



## **PUBLIC DISCLOSURE**

September 02, 2014

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

National Exchange Bank and Trust  
Charter Number 13879

130 South Main  
Fond Du Lac, WI 54936

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 **Satisfactory**.

The following table indicates the performance level of **National Exchange Bank and Trust** with respect to the Lending, Investment, and Service Tests:

Performance Levels	National Exchange Bank and Trust Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
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:

- National Exchange Bank and Trust’s (NEBAT) lending performance is good. NEBAT demonstrates excellent lending activity, adequate geographic distribution, and excellent borrower income distribution. Lending within the bank’s assessment area is adequate with 75.12 percent of all bank loans made in one of the bank’s assessment areas. Community development lending had a positive impact on the bank’s overall lending performance.
- NEBAT provided an adequate level of qualified investments throughout the bank’s assessment areas. Donations to organizations supported affordable housing initiatives, economic development, and community services targeted towards low- and moderate-income individuals and geographies.
- NEBAT’s performance under the service test is good. Overall, bank branches are accessible to people and geographies of different income levels. Hours are generally good with no significant differences between branches located in different income levels. The bank offers an adequate level of services through alternate delivery systems.

## 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 metropolitan area/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 usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 or loans 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 do 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, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, and 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 metropolitan area/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every 10 years and used to determine the income level category of geographies. Also, the median income

determined by the Department of Housing and Urban Development 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 metropolitan statistical area that contains a population of at least 2.5 million. A metropolitan division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The metropolitan statistical area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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) and the Thrift Financial Reporting (TFR)

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

NEBAT is an intrastate bank headquartered in Fond du Lac, Wisconsin. NEBAT is a full-service bank with 27 full-service banking offices and nine deposit-taking automated teller machines (ATMs) across its footprint. NEBAT is a wholly owned subsidiary of NEB Corporation, a two-bank holding company headquartered in Fond du Lac, Wisconsin. The holding company is controlled by the members that also control the Stone Foundation (Foundation). During our evaluation, we determined that the Stone Foundation meets the definition of an affiliate. The Stone Foundation supports local nonprofit activities through grant making activities of the Foundation. At the bank's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test performance. As of June 30, 2014, NEBAT had total assets of \$1.30 billion, total loans of \$706 million, and Tier One Capital of \$235 million.

NEBAT offers a full range of loan and deposit products to businesses and individuals, including alternative retail services, such as direct deposit and access to electronic banking services (bill payment, mobile banking, and electronic statements). The bank offers a standard product mix of loans, including Wisconsin Housing and Economic Development Authority (WHEDA), the US Department of Veterans Affairs (VA), Federal Housing Authority (FHA), and Small Business Administration (SBA) loans. NEBAT maintains a trust department and private banking business line.

NEBAT's lending focus is to meet the community's residential real estate, commercial, and consumer lending needs. As of June 30, 2014, the bank's loans represent 54 percent of total assets. The loan portfolio consists of 59.26 percent commercial loans, 22.50 percent residential real estate loans, 6.86 percent in other loans, 4.86 percent agricultural loans, 3.30 percent consumer loans, and 3.24 percent government 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 Intermediate Small Bank CRA evaluation dated July 19, 2010.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms the bank reported under the Community Reinvestment Act (CRA) for the period of July 1, 2010 through December 31, 2013. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. Performance tables 1 through 12 in appendix C include only data covered by the 2010 Census, namely 2012 through 2013. Data from 2010 and 2011 is discussed in the applicable narrative sections of the evaluation. We reviewed qualified community development (CD) loans, investments, and services for the period of July 20, 2010 through September 2, 2014.

### Data Integrity



As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration for our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualify as CD as defined in the CRA regulation. Our testing indicated no substantive inaccuracies in the data. Therefore, we concluded that the home mortgage loans, small loans to businesses and farms, and CD activities data could be relied upon for this examination.

## **Selection of Areas for Full-Scope Review**

We selected the Fond du Lac metropolitan statistical area (MSA) and the non-MSA for a full-scope review. Full-scope reviews consider performance context, quantitative, and qualitative factors. The AAs selected for the full-scope review were chosen because they represented a significant portion of the bank's deposit base and lending business in Wisconsin. The Fond du Lac MSA lending volume represents 59.50 percent of total rated loans originated during the evaluation period and the non-MSA represents the next highest volume at 13.47 percent. The other AAs in Wisconsin were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the *Scope of the Examination* section for details regarding how we selected the areas for review.

## **Ratings**

In this evaluation, we placed more weight on the bank's performance in 2012 through 2013 than to its performance in 2010 through 2011 to reach our conclusions. The bank's overall rating is based on results in those areas that received full-scope reviews. Refer to the *Scope of the Examination* section for details regarding how the areas were weighted in arriving at the respective ratings.

Additionally, when evaluating the bank's performance under the lending test, we placed a higher value on the bank's distribution of home mortgage loans than the distribution of small business loans and small farm loans. Within the home mortgage category, greater weight was placed on home refinance and home purchase loans, which make up over 90 percent of home mortgage lending, with home improvement loans receiving substantially less weight.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), in determining a national bank's (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.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Fond du Lac MSA and the non-MSA is good.

#### Lending Activity

The bank's overall lending activity is excellent, considering the strong competition for all types of loans in the bank's AAs. The bank's excellent performance in originating home mortgage loan, small business loans, and small farm loans when compared to its local competitors supports this conclusion.

Refer to table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

#### Fond du Lac MSA

NEBAT's lending activity in the Fond du Lac MSA is excellent. Home mortgage lending activity is excellent, small business lending activity is excellent, and small farm lending is excellent considering the competition in the AA.

Based upon FDIC Deposit Market Share data as of June 30, 2013, NEBAT had deposits of \$912 million, achieving a 33.33 percent market share of deposits, ranking first among 17 financial institutions in the AA, placing them in the top 5.90 percent of total depository banks. Based upon 2012 Peer Mortgage Data, NEBAT achieved an 11.60 percent market share of home purchase loans, ranking second among 94 reporting lenders and is equivalent to being in the top 2.20 percent of lenders. The bank achieved a 15.87 percent market share of home improvement loans, ranking second among 33 reporting lenders and is equivalent to being in the top 6.70 percent of lenders. The bank also achieved a 7.99 percent market share of home refinance loans, ranking third among 164 reporting lenders and is equivalent to being in the top 1.80 percent of lenders. The mortgage lending activity is excellent given the lending market share for a substantial portion of these products that ranked in the top 5.00 percent of the deposit market share.

NEBAT achieved a 30.89 percent market share of small loans to businesses, ranking first among 38 reporting lenders, or the top 2.60 percent of lenders. The small business lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. NEBAT achieved a 55.08 percent market share of small loans to farms, ranking first among 14 reporting lenders, or the top 7.10 percent of lenders.

#### Non-MSA

NEBAT's lending activity in the non-MSA is excellent. Home mortgage lending activity is excellent, small business lending activity is good, and small farm lending is good considering the competition in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2013, NEBAT ranked sixth among 28 institutions and achieved a 5.50 percent market share in the AA. Based on 2012 Peer Mortgage Data, NEBAT had market share of 3.97 percent and ranked seventh among 95 reporting lenders for home purchase lending, equivalent to being in the top 7.40 percent of lenders. The bank achieved a 4.41 percent market share of home refinance loans, ranking seventh among 185 reporting lenders and is equivalent to being in the top 3.80 percent of lenders. The mortgage lending activity is excellent, given the lending market share for a substantial portion of these products that ranked in the top 5.00 percent of the deposit market share.

NEBAT achieved a 6.33 percent market share of small loans to businesses, ranking fifth among 43 reporting lenders, or the top 11.60 percent of lenders. The small business lending activity is good given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. NEBAT achieved a 31.14 percent market share of small loans to farms, ranking second among 17 reporting lenders, or the top 11.80 percent of lenders.

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

Overall, the geographic distribution of loans is adequate. In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's CRA reportable lending activity. We also placed greater weight on the bank's performance in 2012 through 2013 than its performance in 2010 through 2011. For 2000 census data, the Fond du Lac MSA did not have low- or moderate-income census tracts; therefore, analysis of the geographic distribution of home mortgage, small business loans, and small farm loans is not meaningful.

#### ***Home Mortgage Loans***

Refer to tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Refer to table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses and small loans to farms originations and purchases.

Because the non-MSA AA does not have any low- or moderate-income census tracts (CTs), a geographic distribution analysis of home mortgage, small business loans, and small farm loans is not meaningful.

#### **Fond du Lac MSA**

The overall geographic distribution of home purchase loans is excellent. The bank's geographic distribution of home purchase loans during 2012 through 2013 was excellent. There were no low-income geographies. The portion of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was near to its overall market share for home purchase loans.

The overall geographic distribution of home refinance loans is adequate. The bank's geographic distribution of home refinance loans during 2012 through 2013 was adequate. There were no low-income geographies. The portion of loans made in moderate-income census tracts was below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was adequate in comparison to the overall market share for home refinance loans.

The overall geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans during 2012 through 2013 was good. There were no low-income geographies. The portion of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was good.

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

Refer to table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to businesses.

#### **Fond du Lac MSA**

The overall geographic distribution of small loans to business is adequate. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was adequate. There are no low-income census tracts. The percentage of small loans to businesses made in moderate-income geographies is below the percentage of businesses in those geographies. The bank's market share in moderate-income geographies is near to its overall market share for small loans to businesses.

### ***Small Loans to Farms***

Refer to table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

#### **Fond du Lac MSA**

The overall geographic distribution of small loans to farms is very poor. The bank's geographic distribution of small loans to businesses in 2012 through 2013 was very poor. There are no low-income census tracts. The bank made no loans to moderate-income geographies.

### ***Lending Gap Analysis***

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed summary reports and maps and analyzed NEBAT's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

### ***Inside/Outside Ratio***

The ratio is a bank-wide calculation and not calculated by individual rating area or AA. Analysis is limited to bank origination and purchases and does not include any affiliate data. For the combined three and a half year evaluation period, NEBAT originated a majority of all loan products inside the bank's AAs (75.12 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance loans (80.94 percent), home purchase loans (60.64 percent), home improvement loans (81.33 percent), small loans to businesses (69.79 percent), and small loans to farms (87.08 percent).

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

The overall borrower distribution of the bank's lending is excellent. As noted previously, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's reportable lending activity. In addition, we attributed more weight to the bank's performance in 2012 and 2013 than its performance in 2010 and 2011.

### ***Home Mortgage Loans***

Refer to tables 8, 9 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Fond du Lac MSA

Overall, the borrower distribution of home mortgage loans is excellent.

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans during 2012 through 2013 was excellent. The percentage of loans to low-income borrowers exceeds the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers was near to its overall market share of home purchase loans. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted in 2012 through 2013.

The overall borrower distribution of home refinance loans is adequate. The bank's borrower distribution of home refinance loans during 2012 through 2013 was good. The percentage of loans to low-income borrowers was well below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was well below the overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers exceeded the overall market share of home refinance loans. The bank's performance in 2010 through 2011 was weaker than the performance noted in 2012 through 2013 and was considered adequate. This was due to adequate penetration to moderate-income borrowers.

The overall borrower distribution of home improvement loans is good. The bank's borrower distribution of home improvement loans during 2012 through 2013 was good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was near to its overall market share of home improvement loans. The bank's market share of loans to moderate-income borrowers was near to its overall market share of home improvement loans. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted in 2012 through 2013.

#### Non-MSA

Overall, the borrower distribution of home mortgage loans is good. An analysis of home improvement loans was not performed as the bank did not originate or purchase a sufficient number of loans to analyze.

The overall borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans during 2012 through 2013 was excellent. The percentage of loans to low-income borrowers exceeds the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeded the overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share of home purchase loans. The bank's performance in 2010 through 2011 was not inconsistent with the overall performance noted in 2012 through 2013.

The overall borrower distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans during 2012 through 2013 was good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was below its overall market share of home refinance loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share of home refinance loans. The bank's performance in 2010 through 2011 was not inconsistent with the overall performance noted in 2012 through 2013.

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

Refer to table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### **Fond du Lac MSA**

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeds the percentage of small businesses. This performance was enhanced by excellent market share. The bank's market share of loans to small businesses exceeded its overall market share of loans to small businesses. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted in 2012 through 2013 and was considered excellent.

#### **Non-MSA**

The overall borrower distribution of small loans to businesses is excellent. The bank's borrower distribution of small loans to businesses in 2012 through 2013 was excellent. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) exceeded the percentage of small businesses. This performance was enhanced by excellent market share. The bank's market share of loans to small businesses exceeded its overall market share of loans to small businesses. The bank's performance in 2010 through 2011 was not inconsistent with the overall performance in 2012 through 2013.

### ***Small Loans to Farms***

Refer to table 12 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

#### **Fond du Lac MSA**

The overall borrower distribution of small loans to farms is excellent. The bank's borrower distribution of small loans to farms in 2012 through 2013 was excellent. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) exceeds the percentage of small farms. This performance was enhanced by excellent market share. The bank's market share of loans to small farms exceeded its overall market share of loans to small farms. The bank's performance in 2010 through 2011 was not inconsistent with the performance noted in 2012 through 2013 and was considered excellent.

#### Non-MSA

The overall borrower distribution of small loans to farms is good. The bank's borrower distribution of small loans to farms in 2012 through 2013 was good. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) is near to the percentage of small farms. This performance was enhanced by excellent market share. The bank's market share of loans to small farms exceeded its overall market share of loans to small farms. The bank's performance in 2010 through 2011 was not inconsistent with the overall performance in 2012 through 2013.

### **Community Development Lending**

Refer to table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had an overall positive impact on the bank's overall lending performance.

#### Fond du Lac MSA

NEBAT's level of CD lending has a positive impact on its overall lending performance in the Fond du Lac AA. NEBAT originated five loans totaling \$8.99 million in qualified CD loans in the AA during the evaluation period. This volume represented 6.39 percent of allocated Tier One Capital. The bank's CD loans were responsive to AA needs, demonstrated leadership, and supported affordable housing initiatives for low- and moderate-income (LMI) individuals, activities that promoted economic development in downtown Fond du Lac, and activities that revitalized or stabilized LMI geographies in the AA.

Specific examples of the CD loans originated during this evaluation period include:

- One loan, totaling \$2.70 million, was provided to an organization that provides services for LMI individuals. The funding was designated to construct an addition and provide renovations to its building. This organization is located in a moderate-income census tract in downtown Fond du Lac.
- One loan, totaling \$4.50 million, was provided to a local organization to renovate and construct a new downtown arts center. This center is located in a moderate-income census tract located in downtown Fond du Lac. This new center will attract new businesses and individuals to the downtown area and help revitalize the area.

- One loan, totaling \$1.31 million, was provided to a corporation that specializes in skilled nursing care and has a facility in Fond du Lac. A majority of the care recipients are Medicaid and Medicare recipients. The funding is designated to renovate the facility. The facility is located in a moderate-income census tract.
- One tax anticipation note was originated to the Campbellsport school district, totaling \$77,000. The school district used the proceeds to pay general expenses. A majority of the students in the school district come from LMI families and receive free or reduced lunches.

### Non-MSA

NEBAT's level of CD lending has a positive impact on its overall lending performance in the non-MSA AA. NEBAT originated one qualified CD loan totaling \$3.50 million in the AA during the evaluation period. This volume represented 11.05 percent of allocated Tier One Capital. The bank's CD loan was responsive to AA needs.

The CD loan originated during this evaluation period includes:

- A tax anticipation note was originated to the Beaver Dam school district, totaling \$3.50 million. The school district used the proceeds to pay general expenses. A majority of the students in the school district come from LMI families and receive free or reduced lunches.

### **Community Development Loans**

In addition to the CD loans that benefit the bank's AAs, NEBAT originated one qualified CD loan, totaling \$7.50 million, located in the greater statewide area. The loan was a refinance of a project in Milwaukee County that was funded with New Market Tax Credits. This industrial and office building is located in a low-income census tract.

### Other Loan Data

NEBAT provided for consideration one letter of credit totaling \$7.54 million that had a qualified CD purpose. This letter of credit facilitated the construction of industrial/warehouse building in a low-income census tract in Milwaukee County.

### **Product Innovation and Flexibility**

The bank's loan product flexibility had a positive impact on its lending test conclusions. NEBAT offers flexible loans programs targeted to LMI borrowers. Loans originated under these programs are included in the bank's loans to small businesses and are analyzed under other portions of the lending test.

- In 2014, NEBAT developed a loan program designed to encourage investment in downtown Fond du Lac properties by providing property owners and lessees with funds needed to increase or sustain employment levels, conduct additional residential or commercial development, and increase occupancy in downtown Fond du Lac. The Downtown Fond du Lac Loan Program will provide funds for qualified business and property owners within the Downtown Business Improvement District at a below-market interest rate with special consideration for larger projects.



- The St. Agnes Loan Program provides low interest rate financing for patients of Agnesian Healthcare Hospital who do not have sufficient insurance or are unable to repay hospital bills within a certain timeframe. This program primarily benefits LMI individuals.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test. In the Madison MSA, the bank's performance is weaker than the bank's overall performance in the state. The weaker performance had no impact on the overall lending test rating. Refer to the tables 1 through 12 in appendix C for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Fond du Lac MSA is and performance in the non-MSA is poor.

Refer to table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

#### Fond du Lac MSA

During the evaluation period, NEBAT made 59 investments in the AA totaling \$2.50 million. When considering current investments, the total represents 1.78 percent of allocated Tier One Capital for the AA. This level is considered adequate and is commensurate with the adequate level of investments made. The bank's responsiveness to the CD needs in the AA is adequate.

These donations were to organizations that supported affordable housing initiatives, economic development, revitalization/stabilization, and community services targeted towards LMI individuals and geographies over the evaluation period. The investments also included funding for programs that focus on financial counseling and financial literacy support which were some of the main identified CD needs in the Fond du Lac AA.

#### Non-MSA

During the evaluation period, NEBAT made 26 investments in the non-MSA totaling \$153,100. When considering current investments, the total represents approximately 0.48 percent of allocated Tier One Capital for the AA. This is a poor level of investments. The bank's responsiveness to the CD needs in the AA is poor.

### Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test is consistent with the bank's overall "Low Satisfactory" performance under the investment test. In the Madison and Sheboygan MSAs, the bank's performance was below the bank's overall performance in the state due to a lower level of investments. The performance in the limited-scope AAs was not significant enough to

affect the overall conclusions. However, the Milwaukee MSA AA had an adequate level of investments. Refer to the table 14 in appendix C for the facts and data that support these conclusions.

## **SERVICE TEST**

NEBAT's performance under the service test in Wisconsin is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Fond du Lac MSA is good, and performance in the non-MSA is good.

### **Retail Banking Services**

Refer to table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Fond du Lac MSA

NEBAT's branch distribution in the AA is good. Branches are reasonably accessible to essentially all portion of geographies and individuals of different income levels in the AA. There are no low-income census tracts in the AA. There were two branches located in moderate-income census tracts. The percentage of branches in moderate-income census tracts exceeds the percentage of the population in moderate-income census tracts. NEBAT's branch distribution in 2011 was not inconsistent with the performance noted in 2012 through 2013.

There were no branch openings or closings that affected the accessibility of the bank's delivery systems to LMI geographies or individuals.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We placed no significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

#### Non-MSA

NEBAT's branch distribution in the AA is good. Branches were reasonably accessible to essentially all portion of geographies and individuals of different income levels in the assessment area. There are no low-income census tracts in the AA. There was one branch located in a moderate-income census tract. The percentage of branches in moderate-income census tracts exceeds the percentage of the population in moderate-income census tracts.

There were no branch openings or closing that affected the accessibility of the bank's delivery systems to LMI geographies or individuals.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking; these delivery methods provide increased access to banking services throughout all areas in the AA. We placed no significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

## **Community Development Services**

NEBAT's performance in providing CD services was good. CD services focused on community services targeted to LMI individuals and economic development services. Bank employees participated in a variety of organizations and partnerships, some in leadership roles, that benefited LMI individuals, promoted economic development, and provided affordable housing. NEBAT employees also provided technical assistance on financial and banking related matters to community groups and to LMI persons and families.

### Fond du Lac MSA

In the Fond du Lac AA, 17 NEBAT employees provided their expertise to 12 different CD organizations throughout the evaluation period. This represents a good level of activities and good responsiveness to the needs of the community. NEBAT employees held educational sessions throughout the evaluation period. These educational sessions included first-time homebuyer workshops, a foreclosure prevention program, and mortgage education fairs. Additionally, 11 NEBAT employees demonstrated leadership and served on the board of directors or on committees for these organizations.

### Non-MSA

In the non-MSA, four NEBAT employees provided their expertise to four different CD organizations throughout the evaluation period. This represents a good level of activities and good responsiveness to the needs of the community. NEBAT employees held educational sessions throughout the evaluation period. These educational sessions included first-time homebuyer workshops, a foreclosure prevention program, and mortgage education fairs. Additionally, one employee demonstrated leadership and served on the board of directors for the organization.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test is not inconsistent with the bank's overall "High Satisfactory" performance. Refer to table 15 in appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliated activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 07/01/2010 to 12/31/2013 Investment and Service Tests and CD Loans: 07/20/2010 to 09/02/2014	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
National Exchange Bank and Trust Fond du Lac, Wisconsin	Home Purchase; Home Improvement; Home Refinance; Small Business; Small Farms; Community Development Loans; Qualified Investments; Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<u>Wisconsin</u> Fond du Lac MSA	Full Scope Review	All but four of census tracts in Fond du Lac County
Non-MSA	Full Scope Review	The southern portion of Green Lake County, all of Marquette County, the northwestern portion of Dodge County and the southwestern census tracts in Waushara County.
Madison MSA	Limited Scope Review	Two northeastern census tracts of Columbia County
Milwaukee MSA	Limited Scope Review	Northern half of Washington County
Sheboygan	Limited Scope Review	All of Sheboygan County except for the eastern census tracts

## Appendix B: Market Profiles for Full-Scope Areas

### Fond du Lac MSA

Demographic Information for Full-Scope Area: Fond du Lac MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	18.75	75.00	6.25	0.00
Population by Geography	83,663	0.00	14.96	74.62	10.42	0.00
Owner-Occupied Housing by Geography	23,951	0.00	7.54	82.15	10.32	0.00
Businesses by Geography	4,663	0.00	23.16	69.50	7.33	0.00
Farms by Geography	495	0.00	2.63	84.44	12.93	0.00
Family Distribution by Income Level	22,632	17.70	18.60	26.60	37.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,216	0.00	22.01	70.64	7.35	0.00
Median Family Income	= \$64,173					
HUD Adjusted Median Family Income for 2012	= \$67,800					
Households Below the Poverty Level	= 10%					
				Median Housing Value	= \$147,741	
				Unemployment Rate	= 3.79%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, 2010 U.S. Census, 2012 HUD updated MFI, and Bureau of Labor Statistics

The Fond du Lac MSA is comprised of all but four of the census tracts in Fond du Lac County. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies.

According to the 2000 U.S. Census, the total population of the AA was 79,824. The distribution of families by income level was 0 percent low-income, 0 percent moderate-income, 93.75 percent middle-income, and 6.25 percent upper-income. According to the 2010 U.S. Census, the total population increased to 83,663, and the distribution of families by income level was 0 percent low-income, 18.75 percent moderate-income, 75.00 percent middle-income, and 6.25 percent upper-income.

The bank offers a full range of commercial and consumer loan and deposit products and services. Based upon FDIC Deposit Market Share data as of June 30, 2013, NEBAT achieved a 33.33 percent market share of deposits, ranking first among 17 financial institutions in the AA, ranking them in the top 5.90 percent of total depository banks.

#### Employment and Economic Factors

According to the Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment in the Fond du Lac AA improved during the evaluation period. Unemployment in the AA fell from 8.10 percent in July 2010 to 5.00 percent in August 2014. Unemployment in the state of Wisconsin fell from 8.20 percent in July 2010 to 5.10 percent in August 2014.

The largest industries in the AA include education, health services, government, and retail. The top four employers are Agnesian Healthcare, Mercury Marine, Marion University, and J.F. Ahern.

### Housing

According to the 2010 U.S. Census, 66.91 percent of the total housing units in the AA were owner-occupied. LMI geographies are primarily rental markets, with rental units accounting for 60.41 percent of the housing units in moderate-income geographies. According to the National Association of Realtors (www.realtor.org), the median housing value for the AA was \$135,000 as of June 2014.

Community and credit needs identified in the AA include affordable housing and small business lending. NEBAT has been responsive to these needs by lending to, investing in, and offering expertise to various community organizations.

### **Non-MSA**

Demographic Information for Full-Scope Area: Fond du Lac Non- MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0.00	0.00	100.00	0.00	0.00
Population by Geography	54,838	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	17,286	0.00	0.00	100.00	0.00	0.00
Businesses by Geography	3,114	0.00	0.00	100.00	0.00	0.00
Farms by Geography	480	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	15,112	18.80	18.91	25.51	37.40	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,605	0.00	0.00	100.00	0.00	0.00
Median Family Income	= \$64,173					
HUD Adjusted Median Family Income for 2012	= \$67,800					
Households Below the Poverty Level	= 10%					
				Median Housing Value	= \$144,330	
				Unemployment Rate	= 3.85%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, 2010 U.S. Census, 2012 HUD updated MFI, and Bureau of Labor Statistics

The non-MSA AA includes the southern portion of Green Lake County, all of Marquette County, the northwestern portion of Dodge County, and the southwestern census tracts in Waushara County. The AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income geographies.

According to the 2000 U.S. Census, the total population of the AA was 53,363. The distribution of families by income level was 0 percent low-income, 6.67 percent moderate-income, 86.67 percent middle-income, and 6.67 percent upper-income. According to the 2010 U.S. Census, the total

population increased to 54,838, and the distribution of families by income level was 0 percent low-income, 0 percent moderate-income, 100.00 percent middle-income, and 0 percent upper-income.

The bank offers a full range of commercial and consumer loan/deposit products and services. Based on FDIC Deposit Market Share data as of June 30, 2013, NEBAT ranked sixth among 28 institutions and achieved a 5.50 percent market share in the AA.

*Employment and Economic Factors*

According to the Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment in the non-MSA AA improved during the evaluation period. Unemployment in the AA fell from 8.60 percent in July 2010 to 5.40 percent in August 2014 for Dodge County; from 8.20 percent to 7.0 percent for Green Lake County; from 9.60 percent to 6.30 percent for Marquette County, and from 9.30 percent to 6.10 percent for Waushara County. Unemployment in the state of Wisconsin fell from 8.20 percent in July 2010 to 5.10 percent in August 2014. The largest industries in the AA include manufacturing, health services, transportation, and retail.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in core tables 2 through 7 and part of table 13; and (3) partially geocoded loans are included in the Total Loans and % Bank Loans column in core tables 8 through 12 and part of table 13. Tables without data are not included in this PE. The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 7. Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/AA.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31, 2013				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
NEB Fond du Lac MSA AA	54.94	817	100,682	910	98,171	213	13,892	5	8,991	1,940	212,745	59.80
NEB NonMSA AA	15.21	212	25,718	173	12,850	152	10,701	1	3,500	537	49,269	13.47
<b>Limited Review:</b>												
NEB Madison MSA Columbia Co AA	4.30	57	8,261	47	5,681	48	3,463	0	0	152	17,405	7.18
NEB MKE MSA Washington Co AA	7.73	128	17,294	141	18,273	4	247	1	150	273	35,814	6.60
NEB Sheboygan MSA AA	17.81	339	42,416	200	21,322	90	6,191	1	1,585	629	69,929	12.94

\* Loan Data as of December 31, 2013. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is July 20, 2010 TO September 2, 2014

\*\*\* Deposit Data as of September 23, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME 2013		Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31,						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>†</sup>	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
NEB Fond du Lac MSA AA	47.57	98	10,231	98	10,231	0	0	0	0	0	0	0	0	59.80
NEB NonMSA AA	15.53	32	2,654	32	2,654	0	0	0	0	0	0	0	0	13.47
<b>Limited Review:</b>														
NEB Madison MSA Columbia Co AA	5.83	12	851	12	851	0	0	0	0	0	0	0	0	7.18
NEB MKE MSA Washington Co AA	15.53	32	4,383	32	4,383	0	0	0	0	0	0	0	0	6.60
NEB Sheboygan MSA AA	15.53	32	1,567	32	1,567	0	0	0	0	0	0	0	0	12.94

<sup>†</sup> Loan Data as of December 31, 2013. Rated area refers to either the state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is From January 01, 2012 to December 31, 2013.

<sup>\*\*\*</sup> Deposit Data as of September 23, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31, 2013						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
NEB Fond du Lac MSA AA	229	58.12	0.00	0.00	7.54	8.30	82.15	82.53	10.32	9.17	11.72	0.00	10.71	11.94	10.89
NEB NonMSA AA	50	12.69	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	3.98	0.00	0.00	3.98	0.00
<b>Limited Review:</b>															
NEB Madison MSA Columbia Co AA	12	3.05	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	3.23	0.00	0.00	3.23	0.00
NEB MKE MSA Washington Co AA	18	4.57	0.00	0.00	4.42	27.78	92.05	72.22	3.53	0.00	0.50	0.00	0.00	0.55	0.00
NEB Sheboygan MSA AA	85	21.57	0.00	0.00	5.65	16.47	81.05	72.94	13.30	10.59	4.59	0.00	11.36	4.50	2.86

\* Based on 2012 Peer Mortgage Data: USPR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown indicates only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Wisconsin				Evaluation Period: January 01, 2012 TO December 31, 2013					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ <sup>***</sup> Units	% BANK Loans	% Owner Occ <sup>***</sup> Units	% BANK Loans	% Owner Occ <sup>***</sup> Units	% BANK Loans	% Owner Occ <sup>***</sup> Units	% BANK Loans						
<b>Full Review:</b>																
NEB Fond du Lac MSA AA	61	57.55	0.00	0.00	7.54	9.84	82.15	81.97	10.32	8.20	15.87	0.00	30.00	14.77	18.18	
NEB NonMSA AA	7	6.60	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	5.05	0.00	0.00	5.05	0.00	
<b>Limited Review:</b>																
NEB Madison MSA Columbia Co AA	3	2.83	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	3.85	0.00	0.00	3.85	0.00	
NEB MKE MSA Washington Co AA	11	10.38	0.00	0.00	4.42	0.00	92.05	100.0	3.53	0.00	4.32	0.00	0.00	4.82	0.00	
NEB Sheboygan MSA AA	24	22.64	0.00	0.00	5.65	25.00	81.05	66.67	13.30	8.33	4.23	0.00	23.08	3.60	2.27	

<sup>\*</sup> Based on 2012 Peer Mortgage Data: USPR

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: Wisconsin				Evaluation Period: January 01, 2012 TO December 31, 2013							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
NEB Fond du Lac MSA AA	526	50.00	0.00	0.00	7.54	3.80	82.15	80.42	10.32	15.78	7.97	0.00	6.45	7.91	8.85
NEB NonMSA AA	155	14.73	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	4.42	0.00	0.00	4.42	0.00
<b>Limited Review:</b>															
NEB Madison MSA Columbia Co AA	42	3.99	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	5.70	0.00	0.00	5.70	0.00
NEB MKE MSA Washington Co AA	99	9.41	0.00	0.00	4.42	4.04	92.05	94.95	3.53	1.01	1.21	0.00	0.55	1.28	0.47
NEB Sheboygan MSA AA	230	21.86	0.00	0.00	5.65	4.35	81.05	92.17	13.30	3.48	3.99	0.00	3.25	4.66	0.93

\* Based on 2012 Peer Mortgage Data: USPR

\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31, 2013							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
NEB Fond du Lac MSA AA	1	100.0	0.00	0.00	49.28	0.00	45.17	100.0	5.56	0.00	6.67	0.00	0.00	9.09	0.00
NEB NonMSA AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
NEB Madison MSA Columbia Co AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NEB MKE MSA Washington Co AA	0	0.00	0.00	0.00	9.98	0.00	90.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NEB Sheboygan MSA AA	0	0.00	0.00	0.00	16.43	0.00	67.29	0.00	16.28	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data: USPR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinance.



Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31, 2013								
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
NEB Fond du Lac MSA AA	910	61.86	0.00	0.00	23.16	13.85	69.50	73.96	7.33	12.20	30.89	0.00	28.50	31.76	39.31		
NEB NonMSA AA	173	11.76	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	6.33	0.00	1.75	7.64	2.67		
<b>Limited Review:</b>																	
NEB Madison MSA Columbia Co AA	47	3.20	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	5.15	0.00	2.08	6.80	0.00		
NEB MKE MSA Washington Co AA	141	9.59	0.00	0.00	4.94	3.55	91.73	96.45	3.33	0.00	3.19	0.00	1.54	4.66	0.55		
NEB Sheboygan MSA AA	200	13.60	0.00	0.00	6.95	6.50	79.72	90.00	13.33	3.50	6.27	0.00	3.62	8.24	1.59		

\* Based on 2013 Peer Small Business Data: US and PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Wisconsin								Evaluation Period: January 01, 2012 TO December 31, 2013				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
NEB Fond du Lac MSA AA	213	42.01	0.00	0.00	2.63	0.00	84.44	89.67	12.93	10.33	55.08	0.00	0.00	55.49	52.17
NEB NonMSA AA	152	29.98	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	31.14	0.00	0.00	33.00	21.95
<b>Limited Review:</b>															
NEB Madison MSA Columbia Co AA	48	9.47	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	46.38	0.00	0.00	48.48	0.00
NEB MKE MSA Washington Co AA	4	0.79	0.00	0.00	1.19	0.00	89.32	100.0	9.50	0.00	6.00	0.00	0.00	9.68	0.00
NEB Sheboygan MSA AA	90	17.75	0.00	0.00	9.48	14.44	87.68	85.56	2.84	0.00	48.84	0.00	77.78	46.67	0.00

\* Based on 2013 Peer Small Business Data: US and PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: Wisconsin						Evaluation Period: January 01, 2012 TO December 31, 2013						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
NEB Fond du Lac MSA AA	229	58.12	17.70	17.78	18.60	24.44	26.60	29.44	37.09	28.33	9.75	9.90	7.11	11.76	10.38
NEB NonMSA AA	50	12.69	18.18	18.75	18.91	33.33	25.51	25.00	37.40	22.92	4.30	10.53	5.33	4.03	1.96
<b>Limited Review:</b>															
NEB Madison MSA Columbia Co AA	12	3.05	26.45	18.18	22.22	27.27	26.89	36.36	24.44	18.18	3.48	2.27	3.13	4.35	6.25
NEB MKE MSA Washington Co AA	18	4.57	14.35	13.33	18.52	26.67	25.11	46.67	42.03	13.33	0.32	0.00	0.39	0.35	0.36
NEB Sheboygan MSA AA	85	21.57	13.68	20.51	16.81	24.36	25.70	24.36	43.81	30.77	4.61	11.90	4.85	3.90	2.47

<sup>\*</sup> Based on 2012 Peer Mortgage Data: (USPR).

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 15.7% of loans originated and purchased by Bank.

<sup>\*\*\*\*\*</sup> Data show includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Wisconsin				Evaluation Period: January 01, 2012 TO December 31, 2013					Market Share <sup>*</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
NEB Fond du Lac MSA AA	61	57.55	17.70	12.24	18.60	20.41	26.60	24.49	37.09	42.86	13.33	12.50	8.89	10.94	18.57	
NEB NonMSA AA	7	6.60	18.18	16.67	18.91	0.00	25.51	33.33	37.40	50.00	4.08	6.67	0.00	3.85	5.00	
<b>Limited Review:</b>																
NEB Madison MSA Columbia Co AA	3	2.83	26.45	50.00	22.22	0.00	26.89	50.00	24.44	0.00	0.00	0.00	0.00	0.00	0.00	
NEB MKE MSA Washington Co AA	11	10.38	14.35	0.00	18.52	9.09	25.11	27.27	42.03	63.64	4.52	0.00	2.86	3.64	7.04	
NEB Sheboygan MSA AA	24	22.64	13.68	4.35	16.81	17.39	25.70	30.43	43.81	47.83	3.96	3.03	3.45	4.30	4.20	

<sup>\*</sup> Based on 2012 Peer Mortgage Data: USPR.

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 14.2% of loans originated and purchased by Bank.

<sup>\*\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Wisconsin		Evaluation Period: January 01, 2012 TO December 31, 2013				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>							
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	Over all	Low	Mod	Mid	Upp			
<b>Full Review:</b>																		
NEB Fond du Lac MSA AA	526	50.00	17.70	5.36	18.60	25.22	26.60	31.47	37.09	37.95	7.39	4.92	7.41	7.52	7.75			
NEB NonMSA AA	155	14.73	18.18	6.21	18.91	28.28	25.51	26.90	37.40	38.62	4.58	2.94	8.09	5.44	3.05			
<b>Limited Review:</b>																		
NEB Madison MSA Columbia Co AA	42	3.99	26.45	18.42	22.22	34.21	26.89	26.32	24.44	21.05	5.77	8.70	6.31	2.46	7.59			
NEB MKE MSA Washington Co AA	99	9.41	14.35	5.62	18.52	23.60	25.11	30.34	42.03	40.45	1.19	0.41	1.08	1.50	1.12			
NEB Sheboygan MSA AA	230	21.86	13.68	5.61	16.81	21.03	25.70	35.51	43.81	37.85	4.39	4.37	5.07	5.27	3.48			

<sup>\*</sup> Based on 2012 Peer Mortgage Data: USPR.

<sup>\*\*</sup> Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 11.2% of loans originated and purchased by Bank.

<sup>\*\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Wisconsin		Evaluation Period: January 01, 2012 TO December 31, 2013		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
NEB Fond du Lac MSA AA	910	61.86	72.96	76.04	74.51	14.51	10.99	30.89	46.11
NEB NonMSA AA	173	11.76	75.56	76.30	82.08	12.14	5.78	6.33	10.78
<b>Limited Review:</b>									
NEB Madison MSA Columbia Co AA	47	3.20	74.60	93.62	82.98	4.26	12.77	5.15	10.50
NEB MKE MSA Washington Co AA	141	9.59	75.09	52.48	67.38	19.15	13.48	3.19	4.29
NEB Sheboygan MSA AA	200	13.60	74.46	83.50	73.00	16.50	10.50	6.27	10.39

\* Based on 2013 Peer Small Business Data: US and PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Wisconsin		Evaluation Period: January 01, 2012 TO December 31, 2013			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
NEB Fond du Lac MSA AA	213	42.01	96.57	97.18	81.69	14.08	4.23	55.08	78.91
NEB NonMSA AA	152	29.98	98.13	94.08	76.97	19.08	3.95	31.14	46.95
<b>Limited Review:</b>									
NEB Madison MSA Columbia Co AA	48	9.47	99.14	100.0	70.83	25.00	4.17	46.38	84.21
NEB MKE MSA Washington Co AA	4	0.79	98.22	100.0	75.00	25.00	0.00	6.00	13.04
NEB Sheboygan MSA AA	90	17.75	95.26	100.0	80.00	14.44	5.56	48.84	68.85

\* Based on 2013 Peer Small Business Data: US and PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Wisconsin									
Evaluation Period: July 20, 2010 TO September 2, 2014									
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
NEB Fond du Lac MSA AA	0	0	59	2,500	59	2,500	73.79	0	0
NEB NonMSA AA	0	0	26	153	26	153	4.52	0	0
<b>Limited Review:</b>									
NEB Madison MSA Columbia Co AA	0	0	5	41	5	41	1.20	0	0
NEB MKE MSA Washington Co AA	0	0	20	582	20	582	17.17	0	0
NEB Sheboygan MSA AA	0	0	10	113	10	113	3.32	0	0

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\*\*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.



Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Wisconsin Evaluation Period: July 20, 2010 TO September 2, 2014																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
NEB Fond du Lac MSA AA	59.80	7	25.93	0	29	71	0	0	0	0	0	0	0	0.00	14.96	74.62	10.42
NEB NonMSA AA	13.47	7	25.93	0	0	100	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
<b>Limited Review:</b>																	
NEB Madison MSA Columbia Co AA	7.18	3	11.11	0	0	100	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
NEB MKE MSA Washington Co AA	6.60	3	11.11	0	0	100	0	0	0	0	0	0	0	0.00	5.91	90.81	3.28
NEB Sheboygan MSA AA	12.94	7	25.93	0	14	86	0	0	0	0	0	0	0	0.00	5.82	81.61	12.58

