



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

October 7, 2002

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank and Trust Company
Charter Number: 2725

345 East Grand Avenue
Beloit, WI 53511

Office of the Comptroller of the Currency
Chicago North Field Office
85 West Algonquin Road, Suite 340
Arlington Heights, IL 60005

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 **The First National Bank and Trust Company of Beloit** (FNBT) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The First National Bank and Trust Company of Beloit Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	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:

- The geographic distribution of FNBT’s home mortgage loans and small loans to businesses reflects a good penetration throughout the bank’s assessment areas (AAs).
- The overall borrower distribution of FNBT's lending reflects a good dispersion among borrowers of different income levels in the bank's AAs.
- Community development lending had a positive effect on the overall lending test conclusions.
 - FNBT has an adequate level of qualified investments considering the moderate level of opportunities in the AAs.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs.

Definitions and Common Abbreviations

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

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

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

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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.

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

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

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

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household 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 or a block numbering area 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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

FNBT is a nationally chartered interstate bank, headquartered in Beloit, Wisconsin. FNBT operates nine offices, of which the main office and five branch locations are in southwestern Wisconsin and the remaining three branches are located in northwestern Illinois. FNBT has offices in the following communities: Beloit (4 locations), Clinton, and Darien in Wisconsin, along with, Rockton, Roscoe, and Winnebago in Illinois.

All of the bank's offices are full-service facilities and offer a full range of traditional banking products. Branches are located throughout FNBT's AAs with seven in the middle-income and two in the upper-income geographies. The bank's AAs do not have any low-income geographies. FNBT has 20 automated teller machines (ATMs) with 13 inside the AAs and 7 outside the AAs. Six of the ATMs are located at FNBT branches, 4 are located at gas stations, and 10 are located at local food markets. The bank does not have any deposit-taking ATMs. Other alternative banking delivery systems include: TeleBanc, a 24 hour automated banking by phone service; Execubanc, a PC/modem direct dial in computer access; and internet banking, a 24-hour automated banking by computer service.

FNBT is a wholly owned subsidiary of Centre I Bancorp, Incorporated, a one-bank holding company. At the last CRA exam (September 20, 1999), Centre I Bancorp was considered a multi-bank holding company. FNBT operated the main office in Beloit, Wisconsin, a loan production office in Roscoe, Illinois, and four branches in Wisconsin (two in Beloit, one in Clinton, and one in Darien). First National Bank of Winnebago, also owned by Centre I Bancorp, was a separate national charter. Since the last CRA exam, First National Bank of Winnebago, was consolidated into the FNBT's national charter making Centre I Bancorp a one-bank holding company. Additionally, FNBT added three branches, two in Illinois and one in Wisconsin. The Rockton and Roscoe branches in Illinois were acquired in 2001 and the new branch in Beloit, Wisconsin was opened in 2001.

FNBT is primarily considered a commercial bank. The retail portfolio has a significant concentration of indirect automobile loans. As of June 30, 2002, FNBT had total assets of approximately \$420 million, total loans of \$259 million, total deposits of \$356 million, and Tier 1 Capital of \$29 million. The bank offers traditional commercial and retail banking services with a loan portfolio representing 62% of the bank's total assets. The loan portfolio is centered in commercial loans. Approximately 47% of the portfolio is commercial and commercial real estate loans, 27% are residential mortgage loans, 7% are construction and land development loans, and 19% are loans to individuals. FNBT is not active in agricultural lending, with only one percent of its loan portfolio comprised of agricultural loans.

FNBT has one subsidiary, Centre I Investment Corporation, located in Las Vegas, Nevada, which holds investments for tax benefits. This subsidiary does not have an impact on FNBT's capacity to meet community credit needs and was not considered in this CRA evaluation.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in the bank's AA's. FNBT was rated "Satisfactory" using small bank CRA examination procedures at its last CRA evaluation of September 20, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed FNBT's originations and purchases of home mortgage loans for the time period of January 1, 1999 through December 31, 2001. Loans to small business were reviewed for the period of January 1, 2000 through December 31, 2001 since FNBT was not required to report small business data until January of 2000. Community development loans that were originated between January 1, 1999 and October 7, 2002, were also reviewed.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between January 1, 1999 and October 7, 2002. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We analyzed the effect of changes in branch locations since our previous CRA examination. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs of its AAs. This analysis covered the period of January 1, 1999 through October 7, 2002.

Due to the timing of the acquisitions of branches in Illinois, data from the Illinois offices is insufficient to provide a meaningful analysis and therefore FNBT's performance in the State of Illinois will not be considered during this evaluation period. Even though the bank's commercial loan portfolio is a greater percentage of the bank's overall loan portfolio, home mortgage loans (both in number and dollars) within the bank's AAs are greater than small loans to businesses. The bank originates very few farm loans and small business loans secured by real estate, therefore these types of loans do not factor into the analysis of the bank's performance.

Data Integrity

We verified a sample of Home Mortgage Disclosure Act (HMDA) reported loans and small loans to businesses to determine the accuracy of data presented by the bank. We reviewed a sample of HMDA-reportable transactions to ensure the purpose, action taken, location, race, gender, applicant income, and loan size were accurately included on FNBT's Loan Application Register. We reviewed a sample of small loans to businesses to ensure the loan type, original amount, location, and gross revenue were accurately reported. No significant errors were noted in the bank's HMDA data. We did note significant errors in key fields of the bank's small business data. Bank management agreed to correct the errors and resubmit the data. To assess the accuracy of the corrected data, we used the bank's corrected data to select another sample of small business loans. We found the corrected data to be accurate. As a result, we were able to rely on the bank's data to make an appropriate and accurate assessment of the bank's performance under the Community Reinvestment Act.

In addition, we reviewed Community Development (CD) loans, investments and services, submitted by FNBT's management, to determine that they met the regulatory definitions for CD. The review indicated that some of the items submitted by FNBT for consideration did not

meet the definition or purpose of CD. Therefore, this evaluation was based on only those CD loans, investments and services that met the regulatory definitions.

Selection of Areas for Full-Scope Review

Our analysis included full-scope examination procedures for Rock County in the Metropolitan Area (MA) 3620 in the State of Wisconsin and limited-scope examination procedures in Walworth County which is in a non-MA area in the State of Wisconsin. Activity in this area (which is one middle-income geography) has been minimal. Approximately 6% of the bank's loans were made in Walworth County. Please refer to the table in Appendix A for additional information on the scope of our review.

Ratings

The bank's overall rating is based primarily on the conclusions reached in the evaluation of FNBT's performance in its Rock County AA, which received a full-scope review.

When determining conclusions for the Lending Test, home mortgage lending is weighted more heavily than small business lending. This weighting is reflective of the bank's higher home mortgage lending volume as indicated in the Scope of Evaluation section above.

Other

We conducted one community contact interview in the Rock County AA during our examination. We contacted the Chamber of Commerce in Beloit, Wisconsin. The contact indicated that one of the primary credit needs for the area is loans for small businesses for start up and operating capital. A secondary need is for financial assistance to provide education and job retraining for low- and moderate-income residents. Our contact indicated that local financial institutions had a good record of meeting community credit needs in the area.

Fair Lending Review

An analysis of recent HMDA, small business, and small farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk-based fair lending approach. Based on its analysis of information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed as of March 31, 1996.

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 a full-scope review, the bank's performance in the Rock County AA is good.

Lending Activity

Refer to "Table 1. Lending Volume," Appendix C-4, and "Table 1. Other Products," Appendix C-5 and C-6, for the facts and data used to evaluate the bank's lending activity.

FNBT extended 609 home mortgage loans and small loans to businesses totaling \$31,571,000 in the Rock County AA, which is in the Janesville/Beloit MA 3620. Of these, 32% were small loans to businesses and 68% were home mortgage loans. Small loans to farms and small business loans secured by real estate are not primary business lines of FNBT and are not being considered as part of this evaluation.

Among home mortgage loan originations and purchases, 36% were for home improvement, 32% were for home purchase, and 32% were for home refinance.

FNBT's lending activity in the Rock County AA is good. Information on deposit market share, compiled by the FDIC as of June 30, 2001, shows that the bank ranks second out of 19 FDIC-insured financial institutions with a deposit market share of 14.20% in the Rock County AA. Based on 2000 peer mortgage data for the Rock County AA, FNBT ranked third out of 154 lenders (98 percentile ranking) with a market share of 5.64%. FNBT ranks fifth of 102 lenders (95 percentile ranking) for home purchase lending with a with a 4.77% market share; for home improvement loans, the bank ranks second out of 35 lenders (94 percentile ranking) with a 16.23% market share; and ninth of 108 lenders (92 percentile ranking) for home refinance loans with a market share of 2.51%.

Based on 2000 CRA aggregate data, FNBT ranks tenth of 58 lenders (83 percentile ranking) originating/purchasing small loans to businesses in the Rock County AA, with a 3.24% market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of FNBT's home mortgage loans and small loans to businesses reflects a good penetration throughout the Rock County AA.

The bank's Rock County AA does not have any low-income geographies. Three geographies are moderate-income, ten are middle-income and two are upper-income. The analysis below is based on the three moderate-income geographies.

Home Mortgage Loans

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

The geographic distribution of home purchase loans in the Rock County AA is excellent. Home purchase loans made in the AA's moderate-income geographies (24.06%) exceed the percentage of owner-occupied units in those geographies (19.97%). The market share for home purchase loans made in the moderate-income geographies (8.20%) exceeds the bank's overall market share (4.77%) for these loans.

The geographic distribution of home improvement loans in the Rock County AA is excellent. Home improvement loans made in the Rock County AA's moderate-income geographies (19.59%) meet the percentage of owner-occupied units in those geographies (19.97%). The market share for home improvement loans made in the moderate-income geographies (19.74%) exceeds the bank's overall market share (16.23%) for these loans.

The geographic distribution of home refinance loans in the Rock County AA is adequate. The percentage of home refinance loans made in the AA's moderate-income geographies (14.18%) is near to the percentage of owner-occupied units in those geographies (19.97%). The market share for home refinance loans made in the moderate-income geographies (1.91%) is slightly below the bank's overall market share (2.51%) for these loans.

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/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the Rock County AA is adequate. The percentage of small business loans made in the moderate-income geographies (13.92%) is near to the percentage of businesses in those geographies (16.80%). The bank's market share for small loans to businesses (2.08%) in the moderate-income geography is somewhat below its overall market share (3.63%) for small loans to businesses. There are no low-income geographies in the Rock County AA.

When forming our conclusions for geographic distribution of small business lending in the moderate-income geographies, we considered the stagnant economy and little to no growth within those geographies. The outlook for the local economy is considered weak due to the continued trend of plant closings and layoffs from the larger employers in the Beloit area.

Lending Gap Analysis

Maps and reports detailing FNBT's lending activity in the Rock County AA over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A majority of home mortgage loans and small loans to businesses, originated or purchased by FNBT over the evaluation period, were within the Rock County AA. Eighty percent of the combined HMDA loans and 57% of the small loans to businesses were extended within its Rock County AA. The bank has 74% of its home purchase loans, 83% of its home refinance loans and 84% of its home improvement loans within the Rock County AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The borrower distribution of home purchase loans is good. Home purchase loans made to low-income borrowers (10.69%) are below the percentage of low-income families within the Rock County AA (23.27%). Home purchase loans made to moderate-income borrowers (25.95%) exceeds the percentage of moderate-income families (17.46%) within the Rock County AA. The market share for home purchase loans made to low-income families (2.67%) is below the bank's overall market share (5.17%) for these loans. The market share for home purchase loans made to moderate-income families (3.02%) is also below the bank's overall market share (5.17%).

When evaluating the borrower distribution of all types of home mortgage loans, we considered the significant number of households that live below the poverty level (13.13% of households) and the barriers that this may have on home ownership. We also considered the effects of plant closings, layoffs and other negative employment trends over the last two years in the Rock County AA.

The borrower distribution of home improvement loans is good. Home improvement loans made to low-income borrowers (14.97%) are below the percentage of low-income families (23.27%) that reside in the area. Home improvement loans made to moderate-income borrowers (27.21%) exceeds the percentage of moderate-income families within the Rock County AA (17.46%). The market share for home improvement loans made to low-income borrowers (15.38%) is near the bank's overall market share (16.13%) of these loans. The market share for home improvement loans made to moderate-income borrowers (14.29%) is somewhat below the bank's overall market share (16.13%) for these loans.

The borrower distribution of home mortgage refinance loans is good. Home mortgage refinance loans made to low-income borrowers (20.61%) is somewhat below the percentage of low-income families (23.27%) that reside in the Rock County AA. Home mortgage refinance loans made to moderate-income borrowers (23.66%), exceeds the percentage of moderate-income families (17.46%) within the Rock County AA. The market share for home mortgage refinance loans made to low-income borrowers (4.29%) exceeds the bank's overall market share (2.77%) for home mortgage refinance loans. The market share for home mortgage refinance loans made to moderate-income borrowers (1.18%) is somewhat below the overall market share (2.77%) for these loans.

Small Loans to Businesses

Refer to Table 11 of Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The 54.12% of FNBT's small loans to businesses with revenues of \$1 million or less is below the 88.89% of businesses in the Rock County AA that are defined as such. The bank's market share of loans to businesses with revenues less than a million dollars (6.68%) exceeds its overall market share (3.63%). The numbers are reasonable given the weak economic conditions of the area that have suppressed loan demand.

Community Development Lending

Refer to "Table 1. Lending Volume" of Appendix C-4 for the facts and data used to evaluate FNBT'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.

Community development lending had a positive effect on the overall lending test conclusions. There are a moderate number of CD opportunities in the Rock County AA. FNBT extended other loans that had CD characteristics, but they were reported as and considered in the evaluation of home mortgage and/or small business loans.

During the evaluation period, FNBT extended three community development loans totaling approximately \$1,051,800. These loans are listed below.

- A \$130,000 loan to the City of Beloit to renovate and convert a building in downtown Beloit (an area targeted by the city for re-development) to serve as "a location to house and nurture individual entrepreneur artists" as the Greater Beloit Fine Arts Incubator. Artists can create and market their wares from the location. A \$127,000 renewal of the Fine Arts Incubator loan to the City of Beloit was also extended.
- A \$795,287 loan to the Stateline Boys and Girls Club of Beloit/South Beloit to expand facilities where services with a community development purpose are provided to the club's membership. Sixty-eight percent of the club's membership are from low- and moderate-income families.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusions for the Rock County AA.

FNBT is a participant in the Wisconsin Housing and Economic Development Authority (WHEDA) Home Ownership Mortgage Loan (HOME) program. This program offers low cost, low interest rate mortgages to low-income first-time homebuyers. These programs include home purchase, construction, rehabilitation, and low down-payment loans. The borrowers must meet certain eligibility requirements, including income standards, as determined by WHEDA. During this evaluation period, the bank made three loans totaling \$145,420.

FNBT also participates in three other flexible, affordable housing programs targeted to low- and moderate-income individuals. These programs offer zero to three percent down payment options, down payment assistance, higher debt to income ratios and flexible credit history requirements. The bank does not track the number or dollar volume of these loans, therefore these loans are not considered in this analysis.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the non-MA of Walworth County is not inconsistent with the bank's overall High Satisfactory performance under the lending test in Wisconsin. We take into consideration that this non-MA Walworth County AA consists of one middle-income geography, with only 1,204 owner-occupied units and 195 small businesses.

Refer to the Tables 1 through 11 in the State of Wisconsin section of Appendix D 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 the full-scope review, the bank's performance in the Rock County AA is adequate

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

During the evaluation period, FNBT's qualified investments consisted of donations and larger investments totaling approximately \$465,000. Discussions with FNBT's personnel and community contact indicated that opportunities for investments are moderate. FNBT exhibits adequate responsiveness to credit and community development needs.

Qualifying Grants/Donations - During the evaluation period, FNBT provided \$61,600 in donations to five different local non-profit organizations for various projects and initiatives that have a CD purpose. Examples of these projects include:

- A \$46,000 donation to a not-for-profit organization that provides educational and career development opportunities for youth primarily from low- and moderate-income families. Sixty-eight percent of the youth served by this organization are from low- and moderate-income families.
- FNBT made an \$8,000 donation to a not-for-profit organization that serves primarily low- and moderate-income individuals. This organization provides funding to various organizations whose services meet the definition of community development.

- A \$4,600 donation to a community development corporation. This organization develops programs and strategies to redevelop targeted areas and provide access to small business loan programs.
- A \$3,000 donation to a local organization that provides counseling and credit services to low- and moderate-income first time homebuyers.

Investments: Qualifying larger investments for FNBT during this evaluation period totaled approximately \$403,330. The bank purchased a one-third interest in a \$1.2 million tax anticipation bond. The bond was issued by the Community Development Authority of the City of Beloit, Wisconsin to acquire property within a tax increment district. The area, targeted by the city for redevelopment, is in need of urban renewal and is referred to as the “Gateway Project.”

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank’s performance under the investment test in the non-MA of Walworth County is not inconsistent with the bank’s overall Low Satisfactory performance under the investment test. Refer to Table 14 of Appendix C for the facts and data used to evaluate the bank’s level of qualified investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNBT’s performance under the Service Test is rated Low Satisfactory. Based on the full-scope review, FNBT’s performance in the Rock County AA is adequate.

Refer to Table 15 of Appendix C for the facts and data that support these conclusions.

Retail Banking Services

FNBT’s distribution of delivery systems is adequate. Delivery systems are accessible to geographies and individuals of different income levels in the Rock County AA. Five of the bank’s office locations are in the Rock County AA. There are three moderate-income geographies and no low-income geographies in the Rock County AA. The bank does not have any branch locations in moderate-income geographies. However, four of the bank’s branches and ATM’s are within one mile of the three moderate-income geographies in the Rock County AA. The percentage of the population within moderate-income geographies is 24.5%.

All of the bank’s branches are full service facilities, offering traditional deposit and loan products and having relatively similar hours of operation. The hours of FNBT’s office locations do not negatively impact low- or moderate-income individuals. All office lobbies, except the downtown office, are open at 8:30 a.m., Monday through Saturday. They close at 5:00 p.m. on Monday through Friday and at 12:00 p.m. on Saturday. The downtown Beloit office does not have Saturday hours. This is the main office located in a middle-income geography in downtown Beloit and has relatively few people in the area on weekends.

All branches have drive-up facilities. All drive-up facilities are open at 8:00 a.m. Monday through Saturday, and closes at 5:00 p.m. Monday through Friday, and at 12:00 p.m. on Saturday.

The bank has opened one branch, in a middle-income geography, in the Rock County AA since the previous examination. Delivery systems are accessible to essentially all portions of the Rock County AA. The branch opening had a neutral effect on the accessibility of its delivery systems to the moderate-income geographies or to low or moderate-income individuals.

Community Development Services

FNBT's performance in providing CD services to its Rock County AA has a positive impact on the bank's service test. Many bank employees spend a great number of hours providing services to organizations that have community development as their primary purpose. The bank is considered a leader in providing CD services.

Major highlights of CD service activities in the Rock County AA during the evaluation period include:

- FNBT has taken a leadership role in redeveloping the Beloit riverfront, located in a moderate-income geography within the Rock County AA. A director of the bank founded an organization for the purpose of redeveloping and revitalizing the property to promote economic development and stabilization of the neighborhood.
- A bank employee served on the board and finance committee of Neighborhood Housing Services (NHS) providing their financial expertise to the budgeting process. Among NHS's many programs targeted to low- and moderate-income individuals, it provides an array of educational, counseling and financing programs for low- and moderate-income first time home buyers.
- A bank employee serves on the budget and financial review committee of a not-for-profit organization providing financial expertise to the budgeting process. This organization provides educational and career development opportunities for youth primarily from low- and moderate-income families. Sixty-eight percent of the youth served by this organization are from low- and moderate-income families.
- Another employee serves on the budget and allocation committee of a not-for-profit organization providing their expertise to the budget and funding process. This not-for-profit organization serves primarily low- and moderate-income individuals by providing funds to various organizations that meet the definition of community development.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, FNBT's performance under the service test in the non-MA Walworth County AA is not inconsistent with the bank's overall Low Satisfactory performance under the service test.

Refer to Table 15 of 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, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test January 1, 1999 to December 31, 2001 Investment and Service Tests and CD Loans: January 1, 1999 to October 7, 2002	
Financial Institution	Products Reviewed	
First National Bank and Trust (FNBT) Beloit, Wisconsin	Home mortgage, small loans to businesses, community development loans and community development investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Rock County in MA 3620	“Full-Scope”	
Walworth County, non-MA	“Limited-Scope”	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Rock County, MA 3620	B-1
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State of Wisconsin Full-Scope Area

Rock County

Demographic Information for Full Scope Area: ROCK County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0.00	20.00	66.67	13.33	0.00
Population by Geography	50,449	0.00	24.53	63.77	11.70	0.00
Owner-Occupied Housing by Geography	12,396	0.00	19.97	64.79	15.24	0.00
Business by Geography	1,530	0.00	16.80	63.92	19.28	0.00
Farms by Geography	135	0.00	1.48	80.00	18.52	0.00
Family Distribution by Income Level	13,474	23.27	17.46	25.75	33.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,488	0.00	34.15	57.49	8.36	0.00
Median Family Income		35,605	Median Housing Value		43,916	
HUD Adjusted Median Family Income for 2001		57,400	Unemployment Rate		5.9%	
Households Below Poverty Level		13.13%				

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

Source: 1990 US Census and 2001 HUD updated MFI

FNBT's AAs in the state of Wisconsin consists of the southern portion of Rock County (Janesville/Beloit MA) and one geography in the southwestern portion of Walworth County (non-MA). The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

FNBT's Rock County AA is within the Janesville/Beloit MA and is comprised of 15 geographies. In this AA, there are no low-income geographies, three are moderate-income geographies, ten are middle-income geographies, and two are upper-income geographies. The bank's main office and four branches are located in this AA.

The population of the Rock County AA is 50,449 based on 1990 census data. None of the population lives in low-income geographies, 24% live in moderate-income geographies, 64% live in middle-income geographies, and 12% live in upper-income geographies.

The updated Housing and Urban Development (HUD) 2001 median family income for the Janesville-Beloit MA is \$57,400. A breakdown of family income levels in the AA shows 23% as low-income (3,136 families), 17% moderate-income (2,352 families), 26% middle-income (3,469 families) and 34% upper-income (4,517 families). A low-income family has a maximum income of only \$28,126. In addition, a total of 2,455 households have incomes below the poverty level. This represents 48% of the low-income households and 13% of the total households in the Rock County AA.

Of the 19,562 housing units in the Rock County AA, 12,396 (63%) are owner-occupied, 6,259 (32%) are rental-occupied and the remaining 907 (5%) are vacant. None of the owner-occupied units are located in low-income geographies, 49% are located in moderate-income geographies, 65% are located in middle-income geographies, and 85% are located in upper-

income geographies. The median housing value within the Rock County AA based on 1990 census data is \$43,916.

The outlook for the local economy is weak. One of the areas larger employers laid off approximately 1,000 employees. There are a number of mid-sized companies reliant on the larger company for maintaining their production levels. Between 2001 and 2002, five mid-sized corporations have closed in the Beloit area, resulting in the loss of approximately 350 additional. Other negative employment trends include the announced layoffs of approximately 3,000 employees from a major electronics firm in the Beloit area. Slower car sales have led to temporary production shut downs at major car manufacturing plants in the area.

A majority of the businesses in FNBT's Rock County AA are incorporated with 1 to 4 employees. And 89% of the businesses in the Rock County AA report gross revenues of \$1 million or less. The primary industry in the Rock County AA is service oriented (39%), followed by retail trade (19%), construction (10%), agriculture and finance (8%), manufacturing (7%), and transportation and wholesale trade (4%). The average unemployment rate in the Janesville-Beloit MA for 2001 was 5% and the average rate in 2002 through August was 5.9%. The average rate for the state of Wisconsin for 2001 was 4.6% and the average rate in 2002 through August was 5.5%.

There are numerous local and regional deposit-taking financial institutions in the Janesville/Beloit MA. There are also numerous lenders, besides depository institution, that offer a wide variety of loan products. Therefore, competition for both deposits and loans is intense.

Appendix C: Tables of Performance Data

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: 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/assessment area. 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/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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/assessment area. 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 are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 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 are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 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/assessment area. 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/assessment area.

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. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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.

NATIONAL BANK & TRUST CO

Table 1. Lending Volume

LENDING VOLUME		Geography: WISCONSIN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/Assessment Area (2001):	% 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)	
Full Review:												
FNBT WI ROCK County	94.28	415	19,617	194	11,954	1	25	3	1,051	613	32,647	99.95
Limited Review:												
FNBT WI Walworth County	5.72	10	227	20	3,503	7	318	0	0	37	4,048	0.05

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 1, 1999 to October 08, 2002.

*** Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

NATIONAL BANK & TRUST CO

Table 1. Other Products

LENDING VOLUME		Geography: WISCONSIN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001						
MA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
FNBT WI ROCK County	100.00	6	456	6	456	0	0	0	0	0	0	0	0	99.95
Limited Review:														
FNBT WI Walworth County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.05

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is From January 1, 1999 to December 31, 2001.

*** Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

NATIONAL BANK & TRUST CO

Table 1. Other Products

LENDING VOLUME		Geography: WISCONSIN		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001	
MA/Assessment Area (2001):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
FNBT WI ROCK County	0	0	0	0	0
Limited Review:					
FNBT WI Walworth County	0	0	0	0	0

* The evaluation period for Optional Product Line(s) is From January 1, 1999 to December 31, 2001.

BANK & TRUST CO

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2001			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
FNBT WI ROCK County	133	99.25	0.00	0.00	19.97	24.06	64.79	59.40	15.24	16.54	4.77	0.00	8.20	3.52	5.56	
Limited Review:																
FNBT WI Walworth County	1	0.75	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2000 Peer Mortgage Data: Central Region.

** 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 1990 Census information.

BANK & TRUST CO

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2001		Geography: WISCONSIN								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					
MA/Assessment Area:	Total Home Improvement 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
Full Review:															
FNBT WI ROCK County	148	94.87	0.00	0.00	19.97	19.59	64.79	72.97	15.24	7.43	16.23	0.00	19.74	16.31	8.33
Limited Review:															
FNBT WI Walworth County	8	5.13	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.64	0.00	0.00	13.64	0.00

* Based on 2000 Peer Mortgage Data: Central Region.

** 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.

*** 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 1990 Census information.

BANK & TRUST CO

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2001				Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
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
Full Review:															
FNBT WI ROCK County	134	99.26	0.00	0.00	19.97	14.18	64.79	71.64	15.24	14.18	2.51	0.00	1.91	2.47	3.92
Limited Review:															
FNBT WI Walworth County	1	0.74	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Central Region.

** 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 1990 Census information.

BANK & TRUST CO

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WISCONSIN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001							
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
Full Review:															
FNBT WI ROCK County	0	0.00	0.00	0.00	18.78	0.00	74.64	0.00	6.58	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
FNBT WI Walworth County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Central Region.

** 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 1990 Census information.

BANK & TRUST CO

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 31, 2001			Geography: WISCONSIN								Evaluation Period: JANUARY 1, 1999 TO DECEMBER				
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	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBT WI ROCK County	194	90.65	0.00	0.00	16.80	13.92	63.92	68.56	19.28	17.53	3.63	0.00	2.08	4.77	2.62
Limited Review:															
FNBT WI Walworth County	20	9.35	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.99	0.00	0.00	1.49	0.54

* Based on 2000 Peer Small Business Data: US&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 (2001).

BANK & TRUST CO

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001						
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	Overa II	Low	Mod	Mid	Upp
Full Review:															
FNBT WI ROCK County	1	12.50	0.00	0.00	1.48	0.00	80.00	100.00	18.52	0.00	0.85	0.00	0.00	0.39	2.17
Limited Review:															
FNBT WI Walworth County	7	87.50	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.13	0.00	0.00	7.27	0.00

* Based on 2000 Peer Small Business Data: US&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 (2001).

BANK & TRUST CO

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE				Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
FNBT WI ROCK County	133	99.25	23.27	10.69	17.46	25.95	25.75	29.77	33.52	33.59	5.17	2.67	3.02	5.67	10.34	
Limited Review:																
FNBT WI Walworth County	1	0.75	9.88	0.00	16.10	0.00	25.35	100.00	48.68	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2000 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 1.49% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

BANK & TRUST CO

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2001		Geography: WISCONSIN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBT WI ROCK County	148	94.87	23.27	14.97	17.46	27.21	25.75	34.69	33.52	23.13	16.13	15.38	14.29	18.69	15.49
Limited Review:															
FNBT WI Walworth County	8	5.13	9.88	25.00	16.10	0.00	25.35	37.50	48.68	37.50	13.64	100.00	0.00	20.00	9.09

* Based on 2000 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 0.64% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

BANK & TRUST CO

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2001				Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBT WI ROCK County	134	99.26	23.27	20.61	17.46	23.66	25.75	25.19	33.52	30.53	2.77	4.29	1.18	1.38	5.66
Limited Review:															
FNBT WI Walworth County	1	0.74	9.88	0.00	16.10	100.00	25.35	0.00	48.68	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 2.22% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

BANK & TRUST CO

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2001				Geography: WISCONSIN		Evaluation Period: JANUARY 1, 1999 TO DECEMBER			
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
Full Review:									
FNBT WI ROCK County	194	90.65	88.89	54.12	87.63	6.19	6.19	3.63	6.68
Limited Review:									
FNBT WI Walworth County	20	9.35	82.56	25.00	70.00	10.00	20.00	0.99	1.93

* Based on 2000 Peer Small Business Data: US&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&B - 2001).

**** 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.

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Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001			
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 \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBT WI ROCK County	1	12.50	96.30	100.00	100.00	0.00	0.00	0.85	0.96
Limited Review:									
FNBT WI Walworth County	7	87.50	98.36	100.00	85.71	14.29	0.00	3.13	3.39

* Based on 2000 Peer Small Business Data: US&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 - 2001).

**** 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 the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNBT WI ROCK County	0	0	6	465,000	6	465,000	100.00	0	0
Limited Review:									
FNBT WI Walworth County	0	0	0	0	0	0	0.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS									Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					
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	
Full Review:																		
FNBT WI ROCK	99.95	5	83	0.00	0.00	80.00	20.00	1	0	0	0	1	0	0.00	24.53	63.77	11.70	
Limited Review:																		
FNBT WI Walworth	0.05	1	17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00	

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FNBT WI Walworth

Demographic Information for Limited Scope Area: FNBT WI Walworth						
Demographic Characteristics	#	Low % Of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1	0.00	0.00	100.00	0.00	0.00
Population by Geography	4,724	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	1,204	0.00	0.00	100.00	0.00	0.00
Business by Geography	195	0.00	0.00	100.00	0.00	0.00
Farms by Geography	61	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	1,286	9.88	16.10	25.35	48.68	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	334	0.00	0.00	100.00	0.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below Poverty Level		30,290 48,400 11.36%	Median Housing Value Unemployment Rate (1990 US Census)		50,092 3.61%	

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

Source: 1990 US Census and 2001 HUD updated MFI

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FNBT WI ROCK County

Demographic Information for Full Scope Area: FNBT WI ROCK						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0.00	20.00	66.67	13.33	0.00
Population by Geography	50,449	0.00	24.53	63.77	11.70	0.00
Owner-Occupied Housing by Geography	12,396	0.00	19.97	64.79	15.24	0.00
Business by Geography	1,530	0.00	16.80	63.92	19.28	0.00
Farms by Geography	135	0.00	1.48	80.00	18.52	0.00
Family Distribution by Income Level	13,474	23.27	17.46	25.75	33.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,488	0.00	34.15	57.49	8.36	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below Poverty Level		35,605 57,400 13.13%	Median Housing Value Unemployment Rate (1990 US Census)	43,916 5.9%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2001 HUD updated MFI