

# **PUBLIC DISCLOSURE**

February 5, 2018

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Bank Financial Centre  
Cert: #12517

155 West Wisconsin Avenue  
Oconomowoc, Wisconsin 53066

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office  
300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

**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, nor should it 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.

from families living below the poverty level or other schools designated as being in particular need of assistance. In addition, the bank invested in one \$250,000 bond to a national organization that specializes in crime prevention at senior housing facilities. Besides these larger investments, the bank also made 92 qualifying cash donations totaling \$219,000 to various community organizations. These qualifying donations were made to entities with the primary purpose of benefiting low- and moderate-income residents in the AA.

## **CD Initiatives**

The bank makes significant use of innovative and/or complex investments to support CD initiatives, as evidenced by the investments in the LIHTCs. These complex investments make up 43.02 percent of total qualifying investments.

## **SERVICE TEST**

The bank's service performance reflects adequate responsiveness to AA credit needs. This rating is derived after evaluating the following areas: accessibility of delivery systems, changes in branch locations, reasonableness of business hours and services in meeting AA needs, and CD services.

### **Accessibility of Delivery Systems**

The bank's delivery systems, including both branch facilities and alternative delivery systems, are accessible to limited portions of the AA. Tables 15 and 16 in Appendix B reflect the location of the bank's offices, automated teller machines (ATMs), and record of branch openings or closings by income category of the census tract. This data is compared with the population within each geography. The distribution of the banking offices and ATMs do not compare favorably to the population distribution. The bank does not have any branches or ATMs in low- or moderate-income census tracts, while 31.56 percent of the population resides in low- and moderate-income census tracts.

The bank has 14 full-service banking offices. All but one offer Saturday hours, drive-up facilities, and 24-hour ATMs. The downtown Milwaukee branch does not offer Saturday hours or drive-up facilities, and the ATM is available from 8:00 a.m. to 6:00 p.m. weekdays. The bank has 17 LPOs with six LPOs in the AA. One LPO (16.67 percent of the six LPOs) is located in a moderate-income census tract in West Allis.

The bank also has four limited-service banking offices that are open one or two hours per week. These offices are located in independent and assisted living apartment complexes. These offices provide greater access to banking services for primarily low- and moderate-income residents. The bank has an additional cash dispensing ATM located at a service station in Oconomowoc in an upper-income census tract. The bank continues to be part of the Community Bankers of Wisconsin ATM Access network, which provides for surcharge-free ATM use at over 600 ATM locations across the state.