



## Community Reinvestment Act Disclosure

In accordance with the Community Reinvestment Act (CRA), all financial institutions are required to maintain, and upon request, make available for public inspection a complete Community Reinvestment Act Public File. The Public File includes information about The First National Bank of Bangor branch locations, our products and services, the public section of our most recent CRA performance evaluation prepared by the Office of the Comptroller of the Currency, and other information. If you are interested in viewing our CRA Public File, please continue reading this document.



## CRA Public Comments

The bank has not received any comments for the previous five years.



## List of Branches Opened or Closed in the Last Five Years

The bank has not opened or closed any branches in the previous five years.



## Branch Locations and Service Hours

Branch #	Branch Name	Address	City	State	Zip	Census Tract	MSA Name	Lobby Hours	Drive-Up Hours	County	Income Tract Level
1	Bangor	1798 Commercial St	Bangor	WI	54614	0101.01	La Crosse-Onalaska, WI-MN	8:00 - 4:00 M - F 8:00 - 11:30 S	7:30 - 5:00 M - Th 7:30 - 5:30 F 7:30 - 12:00 S	La Crosse	Middle
2	Holmen	520 McHugh Rd	Holmen	WI	54636	0102.02	La Crosse-Onalaska, WI-MN	8:00 - 4:00 M - F 8:00 - 11:30 S	7:30 - 5:00 M - Th 7:30 - 5:30 F 7:30 - 12:00 S	La Crosse	Middle
3	West Salem	975 W WI-16	West Salem	WI	54669	0101.02	La Crosse-Onalaska, WI-MN	8:00 - 4:00 M - F 8:00 - 11:30 S	7:30 - 5:00 M - Th 7:30 - 5:30 F 7:30 - 12:00 S	La Crosse	Middle
4	Mindoro	N8305 County Road C	Mindoro	WI	54644	0101.01	La Crosse-Onalaska, WI-MN	9:00 - 2:00 M & W 9:00 - 5:00 F	N/A	La Crosse	Middle
5	St Joseph Ridge	W2703 State Rd 33	La Crosse	WI	54601	0108.00	La Crosse-Onalaska, WI-MN	9:00 - 2:00 M & W 9:00 - 5:00 F	9:00 - 2:00 M & W 9:00 - 5:00 F	La Crosse	Middle

# **FIRST NATIONAL BANK**

Bangor • West Salem • Holmen • Mindoro • St. Joseph Ridge

## Products & Services

Personal Banking	Commercial Banking
<p style="text-align: center;"><b><u>Deposits</u></b></p> <p>Consumer Checking Account Products            Consumer Savings Account Products            Certificates of Deposit (CDs)            Individual Retirement Accounts (IRAs)            Overdraft Protection Products            Master Card® Debit Card</p> <p style="text-align: center;"><b><u>Digital Banking</u></b></p> <p>Online/Mobile Banking            Telephone Banking            Mobile Deposit            Bill Pay            Account Alerts            E-Statements</p> <p style="text-align: center;"><b><u>Consumer Lending</u></b></p> <p>Installment            Single Pay</p> <p style="text-align: center;"><b><u>Real Estate Lending</u></b></p> <p>Purchases            Refinances            Lot/Construction            Home Equity Loan            Home Equity Lines of Credit</p>	<p style="text-align: center;"><b><u>Deposits</u></b></p> <p>Commercial Checking Account Products            Commercial Savings Account Products            Certificates of Deposit (CDs)            Overdraft Protection Products            Master Card® Business Debit Card</p> <p style="text-align: center;"><b><u>Digital Banking</u></b></p> <p>Online/Mobile Banking            Telephone Banking            Mobile Deposit            Merchant Capture            Automated Clearing House (ACH) Origination            E-Statements</p> <p style="text-align: center;"><b><u>Commercial Lending</u></b></p> <p>Real Estate            New Construction            Operating Lines of Credit            Equipment</p> <p style="text-align: center;"><b><u>Agriculture Lending</u></b></p> <p>Real Estate            Lines of Credit            Equipment/Machinery            Operating Loans</p>



# FIRST NATIONAL BANK

Bangor • West Salem • Holmen • Mindoro • St. Joseph Ridge

## Fee Schedule

Description	Fee
Account Activity Printout	\$5.00
Account Research/Reconciliation (1 hr min)	\$35.00
ACH Origination	\$10.00
Certified Checks	\$15.00
Check Copy	\$2.00
Check Printing	fee depends on style ordered
Collection Item Fee	\$10.00
Debit Card Replacement	\$5.00
Debit Card PIN Reissue	\$5.00
Dormant Checking/Savings Account	\$5.00
Fax Transmission	\$5.00
Foreign Check Processing	\$20.00
Garnishment/Levy	\$50.00
Money Order (Bank)	\$3.00
Money Order (Personal)	\$2.00
Overdraft Item Fee (additional \$3/thousand if item over \$1000)	\$25.00
Extended Overdrawn Balance (Per Week)	\$25.00
Overdraft Protection	\$3.00
Photocopy (Per Page)	\$0.25
Returned Deposit Item	\$10.00
Safe Deposit Box Rental	Varies by Size
Safe Deposit Box Drilling	\$100.00
Statement Reprint	\$5.00
Stop Payment	\$25.00
Stop Payment-Lost Checkbook	\$50.00
Telephone Transfer	\$1.00
Wire Transfer (Incoming/Outgoing)	\$20.00
Wire Transfer (International)	\$40.00



## Community Map for The First National Bank of Bangor locations at Bangor, Holmen, West Salem, Mindoro, and St Joseph Ridge

The geological area of the primary lending/assessment area for all **The First National Bank of Bangor** locations are identified on the attached map and are in the following **Census Tract Areas:**

La Crosse County - 0001.00, 0002.00, 0003.00, 0004.01,  
0004.02, 0005.00, 0006.00, 0007.00,  
0008.00, 0009.00, 0010.00, 0011.01,  
0011.02, 0012.00, 0101.01, 0101.02,  
0102.02, 0102.03, 0102.04, 0102.05,  
0103.00, 0104.01, 0104.03, 0104.04,  
0105.00, 0106.00, 0107.00, & 0108.00  
Entire La Crosse County  
MSA/MD Name: La Crosse - Onalaska, WI-MN

Our assessment area consists of La Crosse County which includes the 28 listed census tract numbers based on the 2023 FFIEC Census Report







## Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data shows geographic distribution of loans and applications: ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online.

For more information, visit the Consumer Financial Protection Bureau's website [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



Quarterly Loan to Deposit Ratio  
2023

31-MAR-23	127.35%
30-JUN-23	136.19%
29-SEPT-23	134.95%
29-DEC-23	120.31%



## **PUBLIC DISCLOSURE**

April 29, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of Bangor  
Charter Number 13202

1798 Commercial Street  
Bangor, WI 54614

Office of the Comptroller of the Currency

222 South 9<sup>th</sup> Street, Suite 800  
Minneapolis, MN 55402

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 **Satisfactory**.

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The loan-to-deposit ratio is more than reasonable.
- The majority of loans by both number and dollar are in the assessment area.
- The Lending Test for Wisconsin is satisfactory.
- The bank received no CRA-related complaints during the evaluation period.

### Loan-to-Deposit Ratio

Considering First National Bank of Bangor's (FNB Bangor or the bank) size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to deposit ratio is more than reasonable. The bank's average quarterly loan-to-deposit (LTD) ratio reflects reasonable responsiveness towards meeting the credit needs of the community. FNB Bangor's quarterly LTD ratio from December 31, 2019, to December 31, 2023, averaged 109.9 percent. The combined average quarterly LTD ratio for five competitor banks was 76.8 percent over the same period, and the ratios for each competitor bank ranged between 51.3 percent and 109.9 percent. The asset size of the competitor banks ranged from \$70 million to \$627 million, with an average asset size of \$372 million. Out of the six financial institutions in the peer group, FNB Bangor ranks as the fourth largest in asset size.

### Lending in Assessment Area

A majority of the bank's loans are inside the AA.

The bank originated and purchased 75.1 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				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
<b>2021 Commercial</b>	36	66.6	18	33.3	54	4,833	70.8	1,985	29.2	6,818
<b>2022-23 Commercial</b>	47	83	9	16	56	10,201	77.7	2,919	22.3	13,120
<b>Total</b>	<b>83</b>	<b>75.1</b>	<b>27</b>	<b>24.9</b>	<b>110</b>	<b>15,034</b>	<b>75.4</b>	<b>4,904</b>	<b>24.6</b>	<b>19,938</b>

Source: Bank Data  
 Due to rounding, totals may not equal 100.0%  
 Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.

## Description of Institution

As of December 31, 2023, FNB Bangor is a \$348 million community bank headquartered in Bangor, Wisconsin. FNB Bangor has three full-service locations in the State of Wisconsin. Branches are located in Bangor, West Salem, and Holmen, Wisconsin. There are also two limited hour locations in Mindoro and St. Joseph Ridge, Wisconsin. The bank does not operate any automated teller machines (ATMs). Since the last CRA evaluation there have been no mergers or acquisitions.

FNB Bangor offers traditional commercial, consumer, agricultural, real estate, and residential loans. As of December 31, 2023, FNB Bangor's outstanding loan balance is \$261 million. The loan portfolio makes up approximately 73 percent of total assets. The bank's loan portfolio is comprised of real estate loans, at 88.4 percent, commercial loans, at 4.4 percent, agricultural loans at 1.2 percent, individual loans at 1.4 percent, and municipal loans at 4.6 percent, based on the dollar amounts of loans outstanding. The bank has a low-risk lending strategy that is focused on maintaining strong tier 1 capital and retaining the core customer base. As of December 31, 2023, tier one capital totaled \$85.9 million, and the bank's tier one leverage capital ratio was 26.2 percent.

The prior CRA evaluation, dated November 25, 2019, received a rating of "Satisfactory". There are no current financial or legal considerations that affect the bank's ability to meet the credit needs of the AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC used small bank examination procedures to evaluate FNB Bangor's record of meeting the credit needs of its community through its lending activities. The lending test review period is January 1, 2021, through December 31, 2023. The bank has one AA, consisting of La Crosse County, Wisconsin. Conclusions were based on the bank's commercial lending by number and by dollar volume as the primary product. Examiners sampled 110 commercial loans originated or purchased in the bank's AA during the review period to assess the bank's performance under the Lending Test.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (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 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 bank's overall rating is based solely on the ratings in the state of Wisconsin for the bank's sole AA. Since FNB Bangor only has locations in Wisconsin, only a state rating will be given.

The MMSA rating 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 CFR 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 AA 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 Wisconsin<sup>1</sup>: Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes is satisfactory.
- FNB Bangor received no CRA-related complaints during the evaluation period.

#### Description of Institution's Operations in Wisconsin

FNB Bangor has one AA, the La Crosse AA, in Wisconsin. The full-scope review encompassed the La Crosse-Onalaska WI-MN Multistate Metropolitan Statistical Area (MMSA). FNB Bangor operates five branches within the AA in the municipalities of Bangor, Holmen, St. Joseph Ridge, Mindoro, and West Salem. All five branches are located in middle income census tracts. There were no new branches or branch closures during the evaluation period. FNB Bangor does not operate any deposit-taking or cash – dispensing ATMs in the AA.

There is a total of 28 census tracts (CTs) in the AA. There was one low-income tract, five moderate-income tracts, fifteen middle-income tracts, five upper-income tracts, and two tracts that did not report an income level. There were no underserved CTs in the AA. In 2021 there was a total of 25 CTs in the AA. There was one low-income tract, four moderate income tracts, fourteen middle income tracts, five upper income tracts, and one tract that did not report an income level.

There is strong competition within the AA. According to FDIC Deposit Market Share Report as of June 30, 2023, FNB Bangor ranks eighth among 17 financial institutions with a deposit market share of 4.68 percent. FNB Bangor's main competitors in the AA are River Bank, Associated Bank, Citizens State Bank of La Crosse, Wells Fargo Bank, and Bremer Bank with a collective deposit market share of 40.1 percent.

La Crosse County has recovered well from the pandemic with unemployment rates falling after it ended. High inflation, however, has disrupted the economic recovery recently with the Consumer Price index increasing to 9.1 percent in 2022, the largest increase in 40 years. The economy has further slowed with the higher interest rates. The greatest areas of employment are education and health services, manufacturing, leisure and hospitality, and trade/transportation/utilities. Major employers include local government and education, Gunderson Health System, Kwik Trip, The Mayo Clinic, and Trane Technologies.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.



The annual unemployment rate decreased from 3.1 percent to 2.5 percent between 2021 and 2022 and further decreasing to 2.3 percent in December 2023. The State of Wisconsin unemployment rate in 2021 was 3.9 percent and decreasing to 3.0 percent in December 2023. The national unemployment rate for 2021 was 3.9 percent and decreased in 2022 to 3.5 percent later increasing to 3.7 percent in 2023. It is estimated that 99 percent of the jobs lost in Wisconsin due to the pandemic have been regained. La Crosse regional employment over the next 10 years is expected to grow by 6.5 percent.

The community contact said that that programs are needed for new market tax credits, more access to sustainable capital is needed, and that banks need to develop and participate in more creative financing, particularly for capital. The contact highlighted that high rent and affordable housing is a persisting challenge for residents in the La Crosse AA. It was noted that zoning laws are preventing the construction of new multi-family housing as well. Management recognized the rising housing costs and interest rates and how they are affecting affordability in the AA.

<b>Table A – Demographic Information of the Assessment Area 2022-23</b>						
<b>Assessment Area: La Crosse WI MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	28	3.6	17.9	53.6	17.9	7.1
Population by Geography	120,784	2.1	18.8	57.8	16.7	4.7
Housing Units by Geography	50,680	1.8	18.6	58.6	15.8	5.1
Owner-Occupied Units by Geography	30,074	0.0	13	66.9	19.5	0.5
Occupied Rental Units by Geography	18,031	4.9	27.2	44.8	10.8	12.3
Vacant Units by Geography	2,575	0.7	24.3	58.5	7.8	8.6
Businesses by Geography	10,215	1.7	17.4	52.5	16.9	11.6
Farms by Geography	390	.5	7.4	70.3	19	2.8
Family Distribution by Income Level	27,311	16.6	19.1	24.4	40.0	0
Household Distribution by Income Level	48,105	22.6	17.1	19.5	40.9	0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA		\$81,684	Median Housing Value			\$176,536
Median Household Income: \$62, 497			Median Gross Rent			\$882
Households Below Poverty Level: 11.5%			Families Below Poverty Level			4.1%
<i>Source: 20XX ACS Census and 20XX D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area 2021</b>						
<b>Assessment Area: La Crosse MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	25	4.0	16.0	56.0	20.0	4.0
Population by Geography	117,048	2.1	15.7	60.3	17.7	4.2
Housing Units by Geography	49,008	2.7	17.5	60.4	17.9	1.6
Owner-Occupied Units by Geography	30,084	0.4	7.8	68.2	23.2	0.4
Occupied Rental Units by Geography	16,261	6.2	33.8	47.3	8.7	4.1

Vacant Units by Geography	2,663	7.2	27.6	52.3	12.8	0.0
Businesses by Geography	6,405	12.0	16.7	56.5	13.8	1.1
Farms by Geography	260	1.2	4.2	74.6	19.2	0.8
Family Distribution by Income Level	28,033	18.3	18.9	22.1	40.6	0.0
Household Distribution by Income Level	46,345	21.9	17.5	19.0	41.5	0.0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA	\$68,531	Median Housing Value				\$155,655
Median Household Income: \$55,837	Median Gross Rent				\$761	
Households Below Poverty Level: 13.2%	Families Below Poverty Level				6.7%	
<i>Source: 2015 ACS and 2021 D&amp;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>						

## Scope of Evaluation in Wisconsin

The OCC used small bank examination procedures to evaluate the bank's record of meeting the credit needs of its community through its lending activities. The lending test review period is January 1, 2021, through December 31, 2023. The bank has one AA, consisting of La Crosse County, WI. Conclusions were based on the bank's commercial lending by number and by dollar volume as the primary product. Examiners sampled 110 commercial loans originated or purchased in the bank's AA for the review period to assess the bank's performance under the Lending Test. The greatest weight in evaluating FNB Bangor's performance was placed on the bank's lending for 2022 and 2023, due to the longer evaluation period and greater volume of loans originated or purchased during those years. The evaluation of 2021 was separate from 2022 and 2023 due to updates to US Census Data and changes made to demographics and census tracts beginning in 2022.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the La Crosse WI MSA AA is adequate.

## Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State of Wisconsin.

### *Small Loans to Businesses*

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.

The distribution of loans to businesses in low- and moderate-income geographies in the AA is poor. FNB Bangor made no loans in low- or moderate-income tracts during the evaluation period. These

census tracts are all located in the City of La Crosse in which the bank does not have a presence and where there is strong lending competition from other banks. FNB Bangor's branches are in rural areas removed from these tracts with the closest bank location approximately 10 miles from the closest low- or moderate-income census tract.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to businesses of different sizes.

#### ***Small Loans to Businesses***

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 originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is reasonable. FNB Bangor exceeded aggregate lending to businesses with revenues of less than \$1 million but was below the area demographics. A large portion of the bank's sampled loans were to business with unknown gross revenues. In using a proxy analysis for FNB Bangor's lending in the AA, we found that 95.7 percent of the bank's business loans were less than \$1 million and that 61.7 percent of the loans were \$100 thousand or less. FNB Bangor primarily serves the more rural areas of La Crosse County where its branches are located. The bank has no branch locations in the more populated areas of the county such as La Crosse or Onalaska, making it difficult to lend in those areas. The strong competition from other institutions already located in the cities of La Crosse and Onalaska and their branching and size make lending more difficult for FNB Bangor. In 2021, the bank's performance was nearer to demographics and well above the aggregate comparator.

### **Responses to Complaints**

FNB Bangor did not receive any written complaints relating to its CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	1/1/21 - 12/31/23	
<b>Bank Products Reviewed:</b>	Small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>States</b>		
Wisconsin	Small Bank	<i>La Cross County, WI AA</i>

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	(First National Bank of Bangor)
	Lending Test Rating
Overall Bank:	Satisfactory
State:	
Wisconsin	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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 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.

**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.

**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.

**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.

**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

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### 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 are treated 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 30<sup>th</sup> 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 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2021</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
La Crosse MSA AA	36	4,833	100.0	1,387	12.0	0.0	9.3	16.7	0.0	12.8	56.5	91.4	56.0	13.8	8.6	20.0	1.1	0.0	2.0	
<b>Total</b>	<b>36</b>	<b>4,833</b>	<b>100.0</b>	<b>1,387</b>	<b>12.0</b>	<b>0.0</b>	<b>9.3</b>	<b>16.7</b>	<b>0.0</b>	<b>12.8</b>	<b>56.5</b>	<b>91.4</b>	<b>56.0</b>	<b>13.8</b>	<b>8.6</b>	<b>20.0</b>	<b>1.1</b>	<b>0.0</b>	<b>2.0</b>	

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*The First National Bank Of Ban (10000013202) excluded from Aggregate*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2022-23</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Business</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
La Crosse MSA AA	47	10,201	100.0	1,387	1.7	0.0	0.6	17.4	0.0	16.0	52.5	80.9	53.2	16.9	19.1	18.7	11.6	0.0	11.4	
<b>Total</b>	<b>47</b>	<b>10,201</b>	<b>100.0</b>	<b>1,387</b>	<b>1.7</b>	<b>0.0</b>	<b>0.6</b>	<b>17.4</b>	<b>0.0</b>	<b>16.0</b>	<b>52.5</b>	<b>80.9</b>	<b>53.2</b>	<b>16.9</b>	<b>19.1</b>	<b>18.7</b>	<b>11.6</b>	<b>0.0</b>	<b>11.4</b>	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*The First National Bank Of Ban (10000013202) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
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	
La Crosse MSA AA	36	4,833	100.0	1,387	76.5	63.9	46.0	7.7	25.0	15.8	11.1	
<b>Total</b>	<b>36</b>	<b>4,833</b>	<b>100.0</b>	<b>1,387</b>	<b>76.5</b>	<b>63.9</b>	<b>46.0</b>	<b>7.7</b>	<b>25.0</b>	<b>15.8</b>	<b>11.1</b>	

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*The First National Bank Of Ban (10000013202) excluded from Aggregate*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022-23</b>
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	
La Crosse MSA AA	47	9	100.0	1,387	84.3	51.1	46.6	4.7	31.9	11.1	17.0	
<b>Total</b>	<b>47</b>	<b>9</b>	<b>100.0</b>	<b>1,387</b>	<b>84.3</b>	<b>51.1</b>	<b>46.6</b>	<b>4.7</b>	<b>31.9</b>	<b>11.1</b>	<b>17.0</b>	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*The First National Bank Of Ban (10000013202) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.