



PUBLIC DISCLOSURE

December 3, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Community Bank
Charter Number 11412

109 East Second Street
New Richmond, WI 54017

Office of the Comptroller of the Currency

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222 South Ninth Street
Suite 800
Minneapolis, MN 55402-3393

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

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Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.

The primary factors supporting the rating of First National Community Bank include:

- The bank's distribution of loans reflects **excellent distribution** among individuals of different income levels.
- The bank's distribution of loans reflects **excellent distribution** across geographies of different income levels within the assessment areas (AAs).
- The bank originated a **majority** of loans within its AAs.
- The bank's net loan-to-deposit (LTD) ratio is **reasonable** given the bank's size and the credit needs of its AAs.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

First National Community Bank (FNCB) is a \$200 million, full-service bank headquartered in New Richmond, WI. The community of New Richmond is located in St. Croix County in western WI. The bank has three branches in addition to the main office in New Richmond. The branches are located in Hudson WI, Somerset WI, and Dresser WI. The bank expanded their footprint in 2014 and added another assessment area (AA) with the addition of the Dresser branch. This AA is located in the Wisconsin Non-MSA. The main office and other two branches are located in St. Croix County which is located in the Minneapolis-St. Paul-Bloomington MN-WI Metropolitan Statistical Area (MSA). The bank operates six automated teller machines (ATMs), none of which accept deposits. The bank also operates two messenger branches in New Richmond which provide a service weekly or biweekly to elderly residents with limited mobility or access to banking. Excluding the Dresser branch acquisition, there were no other branches opened or closed during the evaluation period. The bank has no affiliates or subsidiaries.

FNCB is a single-state, small community bank that offers traditional banking products and services. As of January 2, 2019, the bank's loan portfolio totaled \$132 million, or 64 percent of average assets based on September 30, 2018 call report information. The bank's primary business focus by number of loans is residential real estate and consumer lending. By dollar volume, commercial loans exceed retail loans with 59 percent of the loan portfolio consisting of commercial loans. Additionally, the bank services a portfolio of \$177 million mortgage loans. Tier one capital as of September 30, 2018 totaled \$19 million.

Competition within the AAs is strong. According to the June 30, 2018 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 14 financial institutions operate 25 branches throughout the AAs. FNCB ranks second among the 14 financial institutions in the AAs with \$165 million in deposits, or 13.94 percent of the market share of deposits. FNCB's primary competitors are Associated Bank NA, Citizens State Bank, Wells Fargo Bank NA, First American Bank NA, Bremer Bank NA, and Hiawatha National Bank who together hold approximately 64 percent of the market share. All other institutions hold 7 percent or less of the deposit market share. The proximity to the Minneapolis/St. Paul Metro area brings in more banks and competition.

There are no financial, legal, or other factors that impede the bank's ability to meet its CRA obligations. FNCB was rated Satisfactory at the last CRA evaluation dated March 25, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNCB's CRA performance using small bank procedures, which consists of the lending test. The lending test evaluates the bank's record of meeting the credit

needs of its AAs through its lending activities. The evaluation period for the LTD ratio and the complaint portions of the lending test covered from March 31, 2013 to December 3, 2018. The evaluation period for the remaining portions of the lending test covered January 1, 2015 to December 31, 2017.

We assessed the bank’s performance by selecting primary products based on the number and dollar volume of loans originated between January 1, 2015 and December 31, 2017. Given changes in census data, we completed two separate assessments, one from January 1, 2015 through December 31, 2016, and the other from January 1, 2017 through December 31, 2017. We determined consumer and home mortgage loans were the primary product for the St. Croix County MSA AA, and consumer loans were the primary product for the Polk County Non-MSA AA. See the loan origination volumes below. We selected a random sample of 20 consumer loans for each assessment period and reviewed the HMDA data for the St. Croix County MSA AA.

St. Croix County MSA AA Originations		
2015-2017	By #	By Volume (\$000s)
Consumer	49%	11%
Home Mortgage	31%	60%
Commercial	20%	28%
Farm	0%	0%
Total	2,129	235,651

Polk County Non-MSA AA Originations		
2015-2017	By #	By Volume (\$000s)
Consumer	79%	20%
Home Mortgage	9%	13%
Commercial	11%	66%
Farm	1%	0%
Total	182	10,263

We used call report data to determine the bank’s quarterly LTD ratio and annual deposit information reported to the FDIC to find similarly situated banks. The most recent deposit information is as of June 30, 2018.

Data Integrity

We completed a data integrity exam as of March 31, 2017 for the loans reported on the HMDA Loan Application Register from January 1, 2015 to December 31, 2016 and determined the data was accurate.

Selection of Areas for Full-Scope Review

FNCB has two AAs; St. Croix County MSA AA and Polk County Non-MSA AA. The St. Croix County MSA AA received a full-scope review while the Polk County Non-MSA AA received a limited scope review. Refer to Appendix A for an outline of the examination scope for both AAs and Appendix B for a full description of the St. Croix County MSA AA and the community profile.

Ratings

The bank's overall rating is based on the lending test. We placed greater weight on the St. Croix County MSA AA lending test results as FNCB derives the greatest volume of deposits and originates the majority of its loans from this AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

FNCB's performance under the lending test is Outstanding. Overall, the bank's lending activity reflects outstanding responsiveness to the AAs' credit needs for consumer and home mortgage loans.

We evaluated FNCB's lending performance on five performance criteria: the loan-to-deposit ratio; lending in the AAs; lending to borrowers of different incomes; geographic distribution of loans; and responses to CRA related complaints.

Loan-to-Deposit Ratio

FNCB's average LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs. FNCB's quarterly net LTD ratio averaged 72.11 percent over the 23

quarters from March 31, 2013 to September 30, 2018. The ratio ranged from a quarterly low of 66.58 percent to a quarterly high of 80.32. FNCB's LTD ratio ranks fifth among six similarly situated banks. Similarly situated banks include those operating in the bank's AAs with similar asset sizes and deposit market share within the AAs. The following table shows LTD details and rankings:

LTD Ratio Institution (Headquarters)	Assets as of 09/30/2018 (000s)	Average LTD Ratio (%)
Hiawatha National Bank (Hager City, WI)	\$201,375	83.81
Citizens State Bank (Hudson, WI)	\$203,872	81.16
Sterling Bank (Barron, WI)	\$236,962	75.12
The First Bank of Baldwin (Baldwin, WI)	\$171,471	73.79
First National Community Bank (New Richmond, WI)	\$199,524	72.11
First Resource Bank (Lino Lakes, MN)	\$201,410	64.81

Source: Call Report Data.

Lending in Assessment Area

The bank originates a majority of its loans inside its AAs. A random sample of 80 consumer loans and all HMDA loans were analyzed to determine the bank's lending in its AAs. FNCB originated 74.10 percent of loans by number and 73.33 percent of loans by dollar within its AAs. The following table shows the lending by product type inside and outside the AAs.

Lending in FNCB's AAs 2015-2017										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total \$(000)
	#	%	#	%		\$(000)	%	\$(000)	%	
HMDA Loans	437	74.32	151	25.68	588	86,308	73.34	31,372	26.66	117,680
Consumer Loans	58	72.50	22	27.50	80	1,425	72.73	535	27.27	1,960
Totals	495	74.10	173	25.90	668	87,733	73.33	31,907	26.67	119,640

Source: OCC Loan sample; HMDA Data

Due to rounding, totals may not equal 100.0

Lending to Borrowers of Different Incomes

The distribution of loans reflect excellent distribution among individuals of different income levels when compared to the aggregate lending data and AA demographics.

St. Croix County MSA AA

Home mortgage loans reflect excellent distribution to low- and moderate-income (LMI) borrowers. Lending to low-income borrowers is lower than the comparator for low-income families likely due to the 7.2 and 6.3 percent poverty rate and median housing value of \$227 thousand and \$207 thousand, respectively in 2015-2016 and 2017. Despite this, FNCB exceeded the aggregate peer lending in this income category. Lending to moderate-income borrowers exceeds both the percent of moderate-income family comparator and the peer lending to these borrowers.

Consumer lending reflects excellent distribution to LMI borrowers. Loans for consumer purposes significantly exceed the demographic comparator for both LMI borrowers.

Borrower Distribution of Home Mortgage Loans in St. Croix County MSA AA												
Borrower Income Level	Low			Moderate			Middle			Upper		
Year	% of AA Families	% of Number of Loans	Aggregate	% of AA Families	% of Number of Loans	Aggregate	% of AA Families	% of Number of Loans	Aggregate	% of AA Families	% of Number of Loans	Aggregate
2015-2016	16.7	8.3	7.6	18.9	22.7	19.6	26.3	27.8	24.6	38.0	37.7	32.7
2017	18.0	10.3	8.1	20.1	23.4	23.5	25.3	28.0	25.4	36.6	33.6	28.5

Source: Data reported under HMDA; 2010 U.S. Census; 2015 American Community Survey (ACS) US Census

Due to rounding, totals may not equal 100.0

Borrower Distribution of Consumer Loans in St. Croix County MSA AA									
Borrower Income Level	Low		Moderate		Middle		Upper		
Year	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	
2015-2016	19.0	20.0	15.5	30.0	22.7	20.0	42.8	30.0	
2017	20.0	40.0	16.6	25.0	21.4	20.0	42.1	15.0	

Source: 01/01/2015 – 12/31/2017 Bank Data; 2010 U.S. Census; 2015 ACS US Census

Due to rounding, totals may not equal 100.0

Polk County Non-MSA AA

Based on limited-scope reviews, performance under the lending test in the Polk County Non-MSA AA is consistent with the bank’s performance in the St. Croix County MSA AA.

Geographic Distribution of Loans

The distribution of loans reflects excellent distribution throughout CTs of different income levels.

St. Croix County MSA AA:

The AA included three moderate-income CTs as of 2017 due to a change stemming from the 2015 ACS US Census. Due to the addition of moderate-income CTs, we assessed the bank’s performance in lending to these CTs during 2017.

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the AA. The bank’s performance exceeds the ratio of owner-occupied housing and the performance of its peers in the moderate-income CTs.

The geographic distribution of consumer loans represents reasonable dispersion throughout the AA. Lending in the moderate-income CT is slightly above the demographic comparator.

Geographic Distribution of Home Mortgage Loans in St. Croix County MSA AA											
CT Income Level	Low		Moderate			Middle			Upper		
Year	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	Aggregate	% of AA Owner Occupied Housing	% of Number of Loans	Aggregate	% of AA Owner Occupied Housing	% of Number of Loans	Aggregate
2017	0.0	0.0	19.9	27.1	18.7	68.4	62.6	71.8	11.7	10.3	9.4

Source: 2015 ACS US Census; Data reported under HMDA

Due to rounding, totals may not equal 100.0

Geographic Distribution of Consumer Loans in St. Croix County MSA AA								
CT Income Level	Low		Moderate		Middle		Upper	
Year	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
2017	0.0	0.0	21.7	25.0	68.5	65.0	9.7	10.0

Source: 01/01/2017 Bank Data; 2015 ACS US Census

Due to rounding, totals may not equal 100.0

Polk County Non-MSA AA:

This AA was not reviewed for geographic distribution of loans because it does not include any LMI CTs.

Responses to Complaints

During this evaluation period, there were no complaints related to FNCB's performance in meeting AA credit needs.

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 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”).

Time Period Reviewed	Lending Test: <ul style="list-style-type: none"> • LTD (03/31/2013 to 09/30/2018); • Lending In Assessment Area, Borrower Distribution, Geographic Distribution (1/1/2015 to 12/31/2017); and • Complaints (03/25/2013 to 12/03/2018). 	
Financial Institution	Products Reviewed	
First National Community Bank (FNCB) New Richmond, WI	Home Mortgage and Consumer Loans	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wisconsin: Minneapolis MSA #33460 WI Non-MSA	Full-Scope Limited Scope	St. Croix County, WI Polk County, WI (CT 9607 and 9608)

Appendix B: Community Profiles for Full-Scope Areas

St. Croix County MSA AA

Demographic Information of the Assessment Area						
Assessment Area: FNCB St. Croix County MSA AA – 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	0.0	92.9	7.1	0.0
Population by Geography	84,345	0.0	0.0	93.9	6.1	0.0
Housing Units by Geography	33,495	0.0	0.0	95.3	4.7	0.0
Owner-Occupied Units by Geography	24,771	0.0	0.0	94.1	5.9	0.0
Occupied Rental Units by Geography	7,053	0.0	0.0	98.5	1.5	0.0
Vacant Units by Geography	1,671	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	5,157	0.0	0.0	92.8	7.2	0.0
Farms by Geography	517	0.0	0.0	96.9	3.1	0.0
Family Distribution by Income Level	23,362	16.7	18.9	26.3	38.0	0.0
Household Distribution by Income Level	31,824	19.0	15.5	22.7	42.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul- Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$227,021
2016 FFIEC Updated MSA Median Family Income		\$85,200	Median Gross Rent			\$800
Households Below Poverty Level		7.2%	Families Below Poverty Level			4.6%
<i>Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: FNCB St. Croix County MSA AA – 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	21.4	64.3	14.3	0.0
Population by Geography	86,118	0.0	20.9	67.8	11.2	0.0
Housing Units by Geography	34,468	0.0	21.8	68.8	9.5	0.0
Owner-Occupied Units by Geography	25,009	0.0	19.9	68.4	11.7	0.0
Occupied Rental Units by Geography	7,450	0.0	27.9	69.0	3.2	0.0
Vacant Units by Geography	2,009	0.0	21.9	72.8	5.3	0.0

Businesses by Geography	5,266	0.0	22.0	66.6	11.4	0.0
Farms by Geography	499	0.0	35.5	50.9	13.6	0.0
Family Distribution by Income Level	23,942	18.0	20.1	25.3	36.6	0.0
Household Distribution by Income Level	32,459	20.0	16.6	21.4	42.1	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	\$85,636	Median Housing Value			\$206,911	
2017 FFIEC Updated MSA Median Family Income	\$89,800	Median Gross Rent			\$897	
Households Below Poverty Level	6.3%	Families Below Poverty Level			4.4%	
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA is reasonable, complies with regulatory requirements, and does not arbitrarily exclude any low- or moderate-income geographies nor reflect illegal discrimination. St. Croix County MSA AA consists of all 14 CTs within St. Croix County and is within the Minneapolis- St. Paul- Bloomington, MN-WI MSA. The main office and two branch locations are in St. Croix County and the CTs are contiguous. From 2015-2016, the AAs consisted of no low- or moderate- CTs, 13 middle-income CTs, and one upper-income CT. In 2017, three CTs changed from middle-income to moderate-income and one CT changed from middle-income to upper-income.

Based on 2015 ACS census data, the population of the AA is 86,118. Approximately 21 percent of the population lives in a moderate-income CT, 68 percent live in a middle-income CT, and 11 percent live in an upper-income CT. The 2017 FFIEC Updated MSA Median Family Income is \$89,900. Approximately 4.4 percent of families and 6.3 percent of households were below the poverty level in 2017. The annual unemployment rate in St. Croix County in 2017 was 3.1 percent, a decrease from 2015 and 2016 of 3.8 percent.

According to our discussion with a local community contact, St. Croix County is largely dependent on jobs coming out of the Minneapolis/St. Paul Metro area. Over 50 percent of the population travels outside of the county for employment. The largest employers are the county, school districts, and hospitals/clinics. Larger private companies in the area include the plastics, fabrication, and injection molding sector. Financial institutions have a positive perception in the communities and are meeting the needs of the consumers.