner-occupied. The AA does not have any low-income CTs.

The institution's non-MSA AA contains no low- or moderate-income CTs. Therefore, an analysis of geographic distribution would not provide meaningful information.

Responses to Complaints

The institution has not received any CRA-related complaints since the last examination.

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 metropolitan and non-metropolitan areas 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	Lending Test (excludes CD loans): (01/01/15 to 12/31/17)	
Financial Institution	Products Reviewed	
Fox Valley Savings Bank Fond du Lac, WI	Residential Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None Reviewed	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Fond du Lac MSA	Full Scope	20 CTs in all of Fond du Lac County
Oshkosh-Neenah MSA	Limited Scope	24 CTs in southern Winnebago County
Non-MSA AA (Dodge County)	Limited Scope	14 CTs in northern Dodge County

Appendix B: Community Profiles for Full-Scope Areas

Fond du Lac MSA AA

Demographic Information for Full-Scope Area: Fond du Lac MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	20	5.00	5.00	85.00	5.00	0.00
Population by Geography	101,920	3.61	5.73	82.03	8.63	0.00
Owner-Occupied Housing by Geography	29,372	1.18	2.54	87.09	9.19	0.00
Businesses by Geography	4,564	9.75	5.61	78.22	6.42	0.00
Farms by Geography	440	1.14	0.68	87.95	10.23	0.00
Family Distribution by Income Level	27,232	17.01	18.38	25.18	39.43	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,639	5.21	7.48	81.57	5.74	0.00
Median Family Income = \$67,472 HUD Adjusted Median Family Income for 2017 = \$65,300 Households Below the Poverty Level = 9.83%			Median Housing Value = \$147,403 Unemployment Rate = 2.2%			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2015 U.S. Census, and 2017 FFIEC updated MFI.

According to the 2015 census data, the institution's Fond du Lac MSA AA consists of all 20 CTs: one is low-income (5 percent), one is moderate-income (5 percent), 17 are middle-income (85 percent), and one is upper-income (5 percent). The total population of the AA is 101,920. The median family income is \$67,472, and the FFIEC updated MSA median family income is \$65,300. The percentage of households below the poverty level is 9.83 percent. Owner-occupied units comprise 66.26 percent of total housing units.

The local economy is stable. The largest employers in the area are hospitals, universities, a correctional facility, and multiple manufacturing firms in Fond du Lac, Oshkosh, and Waupun. The area has not gained or lost any large employers in recent years. As of December 2017, the unemployment rate in Fond du Lac County was 2.2 percent, as compared to the state of Wisconsin unemployment rate of 2.7 percent.

Competition from other financial institutions is strong in the local market. The institution's competitors include interstate banks, large national banks, branches of state banks, and local credit unions. As of June 30, 2017, the bank's market share for total deposits was 5.07 percent, which ranked seventh out of 29 financial institutions in Fond du Lac, Winnebago, and Dodge Counties. Market share among the other 28 institutions ranges from 0.19 percent to 17.56 percent.

In assessing the bank's CRA performance, we contacted a local economic development professional to determine the performance of local financial institutions. This contact stated that the local financial institutions are meeting the credit needs of the community.