



Public Disclosure

July 11, 1997

Community Reinvestment Act Performance Evaluation

**Marshall & Ilsley First National Bank, West Bend
Charter Number: 11060**

**321 North Main Street
West Bend, Wisconsin 53905**

**Office of the Comptroller of the Currency
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Milwaukee, WI 53203**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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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 **Marshall & Ilsley First National Bank, West Bend** (M&I FNB) prepared by **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **July 11, 1997**. 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 C.F.R. Part 25.

Institution's CRA Rating: This institution is rated "**Satisfactory record of meeting community credit needs**".

The rating is influenced primarily by:

Lending Test -

- a good responsiveness to assessment area credit needs,
- a substantial majority of loans were made in the bank's assessment area,
- a good geographic distribution of loans inside the assessment area,
- an adequate distribution of loans among borrowers of different income levels, and
- a good distribution of loans among businesses and farms of different sizes.

Service Test -

- delivery systems that are accessible to essentially all portions of the bank's assessment area,
- a record of opening and closing branches that has improved the accessibility of its delivery systems, and
- an adequate level of community development services.

The following chart indicates the performance level of **M&I FNB** with respect to the lending, investment, and service tests.

M&I First National Bank, West Bend Performance Tests			
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial noncompliance			

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

Description of Institution and Assessment Area

Marshall & Ilsley First National Bank, West Bend (M&I FNB) is wholly owned by Marshall & Ilsley Corporation, a \$13 billion multi-bank holding company. The bank has its main office in West Bend, Wisconsin, and serves communities in Washington County, Wisconsin, which is located in the Milwaukee Metropolitan Statistical Area (MSA). West Bend is the largest city in the county, population 24,591 per 1990 U.S. Census data.

The bank’s assessment area includes all of Washington County, Wisconsin, which is comprised of 14 middle-income census tracts (78%) and 4 upper-income census tracts (22%). There are no low- or moderate income census tracts in Washington County. The income levels of the geographies are based on the 1990 US Census Median Family Income for the Milwaukee MSA, which is \$39,005. The family breakdown in the assessment area by income levels is 11% low income families, 18% moderate income families, 30% middle income families, and 41% upper income families. The income levels of individuals are based on updated information from the Department of Housing and Urban Development (HUD). The 1997 HUD Updated Median Income for the Milwaukee MSA is \$50,700.

Based on 1990 Census data, there are a total of 34,382 housing units in the bank’s assessment area. Owner occupied units comprise 70% of the total housing units; 25% are rental units. The median housing value is \$82,150.

Major industries within the assessment area include manufacturing, services, and retail trade. The economy is stable with some areas of growth. The unemployment rate (2%) is well below the national average. Business demographic data indicates that there are over 3,000 businesses in Washington County. The vast majority of these businesses have fewer than 50 employees and are considered to be small businesses. Only 3% of the households are self-employed farmers.

M&I FNB has 5 branch offices located in its assessment area, as well as 5 ATMs. Additionally, M&I's affiliate, M&I Menomonee Falls, is immediately adjacent to southern Washington County and has 2 branch locations in southern Washington County. As will be seen, the presence of the affiliate makes it difficult for M&I FNB to make many loans in the southern portion of its assessment area.

There are no impediments which would hamper M&I FNB's ability to meet the credit needs of its community. However, competition with other financial institutions who serve this assessment area, including branches of regional and multinational banks, is strong. Hartford, Wisconsin, located in the southwestern portion of Washington County, is the location for several banks which makes it difficult for M&I FNB to make loans in that portion of its assessment area. As of March 31, 1997, the bank had total average assets of \$267,700,000 and a return on average assets (ROAA) of 1.32%. Net loans represented 51% of average assets with earning assets accounting for 93% of average assets. The loan portfolio is comprised of 66% real estate loans, 24% commercial and industrial loans, 8% installment loans, 1% agricultural loans, and 1% credit cards.

Community contacts with local economic development, business, and housing organizations were complimentary of the bank's efforts to meet credit needs of the community. Both bank management and community contacts mentioned affordable housing as a community need in the assessment area. Local organizations are working with the banks for approval of smaller zoning requirements with respect to the size of individual housing lots, so builders can develop more affordable homes in the area. Community representatives also indicated that business growth and expansion is vital for creation of more jobs in the county. Currently, many Washington County residents commute to larger cities outside of the county, such as Milwaukee, Wisconsin, for better employment opportunities. Milwaukee is located 40 miles southeast of West Bend.

Conclusions with Respect to Performance Tests

Lending Test

Overall, M&I FNB's loan activity demonstrates:

- ▶ a good responsiveness to assessment area credit needs;
- ▶ a substantial majority of loans were made in the institutions's assessment area;
- ▶ a good geographic distribution of loans inside the assessment area;
- ▶ an adequate distribution of loans among borrowers of different income levels;
- ▶ a good distribution of loans among businesses and farms of different sizes, including very small businesses and farms;
- ▶ an adequate level of community development loans; and
- ▶ use of flexible lending practices to help serve assessment area credit needs.

Performance Criteria:

Lending Activity - M&I FNB's lending levels reflect good responsiveness to assessment area credit needs. In 1995, M&I FNB ranked 4th with respect to the market share percentage of all home mortgage loans originated in Washington County. There were a total of 174 lenders that reported home mortgage loans in Washington County. M&I's mortgage corp affiliate was ranked 3rd in the market share report, and a large percentage of the mortgage corp's loans made in Washington County were originated through M&I FNB. The market share percentages of M&I FNB and M&I Mortgage Corp. combined would produce the largest market share in Washington County. As the largest bank headquartered in Washington County, M&I FNB is also one of the leaders with respect to the number of small business loan originations made by banks headquartered in the county. In 1996, M&I FNB originated 115 mortgage loans (\$10.9 million) in their assessment area. Information was not available to compare this volume to others, but it is consistent with 1995 lending levels.

In 1995, M&I FNB's overall loan-to-deposit ratio averaged 71%. Between December 31, 1995 and March 31, 1996, M & I West Bend's loan-to-deposit ratio dropped to 59%, due to the securitization of \$26 million in real estate mortgages for tax purposes. Since March 31, 1996, the bank's loan to deposit ratio has been stable, averaging 59%. The loan to deposit ratio for the bank's national peer group, consisting of banks of similar size, averaged 70% during the same time period. The bank's loan to deposit ratio is well below the peer average, due to the asset securitization. If the bank had not secured \$26 million in real estate loans, their loan to deposit ratio would be very close to the national peer average.

The loan to deposit ratio for a custom peer group consisting of several banks headquartered in Washington County, Wisconsin was much higher than the national peer, averaging 87% between March 31, 1996 and March 31, 1997. The banks in this peer group vary in size. The bank's loan to deposit ratio is well below that of the custom peer group. This is partially due to the \$26M asset securitization that took place between December 31, 1995 and March 31, 1996. However, the bank's below average loan to deposit ratio is also attributable to the large number of fixed rate mortgage loans that were originated by the bank, sold to the mortgage company affiliate who then sells them in the secondary mortgage market.

Assessment Area Concentration - The following tables demonstrate that a substantial majority of M&I FNB's loans are made inside its assessment area. Table 1 shows the number and amount of M&I FNB Home Mortgage Disclosure Act (HMDA), small business, and small farm loans originated in 1996. Table 2 shows HMDA activity in 1995. HMDA activity does not include M&I FNB's originations at the mortgage company.

*Note: Loans purchased by the institution are also considered as originations for the lending test.

Table 1				
Ratio of Loans Originated Inside the Assessment Area - 1996				
	HMDA	Small Business	Small Farm	Total
Number				
# of loans inside the AA	162	579	108	849
Total # of Loans	192	662	128	982
% of Loans Inside/Total # of Loans	84%	87%	84%	85%
Dollars (in 000's)				
\$ of Loans Inside the AA	8,613	54,077	5,697	68,387
Total \$ of Loans	11,591	63,273	6,645	81,509
% of Loans Inside/Total \$ of Loans	74%	85%	86%	82%

Source: 1996 HMDA Lar, Small Business/Small Farm Data Collection Register
M&I prepared Census Traks Plus Report for Small Business/Small Farm Data

Table 2	
Ratio of HMDA Loans Inside the Assessment Area - 1995	
Number	
# of Loans inside the AA	178
Total # of Loans	206
% of Loans Inside/Total # of Loans	86%
Dollars (in 000's)	
\$ of Loans Inside the AA	9,886
Total \$ of Loans	11,816
% of Loans Inside/Total \$ of Loans	84%

Source: 1995 HMDA Lar

Geographic Distribution - The geographic distribution of loans reflects good penetration in M&I FNB's assessment area. This is based on the loan location of M&I FNB's HMDA, small business and small farm loans. There are no low or moderate income tracts in the bank's assessment area.

Home Mortgage Loans:

As noted in the “Description of Institution and Assessment Area” section, M&I FNB’s affiliate in Menomonee Falls, Wisconsin is adjacent to the southern portion of Washington County and has two branches in the southern portion of Washington County. This affects M&I FNB’s ability to generate loans in these areas. The effect of this is that nearly all of M&I FNB’s lending activity is located in the central and northern portions of Washington County. The portions of southern Washington County where loan penetration is low or non-existent are primarily upper-income census tracts. The Hartford area, in southwestern Washington County, also shows less penetration, due to competition from local banks in that area. The following tables (Tables 3 and 4) illustrate the number and dollar amount of HMDA loans that were originated in each category of geography (middle and upper-income) in the bank’s assessment area. Loans made by M&I FNB’s mortgage company are also included in this analysis. In light of the above, and the income characteristics of the assessment area, the geographic distribution of HMDA loans is good.

Table 3 Geographic Distribution of HMDA Loans - 1996				
Originations/Purchases	# of Loans in the AA	Percent of Total	Dollar of Loans in the AA (000's)	Percent of Total
Middle-Income Tracts	269	97%	19,250	97%
Upper-Income Tracts	8	3%	581	3%
Total	277	100%	19,831	100%

Table 4 Geographic Distribution of HMDA Loans - 1995				
Originations/Purchases	# of Loans in the AA	Percent of Total	Dollar of Loans in the AA (000's)	Percent of Total
Middle-Income Tracts	281	99%	18,389	99%
Upper-Income Tracts	2	1%	138	1%
Total	283	100%	18,527	100%

Source: 1995 and 1996 HMDA LAR
M&I FNB prepared geographic distribution/Census Tracts Plus reports

Small Business and Farm Loans:

M&I FNB’s geographic distribution of small business and small farm loans reflects good penetration throughout the assessment area. Small business loans are well-dispersed throughout the central and northern portions of Washington County. The heaviest concentration of small business loans is in West Bend, the largest city in the county, and where the greatest opportunity exists for small business lending. Areas of lesser penetration in the southern and southwestern portions of the county are primarily residential, contain several parks, and are also served by M&I Menomonee Falls and local banks in Hartford. Small farm loans are also well-dispersed in the central and northern portions of Washington County. Areas of low or no penetration are in the southern and southwestern portions of the county, which have only a small number of farms. M&I Menomonee Falls and local Hartford banks also serve the farm needs in the southern and southwestern portions of Washington County. Table 5 illustrates the number and dollar amount of small business and small farm loans that were originated in middle- and upper-income census tracts in the bank’s assessment area.

Table 5 Geographic Distribution of Small Business and Small Farm Loans - 1996				
Originations/Purchases	# of Loans in the AA	Percent of Total	Dollar of Loans in the AA (000's)	Percent of Total
Middle-Income Tracts	659	96%	56,603	95%
Upper-Income Tracts	28	4%	3,171	5%
Total	687	100%	59,774	100%

Source: Small Business and Small Farm Data Collection Register
M&I prepared Census Traks Plus reports

Borrower Characteristics - Overall, the distribution of M&I FNB’s home mortgage, small business, and small farm loans based on borrower characteristics in the assessment area is good. This is based on the distribution of loans to low-, moderate-, middle-, and upper- income individuals in the assessment area, as well as loans to small businesses and farms of different sizes.

Home Mortgage Loans:

The level of HMDA loans in M&I FNB’s assessment area to persons with low-or moderate-incomes is adequate in relation to the percentage of low-or moderate-income families living in assessment area. Tables 6 and 7 show that a reasonable number of HMDA loans made are to low- and moderate-income individuals. In 1996, 20% of HMDA loans and 12% of the dollar amount of HMDA loans were made to low- and moderate- income individuals, as compared to 29% of the families living in the assessment area with low- and moderate-incomes. The percentage of dollars to low- and moderate-income individuals is lower than the percentage of loans, due to the smaller average size of loans requested by low and moderate income individuals. The bank’s penetration of HMDA loans among low-income individuals is slightly low compared to the number of low-income families in the assessment area. However, based on 1995 aggregate

HMDA data, M&I FNB's penetration among low-income borrowers is consistent with the rest of the lending market in the assessment area. This analysis includes loans made by M&I FNB's mortgage company.

Table 6					
Borrower Distribution of HMDA Loans - 1996					
Originations/ Purchases	% of families in AA	# of Loans in AA	% of Total	Dollars (\$) of loans in AA	% of Total
Low-Income	11%	10	4%	207	1%
Moderate-Income	18%	45	16%	2,213	11%
Middle-Income	30%	114	41%	7,798	39%
Upper-Income	41%	107	39%	9,383	47%
N/A	-	1	-	230	1%
Total	100%	277	100%	19,831	100%

Source: 1996 HMDA-Lar (Bank and Mortgage Co.)
M&I prepared analysis

Table 7					
Borrower Distribution of HMDA Loans - 1995					
Originations/ Purchases	% of families in AA	# of Loans in AA	% of Total	Dollars (\$) of loans in AA	% of Total
Low-Income	11%	7	3%	159	1%
Moderate-Income	18%	43	15%	1,994	11%
Middle-Income	30%	105	37%	5,746	31%
Upper-Income	41%	121	43%	10,245	55%
N/A	-	7	2%	383	2%
Total	100%	283	100%	18,527	100%

Source: 1995 HMDA-Lar (Bank and Mortgage Co.)

Small Business and Small Farm Lending:

The distribution of M&I FNB's small business and small farm loans based on borrower

characteristics in the assessment area is good. Business demographic data indicates that 73% of the businesses and 92% of the farms in Washington County have revenues less than \$1 million. Table 8 shows that a majority of M&I FNB's loans to small businesses and small farms originated in their assessment area are made to businesses or farms with revenues of less than \$1 million. The distribution demonstrates that the bank is offering product lines consistent with the business demographics and needs of the community.

Type of Loan	Number < \$1mm	% of Total	Number > \$1mm	% of Total	\$ Amount (000's) < \$1mm	% of Total	\$ Amount (000's) > \$1mm	% of Total
Small Business Loans	440	76%	139	24%	30,303	56%	23,774	44%
Small Farm Loans	107	99%	1	1%	5,687	99%	10	1%
Total	547	80%	140	20%	35,990	60%	23,784	40%

Source: Small Business/Small Farm Data Collection Register
M&I prepared Census Traks Plus Reports and Revenue Analysis

Table 9 summarizes M&I FNB's small business and small farm lending by varying loan amounts in their assessment area. The new CRA regulation assumes that loan size generally correlates with the size of the business or farm borrower. Business demographic data indicates that 77% of the businesses and farms in Washington County have less than 10 employees. The following table shows that 76% of total small business and farm loans originated have loan amounts less than \$100,000. The analysis demonstrates that M&I FNB is meeting the credit needs of very small businesses and farms by making loans in small dollar amounts.

Origination Amount	Count	% of Total	\$ Amount (000's)	% of Total
Less than \$100,000	521	76%	16,842	28%
Between \$100,000 and \$200,000	106	15%	17,203	29%
Greater than \$250,000	60	9%	25,729	43%
Total	687	100%	59,744	100%

Source: Small Business/Small Farm Data Collection Register
M&I prepared Census Traks Plus Reports and Loan Amount Analysis

Community Development Lending - M&I FNB's level of community development lending is limited, but considered adequate, given the size of the bank and level of opportunity in their assessment area. Community development loans are those that do not meet the definition of a

home mortgage, small business, or small farm loan, unless it is a multifamily dwelling, but do meet the definition of community development contained in the CRA regulation (12 CFR 25.12(h)). M&I FNB's business niche is home mortgage loans and small business lending, so the majority of their loans have already been considered in other parts of the lending test. Since there are no low- or moderate-income tracts in the bank's assessment area, a community development loan for this bank must have its primary purpose fall into 1 of the following 3 categories: affordable housing for low- or moderate-income individuals, community services targeted to low- or moderate-income individuals, or activities that promote economic development by financing small businesses or small farms.

Based on information received from bank management, we determined that the bank originated 4 community development loans, totaling \$420,361, in its assessment area since the last examination. Three of these loans were for multifamily rental units, specifically for low- and moderate-income individuals. Income requirements for these buildings are regulated by the Department of Housing and Urban Development (HUD). One loan was to an economic development corporation, for the purpose of buying a building, to be used as a small business incubator for new small businesses. This loan was made in December, 1994, which was prior to the data collection requirements for small business loans, so since it was not counted as a small business loan, it was included as a community development loan.

Innovative or Flexible Lending Practices - M&I FNB uses flexible lending practices to help address the credit needs of low- and moderate income individuals and small businesses and farms. The bank's flexible lending programs are summarized as follows:

Neighborhood Home Loan Program (NHLP)- M&I FNB began offering this program in January, 1997. It is designed to provide low- and moderate- income households better access to home ownership than traditional lending methods for the purchase and/or refinance of primary residences. NHLP allows for a down payment as low as 3%, and private mortgage insurance is not required. Cash reserves are not required and debt ratios are slightly more liberal than standard underwriting guidelines. The standard application fee of \$295 is not collected unless the loan closes. Additionally, the bank is responsible for paying the cost of the credit report and appraisal if the loan does not close. The product is only available in the bank's assessment area and the borrower's income may not exceed 100% of the HUD defined area median income. To date, M&I FNB has originated 4 loans, totaling \$169,505, under this program.

Piggy-Back Mortgage - M&I FNB began offering this product in January, 1997. It is designed to allow a customer to take out a second mortgage for the down payment on their home. M&I may lend up to 100% of the home's value. Advantages to the customer include avoiding PMI insurance, and unlike PMI payments, interest on the second mortgage is tax-deductible. To date, M&I FNB has originated 3 loans, totaling \$79,000, under this program.

M&I FNB also demonstrates flexibility in helping to meet special needs of the community by offering several government funded or guaranteed loan products. Loan activity with respect to government loan programs is summarized below:

Small Business Administration Loans (SBA)- Activity included in the small business data.

Farmers Home Administration Loans (FmHA)- Activity included in the small business data.

Wisconsin Housing & Economic Development Authority (WHEDA) HOME Program- 8 originations, totaling \$668,309 between January 1, 1995 and March 31, 1997.

WHEDA Home Improvement Loan- 1 origination, \$4,192, funded on 6/28/96.

State Veterans Administration (VA) Loan- 2 originations, totaling \$158,803.

M&I FNB also offers student loans.

Investment Test

M&I FNB's level of qualified investments and grants is limited, but considered adequate given the level of opportunity in their assessment area. Additionally, investment decisions for the bank are made at the corporate level, although corporate management is generally responsive to investment recommendations from bank management. Based on discussions with bank management and other community contacts, there is a low level of opportunity for qualified community development investments in the bank's assessment area. This is primarily due to the lack of low- or moderate-income geographies in the bank's assessment area. Going forward, the bank is encouraged to be innovative and responsive to available opportunities for qualified investments and grants that benefit its assessment area.

In 1995 and 1996, M&I FNB had \$31,000 in qualified grants, in the form of donations to their local United Way chapter. United Way contributes to local charities in Washington County, several of which specifically provide services for low-income individuals. These services include subsidized child care for low-income families and homeless assistance.

Service Test

Overall, M&I FNB's services demonstrate:

- ▶ delivery systems that are accessible to essentially all portions of their assessment area.
- ▶ a record of opening and closing branches that has improved the accessibility of its delivery systems.
- ▶ business hours and services that are convenient for its customers.
- ▶ an adequate level of community services.

Retail Banking Services

Given the bank's size and financial capacity, delivery systems are accessible to essentially all portions of M&I FNB's assessment area, including low- and moderate-income individuals. M&I operates 5 full service branch offices and 5 additional ATMs in Washington County. Three of the full service branches are located in West Bend, which is in central Washington County and is accessible from all portions of the county. The other 2 branches are in Allenton (western Washington County), and Jackson (southeastern Washington County). All of the branches are in middle-income census tracts (there are no low- or moderate-income census tracts in Washington County). In addition, Marshall & Ilsley Corporation's inter-bank system provides customer access to bank affiliates for check cashing and deposit account transactions statewide. M&I Bank, Menomonee Falls has 2 branches in the southern portion of Washington County, which provide customers living in that portion of the county convenient access to the bank's products and services. M&I FNB does not have a branch in the immediate Hartford area, but there are several local banks that service this area.

M&I FNB's record of opening and closing offices has improved the accessibility of its delivery systems in its assessment area, including low- and moderate-income individuals. The bank's branch network increased from 2 to 5 in late 1994, due to acquisition activity. They have not closed any branch offices.

Branch hours are reasonable and convenient to all customers. All of the branches have drive-up facilities, are open late on Fridays (until 6 or 7 PM), and have Saturday morning hours. Four of 5 locations open their drive-up facilities at 7:30 AM, Monday through Friday. M&I FNB has a wide variety of products and services that are offered consistently at all branches.

M&I FNB offers all customers access to the following alternative delivery services:

- ATM cards (proprietary and nonproprietary),
- M&I Direct, 24 hour banking by phone (no cost),
- M&I Direct, 24 hour banking by computer (low cost), and
- banking by mail.

Community Development Services

M&I FNB provides an adequate level of community development services. These services help to

meet the financial service needs of the community, and provide community members (especially low and moderate income individuals) with information, education and counseling regarding credit and financial services. Below are examples of community development services provided by the bank:

Seminars - The bank periodically holds WHEDA approved, home buyers seminars for all members of its community, but especially geared to low- and moderate-income individuals. The seminar discusses the basics of buying a home, and qualifications for the WHEDA program, conventional programs, and other government assisted programs.

Financial Aid Nights- The bank periodically participates in financial aid seminars at local high schools. Bank employees represent the bank at these seminars and provide information on federal student loan programs and financial aid workbooks.

Credit Counseling - The bank's lenders provide credit counseling to small businesses and low- and moderate-income individuals on a request basis. They also educate these customers on the flexible and government loan programs for which they could be eligible.

Small Business/Non-Profit Checking Account- a lower-cost checking account is available for small businesses and non-profits with low transaction activity.

Trust Services - the banks provides trust services under substantially reduced fee schedules for an organization who provides services and job opportunities for persons with disabilities, many of whom are low- to moderate-income individuals.

In addition to the above, many of M&I FNB's employees are involved in various small business and economic development related community groups. Periodically, they will represent the bank by making a financial services or credit related presentation to these groups. M&I FNB employees also participate in banking presentations at local schools.

Fair Lending Review

No violations of the substantive provisions of the antidiscrimination laws and regulations (ECOA, FHA, or HMDA) were identified. M&I FNB's fair lending policies, procedures, training programs, and internal assessment efforts have been effective in assisting lenders in these issues.

Metropolitan Statistical Areas

Conclusions with respect to performance tests in Milwaukee, WI MSA

M&I FNB's CRA performance within the Milwaukee, WI MSA is consistent with the overall performance and rating of the bank. The bank's assessment area is smaller than the boundaries of the Milwaukee MSA.

Appendix

Scope of Examination

The table below lists the scope of the examination. Specifically, it lists the lending products reviewed, M&I FNB's assessment area, and the time period covered in the review.

Scope of Examination			
Time Period Reviewed	1995 and 1996		
Financial institution	Products Reviewed		
M&I FNB, West Bend, WI	Real Estate Loans reported on HMDA LAR, Small business and Small farm, loans.		
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Other Information
Washington County, WI (Milwaukee MSA)	on-site	Main Office	See "Description of Assessment Area"

Definitions

Low-Income means an individual income that is less than 50% of the area median income, or a median family income (MFI) that is less than 50%, in the case of a geography.

Moderate-Income means an individual income that is at least 50% and less than 80% of the area median income, or a MFI that is at least 50% and less than 80%, in the case of a geography.

Middle-Income means an individual income that is at least 80% and less than 120% of the area median income, or a MFI that is at least 80% and less than 120%, in the case of a geography.

Upper-Income means an individual income that is 120% or more of the area median income, or a MFI that is 120% or more, in the case of a geography.

Geography means a census tract or block numbering area.