

# **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.

## INSTITUTION RATING

**INSTITUTION'S CRA RATING: Satisfactory.**

The following table indicates the performance level of **First Bank Financial Centre** with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	First Bank Financial Centre		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

\*Note: The lending test is weighted more heavily than the investment and service tests when arriving at the overall rating.

The bank's CRA performance reflects adequate responsiveness to the credit needs of the assessment area (AA). The bank's performance regarding each of the three tests is summarized below.

**The Lending Test is rated Low Satisfactory.**

- Lending levels reflect good responsiveness to the credit needs in the AA.
- An adequate percentage of home mortgage and small business loans are made in the AA.
- The geographic distribution of loans reflects poor penetration throughout the AA, particularly in low- and moderate-income geographies.
- The distribution of loans to borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes.
- The bank exhibits an adequate record of serving the credit needs of the most economically disadvantaged areas of the AA, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.
- The bank has made an adequate level of community development (CD) loans.
- The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

**The Investment Test is rated Outstanding.**

- The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The bank exhibits excellent responsiveness to credit and community economic development needs.
- The bank makes significant use of innovative and/or complex investments to support CD initiatives.

**The Service Test is rated Low Satisfactory.**

- Delivery systems are accessible to limited portions of the bank's AA.
- To the extent changes have been made, the bank's record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- Services and business hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and/or individuals.
- The bank is a leader in providing CD services.

## **SCOPE OF EVALUATION**

### ***General Information***

First Bank Financial Centre (FBFC) was evaluated using the Interagency Large Institution Examination Procedures. This evaluation covers the period from the prior evaluation dated January 20, 2015, to the current evaluation dated February 5, 2018. Examiners relied upon records provided by the bank, U.S. Census data, D&B demographic data, community contacts, and loan information reported under the Home Mortgage Disclosure Act (HMDA) and the CRA. The lending, investment, and service test ratings are assigned for the institution. Of these, the lending test is given more weight than the investment and service tests.

The Lending Test considered the institution's performance according to the following criteria.

- Lending activity,
- AA concentration,
- Geographic distribution of loans,
- Borrower profile,
- Responsiveness to credit needs of highly economically disadvantaged geographies and low-income persons and small businesses,
- CD lending activities, and
- Product innovation.

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.