



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

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Community Reinvestment Act Performance Evaluation

Wells Fargo Bank Wisconsin, National Association
Charter Number: 15057

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Office of the Comptroller of the Currency

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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Wells Fargo Bank Wisconsin, National Association** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **June 12, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area 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 (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Limited-Scope 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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholder's equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory.**”

The following table indicates the performance level of Wells Fargo Bank Wisconsin, National Association (WFWI), with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wells Fargo Bank Wisconsin, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- An overall adequate geographic and borrower distribution of lending.
- A good level of investment activity that has been responsive to assessment area community development needs.
- Good delivery systems that are readily accessible to geographies and individuals of different income levels.

Description of Institution

Wells Fargo Bank Wisconsin, National Association (WFWI), an intrastate bank, is headquartered in Milwaukee, Wisconsin. WFWI was formerly known as Norwest Bank Wisconsin, NA. Wells Fargo & Company changed the name of the bank in June 2000. The bank has 15 branch offices in the Milwaukee-Waukesha MSA, which represents 27% of the bank's deposits. WFWI conducts business through 52 branch offices in 12 AAs within the state. The bank's deposits by AA follows:

WFWI Assessment Areas (% of deposits)		
Milwaukee-Waukesha MSA (27%)	Eau Claire MSA (8%)	Madison MSA (4%)
Sheboygan MSA (19%)	Oconto AA (5%)	Waupun AA (3%)
Green Bay MSA (12%)	Racine MSA (5%)	Manitowoc AA (2%)
Appleton MSA (8%)	Ladysmith AA (4%)	Dodgeville AA (2%)

WFWI is a subsidiary of Wells Fargo & Company (WFC), San Francisco, California, a multi-bank holding company. WFC recently merged with Norwest Corporation, which formerly was headquartered in Minneapolis, Minnesota. WFC has total assets in excess of \$200 billion and conducts business through almost 3,000 offices and over 6,000 ATMs in 21 states.

WFWI has total assets of approximately \$1.9 billion, and total deposits of some \$1.6 billion. Loans, net of allowances for losses, total approximately \$1 billion, equating to about 55% of total assets and about 63% of total deposits. Approximately 26% of the loans of the bank are to individuals for household, family, and personal use. Another 24% of the loan portfolio financed commercial and industrial businesses. The remainder of the portfolio is largely secured by real estate for purposes such as construction and land development, personal use, and farming. WFWI has a total Tier I capital base of approximately \$136 million.

At the request of WFWI and in accordance with provisions of the CRA, this evaluation considers lending activities of Wells Fargo Home Mortgage, Inc., Norwest Home Improvement, Inc., and Wells Fargo Funding, Inc. These affiliates are related subsidiaries of WFC and are not subsidiaries of WFWI.

WFWI is a full service bank offering a typical array of retail banking services and loan products. Its business strategy is in no way limited or specialized to any narrow field of endeavor. Through the bank's affiliate, Wells Fargo Home Mortgage (WFHM), borrowers can obtain home purchase and refinance lending that is sometimes not available through other local commercial banks.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its assessment areas. WFWI was rated "Outstanding" at its last CRA evaluation dated November 19, 1996.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation included a review of the bank's HMDA-reportable, small business, and community development lending; community development investments; and retail and community development services. In accordance with OCC policy, we evaluated HMDA-reportable loans and loans to small businesses for the calendar years 1997, 1998, and 1999. WFWI's origination/purchase of small loans to farms was not evaluated. The volume was not significant enough, at one percent of the number of reported loan originations/purchases over the Lending Test period, to perform a meaningful analysis. All other products and activities were evaluated for the period beginning the date of the previous CRA public evaluation (November 19, 1996) and concluding June 12, 2000.

Data Integrity

In association with this review, small business and small farm data submitted by the bank in compliance with requirements of the CRA was reviewed for accuracy using a selected sample. This activity revealed no significant errors in reporting. Some minor errors were detected and corrected for analysis purposes. The accuracy of HMDA data was reviewed using reports and working papers of the internal auditors of the bank as well as a review of a sample of loan applications. The HMDA, small business, and small farm data were determined to be accurate and useful for analysis.

Information presented to the examiners to support the bank's compliance with the Investment Test and with the community development portions of the Lending and Service Tests was reviewed to ensure qualification under the definitions and requirements of the CRA.

Selection of Areas for Full-Scope Review

Of WFWI's twelve assessment areas (AAs), the Green Bay, Milwaukee-Waukesha, and Sheboygan MSAs were selected for full-scope reviews. These AAs approximate 58% of the bank's deposit gatherings. The remaining AAs each hold less than 10% of the bank's deposits.

Ratings

The ratings are based primarily on conclusions reached for WFWI's performance in the full-scope AAs. In this regard, greater weight was given to the bank's performance in the Milwaukee-Waukesha MSA, followed by the Sheboygan and Green Bay MSAs given the significance of their deposit and loan contributions. Performances in the AAs receiving limited-scope review were assessed to ensure consistency.

Other

We considered information received through communications with several community groups representing housing and small business advocates. The comments indicated that there is a continuing need for affordable housing and additional access to small business financing.

Fair Lending Review

In conjunction with the CRA review, the OCC conducted a Fair Lending examination of WFWI. The examination utilized the OCC's Fair Lending examination procedures and focused upon refinance loan applications underwritten by the bank's Consumer Retail Division. Examiners selected and analyzed a sample of applications submitted by Black and White persons that were processed between July 1, 1999 and June 30, 2000. Some 36 loan files were reviewed. The objective was to determine if WFWI provided consistent treatment to these applicants without regard to race, color, or national origin. These factors (prohibited bases) can form the basis for illegal discrimination.

Conclusions:

- The OCC found no evidence of disparate treatment applied on a prohibited basis; no violations of fair lending laws were cited.
- WFWI has a satisfactory process in place, including training, to help ensure ongoing compliance with fair lending laws.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance is adequate in the Green Bay and Milwaukee-Waukesha MSAs, and good in the Sheboygan MSA.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

For each full-scope AA, home mortgage loans represent the largest number of total reported loans, followed by small loans to businesses, then small loans to farms. On an aggregate basis, home mortgage loans comprised 89 percent of the reported number of loans originated or purchased, while small loans to businesses and small loans to farms comprised about eleven percent and less than one percent respectively. Among home mortgage loan originations, home purchase and refinance loans represent the greatest volumes at 38 percent and 57 percent respectively. These profiles are fairly consistent for each full-scope AA.

WFWI's lending activity is excellent in the Green Bay and Milwaukee-Waukesha MSAs and good in the Sheboygan MSA. In the Green Bay MSA, the bank is ranked second in home purchase lending, fifth in home improvement, first in home refinance, third in small loans to businesses, and eighth in small loans to farms, while its deposit ranking is fifth. In the Milwaukee-Waukesha MSA, the bank is ranked first in home purchase loans, tenth in home improvement, second in home refinance, and 21st in small loans to businesses, yet the bank's market share of deposits is only two percent with an extremely low ranking. In the Sheboygan MSA, the bank is ranked third in home purchase and home improvement loans, second in home refinance loans, third in small loans to businesses and seventh in small loans to farms, while its deposit ranking is second.

Distribution of Loans by Income Level of the Geography

WFWI's overall geographic distribution of lending is adequate. The bank's home lending geographic distribution is poor in the Milwaukee-Waukesha MSA, good in the Green Bay MSA and excellent in the Sheboygan MSA. The bank's distribution of small loans to businesses is excellent in the Milwaukee-Waukesha and Sheboygan MSAs and good in the Green Bay MSA. We based our conclusions primarily upon the bank's lending distribution compared to area demographics. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

It should be noted that of the owner-occupied units in the Green Bay MSA, only one-half of one percent are located in low-income geographies. Accordingly, the number of units in these areas and the associated opportunities available there are nominal. As such, we did not conclude on the geographic distribution within low-income geographies for the Green Bay MSA.

The overall geographic distribution of home mortgage loans is poor in the Milwaukee-Waukesha MSA, good in the Green Bay MSA, and excellent in the Sheboygan MSA.

Home Purchase Loans

WFWI's home purchase loan geographic distribution is excellent in the Green Bay MSA, poor in the Milwaukee-Waukesha MSA, and excellent in the Sheboygan MSA. In the Green Bay MSA, the bank's portion of home purchase loans made in moderate-income geographies matches the portion of owner-occupied housing units within those geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

In the Milwaukee-Waukesha MSA, WFWI's portion of home purchase loans made in low-income geographies is about one-third the portion of owner-occupied housing, and the bank's respective market share is less than half its overall market share. The bank's portion of home purchase loans made in moderate-income geographies is more than two-thirds the portion of owner-occupied housing units within those geographies. Moreover, WFWI's market share of loans made in moderate-income geographies is more than half the overall market share of the bank.

In the Sheboygan MSA, there are no low-income geographies. The portion of WFWI's home purchase loans made in moderate-income geographies significantly exceeds the portion of owner-occupied housing units within those geographies. In addition, the market share of loans made in moderate-income geographies exceeds the bank's overall market share.

Home Improvement Loans

WFWI's home improvement loan distribution is good in the Green Bay MSA, adequate in the Milwaukee-Waukesha MSA, and good in the Sheboygan MSA. In the Green Bay MSA, the portion of the WFWI's home improvement loans made in moderate-income geographies is near to the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans made in moderate-income tracts also is near to the bank's overall market share.

In the Milwaukee-Waukesha MSA, the portion of WFWI's home improvement loans made in low-income geographies is about two-thirds of the owner-occupied housing. The bank's market share of loans made in low-income tracts is significantly less than its overall market share. The bank's portion of home purchase loans made in moderate-income geographies slightly exceeds the portion of owner-occupied housing units within those geographies. In addition, the market share of WFWI's loans made in moderate-income geographies is near to the overall market share of the bank.

In the Sheboygan MSA, there are no low-income geographies. The portion of WFWI's home improvement loans made in moderate-income geographies matches the portion of owner-occupied housing units there, however, the respective market share of such loans is more than two-thirds the bank's overall market share.

Home Refinance Loans

WFWI's refinance loan distribution is good in the Green Bay MSA, poor in the Milwaukee-Waukesha MSA, and excellent in the Sheboygan MSA. In the Green Bay MSA, The bank's portion of refinance loans made in moderate-income geographies is about three-quarters the portion of owner-occupied housing units that are within those geographies. The bank's market share of loans made in moderate-income tracts exceeds its overall market share.

In the Milwaukee-Waukesha MSA, the portion of WFWI's refinance loans made in low-income geographies is significantly less than the owner-occupied housing units. The bank's market share of loans made in the low-income tracts is significantly less than its overall market share. The bank's portion of refinance loans made in moderate-income geographies is half of the owner-occupied housing units that are within those geographies. The bank's market share of loans made in moderate-income tracts is almost two-thirds its overall market share.

In the Sheboygan MSA, there are no low-income geographies. The portion of WFWI's refinance loans made in moderate-income geographies matches the portion of owner-occupied housing units there, and the respective market share of such loans exceeds the bank's overall market share.

Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

WFWI's geographic distribution of small loans to businesses is good in the Green Bay MSA and is excellent in the Milwaukee-Waukesha and Sheboygan MSAs.

In the Green Bay MSA, the bank's portion of small loans to businesses made in low-income geographies is less than half the portion of businesses within those geographies. The bank's market share of such loans is less than half its overall market share. The bank's portion of small loans to businesses made in moderate-income geographies in the Green

Bay MSA exceeds the portion of businesses within those geographies. The bank's market share of such loans exceeds its overall market share.

In the Milwaukee-Waukesha MSA, WFWI's portion of small loans to businesses made in low-income geographies exceeds the portion of businesses in those geographies. Further, the bank's market share of loans exceeds its overall market share. The bank's portion of small loans to businesses made in moderate-income geographies matches the portion of businesses that are in those geographies. The bank's market share of such loans is consistent in that it exceeds the overall market share of the bank.

In the Sheboygan MSA, there are no low-income geographies. The portion of the bank's small loans to businesses made in moderate-income geographies in this MSA significantly exceeds the portion of businesses that are in those geographies. The bank's market share of such loans is consistent in that it significantly exceeds the overall market share of the bank.

Small Loans to Farms

Refer to Table 6 in Appendix C for the facts and data regarding the geographic distribution of the bank's origination/purchase of small loans to farms. As previously noted, WFWI's small loans to farms were not analyzed as they account for less than one percent of the bank's total lending.

Lending Gap Analysis

We performed an analysis of WFWI's home mortgage loans, and small loans to businesses using a variety of techniques including mapping for the full-scope AAs. This analysis revealed no unexplained conspicuous gaps in the geographic distribution of loans in the Green Bay and Sheboygan MSAs.

Inside/Outside Ratio

A substantial majority of the bank's loans are made within its AAs. The bank made 84% of its small business loans within its AAs.

Distribution of Loans by Income Level of the Borrower

WFWI's distribution of loans by income level of borrower is adequate. The bank's home lending distribution is adequate in the Milwaukee-Waukesha MSA and Green Bay MSA and good in the Sheboygan MSA. The bank's distribution of small loans to businesses is good in the Milwaukee-Waukesha and Sheboygan MSAs and excellent in the Green Bay MSA.

We based our conclusions primarily upon the bank's lending to borrowers of different income levels compared to the population demographics of the area. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

WFWI's overall distribution of home mortgage loans is adequate in the Milwaukee MSA and Green Bay MSA and good in the Sheboygan MSA.

Home Purchase Loans

WFWI's home purchase loan borrower distribution is good in both Green Bay and Milwaukee-Waukesha MSAs and is excellent in the Sheboygan MSA. In the Green Bay MSA, the portion of WFWI's home purchase loans made to low-income borrowers is less than half the families defined as such. The bank's market share of loans to low-income families is near to its overall market share. The bank's portion of home purchase loans made to moderate-income borrowers significantly exceeds the portion of moderate-income families. In addition, the bank's market share of such loans is near to its overall market share.

In the Milwaukee-Waukesha MSA, the portion of home purchase loans made to low-income borrowers is a third of the families defined as such. The bank's market share of loans to low-income families is moderately close to its overall market share. The bank's portion of home purchase loans made to moderate-income borrowers matches the portion of moderate-income families and the respective market share of such loans matches the bank's overall market share.

In the Sheboygan MSA, the portion of WFWI's home purchase loans made to low-income borrowers is about two-thirds the families defined as such. The respective market share of such loans exceeds the overall market share of the bank. The bank's portion of home purchase loans made to moderate-income borrowers significantly exceeds the portion of moderate-income families. In addition, the bank's market share of such loans significantly exceeds its market share.

Home Improvement Loans

WFWI's home improvement loan borrower distribution is good in the Green Bay MSA, poor in the Milwaukee-Waukesha MSA, and adequate in the Sheboygan MSA. In the Green Bay MSA, the portion of home improvement loans made to low-income borrowers approximates one-third of the families defined as such. The bank's market share of loans made to low-income families is near to its overall market share. The bank's portion of home improvement loans made to moderate-income borrowers exceeds the portion of moderate-income families. In addition, the bank's market share of such loans is near to its overall market share.

In the Milwaukee-Waukesha MSA, the portion of home improvement loans made to low-income borrowers is significantly less than the families defined as such and the respective

market share of such loans is well below the bank's overall market share. The portion of home improvement loans made to moderate-income borrowers is moderately close to the portion of such families. However, the bank's respective market share of such loans is well below its overall market share.

In the Sheboygan MSA, the portion of WFWI's home improvement loans made to low-income borrowers is about half the portion of families defined as such. The bank's respective market share of such loans is moderately close to its overall market share. The bank's portion of home improvement loans made to moderate-income borrowers is also moderately close to the portion of such families. The bank's market share of such loans is about two-thirds its overall market share.

Home Refinance Loans

WFWI's refinance loan borrower distribution is adequate for the Green Bay and Sheboygan MSAs and poor for the Milwaukee-Waukesha MSA. In the Green Bay MSA, the portion of WFWI's refinance loans made to low-income borrowers is almost a quarter of the families defined as such. The bank's market share of loans made to low-income families is moderately close to its overall market share. The portion of refinance loans made to moderate-income borrowers is below the portion of moderate-income families. In addition, the bank's market share of such loans is moderately close to its overall market share.

In the Milwaukee-Waukesha MSA, the portion of WFWI's refinance loans made to low-income borrowers is significantly less than the families defined as such. The bank's market share of loans to low-income families is more than two-thirds its overall market share. The bank's portion of refinance loans made to moderate-income borrowers is two-thirds the portion of moderate-income families. In addition, the bank's market share of such loans is slightly more than two-thirds of its overall market share.

In the Sheboygan MSA, the portion of WFWI's refinance loans made to low-income borrowers is more than one-third the families defined as such. The bank's market share of loans made to low-income families is more than two-thirds its overall market share. The bank's portion of refinance loans made to moderate-income borrowers is near to the portion of moderate-income families. In addition, the bank's market share of such loans is near to its overall market share.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent in the Green Bay MSA and good in the Milwaukee-Waukesha and Sheboygan MSAs. In the Green Bay MSA, the bank's portion of small loans to small businesses (businesses with revenues of \$1 million or less) exceeds the portion of businesses defined as such. In addition, the bank's market share of small loans made to small businesses exceeds its overall market share for small

loans to all businesses. In both the Milwaukee-Waukesha and Sheboygan MSAs, the bank's portion of small loans to small businesses substantially meets the portion of businesses defined as such and the respective market shares of such loans exceed the bank's overall market shares.

Small Loans to Farms

Refer to Table 11 in the Appendix C for the facts and data regarding the borrower distribution of the bank's origination/purchase of small loans to businesses.

As previously noted, WFWI's small loans to farms were not analyzed as they account for less than one percent of the bank's total lending.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

Community development (CD) lending had a neutral impact on the Lending Test conclusion for all three full-scope AAs. In the Green Bay MSA, WFWI originated five CD loans totaling \$448 thousand. The number and dollar amount of loans is not considered significant relative to the credit needs within the bank's AA. None of the loans exhibits a notable level of complexity or innovation.

The following are examples of CD loans that address the needs of LMI neighborhoods or individuals:

- WFWI provided a \$137 thousand bridge loan for the purchase of a group home to house LMI homeless veterans.
- WFWI participated with five banks in a loan pool. WFWI lent \$20 thousand in a total pool of \$100 thousand. Funds are lent by a not-for-profit organization in the form of "micro-loans" that provide financing to small businesses.

In the Milwaukee-Waukesha MSA, WFWI's CD lending totaled \$1.2 million (10 loans originated). The number and dollar amount of loans is not considered significant relative to the credit needs within the bank's assessment area.

In addition, WFWI has originated other loans with CD characteristics in the AA that were included in the home mortgage and small loans to businesses lending totals that had a positive impact on the AA.

The following are examples of CD loans that address the needs of LMI neighborhoods or individuals:

- WFWI participates in a consortium of local lenders that provide financing for LMI

households for both purchase and rehabilitation of properties. The program is designed to serve individuals who cannot qualify for conventional home financing. WFWI works with a state funded not-for-profit agency. Lending programs include an innovative rehabilitation program that resulted in local homeowners being able to receive a 12-year term loan with a zero interest rate. A bank employee took an active leadership role in the non-profit agency and its creation of the rehab loan program. The organization does a significant amount of pre- and post-closing counseling.

- WFWI lent \$250 thousand for a working capital loan to a community action agency. The agency was created pursuant to state statute, and its mission is to facilitate anti-poverty programs at the local level.

In the Sheboygan MSA, the bank's CD loan totaled \$240 thousand. The loan provided temporary financing for the purchase and renovation of a family group home to shelter homeless women and their children. One of the programs of the home is to provide job-skills to increase employment options of the women. The number and dollar amount of the bank's activity is not considered significant relative to the credit needs or opportunity within the bank's AA and the loan does not exhibit a high level of complexity or innovation.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the bank's Lending Test conclusions. The bank, either on its own or through its affiliates, offers flexible mortgage-related lending programs, many of which intend to benefit low- and moderate-income borrowers. The programs are available to borrowers throughout the state.

WFHM offers the WHEDA HOME program. WFHM has originated 104 loans totaling \$7.76 million. This bond program is designed to meet the affordable mortgage needs of LMI homebuyers throughout Wisconsin. Loan limits vary by county and total loan-to-value is 95%. Flexible consideration is given to credit experience and employment history. This program may include possible homeowner education and waiver of PMI insurance.

WFHM originated 72 loans totaling \$5.4 million through the Freddie 97 loan program. This program allows gifts to cover closing costs and loan-to-values of up to 97%. It is limited to applicants with incomes of less than 100% the average median income.

During the review period, WFHM originated 26 loans totaling \$2.7 million under the Community Living Program. This program provides funding to individual or legal entity investors to provide primary and permanent housing for LMI individuals with disabilities. The bank lends up to 90% of the property and allows cash out for rehabilitation or repairs. Qualifications are based on the property cash flow.

WFHM originated a program, The 3% Solution program, which originated 24 loans totaling \$2.4 million. This loan program targets credit worthy borrowers who have difficulty accumulating funds for down payments and closing costs. The program is available nationally, has no income limits, and down payment sources can be from borrowers' own

funds, gift, grant or unsecured loan from a relative, employer, or non-profit.

WFHM offers a Community Home Ownership Program, which has originated 39 loans totaling \$1.96 million. This program is designed to meet the affordable mortgage needs of LMI homeowners. Loan-to-value is 95% and total debt-to-income is 41%. Flexible consideration is given to credit experience and employment history. This program may include possible homeowner education and waiver of PMI insurance.

WFHM and four other banks initially each made a commitment of \$150 thousand to the Doors Program/ADVOCAP program. WFHM has originated 15 loans totaling \$802 thousand. The Appleton Housing Authority administers the Doors Program, which serves Outagamie County residents. The Doors Program was created to assist LMI borrowers with up to \$6.5 thousand in down-payment assistance. The income limit is 80% of the area median income and there is a maximum \$1 thousand from borrower funds. Loans are made at below market rate to ensure affordability.

WFHM offers the FHA 203K - Renovation Program. WFHM has originated five loans totaling \$476 thousand. WFHM was one of the first lenders to originate the 203K rehab mortgages. The program uses standard FHA guidelines and has a minimum \$5 thousand improvement on the property. This national program targets borrowers purchasing a home in need of modest repairs that wish to roll the repairs into the first mortgage. This program allows the borrower to finance the rehab costs using the lesser of the purchase price plus the costs of the rehab or the value after improvement.

WFHM offers the Waupun Block Grant Program, and originated seven loans totaling \$358 thousand. This program assists LMI borrowers and provides up to \$15 thousand for down payment, closing costs, and/or home improvement. Loans provided under this program have no interest or required payments. It is a passive second mortgage where the original loan-to-value can exceed 100%. These loans are held within the WFWI portfolio.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the WFWI's performance under the Lending Test in the Appleton, Dodgeville, Eau Claire, and Waupun limited-scope AAs is not inconsistent with the bank's overall "Low Satisfactory" performance under the Lending Test. The bank's performance in the Ladysmith, Madison, Manitowac, Oconto, and Racine AAs is stronger than the bank's overall "Low Satisfactory" rating based on their geographic and borrower lending distribution. The bank's stronger lending in these AAs did not impact the overall Lending Test rating as the lending in these areas accounted for only 21% of the bank's total lending. *Refer to tables 1 through 11 in Appendix C for the facts and data that support these conclusions.*

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in all three full-scope AAs is good. To assist in gauging the relative volume of investments, we calculated their relationship to Tier 1 Capital, allocated by AA.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

In the Green Bay MSA, WFWI made 24 qualified investments totaling \$3.3 million. This represents a good percentage of the bank's prorated Tier 1 Capital in qualified investments over the three and one-half-year evaluation period. A majority of this activity consists of the AA's allocated portion of LMI-mortgage-backed securities and multifamily mortgage-backed securities. These securities were purchased by WFWI's affiliate Wells Fargo Bank Minnesota. The portion of securities that were supported by LMI-mortgages in Wisconsin were allocated to WFWI for CRA consideration. The allocated portion was not considered in any other affiliate's CRA performance. The bank's investments also include a variety of local grants and contributions within this AA. These primarily supported community services for LMI persons, along with some small business development.

In the Milwaukee-Waukesha MSA, WFWI made 42 qualified investments totaling \$6.3 million. This also represents a good percentage of the bank's prorated Tier 1 Capital in qualified investments over the three and one-half-year evaluation period. Again, the majority of this volume consists of the AA's allocated portion of LMI-mortgage-backed securities and multifamily mortgage-backed securities. These securities were purchased by WFWI's affiliate Wells Fargo Bank Minnesota. The portion of securities that were supported by LMI-mortgages in Wisconsin were allocated to WFWI for CRA consideration. The bank's investments also include a variety of local grants and contributions within this AA. These primarily supported community services for LMI persons, along with some small business development.

In the Sheboygan MSA, WFWI made five qualified investments totaling \$4.8 million. This represents a good percentage of the bank's prorated Tier 1 Capital being made in qualified investments over the three and one-half-year evaluation period. The majority of this volume consists of the AA's allocated portion of LMI-mortgage-backed securities and multifamily mortgage-backed securities. These securities were purchased by WFWI's affiliate Wells Fargo Bank Minnesota. The portion of securities that were supported by LMI-mortgages in Wisconsin were allocated to WFWI for CRA consideration. The bank's investments also include a variety of local grants and contributions within this AA. These primarily supported community services for LMI persons, along with some small business development.

Although all of these investments are responsive to identified needs in the bank's AAs,

none is notable for its innovation or creativity.

Conclusions for Area Receiving Limited-Scope Reviews

Based upon limited-scope reviews, the bank's performance under the Investment Test in the limited-scope AAs is not inconsistent with the overall "High Satisfactory" rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Milwaukee-Waukesha MSA and Green Bay MSA is good and adequate in the Sheboygan MSA.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's delivery system and branch openings and closings.

WFWI's delivery systems have good accessibility to geographies and individuals of different income levels in the Milwaukee-Waukesha MSA and the Green Bay MSA, and adequate accessibility in the Sheboygan MSA. In the Milwaukee-Waukesha MSA, the distribution of WFWI offices in low-income geographies exceeds the distribution of families living there.

And including the one branch that borders (across the street from) a low-income census tract, the distribution significantly exceeds the distribution of families living there. Although the distribution of branches in moderate-income geographies is less than the distribution of families living there, including the three branches that border moderate-income geographies, the distribution of branches exceeds the distribution of families living there.

In the Green Bay MSA, the distribution of WFWI offices in moderate-income geographies exceeds the distribution of families living there. Although none of the bank's branches are in low-income geographies, only 1.6% of the population resides in these geographies. In the Sheboygan MSA none of the bank's six branches are located in moderate-income geographies, however only 9.5% of the population resides in these geographies. There are no low-income geographies in the Sheboygan MSA.

Branch openings and closures have not adversely affected the accessibility of delivery systems in either full-scope AA. There were no closures in low-or moderate-income geographies in the full-scope AAs.

WFWI's offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how low- and moderate-income individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing conclusions for each full-scope area under the Service Test. In the Milwaukee-Waukesha MSA, the distribution of the bank's thirty-eight ATMs in both low- and moderate-income geographies is well below the distribution of families living there. In the Sheboygan MSA, the bank only has

one ATM, which is not in either a low- or moderate-income geography. In the Green Bay MSA, the distribution of the bank's three ATMs significantly exceeds the distribution of both

low- and moderate-income families living there.

WFWI's hours and services offered in all three AAs are adequate. Hours and services in both the Sheboygan MSA and the Green Bay MSA, are comparable among all locations regardless of the income level of the geography. Although neither of the two branches in low-income geographies in the Milwaukee-Waukesha MSA, offers Saturday banking hours, both of these branches are in the downtown area that gets significantly less business on weekends. The bank has another branch in downtown Milwaukee that is in a middle-income geography that also does not offer Saturday banking hours. In addition, one of the downtown branches that is in a low-income area has only twenty families that live there. The other branch is only a limited service office in a grocery store with only one employee. At this office, Saturday banking is available by appointment. WFWI offers a no minimum balance checking account in all AAs that allow customers, including those who are low- and moderate-income, to maintain accounts without fees.

Community Development Services

WFWI's performance in providing CD services to the Milwaukee-Waukesha MSA, the Sheboygan MSA, and the Green Bay MSA are adequate.

In the Milwaukee-Waukesha MSA, WFWI is involved in two economic development, three affordable housing, and two different community service organizations. WFWI's involvement is primarily centered in board member participation, serving on the loan committee of four organizations, and assisting in fund raising. In the Sheboygan MSA, WFWI is involved in one economic development, two affordable housing, and two different community service organizations. In the Green Bay MSA, WFWI is involved in two economic development, and two different community service organizations. WFWI's involvement in both the Sheboygan MSA and the Green Bay MSA is primarily centered in board member participation and assisting in fund raising.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton-Oshkosh-Neenah MSA, Eau Claire MSA, Racine MSA, and Ladysmith AA is not inconsistent with the bank's overall High Satisfactory performance. The performance in Dodgeville, Manitowoc, Waupun, and the Madison MSA, is weaker than the bank's overall performance. In Dodgeville, Manitowoc, and Waupun, there are no low- or moderate-income geographies. In the Madison MSA, none of the four branches are in low- or moderate-income geographies, although 6.9% and 19.9% of the population respectively reside in those geographies. This weaker performance did not lower the level of the bank's overall performance under the Service Test. In the Oconto AA, there are no low-income geographies and the bank's percentage of branches significantly exceeds the population

in moderate-income geographies. The bank's stronger performance in this AA did not impact the overall rating of the Service Test.

Refer to Table 13 in Appendix C for the facts and data that support these conclusions.

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: January 1, 1997 to December 31, 1999 Investment Test: November 19, 1996 to June 12, 2000 Service Test: November 19, 1996 to June 12, 2000	
Financial Institution		Products Reviewed
Wells Fargo Wisconsin, N.A. Milwaukee, Wisconsin		Home mortgage loans, small loans to businesses and farms, and CD loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Wells Fargo Mortgage Corporation	Holding company Subsidiary	Home purchase and refinance loans
Norwest Home Improvement, Inc.	Holding company subsidiary	Home improvement loans
Wells Fargo Funding, Inc.	Holding company subsidiary	Home purchase and refinance loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Milwaukee-Waukesha MSA #5505	Full Scope	
Sheboygan MSA #5507	Full Scope	
Green Bay MSA #5503	Full Scope	
Appleton-Oshkosh MSA	Limited Scope	
Dodgeville non-MSA	Limited Scope	
Eau Claire MSA	Limited Scope	
Ladysmith Non-MSA	Limited Scope	
Madison MSA	Limited Scope	
Manitowoc	Limited Scope	
Oconto Non-MSA	Limited Scope	
Racine MSA	Limited Scope	
Waupun Non-MSA	Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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Appendix B: Market Profiles for Full Scope Areas

Green Bay MSA

Demographic Information for Full-Scope Area: Green Bay MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	4.08	20.41	57.14	16.33	2.04
Population by Geography	194,594	1.55	20.21	57.43	20.36	0.44
Owner-Occupied Housing by Geography	47,423	0.51	19.35	58.20	21.94	0.00
Businesses by Geography	7,968	6.86	16.05	61.58	15.45	0.05
Farms by Geography	560	0.00	3.39	85.18	11.43	0.00
Family Distribution by Income Level	50,732	17.09	17.89	28.63	36.38	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,748	2.24	32.41	52.88	12.47	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$37,121 = \$54,100 = 9.28%	Median Housing Value Unemployment Rate (1999)				= \$62,219 = 2.4%

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Green Bay MSA comprises 12% of WFWI deposits. The bank has a 6% deposit market share, which places it fifth in market rank. The top two area competitors include Associated Bank Green Bay and M&I Bank Northeast. Together, the two hold about 50% of the deposit market share. These two banks are ranked first and second in small business lending, with 22% and 18%, respectively, of the small business market share. WFWI follows third with a 10% market share. M&I Northeast carries the small farm market with a 62% market share. Among only eleven small farm lenders, WFWI is ranked eighth with a 2% market share. However, among many banks competing for mortgage loans, WFWI and its affiliates are ranked first in HMDA reported mortgage originations. They have a 12% market share. Associated Bank Green Bay and M&I Northeast and their affiliates are close competitors, holding market shares of about 11% and 10%, respectively. 8% of the bank's branches are located in this AA.

This AA consists of the entire Green Bay MSA. The MSA's economy is largely reliant on manufacturing, trade, and services. Top employers include paper goods manufacturers, Fort James Corporation and Proctor and Gamble Paper Products, the Oneida Tribe of

Indians of Wisconsin, and several medical providers. Unemployment is extremely low at 2.4%. The area population is relatively stable at 219 thousand. Housing prices have increased to \$111 thousand for existing housing. (Source: Dismal Scientists Inc.)

As part of our evaluation, we considered information from several different community organizations, supporting housing, small business and economic development. The contacts expressed the need for affordable housing and additional small business lending.

Milwaukee-Waukesha MSA

Demographic Information for Full-Scope Area: Milwaukee-Waukesha MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	392	19.13	17.35	43.11	19.64	0.77
Population by Geography	1,432,149	12.73	13.58	46.59	27.05	0.06
Owner-Occupied Housing by Geography	319,660	4.71	10.23	51.28	33.77	0.00
Businesses by Geography	49,235	7.39	9.56	47.92	34.83	0.30
Farms by Geography	1,337	1.27	3.66	53.85	41.14	0.07
Family Distribution by Income Level	372,335	19.55	17.66	25.59	37.21	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	138,529	23.14	20.22	43.78	12.86	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$39,005 = \$57,600 = 10.38%	Median Housing Value Unemployment Rate (1999)				= \$76,108 = 3.0%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The Milwaukee-Waukesha MSA comprises the most significant portion of WFWI deposits at 27%. However, the bank has limited, deposit market share in the community at less than two percent. Top competitors in the market include M&I Marshall and Isley Bank, Firststar Bank, and Bank One. There are also numerous mortgage companies competing in the market. WFWI and its affiliates rank first in HMDA reported mortgage originations however, they hold only a 4.7% market share. M&I and Cendant Mortgage are close competitors, with market shares of 4.6% and 4.2%, respectively. Competition is strong among small business lenders. The top lender, Firststar Bank Milwaukee, holds only a 13% market share. Wells Fargo is ranked 21st with a 1% market share. M&I First National Bank dominates the small farm lending market with a 47% market share. WFWI's affiliate, Wells Fargo Bank Minnesota, made one loan and holds less than 1% market share. 29% of the bank's branches are located in this AA.

This AA covers the Milwaukee-Waukesha MSA. The Milwaukee metropolitan area, located in the southeastern corner of Wisconsin on Lake Michigan, consists of Milwaukee, Ozaukee, Washington, and Waukesha counties. With 1.45 million residents, the metro area accounts for slightly more than one-fourth of the state's population. Manufacturing remains the dominant sector in the local economy, although its role has diminished. The leading industries are non-electrical machinery, transportation equipment, fabricated metals, plastics, and printing. Low business costs have attracted the headquarters of national manufacturers, including Miller Brewing, S. C. Johnson Wax, Harley-Davidson, Johnson Controls, Rockwell Automation, and Briggs & Stratton.

Milwaukee's industrial base has supported vibrant growth in legal, computer, engineering, and personnel services. As the state's largest commercial center, trade and services are key to the local economy as well. The metro area is a center for shipping and warehousing, with ports on Lake Michigan providing easy access to consumer markets in the eastern United States and Canada. Unemployment at three percent is below the national average of four percent. Housing prices have increased considerably with the average cost of housing averaging \$196 thousand for new housing and \$135 thousand for existing housing. (Source: Metro Economics and Haver Regional Economic Focus).

As part of our evaluation, we considered information from several different community organizations, supporting housing, small business and economic development through a review of contact forms. The contacts expressed the need for affordable housing and additional small business lending.

Sheboygan MSA

Demographic Information for Full-Scope Area: Sheboygan MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0.00	8.33	87.50	4.17	0.00
Population by Geography	103,877	0.00	9.49	86.38	4.13	0.00
Owner-Occupied Housing by Geography	27,116	0.00	6.17	88.88	4.95	0.00
Businesses by Geography	3,585	0.00	9.29	84.71	6.00	0.00
Farms by Geography	428	0.00	0.47	94.86	4.67	0.00
Family Distribution by Income Level	28,195	14.74	19.56	31.21	34.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,672	0.00	14.36	83.35	2.28	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$36,707 = \$54,500 = 6.88%	Median Housing Value Unemployment Rate (1999)				= \$59,187 = 2.0%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Sheboygan MSA comprises 19% of WFWI deposits. With a 21% market share, the bank holds the second market rank position behind Firststar Bank. Firststar Bank has a 28% market share. There are many bank's competing for mortgage loans. WFWI and its affiliates are ranked second in HMDA reported mortgage originations. They have a 9.6% market share behind Associated Mortgage Company with a 15.1% market share. WFWI ranks third among several small business lenders. They hold an eleven- percent market share behind Firststar Bank Wisconsin and National Exchange Bank and Trust. These banks have respective market shares of 26% and 13%. WFWI ranks sixth among ten small farm lenders. Top farm lenders include National Exchange Bank & Trust, Firststar Bank Wisconsin, and M&I Bank Fox Valley. The bank has 11% of its branches located in this AA.

This AA consists of the entire Sheboygan MSA, which is comprised solely of Sheboygan County. Sheboygan is located on Lake Michigan about an hour from Milwaukee, Green Bay, and the Fox Cities and two hours from Chicago. The MSA's economy is reliant largely on manufacturing. Top employers include Kohler Company, Mirro Company, Bemis Manufacturing, Fisher Hamilton, Aurora Medical Center, JL French Company, and Sargento Foods. Unemployment is extremely low at two percent. The area population is stable at 110 thousand. Housing prices have increased to \$83 thousand for existing housing (Source: Dismal Scientists Inc. and Haver Regional Economic Focus).

As part of our evaluation, we considered information from several different community organizations, supporting housing, small business and economic development through a review of contact forms. The contacts expressed the need for affordable housing and additional small business lending.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables:

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/AA.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 7. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans - See Table 7.

- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Evaluation Period: 01/01/1997 TO 12/31/1999												
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Green Bay MSA	12	4,960	403,522	988	116,940	12	567	5	448	5,965	521,976	17
Milwaukee MSA	27	10,584	1,162,539	796	93,929	3	267	10	1,262	11,393	1,257,997	32
Sheboygan MSA	19	2,576	160,865	360	49,473	12	1,075	1	240	2,949	211,653	8
Limited Scope												
Appleton-OshKosh MSA	8	4,208	349,464	514	48,847	0	0	4	650	4,726	398,961	13
Dodgeville Non-MSA	2	155	9,592	39	2,317	9	484	0	0	203	12,393	1
Eau Claire MSA	8	1,277	99,045	378	55,814	8	1,373	0	0	1,663	156,232	5
Ladysmith Non-MSA	4	257	12,614	76	4,156	5	238	1	500	339	17,508	1
Madison MSA	4	1,670	174,768	185	14,412	6	107	2	74	1,863	189,361	5
Manitowoc	2	789	46,956	173	10,408	10	1,085	0	0	972	58,449	3
Oconto Non-MSA	5	1,399	77,223	380	24,901	197	12,270	0	0	1,976	114,394	6
Racine MSA	5	2,055	170,703	149	9,077	4	774	1	100	2,209	180,654	6
Waupun Non-MSA	3	1,079	72,490	101	10,214	136	7,276	0	0	1,316	89,980	3

* Deposit Data as of June 30, 1999.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																	Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans																		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**																	
Full Scope																																	
Green Bay MSA	< 1	0	19	19	58	58	22	23	2	9.8	0.0	10.9	9.5	10.2	1,385	12																	
Milwaukee MSA	5	2	10	7	51	51	34	40	1	5	2.1	3.1	5.0	5.7	4,547	39																	
Sheboygan MSA	0	0	6	10	89	84	5	6	3	10.8	0.0	13.8	10.8	8.2	699	6																	
Limited Scope																																	
Appleton-OshKosh MSA	0	0	5	4	85	77	10	19	2	9.7	7.7	11.7	9.0	13.5	2,032	17																	
Dodgeville Non-MSA	0	0	0	0	100	100	0	0	8	3.0	0.0	0.0	3.0	0.0	35	0																	
Eau Claire MSA	0	0	10	5	75	65	15	30	3	7.3	0.0	3.2	6.1	13.2	505	4																	
Ladysmith Non-MSA	0	0	35	47	65	53	0	0	7	4.9	0.0	10.9	3.0	0.0	45	0																	
Madison MSA	1	1	14	18	65	64	20	17	12	2.5	5.1	2.2	2.5	2.5	733	6																	
Manitowoc	0	0	0	0	78	76	22	24	4	7.9	0.0	0.0	8.6	5.7	291	2																	
Oconto Non-MSA	0	0	7	6	93	94	0	0	4	7.1	0.0	7.5	7.1	0.0	240	2																	
Racine MSA	4	2	4	4	82	83	10	11	3	8.3	1.9	8.5	8.3	10.7	913	8																	
Waupun Non-MSA	0	0	0	0	73	84	27	16	6	4.6	0.0	0.0	5.8	1.9	341	3																	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT																	Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans																		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**																	
Full Scope																																	
Green Bay MSA	< 1	<1	19	18	58	64	22	18	5	8.1	9.1	7.7	8.3	7.5	258	15																	
Milwaukee MSA	5	3	10	11	51	51	34	35	10	2.9	0.6	2.5	2.8	4.0	441	26																	
Sheboygan MSA	0	0	6	6	89	88	5	6	3	10.9	0.0	7.4	11.3	9.7	232	14																	
Limited Scope																																	
Appleton-OshKosh MSA	0	0	5	3	85	78	10	19	9	3.1	0.0	2.2	2.6	7.7	177	11																	
Dodgeville Non-MSA	0	0	0	0	100	100	0	0	16	1.3	0.0	0.0	1.3	0.0	9	1																	
Eau Claire MSA	0	0	10	3	75	76	15	20	11	2.7	0.0	0.9	2.9	4.2	89	5																	
Ladysmith Non-MSA	0	0	35	42	65	58	0	0	11	1.4	0.0	0.0	2.1	0.0	24	1																	
Madison MSA	1	2	14	12	65	67	20	19	21	0.8	0.0	0.3	0.8	0.8	57	3																	
Manitowoc	0	0	0	0	78	73	22	27	5	5.6	0.0	0.0	5.2	7.1	63	4																	
Oconto Non-MSA	0	0	7	11	93	89	0	0	2	13.8	0.0	7.3	14.6	0.0	149	9																	
Racine MSA	4	3	4	2	82	86	10	9	10	3.5	1.3	1.6	4.0	2.2	106	6																	
Waupun Non-MSA	0	0	0	0	73	94	27	6	6	5.5	0.0	0.0	7.4	0.8	80	5																	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																	Evaluation Period: 01/01/1997 TO 12/31/1999	
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans			
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**		
Full Scope																		
Green Bay MSA	< 1	0	19	14	58	63	22	23	1	13.4	6.8	13.9	13.3	13.3	3,302	19		
Milwaukee MSA	5	1	10	5	51	49	34	44	2	4.8	0.8	3.0	4.8	5.2	5,592	32		
Sheboygan MSA	0	0	6	6	89	87	5	7	2	14.9	0.0	18.5	14.9	13.0	1,645	9		
Limited Scope																		
Appleton-OshKosh MSA	0	0	5	2	85	78	10	20	2	6.8	5.0	3.3	6.3	10.4	1,996	11		
Dodgeville Non-MSA	0	0	0	0	100	100	0	0	7	4.1	0.0	0.0	4.1	0.0	111	1		
Eau Claire MSA	0	0	10	6	75	67	15	27	4	6.4	0.0	3.6	5.8	9.9	682	4		
Ladysmith Non-MSA	0	0	35	43	65	57	0	0	6	6.3	0.0	8.5	5.3	0.0	188	1		
Madison MSA	1	1	14	14	65	61	20	25	12	1.8	1.1	2.3	1.6	2.4	877	5		
Manitowoc	0	0	0	0	78	79	22	21	3	7.3	0.0	0.0	7.9	5.9	435	2		
Oconto Non-MSA	0	0	7	11	93	89	0	0	1	17.9	0.0	17.8	17.9	0.0	1,008	6		
Racine MSA	4	2	4	4	82	83	10	11	2	7.2	2.7	8.4	7.3	6.6	1,036	6		
Waupun Non-MSA	0	0	0	0	73	88	27	12	5	6.3	0.0	0.0	7.9	2.8	657	4		

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																	Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans																		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**																	
Full Scope																																	
Green Bay MSA	7	3	16	19	62	56	15	22	3	9.9	4.3	12.6	9.9	10.3	988	24																	
Milwaukee MSA	7	8	10	10	48	46	35	35	21	1.3	1.8	1.8	1.4	1.2	796	19																	
Sheboygan MSA	0	0	9	13	85	79	6	8	3	11.2	0.0	18.2	10.5	16.7	360	9																	
Limited Scope																																	
Appleton-OshKosh MSA	3	0	10	11	70	71	17	17	11	2.9	0.0	3.6	2.6	4.8	514	12																	
Dodgeville Non-MSA	0	0	0	0	100	100	0	0	11	2.5	0.0	0.0	2.6	0.0	39	1																	
Eau Claire MSA	0	0	16	14	65	58	19	28	3	12.5	0.0	12.5	12.2	14.9	378	9																	
Ladysmith Non-MSA	0	0	38	24	62	76	0	0	3	7.8	0.0	6.7	8.2	0.0	76	2																	
Madison MSA	6	4	21	27	57	48	16	21	15	1.2	1.6	1.1	1.2	1.6	185	4																	
Manitowoc	0	0	0	0	82	88	18	12	5	4.1	0.0	0.0	4.5	2.3	173	4																	
Oconto Non-MSA	0	0	7	4	93	96	0	0	4	12.9	0.0	2.9	14.6	0.0	380	9																	
Racine MSA	12	32	6	5	75	51	7	11	11	2.6	7.3	3.8	1.8	3.0	149	4																	
Waupun Non-MSA	0	0	5	2	74	85	22	13	13	1.0	0.0	0.0	1.4	0.3	101	2																	

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upper	#	% of Total**
Full Scope																
Green Bay MSA	0	0	3	0	85	100	11	0	8	1.7	0.0	0.0	1.9	0.0	12	3
Milwaukee MSA	1	0	4	0	54	33	41	67	123	0.0	0.0	0.0	0.0	0.0	3	1
Sheboygan MSA	0	0	0	0	95	100	5	0	7	3.5	0.0	0.0	3.6	0.0	12	3
Limited Scope																
Appleton-OshKosh MSA	0	0	1	0	91	0	8	0	76	0.0	0.0	0.0	0.0	0.0	0	0
Dodgeville Non-MSA	0	0	0	0	100	100	0	0	5	1.1	0.0	0.0	1.1	0.0	9	2
Eau Claire MSA	0	0	18	0	78	88	4	13	5	0.8	0.0	0.0	1.4	0.0	8	2
Ladysmith Non-MSA	0	0	55	80	45	20	0	0	3	2.4	0.0	6.7	1.5	0.0	5	1
Madison MSA	0	0	8	0	78	50	14	50	7	0.6	0.0	0.0	0.4	2.6	6	1
Manitowoc	0	0	0	0	78	100	22	0	10	0.5	0.0	0.0	0.7	0.0	10	2
Oconto Non-MSA	0	0	2	2	98	98	0	0	3	15.6	0.0	0.0	17.7	0.0	197	49
Racine MSA	1	0	3	0	91	100	4	0	6	1.7	0.0	0.0	1.7	0.0	4	1
Waupun Non-MSA	0	0	0	0	75	100	25	0	6	4.9	0.0	0.0	6.8	0.0	136	34

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upper	#	% of Total	
Full Scope																	
Green Bay MSA	17	7	18	21	29	35	36	36	2	9.8	8.2	8.1	10.8	10.8	1,385	12	
Milwaukee MSA	20	6	18	18	26	32	37	43	1	5.0	4.0	4.9	5.6	7.1	4,547	39	
Sheboygan MSA	15	11	20	30	31	34	34	23	3	10.8	12.1	14.5	10.8	9.0	699	6	
Limited Scope																	
Appleton-OshKosh MSA	15	10	19	24	30	31	36	34	2	9.7	18.1	10.5	8.9	9.9	2,032	17	
Dodgeville Non-MSA	16	0	20	17	27	37	37	43	8	3.0	0.0	2.9	0.0	4.6	35	0	
Eau Claire MSA	19	3	18	16	26	29	37	50	3	7.3	2.8	6.1	6.2	10.0	505	4	
Ladysmith Non-MSA	24	7	23	9	25	38	28	44	7	4.9	6.9	0.0	7.7	6.8	45	0	
Madison MSA	16	4	20	24	28	40	36	31	12	2.5	2.2	2.5	3.2	2.5	733	6	
Manitowoc	13	4	17	26	27	30	43	39	4	7.9	2.3	6.5	8.5	9.4	291	2	
Oconto Non-MSA	21	7	20	20	27	33	32	39	4	7.1	7.0	5.8	8.6	7.3	240	2	
Racine MSA	19	8	18	23	27	36	37	33	3	8.3	8.8	8.8	10.6	8.2	913	8	
Waupun Non-MSA	12	4	17	21	27	35	45	40	6	4.6	1.3	6.1	5.2	4.7	341	3	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upper	#	% of Total	
Full Scope																	
Green Bay MSA	17	5	18	21	29	38	36	34	5	8.1	7.8	7.0	8.9	8.1	258	15	
Milwaukee MSA	20	4	18	15	26	32	37	45	10	2.9	1.4	1.8	3.0	4.3	441	26	
Sheboygan MSA	15	7	20	17	31	37	34	35	3	10.9	9.0	6.9	11.7	14.3	232	14	
Limited Scope																	
Appleton-OshKosh MSA	15	3	19	15	30	28	36	51	9	3.1	2.8	2.3	2.6	4.0	177	11	
Dodgeville Non-MSA	16	0	20	11	27	33	37	44	16	1.3	0.0	0.0	3.4	0.0	9	1	
Eau Claire MSA	19	10	18	12	26	28	37	45	11	2.7	5.2	3.1	3.1	2.1	89	5	
Ladysmith Non-MSA	24	13	23	25	25	17	28	46	11	1.4	0.0	0.0	4.8	0.0	24	1	
Madison MSA	16	9	20	14	28	32	36	44	21	0.8	0.5	1.3	0.6	0.7	57	3	
Manitowoc	13	8	17	19	27	22	43	49	5	5.6	6.9	3.8	4.7	7.3	63	4	
Oconto Non-MSA	21	3	20	23	27	30	32	44	2	13.8	6.5	12.0	10.6	20.5	149	9	
Racine MSA	19	7	18	23	27	25	37	43	10	3.5	3.1	5.1	2.7	3.1	106	6	
Waupun Non-MSA	12	1	17	14	27	35	45	49	6	5.5	0.0	1.7	5.9	6.8	80	5	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upper	#	% of Total	
Full Scope																	
Green Bay MSA	17	4	18	14	29	28	36	37	1	13.4	10.7	10.7	11.1	12.0	3,302	19	
Milwaukee MSA	20	4	18	12	26	27	37	46	2	4.8	3.4	4.1	5.1	5.6	5,592	32	
Sheboygan MSA	15	6	20	18	31	33	34	28	2	14.9	11.3	13.6	13.9	12.2	1,645	9	
Limited Scope																	
Appleton-OshKosh MSA	15	4	19	13	30	27	36	36	2	6.8	5.8	5.1	5.5	5.9	1,996	11	
Dodgeville Non-MSA	16	3	20	6	27	34	37	54	7	4.1	10.0	2.0	5.8	3.4	111	1	
Eau Claire MSA	19	7	18	15	26	24	37	45	4	6.4	9.5	6.4	5.5	6.1	682	4	
Ladysmith Non-MSA	24	7	23	22	25	30	28	32	6	6.3	5.7	3.8	5.8	6.7	188	1	
Madison MSA	16	4	20	16	28	30	36	40	12	1.8	1.8	1.3	1.5	2.0	877	5	
Manitowoc	13	5	17	16	27	27	43	40	3	7.3	10.3	7.4	6.4	5.9	435	2	
Oconto Non-MSA	21	6	20	16	27	28	32	41	1	17.9	23.3	17.2	17.9	14.9	1,008	6	
Racine MSA	19	5	18	15	27	30	37	33	2	7.2	7.1	6.4	7.3	5.9	1,036	6	
Waupun Non-MSA	12	2	17	11	27	29	45	48	5	6.3	9.3	3.8	6.0	6.5	657	4	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1997 TO 12/31/1999							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Green Bay MSA	68	72	60	67	19	14	9.9	10.4	998	24
Milwaukee MSA	68	59	51	67	18	15	1.3	1.5	796	19
Sheboygan MSA	72	62	49	67	17	16	11.2	12.4	360	9
Limited Scope										
Appleton-OshKosh MSA	69	66	66	74	18	8	2.9	3.0	514	12
Dodgeville Non-MSA	76	66	64	92	3	5	2.5	2.8	39	1
Eau Claire MSA	72	55	47	67	18	15	12.5	11.3	378	9
Ladysmith Non-MSA	75	89	73	92	4	4	7.8	9.1	76	2
Madison MSA	71	83	52	82	11	7	1.2	1.9	185	5
Manitowoc	74	84	62	85	10	5	4.1	5.3	173	4
Oconto Non-MSA	78	81	70	87	8	5	12.9	12.7	380	9
Racine MSA	73	86	62	83	13	4	2.6	3.2	149	4
Waupun Non-MSA	72	57	69	67	26	7	1.0	0.6	101	2

* The market consists of all other Small Business reporters in Wells Fargo Bank Wisconsin's assessment area and is based on 1998 Aggregate Small Business Data only.

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 7% of small loans to businesses reported by the BANK.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM										
Evaluation Period: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	Farms With Revenues of \$1 million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Green Bay MSA	96	100	94	100	0	0	1.7	1.8	12	3
Milwaukee MSA	95	100	95	33	67	0	0.0	0.0	3	1
Sheboygan MSA	95	100	95	80	20	0	3.5	3.6	12	3
Limited Scope										
Appleton-OshKosh MSA	96	0	98	0	0	0	0.0	0.0	0	0
Dodgeville Non-MSA	99	100	92	89	11	0	1.1	1.1	9	2
Eau Claire MSA	99	88	95	38	50	12	0.8	0.9	8	2
Ladysmith Non-MSA	98	100	96	80	20	0	2.4	2.5	5	1
Madison MSA	97	100	95	100	0	0	0.6	0.6	6	2
Manitowoc	97	100	98	50	40	10	0.5	0.5	10	2
Oconto Non-MSA	97	99	82	84	14	2	15.6	15.7	197	49
Racine MSA	96	50	93	25	50	25	1.7	0.0	4	1
Waupun Non-MSA	97	99	92	82	18	0	4.9	5.1	136	34

* The market consists of all other Small Farm reporters in Wells Fargo Bank Wisconsin's assessment area and is based on 1998 Aggregate Small Farm Data only.

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available. No revenue information was available for 1% of small loans to farms reported by the BANK.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
Evaluation Period: 11/19/1996 TO 06/12/2000									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Green Bay MSA	0	0	24	3,306	24	3,306	13.88	1	58
Milwaukee MSA	0	0	42	6,305	42	6,305	26.48	1	131
Sheboygan MSA	0	0	5	4,778	5	4,778	20.07	1	92
Limited Scope									
Appleton-OshKosh MSA	0	0	13	1,821	13	1,821	7.65	1	39
Dodgeville Non-MSA	0	0	6	454	6	454	1.91	1	10
Eau Claire MSA	0	0	14	1,822	14	1,822	7.65	1	39
Ladysmith Non-MSA	0	0	7	910	7	910	3.82	1	24
Madison MSA	0	0	13	985	13	985	4.14	1	19
Manitowoc	0	0	10	456	10	456	1.92	1	10
Oconto Non-MSA	0	0	6	1,136	6	1,136	4.77	1	24
Racine MSA	0	0	19	1,153	19	1,153	4.84	1	24
Waupun Non-MSA	0	0	6	682	6	682	2.86	1	15

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding as of the examination date.

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Table 13. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	Evaluation Period: 11/19/1996 TO 06/12/2000			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population						
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*						
				Low (%)	Mod (%)	Mid (%)	Upper (%)			Low	Mod	Mid	Upper	Low	Mod	Mid	Upper			
Full Scope																				
Green Bay MSA	12.1	4	7.7	0.0	25.0	75.0	0.0	0	5	0	0	+2	+3	1.6	20.3	57.7	20.4			
Milwaukee-Waukesha MSA	26.8	15	28.8	13.3	6.7	46.7	33.3	0	0	0	0	0	0	12.7	13.6	46.6	27.1			
Sheboygan MSA	19.4	6	11.5	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	9.5	86.4	4.1			
Limited Scope																				
Appleton-Oshkosh-Neanah MSA	8.0	3	5.8	0.0	33.3	33.3	33.3	0	0	0	0	+2	0	0.5	7.9	82.0	9.7			
Eau Claire MSA	7.8	5	9.6	0.0	20.0	60.0	20.0	0	0	0	0	+1	0	0.0	11.5	70.8	17.7			
Madison MSA	4.2	4	7.7	0.0	0.0	100.0	0.0	0	0	0	0	+4	0	6.9	19.9	58.0	15.3			
Racine	5.2	2	3.8	0.0	50.0	0.0	50.0	0	0	0	0	0	+1	9.1	6.1	74.7	10.2			
Dodgeville	1.8	1	1.9	0.0	0.0	100.0	0.0	0	0	0	0	+1	0	0.0	0.0	100.0	0.0			
Ladysmith	4.2	3	5.8	0.0	33.3	66.7	0.0	0	0	0	+2	+2	0	0.0	37.3	62.7	0.0			
Manitowoc	2.2	3	5.8	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	0.0	80.4	19.6			
Oconto	5.4	5	9.6	0.0	20.0	80.0	00.0	0	0	0	0	0	0	0.0	5.9	94.1	0.0			
Waupun	2.9	1	1.9	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	0.4	74.0	25.6			

* The percentage of the population in the MSA/AA that resides in these geographies.