

## **CRA – PUBLIC File**

### **Contents**

- 1) Written comments related to the Bank's performance in helping to meet community credit needs including responses to comments
- 2) Public Disclosure (Most Recent CRA Performance Evaluation)
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- 5) BLC Community Bank location, loan services and deposit services
- 6) Assessment area
- 7) HMDA Public Loan Application Register (LAR) / HMDA Disclosure Statement
- 8) BLC Community Banks loan-to-deposit ratio for each quarter of the prior calendar year

# MEMORANDUM

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**TO:** CRA File  
**FROM:** Heather Calnin  
**DATE:** 6/27/2024  
**SUBJECT:** Fraud Awareness Event

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On Tuesday, June 25, 2024, BLC Community Bank hosted a free Fraud Awareness presentation for the public to help educate on the increasing presence of fraud we are seeing. The event was open for anyone to attend and was shared by handing out flyers in the Cheesefest Parade, hanging flyers in local businesses, publishing information on Facebook, the Times Villager, and on our website and statements.

The event covered popular fraud trends in our community, the reality fraud has on victims, how to spot the red flags, tips for prevention, what to do if it happens to you, and local cases and their results. We were joined by Detective Nick Uebehler from the Fox Valley Metro Police Department to share his experience with the cases in our community and presented to 30 attendees.

Each attendee received a copy of the powerpoint presentation, and additional handouts sharing additional types of fraud, a post scam checklist and antispam guide.

BLC continues to be committed to educating our community and looks forward to continuing to share information on the negative impacts of fraud so they can protect themselves and their loved ones.

## MEMORANDUM

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**TO:** CRA File  
**FROM:** Heather Calnin  
**DATE:** 4/26/2024  
**SUBJECT:** National Teach Children to Save Day

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Wisconsin Bankers Association annually sponsors **National Teach Children to Save Day**, an event which encourages bankers to reach out to youth and teach them the importance of saving money.

Seven BLC employees helped to make this educational and fun experience happen. On April 25, 2024, these employees went into one classroom at St. John Nepomucene School and five classrooms Little Chute Elementary School. The book "A Boy, a Budget, and a Dream" was read to the first graders and discussions were had about the importance of saving. These enthusiastic children had many ideas on the subject of money and were quick to share ideas of what they would be saving for! The books were then donated to the classroom, and each child was presented with a bag that contained a \$1 coin, BLC coloring book, a certificate of completion, 7 Tips to Build Good Financial Habits Handout, and a letter for the parents with discussion questions they could ask at home.

BLC continues to be committed to educating our youth and looks forward to continuing to share educational information on the importance of saving for our younger generations.

## MEMORANDUM

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**TO:** CRA File  
**FROM:** Heather Calnin  
**DATE:** 4/27/2023  
**SUBJECT:** National Teach Children to Save Day

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Wisconsin Bankers Association annually sponsors **National Teach Children to Save Day**, an event which encourages bankers to reach out to youth and teach them the importance of saving money.

Six BLC employees helped to make this educational and fun experience happen. On April 27, 2023, these employees went into one classroom at St. John Nepomucene School and five classrooms Little Chute Elementary School. The book “Curious George Saves His Pennies” was read to the first graders and discussions were had about the importance of saving. These enthusiastic children had many ideas on the subject of money and were quick to share ideas of what they would be saving for! The books were then donated to the classroom, and each child was presented with a bag that contained a \$1 coin, BLC coloring book, a certificate of completion, 7 Tips to Build Good Financial Habits Handout, and a letter for the parents with discussion questions they could ask at home.

BLC continues to be committed to educating our youth and looks forward to continuing to share educational information on the importance of saving for our younger generations.

## MEMORANDUM

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**TO:** CRA File  
**FROM:** Heather Calnin  
**DATE:** 5/10/2022  
**SUBJECT:** National Teach Children to Save Day

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Wisconsin Bankers Association annually sponsors **National Teach Children to Save Day**, an event which encourages bankers to reach out to youth and teach them the importance of saving money.

Seven BLC employees helped to make this educational and fun experience happen. On April 28, 2022, these employees went into two classrooms at St. John Nepomucene School and five classrooms Little Chute Elementary School. The book "It's a Habit, Sammy Rabbit!" was read to the first graders and discussions were had about the importance of saving. These enthusiastic children had many ideas on the subject of money and were quick to share ideas of what they would be saving for! The books were then donated to the classroom, and each child was presented with a bag that contained a \$1 coin, BLC coloring book, a certificate of completion, and a letter for the parents with discussion questions they could ask at home.

BLC continues to be committed to educating our youth and looks forward to continuing to share educational information on the importance of saving for our younger generations.

# **PUBLIC DISCLOSURE**

April 1, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

BLC Community Bank  
Certificate Number: 11608

206 East Main Street  
Little Chute, Wisconsin 54140

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

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.

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The following points summarize the bank's Satisfactory Community Reinvestment Act (CRA) performance:

- **Loan-to-Deposit (LTD) Ratio:** The average LTD ratio reflects reasonable performance given the institution's size, financial condition and credit needs of the AA.
- **Assessment Area Concentration:** The bank originated a majority of small business and home mortgage loans within the AA.
- **Geographic Distribution:** The geographic distribution of small business and home mortgage loans reflects reasonable dispersion throughout the AA.
- **Borrower Profile:** The distribution of loans to borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- **CRA-Related Complaints:** The bank has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the rating.

## DESCRIPTION OF INSTITUTION

BLC Community Bank (BLC) is a full-service financial institution conducting business from a single office in Little Chute, Wisconsin. BLC is wholly-owned by Independent Bancorp, Limited, a one-bank holding company also located in Little Chute. No merger or acquisition activities occurred since the previous evaluation. The institution received a Satisfactory rating during its previous Federal Deposit Insurance Corporation (FDIC) Performance Evaluation dated March 22, 2021, based on Small Institution CRA Examination Procedures.

BLC offers a variety of loan and deposit products, with a focus on commercial and residential lending activities. Customers can access BLC's products and services through online, telephone and mobile banking services, as well as a non-depository automated teller machine located at the main office.

As of December 31, 2023, BLC maintained total assets of \$401 million, total loans of \$308 million, and total deposits of \$338 million. The following table shows the loan portfolio breakdown by dollar and percentage as of the December 31, 2023 Reports of Condition and Income.



<b>Loan Portfolio Distribution as of 12/31/2023</b>		
<b>Loan Category</b>	<b>\$ (000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	35,812	11.6
Secured by Farmland	1,158	0.4
Secured by 1-4 Family Residential Properties	92,662	30.1
Secured by Multifamily (5 or more) Residential Properties	16,489	5.4
Secured by Nonfarm Nonresidential Properties	119,891	38.9
<b>Total Real Estate Loans</b>	<b>266,012</b>	<b>86.4</b>
Agricultural Loans	560	0.1
Commercial and Industrial Loans	38,062	12.4
Consumer Loans	3,060	1.0
Other Loans	289	0.1
<b>Total Loans</b>	<b>307,983</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

No financial, legal or other impediments limit BLC’s ability to meet the credit needs of its AA.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. BLC has delineated one AA consisting of all 58 census tracts (CTs) in the Appleton Metropolitan Statistical Area (MSA), which consists of Calumet and Outagamie Counties. The AA has not changed since the previous evaluation. Sources of the data used in this section are: Federal Financial Institution Examination Council (FFIEC), 2020 U.S. Census data, D&B data, U.S. Bureau of Labor Statistics, Wisconsin Realtors Association, Wisconsin Department of Workforce Development, and Fox Cities Chamber Regional Partnership.

### **Economic and Demographic Data**

The following table provides the median family income and corresponding income levels used to analyze home mortgage lending activities in the AA under the Borrower Profile criterion.

<b>Median Family Income Ranges – Appleton MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt; 50%</b>	<b>Moderate 50% to &lt; 80%</b>	<b>Middle 80% to &lt; 120%</b>	<b>Upper ≥ 120%</b>
2022: \$95,900	< \$47,950	\$47,950 to < \$76,720	\$76,720 to < \$115,080	≥ \$115,080
2023: \$104,400	< \$52,200	\$52,200 to < \$83,520	\$83,520 to < \$125,280	≥ \$125,280
<i>Source: FFIEC</i>				

The following table summarizes demographic characteristics of the AA using data obtained during the 2020 U.S. Census.

<b>Demographic Information of the Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	58	3.4	19.0	58.6	19.0	0.0
Population by Geography	243,147	2.2	13.2	61.0	23.6	0.0
Housing Units by Geography	98,471	2.1	14.4	62.3	21.2	0.0
Owner-Occupied Units by Geography	69,384	0.9	13.2	61.4	24.5	0.0
Occupied Rental Units by Geography	25,164	5.3	17.1	65.0	12.6	0.0
Vacant Units by Geography	3,923	4.1	17.1	62.0	16.8	0.0
Businesses by Geography	21,034	4.4	11.0	62.4	22.2	0.0
Farms by Geography	975	1.1	8.3	67.0	23.6	0.0
Family Distribution by Income Level	63,780	17.6	19.3	24.8	38.3	0.0
Household Distribution by Income Level	94,548	22.0	17.0	20.4	40.6	0.0
Median Family Income MSA – 11540 Appleton, WI MSA	\$86,686	Median Housing Value		\$185,835		
		Median Gross Rent		\$808		
		Families Below Poverty Level		4.9%		
<i>Source: 2020 US Census and 2023 D&amp;B Data. 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 following table reflects the median home sales prices during the evaluation period in Calumet and Outagamie Counties as well as in the State of Wisconsin.

<b>Median Home Sales Price</b>				
<b>Area</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>YTD March 2024</b>
Calumet County	\$260,000	\$285,000	\$325,000	\$347,450
Outagamie County	\$234,900	\$261,239	\$278,000	\$290,000
State of Wisconsin	\$241,000	\$265,000	\$285,000	\$280,000
<i>Source: Wisconsin Realtors Association</i>				

Since 2021, the sales price of homes in Calumet County has increased approximately 34 percent and remains well above the State average. Conversely, the sales price of homes in Outagamie County has increased only 23 percent, more closely mirroring pricing trends throughout the State.

The following table provides the annual unemployment rates in the AA compared to the State of Wisconsin during the evaluation period. The unemployment rate in the Appleton MSA remained stable and slightly lower than the statewide unemployment rate throughout the evaluation period.

Unemployment Rates				
Area	2021 (%)	2022 (%)	2023 (%)	January 2024 (%)
Appleton MSA AA	3.1	2.5	2.5	2.2
State of Wisconsin	3.9	2.9	3.0	2.8
<i>Source: Bureau of Labor Statistics</i>				

According to 2023 D&B data, 21,034 businesses operate within the AA, of which 85 percent reported gross annual revenues (GARs) of \$1 million or less. In addition, 61 percent of these businesses have fewer than five employees, and 90 percent operate from a single location. The three largest industries in terms of employment share are trade; transportation and utilities; education and health services; and manufacturing. According to the Fox Cities Chamber Regional Partnership, the largest employers in the Appleton MSA include ThedaCare; Kimberly Clark Corporation; JJ Keller & Associates, Incorporated; and Plexus Corporation.

### **Competition**

BLC operates in a competitive environment where large credit unions and national banks pose the greatest degree of competition for financial services. According to the June 30, 2023 Deposit Market Share Report compiled by the FDIC, 25 financial institutions maintain 51 offices in the Appleton MSA. BLC ranks seventh with a deposit market share of approximately six percent.

Aggregate home mortgage lending data reported by financial institutions required to comply with the Home Mortgage Disclosure Act (HMDA) indicate that 338 institutions extended home mortgage loans in the Appleton MSA during 2022. BLC ranked 18th with a market share of 1.1 percent by number.

The bank is not required to collect or report small business data, and it has elected not to do so. Therefore, the analysis of loans under the Lending Test does not include comparisons against aggregate data. The aggregate data, however, reflects the level of demand for commercial loans. Aggregate data for 2022 (the most recent available) shows 74 lenders originated 4,480 small business loans in the AA, indicating a moderate degree of competition. Many institutions are not required to report lending data; therefore, competition for small business loans is greater than the aggregate data reflects.

### **Community Contact**

According to a representative of a community-based housing organization in the Appleton MSA, financial institutions are meeting the credit needs within the community. The representative opined that strong competition among numerous financial institutions in the area ensures that customers are provided a variety of reasonably-priced credit products. Nonetheless, housing production, housing affordability and the diversity of housing options continue to be a community concern. Single-family detached housing has dominated the market; however, the community contact noted that as demographic and economic trends shift, the community needs a wider variety of housing types to accommodate new and existing households. The contact also noted that, in order to maintain the existing housing stock in the AA, the community needs to address housing preservation, including

the rehabilitation, repair and/or maintenance of existing residential structures.

**Credit Needs**

According to economic and demographic data, as well as information from the community contact, affordable housing represents the primary credit need of the AA.

**SCOPE OF EVALUATION**

**General Information**

This evaluation covers the period from the prior evaluation dated March 22, 2021, to the current evaluation. Examiners used Small Institution CRA Examiner Procedures to assess BLC’s CRA performance, including an evaluation of the institution’s LTD ratio, AA concentration, geographic distribution, borrower profile, and response to CRA-related complaints.

**Activities Reviewed**

Small business and home mortgage lending continue to represent the bank’s major product lines. Examiners made this determination in consideration of BLC’s business strategy, as well as the number and dollar volume of loans originated during the evaluation period. As of December 31, 2023, commercial loans represented approximately 57 percent of the loan portfolio, while home mortgage loans represented approximately 30 percent of the loan portfolio. Small farm and consumer loans represent a nominal percentage of BLC’s loan portfolio; therefore, examiners did not analyze them as part of this evaluation.

Examiners reviewed residential real estate loans recorded on BLC’s 2022 and 2023 HMDA Loan Application Registers. Examiners also reviewed an expanded sample of small business loans originated in 2023 to ensure lending activity included in the Performance Evaluation was representative of actual lending activity throughout the evaluation period.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Universe</b>		<b>Reviewed</b>	
	<b>#</b>	<b>\$ (000s)</b>	<b>#</b>	<b>\$ (000s)</b>
Small Business 2023	163	36,411	115	26,507
Home Mortgage 2022	193	55,393	193	55,393
Home Mortgage 2023	102	36,311	102	36,311
<i>Source: Bank Data</i>				

Examiners placed more weight on small business lending activity, as commercial lending represents the primary business focus of BLC and the largest segment of its loan portfolio. D&B data from 2023 provided a standard of comparison for the bank’s small business lending activity, while 2020 census data and 2022 home mortgage aggregate data provided a standard of comparison for the bank’s home mortgage lending activity.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

BLC demonstrates reasonable performance under the Lending Test. The distribution of small business loans among businesses of different sizes, as well as the geographic distribution of home mortgage loans, support this conclusion.

### Loan-to-Deposit Ratio

BLC's LTD ratio reflects reasonable performance given the institution's size and financial condition, as well as the credit needs in the AA. BLC's average net LTD ratio averaged 91 percent over the previous 12 quarters. This ratio is comparable to similarly situated institutions whose average LTD ratios ranged from 68 percent to 113 percent over the same period. Examiners selected comparable financial institutions based on geographic location, loan portfolio composition, and asset size.

### Assessment Area Concentration

BLC originated a majority of small business and home mortgage loans in its AA.

<b>Lending Inside and Outside of the Assessment Area</b>											
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$ (000s)				Total \$ (000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
<b>Small Business</b>											
2023	77	67.0	38	33.0	115	18,407	69.4	8,100	30.6	26,507	
<b>Home Mortgage</b>											
2022	107	55.4	86	44.6	193	27,898	50.4	27,495	49.6	55,393	
2023	60	58.8	42	41.2	102	20,547	56.6	15,764	43.4	36,311	
<b>Subtotal</b>	<b>167</b>	<b>56.6</b>	<b>128</b>	<b>43.4</b>	<b>295</b>	<b>48,446</b>	<b>52.8</b>	<b>43,259</b>	<b>47.2</b>	<b>91,704</b>	
<i>Source: Bank Data</i>											

### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA.

#### ***Small Business***

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$ (000s)	%
Low	4.4	-	-	-	-
Moderate	11.0	10	13.0	3,008	16.3
Middle	62.4	48	62.3	10,044	54.6
Upper	22.2	19	24.7	5,355	29.1
<b>TOTAL</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>18,407</b>	<b>100.0</b>
<i>Source: 2023 D&amp;B Data; Bank Data</i>					

BLC did not extend any small business loans in low-income CTs in 2023. However, this is reasonable given the location of BLC’s single office in relation to the low-income CTs. Both low-income CTs are located in downtown Appleton, approximately ten miles from BLC’s office. Additionally, numerous financial institutions maintain a physical presence in or very near these low-income CTs. BLC’s distribution of small business loans in moderate-income CTs is reflective of demographic data. In consideration of these factors, the bank’s distribution of small business loans is reasonable.

### **Home Mortgage**

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% Owner Occupied Housing Units	Aggregate Performance % of #	#	%	\$ (000)	%
Low						
2022	0.9	1.8	2	1.9	342	1.2
2023	0.9	-	2	3.3	383	1.9
Moderate						
2022	13.2	13.6	8	7.5	1,293	4.6
2023	13.2	-	10	16.7	1,600	7.8
Middle						
2022	61.4	58.3	61	57.0	15,380	55.1
2023	61.4	-	26	43.3	9,517	46.3
Upper						
2022	24.5	26.3	36	33.6	10,883	39.1
2023	24.5	-	22	36.7	9,047	44.0
<b>TOTALS</b>						
2022	<b>100.0</b>	<b>100.0</b>	<b>107</b>	<b>100.0</b>	<b>27,898</b>	<b>100.0</b>
2023	<b>100.0</b>	<b>--</b>	<b>60</b>	<b>100.0</b>	<b>20,547</b>	<b>100.0</b>
<i>Source: Bank Data; 2022 HMDA Aggregate Data; 2020 US Census Bureau</i>						

Home mortgage loan distribution in low-income tracts during 2022 and 2023 exceeded demographic data and aggregate performance. The distribution of home mortgage loans in moderate-income CTs

lagged demographic data and aggregate performance in 2022. However, the level of lending activity in moderate-income CTs increased in 2023, slightly exceeding demographic data performance. In consideration of the bank’s performance in low-income CTs, as well as the improved lending performance in moderate-income CTs from 2022 to 2023, BLC’s lending performance is reasonable.

**Borrower Profile**

Overall, the distribution of loans reflects reasonable penetration among businesses of different sizes. Examiners based this conclusion primarily on BLC’s small business lending activity, as the distribution of home mortgage loans reflects poor penetration among low- and moderate-income borrowers.

***Small Business***

The distribution of small business loans reflects reasonable penetration among businesses of different sizes.

BLC’s distribution of small business loans among businesses with GARs of \$1 million or less is below the demographic data. Nonetheless, examiners consider the bank’s performance reasonable given the lending performance of other financial institutions in the AA. The lending activity of other area financial institutions not required to report small business lending data under the CRA ranged from 58 to 60 percent. This context lends support to BLC’s reasonable penetration among small businesses in its AA.

Further, the demographic data provided by D&B represents the percentage of businesses operating within the AA, not the percentage of businesses seeking traditional bank financing. Many small businesses finance their businesses needs with credit cards, home equity lines of credit, and/or personal consumer loans, further impacting the demand for small business loans.

<b>Distribution of Small Business Loans by Gross Annual Revenue</b>					
<b>Gross Annual Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
≤ \$1,000,000	85.2	42	54.5	5,309	28.8
> \$1,000,000	4.4	35	45.5	13,098	71.2
Revenue Not Available	10.4	-	-	-	-
<b>TOTAL</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>18,407</b>	<b>100.0</b>
<i>Source: 2023 D&amp;B Data; Bank Data</i>					

Although BLC does not report small business lending data under the CRA, examiners reviewed this data to ascertain the level of lending activity among small businesses in the AA. According to aggregate small business lending performance in 2022, CRA reporters extended 55 percent of their small business loans to entities earning GARs of \$1 million or less. This distribution of small business loans is similar to BLC’s distribution of small business loans.

***Home Mortgage***

The distribution of home mortgage loans reflects poor penetration among borrowers of different income levels.

BLC’s distribution of home mortgage lending activity among low-income and moderate-income borrowers significantly trails demographic data and aggregate performance in 2022 and trails demographic data in 2023. While lending activity to low- and moderate-income borrowers slightly improved in 2023, performance during the review period is below demographic data.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Low						
2022	17.6	11.3	5	4.7	715	2.6
2023	17.6	--	4	6.7	753	3.7
Moderate						
2022	19.3	25.6	14	13.1	2,197	7.9
2023	19.3	--	10	16.7	1,865	9.1
Middle						
2022	24.8	25.5	19	17.7	3,332	11.9
2023	24.8	--	15	25.0	3,839	18.7
Upper						
2022	38.3	27.5	51	47.7	17,581	63.0
2023	38.3	--	28	46.7	13,696	66.7
Not Available						
2022	0.0	10.1	18	16.8	4,073	14.6
2023	0.0	--	3	4.9	394	1.8
<b>TOTALS</b>						
2022	<b>100.0</b>	<b>100.0</b>	<b>107</b>	<b>100.0</b>	<b>27,898</b>	<b>100.0</b>
2023	<b>100.0</b>	<b>--</b>	<b>60</b>	<b>100.0</b>	<b>20,547</b>	<b>100.0</b>
<i>Source: Bank Data; 2022 HMDA Aggregate Date; 2020 US Census Bureau</i>						

**Response to Complaints**

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test Rating.

**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices. Therefore, this consideration did not affect the institution’s overall CRA rating.



## APPENDICES

### SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

## GLOSSARY

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

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

**Rated Area:** A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

BLC Community Bank  
Branches

NONE

MAIN LOCATION ONLY

BLC Community Bank  
Branches

Opened or Closed

NONE

MAIN LOCATION ONLY

**BLC COMMUNITY BANK**  
**MAIN OFFICE**

206 E. MAIN STREET  
LITTLE CHUTE WI 54140

Census Tract: 0118.00

**HOURS OF OPERATION**

LOBBY: 9:00 am – 5:00 pm Monday thru Friday

DRIVES: 7:30 am – 5:00 pm Monday thru Friday  
8:00 am – noon Saturday



**LISTING OF TYPES OF CREDIT OFFERED BY**  
**BLC COMMUNITY BANK**

A. Commercial Loans

1. Short-term secured and unsecured loans to businesses and individuals where adequate evidence of earnings history and net worth are produced.
2. Business loans guaranteed by the SBA or by another federal, state or local agency.
3. Secured loans. Appropriate security can include:
  - Inventory;
  - Accounts Receivable;
  - Machinery and Equipment;
  - Savings accounts and Time Certificates;
  - Marketable securities;
  - First liens on business or residential real estate;
  - Cash surrender value of life insurance.
4. Construction loans, multi-family or commercial property.
5. Commercial letters of credit.

B. Installment/Single Payment Loans

1. Unsecured personal loans to individuals, based upon determination of credit worthiness and income.
2. Secured loans. Security can include:
  - Vehicles;
  - Mobile Homes;
  - Second mortgages on residential real estate;
  - First lien on a second home;
  - Savings accounts and Time Certificates;
  - Marketable securities;
  - Cash surrender value of life insurance.

C. Real Estate Loans

1. First liens on principal residences or second homes which are owner-occupied and contain one to four units.
2. Home improvement loans, the amount to be established upon determination of credit worthiness and income.
3. Construction loans, principal residence or second home.
4. Loans on unimproved real estate.

D. Open End Credit

1. Home equity lines of credit.
2. Commercial lines of credit, with adequate security.
3. Personal reserve accounts.

**LOAN FEES**

**8/2/2024**

- **PURCHASE:** IF CLOSING WILL BE HELD AT A TITLE COMPANY ADD:

**Prepaid Finance Charge - Title - Closing/Settlement Fee to (Title Co) \$200-250. Call for quote: Varies by Title Co.**

**In House Balloon/ARM (Purchase)**

	Prepaid Finance Charge	Fees	
Origination	\$0 / \$300 / \$500		<b><u>NO ORIGATION FEE FOR FULLY AMORTIZED 1-2-3 YEAR LOANS</u></b>
Tax Service	\$68.00		<b><u>\$.00 FULLY AMORTIZED / \$200.00 IN HOUSE BALLOON / \$400.00 ARMs</u></b>
LOL Flood	\$1.00		
Title - Settlement/Closing Fee	\$300.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance - Company Name		\$1,200.00	
Title - Lenders Title		\$525.00	Contact Title Co for Amounts -
Title - ARM Endorsement		\$175.00	Full Owners / Full Lenders / Simultaneous Lenders
Recording		\$60.00	
Title - Special Assessment Letter		\$50.00	These are typically pd by seller
Title - GAP Endorsement		\$125.00	These are typically pd by seller
<b>- Totals</b>	<b>\$369.00</b>	<b>\$2,370.00</b>	<b>\$2,739.00</b>

**FHLB (Purchase)**

	Prepaid Finance Charge	Fees	
Origination	\$800.00		\$300.00 Lender Credit with qualifying DDA
Tax Service	\$68.00		
LOL Flood	\$1.00		
Title - Settlement/Closing Fee	\$300.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance - Company Name		\$1,200.00	
Title - Lenders Title		\$525.00	Contact Title Co for Amounts -
			Full Owners / Full Lenders / Simultaneous Lenders
Recording		\$60.00	
Title - Special Assessment Letter		\$50.00	These are typically pd by seller
Title - GAP Endorsement		\$125.00	These are typically pd by seller
<b>- Totals</b>	<b>\$1,169.00</b>	<b>\$2,195.00</b>	

**Construction (Owner Occupied w/Purchase)**

	Prepaid Finance Charge	Fees	
Origination	\$575.00		
Tax Service	\$68.00		
LOL Flood	\$1.00		
Appraisal Completion Report	\$100.00		
Draw Fee (4)	\$500.00		
Title - Settlement/Closing Fee	\$300.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance		\$1,200.00	
Title - Lenders Title		\$675.00	Spec Homes \$375
Title - Owners Title - ADJ		optional	Contact Title Co for Amounts -
Recording		\$60.00	Full Owners / Full Lenders / Simultaneous Lenders
Title - Special Assessment Letter		\$50.00	These are typically pd by seller
Title - GAP Endorsement		\$125.00	These are typically pd by seller
<b>- Totals</b>	<b>\$1,544.00</b>	<b>\$2,345.00</b>	

**Construction (Owner Occupied w/o Purchase)**

	Prepaid Finance Charge	Fees	
Origination	\$575.00		
Tax Service	\$68.00		
LOL Flood	\$1.00		
Appraisal Completion Report	\$150.00		
Draw Fee (4)	\$500.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance		\$1,200.00	
Title - Lenders Title Insurance		\$675.00	
Title - Owners Title Insurance		optional	Contact Title Co.
Recording		\$30.00	
<b>- Totals</b>	<b>\$1,294.00</b>	<b>\$2,315.00</b>	

**Construction to Permanent Financing (In-House)**

	Prepaid Finance Charge	Fees	
Tax Service	\$0.00		
- Info Pro: Refi n/c			
Will there be an addl inspection fee? Are we escrowing for items left unfinished; if so we require an additional inspection documented in the file as completed. - Prepaid \$150.00			
Flood		\$4.00	
Home Owners Insurance - Company Name		\$0.00	NO AMOUNT
Title - Lenders Title Insurance (update from const)		\$225.00	
<b>- Totals</b>	<b>\$0.00</b>	<b>\$225.00</b>	

**Construction to Permanent Financing (FHLB)**

	Prepaid Finance Charge	Fees	
Tax Service	\$0.00		
- Info Pro: Refi n/c			
Will there be an addl inspection fee? Are we escrowing for items left unfinished; if so we require an additional inspection documented in the file as completed. - Prepaid \$150.00			
Home Owners Insurance - Company Name		\$0.00	NO AMOUNT
Title - Lenders Title Insurance (update from const)		\$225.00	
Recording		\$60.00	
Title - Special Assessment Letter		\$50.00	
<b>- Totals</b>	<b>\$0.00</b>	<b>\$335.00</b>	

**FHLB (Refinance)**

	Prepaid Finance Charge	Fees	
Origination	\$800.00		\$300.00 Lender Credit with qualifying DDA
Tax Service Fee	\$68.00		
LOL Flood	\$1.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance - Company Name		\$0.00	NO AMOUNT
Title - Lenders Title Insurance		\$525.00	
Title - Special Assessment Letter		\$50.00	
Recording		\$60.00	
<b>- Totals</b>	<b>\$869.00</b>	<b>\$1,045.00</b>	

**In House Balloon/ARM (Refinance)**

	Prepaid Finance Charge	Fees	
Origination	\$.00 / \$300 / \$500		<b><u>NO ORIGINATION FEE FOR FULLY AMORTIZED 1-2-3 YEAR LOANS</u></b> <b><u>\$.00 FULLY AMORTIZED / \$200.00 IN HOUSE BALLOON / \$400.00 ARMs</u></b>
Tax Service Fee	\$68.00		
LOL Flood	\$1.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance - Company Name		\$0.00	NO AMOUNT
Title - Lenders Title Insurance		\$525.00	
Title - ARM Endorsement		\$175.00	
Recording		\$30.00	
<b>- Totals</b>	<b>\$699.00</b>	<b>\$1,140.00</b>	

**1st Lien Equivalent/2NDs**

	<b>Prepaid Finance Charge</b>	<b>Fees</b>	
Origination	\$300.00		
Tax Service Fee	\$0.00		
- \$68.00 BLC - per FDIC do not disclose			
LOL Flood	\$1.00		
Appraisal		\$400.00	
Flood		\$10.00	
Home Owners Insurance		\$1,200.00	Purchase transactions only
Title - Lenders Title Insurance - ADJ		\$525.00	Contact Title Co for Amount
- optional Letter Report		\$75.00	
Recording		\$30.00	Purchase transaction - \$60.00
<b>- Totals</b>	<b>\$301.00</b>	<b>\$1,640.00</b>	

## PERSONAL CHECKING ACCOUNTS

### Carefree Checking

- \$25.00 minimum deposit to open account
- No monthly service charge or minimum balance requirement
- Unlimited check writing
- Online/Mobile Banking
- Bill Pay
- Debit Card
- Direct Deposit

### Carefree Interest Checking

All the features of Carefree Checking plus:

- \$500.00 minimum daily balance
- See website or account opening personnel for additional information and details

### InterestPlus Checking

All the features of Carefree Checking plus the opportunity to earn a higher interest rate on balances, and refunds on non-BLC ATM fees up to \$10.00.

#### Qualifications:

- Receive e-statements
- Minimum of 12 debit card transactions post and clear
- Minimum of one direct deposit or ACH deposit

**All qualifications must be met per statement period in order to be eligible.**

See website or account opening personnel for additional information and details

Limit of one InterestPlus checking account per customer.

### Health Savings Account (HSA)

HSA's were designed to help individuals in high-deductible health plans (HDHP) save for current or future qualified medical expenses.

- \$100 minimum deposit required to open account
- Unlimited check writing
- Debit Card
- Online/Mobile Banking
- See website or account opening personnel for additional information and details

## **PERSONAL SAVINGS & MONEY MARKET ACCOUNTS**

### **Statement Savings**

- \$25.00 minimum deposit to open account
- See website or account opening personnel for additional information and details
- Interest compounded and paid quarterly

### **Christmas Club**

- No minimum deposit to open account
- See website or account opening personnel for additional information and details
- Interest compounded and paid annually

### **Certificate of Deposit**

- \$2,500.00 minimum deposit to open account and balance required
- Penalties may apply for early withdrawal
- See website or account opening personnel for additional information and details
- 6-month to 5-year term for certificate

### **Tiered Money Market**

- \$5,000.00 minimum deposit to open account
- Monthly statement
- See website or account opening personnel for additional information and details

## BUSINESS CHECKING ACCOUNTS

**Basic Business Checking:** This account is designed for the business with low activity. No interest is paid on this account type

- 50 Debit/Credit/Deposited items per month, no charge (see fee schedule for charges in excess of 50 items)
- \$100.00 minimum daily balance to avoid monthly service charge of \$8.00
- Paid check images included in monthly statement

**Value Business Checking:** This account is designed for the business with moderate activity. No interest is paid on this account type

- 150 Debit/Credit/Deposited items per month, no charge (see fee schedule for charges in excess of 150 items)
- \$500.00 minimum daily balance to avoid monthly service charge (see fee schedule for service charge information)
- Paid check images included in monthly statement

**Premium Business Checking:** This account is designed for the business with moderate to high activity. No interest is paid on this account type.

- 250 Debit/Credit/Deposited items per month, no charge (see fee schedule for charges in excess of 250 items)
- \$2,500.00 minimum daily balance to avoid monthly service charge (see fee schedule for service charge information)
- Paid check images included in monthly statement

**Business Executive Checking:** This account is designed for the business with high activity.

- 1,000 Debit/Credit/Deposited items per month, no charge (see fee schedule for charges in excess of 1,000 items)
- \$20,000.00 minimum daily balance to avoid monthly service charge (see fee schedule for service charge information)
- Paid check images included in monthly statement

**Business Analysis Checking:** This account is designed for the business that wants credit for account balances to offset service charges and transaction fees. A high-volume business that maintains larger balances will find this account a perfect fit.

- This account earns credit based on the average collected balance
- Excess earnings credit can offset transaction fees
- Paid check images included in monthly statement
- See fee schedule for listing of service and items charges

**Nonprofit Community Checking:** This account is limited to non-profit organizations.

- \$500.00 minimum daily balance to avoid monthly service charge (see fee schedule for service charge information)
- Paid check images included in monthly statement

## **TREASURY MANAGEMENT PRODUCTS**

### **Line of Credit Sweep**

This solution allows business clients to automatically manage surplus cash balances to reduce interest expenses. Funds can automatically be moved back and forth between a BLC primary checking account and line of credit.

### **ACH Payments**

Through online banking, enter and transmit ACH entries electronically; making transactions quicker, safer and easier. Payments sent and received on the ACH network are a much more cost-effective basis than checks. Capabilities include; vendor payments, tax payments, direct deposits of payroll to employee accounts and automated loan payments.

### **Remote Deposit Capture**

This solution allows clients to scan checks and transmit the scanned images to BLC Community Bank for posting and clearing as a digital deposit. The digital deposit is transmitted over an encrypted internet connection to BLC, which accepts the deposits, posts the deposit to the client's account and assigns availability of funds based on the account availability schedule.

### **Positive Pay**

This solution is an integrated transaction management system that encompasses check Positive Pay, ACH Positive Pay and Account Reconciliation, providing clients with one of the most effective fraud prevention tools available.

### **Business Online Bill Pay**

This solution allows clients to pay companies and individuals within the United States that would normally be paid by check. Payments can be scheduled in the Payment Center, making paying repetitive bills quicker and easier.

Speak to a Personal Banker today for additional requirements and account information, including fee schedules.



## **BUSINESS SAVINGS ACCOUNTS**

### **Statement Savings**

- \$25.00 minimum deposit to open account and daily balance required (see fee schedule for service charge information)
- Interest is compounded and paid quarterly

### **Certificate of Deposit**

- \$2,500.00 minimum balance
- Penalties may apply for early withdrawal
- 6-month to 5-year term for certificate
- See website or account opening personnel for additional information and details

### **Tiered Money Market**

- \$5,000.00 minimum deposit to open account and daily balance required
- Monthly statement
- See website or account opening personnel for additional information and details

## **BLC Community Bank – Assessment Area**

47 Census Tracts – Outagamie County (entire county in Assessment Area)

Census Tracts:

101	113	125.04
102	114	125.05
103	115.01	125.06
105.01	115.02	126.02
105.02	116	126.03
106.01	117	126.04
106.02	118	127
107	119.01	128
108	119.02	129.02
109	120	129.03
110	121.01	129.04
111.01	121.02	131
111.02	122	132
111.03	123	133
111.04	124	9400
112	125.03	

11 Census Tracts – Calumet County (entire county in Assessment Area)

201	203.06	206
202	203.08	207
203.03	204	208
203.04	205	

# Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review.

The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials.

These data are available online at the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

HMDA data for many other financial institutions are also available at this Web site.