

Associated Bank, N.A.

Green Bay, WI

- Assets of \$21.6 billion.
- Owned by Associated Banc-Corp of Green Bay, Wisconsin.
- Total 281 branch offices throughout Wisconsin, Illinois, and Minnesota
 - 9 branches in the Metro East.
- Deposits in Metro East market is \$410,078,000, as of June 2011. Represents 2.9% of bank's total deposits (\$14,049,589,000).
- Ranks 29th in MSA market share of deposits, with 0.57 percent of deposits.
- Regulated by the Office of the Comptroller of the Currency.
- Satisfactory on last CRA evaluation in 2006 – Metro East AA received only a limited-scope review and was not described in depth in the evaluation.
- St. Louis Assessment Area: Monroe, Madison, and St. Clair Counties in IL.
- Community Reinvestment Act Programs, as listed on website, include participation with FHA loans, Federal Home Loan Bank, SBA loans, and Associated Community Development LLC as their investment subsidiary.
- Received \$525 million in TARP funding, and repaid money fully September 2011.

Associated Bank Branches in St. Louis MSA								
Street Address	City	State	Zip	County	Income Level	% Median Family Income	% Minority	% Black
104 Homer M. Adams Parkway	Alton	IL	62002	Madison	Middle	98.97	10.61	8.35
1 Junction Drive West	Glen Carbon	IL	62034	Madison	Upper	135.17	8.7	3.69
100 E. Washington St.	Belleville	IL	62220	St. Clair	Moderate	74.64	29.05	23.48
217 W. Washington St	Millstadt	IL	62260	St. Clair	Middle	114.17	1.78	0
6902 W. Main St	Belleville	IL	62223	St. Clair	Upper	129.42	17.19	14.5
6550 N. Illinois St	Fairview Heights	IL	62208	St. Clair	Middle	98.04	21.38	14.48
326 Missouri Avenue	East St. Louis	IL	62201	St. Clair	Low	29.54	99.09	97.28
238 North Main Street	Columbia	IL	62236	Monroe	Upper	132.1	1.93	0
200 South Market Street	Waterloo	IL	62298	Monroe	Middle	113.35	1.54	0

HMDA – lending in St. Louis represents 2.7% of all Bank lending.

- Decreasing levels of lending to African-American borrowers over last three years. Blacks represent 7.11% of originations in 2008, and only 4.37% in 2010. Significantly less proportion of minority borrowers in the bank's total lending; less than 1 percent of loans to blacks in last three years.
- Disparities in origination rates and denial rates between African-Americans and whites. Of black applications, only 28.57% were originated, compared to 60.73% of white applications. The denial rate for black applications over the last three years is 57.64%, compared to 21.78% denial rate for white applicants. Also see disparities in all of the bank's lending.
- Disparity in high cost lending between African-American borrowers and white borrowers. Since 2008, 20.18% of loans originated to African-Americans were high cost loans compared to only 5.70% to whites. St. Louis disparity is greater than all Bank lending.
- Lending to LMI borrowers: In last three years, 11.65% of loans originated to low-income borrowers and 18.06% to moderate-income borrowers, which is about the same within all Bank lending.

ORIGINATIONS										
<i>borrower characteristics</i>		2010		2009		2008		three year total		Census
race/ethnicity		#	%	#	%	#	%			
ST. LOUIS	Total	755		545		605		1905		
	White	677	89.67%	494	90.64%	513	84.79%	1684	88.40%	77.65%
	Black	33	4.37%	38	6.97%	43	7.11%	114	5.98%	18.10%
	Asian	7	0.93%	1	0.18%	2	0.33%	10	0.52%	0.99%
	Other	38	5.03%	12	2.20%	47	7.77%	97	5.09%	3.26%
	Hispanic	3	0.40%	6	1.10%	8	1.32%	17	0.89%	2.89%
ALL AREAS	Total	27393		20969		21188		69550		
	White	26100	95.28%	19978	95.27%	19731	93.12%	65809	94.62%	
	Black	196	0.72%	157	0.75%	247	1.17%	600	0.86%	
	Asian	338	1.23%	264	1.26%	306	1.44%	908	1.31%	
	Other	759	2.77%	570	2.72%	904	4.27%	2233	3.21%	
	Hispanic	271	0.99%	261	1.24%	408	1.93%	940	1.35%	

		ORIGINATION RATE				DENIAL RATE			
<i>borrower characteristics</i>		2010	2009	2008	three year total	2010	2009	2008	three year total
race/ethnicity		%				%			
ST. LOUIS	Total	57.07%	53.12%	57.08%	55.88%	29.86%	24.07%	25.28%	26.69%
	White	62.57%	57.71%	61.44%	60.73%	24.77%	19.28%	20.48%	21.78%
	Black	25.38%	32.48%	28.29%	28.57%	62.31%	57.26%	53.95%	57.64%
	Asian	63.64%	14.29%	50.00%	45.45%	27.27%	42.86%	25.00%	31.82%
	Other	38.00%	26.09%	68.12%	45.12%	43.00%	26.09%	20.29%	32.09%
	Hispanic	60.00%	50.00%	57.14%	54.84%	100.00%	41.67%	21.43%	41.94%
ALL AREAS	Total	67.70%	68.76%	65.33%	67.27%	21.53%	14.57%	18.07%	18.39%
	White	69.31%	70.13%	66.57%	68.71%	20.38%	13.41%	16.92%	17.24%
	Black	34.88%	38.11%	35.19%	35.80%	49.11%	45.39%	46.72%	47.20%
	Asian	52.98%	54.77%	51.69%	53.04%	33.07%	26.76%	28.04%	29.56%
	Other	47.35%	51.03%	60.27%	52.91%	34.37%	27.48%	23.40%	28.65%
	Hispanic	44.43%	46.44%	43.87%	44.72%	40.66%	36.65%	35.48%	37.30%

HIGH COST LOANS									
<i>borrower characteristics</i>		2010		2009		2008		three year total	
race/ethnicity		#	% of originations	#	% of originations	#	% of originations	#	% of originations
ST. LOUIS	Total	51	6.75%	28	5.14%	44	7.27%	123	6.46%
	White	39	5.76%	24	4.86%	33	6.43%	96	5.70%
	Black	11	33.33%	4	10.53%	8	18.60%	23	20.18%
	Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Other	1	2.63%	0	0.00%	3	6.38%	4	4.12%
	Hispanic	1	33.33%	0	0.00%	1	12.50%	2	11.76%
ALL AREAS	Total	858	3.13%	732	3.49%	774	3.65%	2364	3.40%
	White	786	3.01%	666	3.33%	696	3.53%	2148	3.26%
	Black	19	9.69%	19	12.10%	29	11.74%	67	11.17%
	Asian	12	3.55%	3	1.14%	8	2.61%	23	2.53%
	Other	0	0.00%	0	0.00%	41	4.54%	41	1.84%
	Hispanic	17	6.27%	15	5.75%	26	6.37%	58	6.17%

ORIGINATIONS									
		2010		2009		2008		Three year total	
<i>borrower characteristics</i>		#	%	#	%	#	%		
ST. LOUIS	Total	755		545		605		1905	
	Low-Income	84	11.13%	56	10.28%	82	13.55%	222	11.65%
	Moderate-Income	128	16.95%	115	21.10%	101	16.69%	344	18.06%
	Middle-Income	192	25.43%	129	23.67%	133	21.98%	454	23.83%
	Upper-Income	323	42.78%	223	40.92%	204	33.72%	750	39.37%
	NA	28	3.71%	22	4.04%	85	14.05%	135	7.09%
ALL AREAS	Total	27393		20969		21188		69550	
	Low-Income	2357	8.60%	1951	9.30%	1702	8.03%	6010	8.64%
	Moderate-Income	5648	20.62%	4482	21.37%	3860	18.22%	13990	20.12%
	Middle-Income	7461	27.24%	5538	26.41%	5348	25.24%	18347	26.38%
	Upper-Income	10719	39.13%	7900	37.67%	8099	38.22%	26718	38.42%
	NA	1208	4.41%	1098	5.24%	2179	10.28%	4485	6.45%

ORIGINATIONS									
		2010		2009		2008		three year total	
<i>Census Tract Characteristics</i>		#	%	#	%	#	%	#	%
ST. LOUIS	Total	755		545		605		1905	
Racial Composition									
	< 10% Minority	457	60.53%	318	58.35%	333	55.04%	1108	58.16%
	10-19% Minority	157	20.79%	112	20.55%	124	20.50%	393	20.63%
	20-49% Minority	105	13.91%	97	17.80%	113	18.68%	315	16.54%
	50-79% Minority	14	1.85%	10	1.83%	13	2.15%	37	1.94%
	80-100% Minority	22	2.91%	8	1.47%	22	3.64%	52	2.73%
Income Level									
	Low-Income	10	1.32%	7	1.28%	5	0.83%	22	1.15%
	Moderate-Income	85	11.26%	53	9.72%	125	20.66%	263	13.81%
	Middle-Income	398	52.72%	343	62.94%	355	58.68%	1096	57.53%
	Upper-Income	262	34.70%	142	26.06%	120	19.83%	524	27.51%
	NA	0	0.00%		0.00%	0	0.00%	0	0.00%
ALL AREAS	Total	27393		20969		21188		69550	
Racial Composition									
	< 10% Minority	22682	82.80%	17212	82.08%	16822	79.39%	56716	81.55%
	10-19% Minority	2963	10.82%	2374	11.32%	2544	12.01%	7881	11.33%
	20-49% Minority	1402	5.12%	1085	5.17%	1313	6.20%	3800	5.46%
	50-79% Minority	209	0.76%	190	0.91%	305	1.44%	704	1.01%
	80-100% Minority	137	0.50%	108	0.52%	204	0.96%	449	0.65%
Income Level									
	Low-Income	130	0.47%	106	0.51%	171	0.81%	407	0.59%
	Moderate-Income	1763	6.44%	1338	6.38%	1827	8.62%	4928	7.09%
	Middle-Income	17867	65.22%	13422	64.01%	13757	64.93%	45046	64.77%
	Upper-Income	7632	27.86%	6103	29.10%	5433	25.64%	19168	27.56%
	NA	0	0.00%		0.00%	0	0.00%	0	0.00%