

PUBLIC DISCLOSURE

December 20, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

M&I CENTRAL STATE BANK

RSSD Number: 61645

50 Pearl Ave.
Oshkosh, Wisconsin 54901

FEDERAL RESERVE BANK
OF CHICAGO

230 South LaSalle
Chicago, Illinois 60604

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.

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 operations 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 Community Reinvestment Act (CRA) performance of **M&I Central State Bank, Oshkosh, Wisconsin** prepared by the **Federal Reserve Bank of Chicago**, the institution's supervisory agency, as of **December 20, 1999**. 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 228.

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

M&I Central State Bank has a generally strong record of serving its combined assessment area based upon its lending, investment and services activity in its two assessment areas. The bank's overall level of lending is strong. The bank's average twelve-quarter loan-to-deposit ratio is higher than that of its nationwide peer group and compares favorably to its local competitors. The percentage of the bank's overall mortgage, small business and small farm lending within its combined assessment area, as a percentage of its overall lending, exceeded 70%. The geographic distribution of loans was generally strong in both assessment areas. Lending to businesses and farms of different revenue sizes and borrowers of different income levels was also strong. A substantial majority of the bank's small business and small farm loan originations were in original amounts of \$100,000 or less, and were made to businesses and farms with revenues of less than \$1 million. The distribution of the bank's lending to low- and moderate-income borrowers was generally strong considering the percentage of low- and moderate-income families in both assessment areas. Community development lending, investments and services were adequate given the size of the organization and the demographic characteristics of the combined assessment area. Community representatives have stated that many of the community development needs of the combined assessment area are presently being met in large part by government and private agencies.

The following table indicates the performance level of **M&I Central State Bank, Oshkosh, Wisconsin**, with respect to the lending, investment, and service tests. Based on the component test ratings for large banks, the assigned composite rating is **Satisfactory**.

M&I CENTRAL STATE BANK			
Performance Levels	Performance Tests		
	Lending Test (1)	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

(1) The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

DESCRIPTION OF INSTITUTION

M&I Central State Bank is a wholly owned subsidiary of Marshall & Ilsley Corporation, a multi-bank holding company based in Milwaukee, Wisconsin. Marshall & Ilsley Corporation had total assets of approximately \$25.2 billion as of September 30, 2000. M&I Central State Bank had total assets of \$461.1 million as of December 31, 2000. No financial or legal impediments exist that might affect this institution's ability to meet the credit needs of its combined assessment area.

The bank's branch network consists of its main office, seven full-service branches and one limited-service loan production office. The main office is located in the City of Oshkosh in Winnebago County and the branches are located within the bank's two assessment areas encompassing portions of Winnebago, Fond du Lac and Green Lake Counties. Automated teller machines (ATMs) are also available at several branch and off-site locations.

Competition within the bank's combined assessment area is intense, as both large financial institutions from the nearby cities of Green Bay and Appleton, as well as smaller banks, thrifts and credit unions in the locality, compete for deposits and loans. The primary depository institution competitors within the bank's combined assessment area are highlighted in Table 1 below:

Table 1 COMPETITORS WITHIN M&I CENTRAL STATE BANK'S COMBINED ASSESSMENT AREA		
Competitor Name	Headquarters	Competing Locations
Associated Bank, N.A.	Neenah	Oshkosh
F&M Bank-Wisconsin	Kaukauna	Oshkosh
West Pointe Bank	Oshkosh	Oshkosh
Bank One, Wisconsin	Milwaukee	Oshkosh & Fond du Lac
Firststar Bank, N.A.	Cincinnati, OH	Oshkosh & Fond du Lac
Fox Valley Savings & Loan	Fond du Lac	Oshkosh & Fond du Lac
American Bank	Fond du Lac	Fond du Lac
Associated Bank Lakeshore, N.A.	Manitowoc	Fond du Lac
Mutual Savings Bank	Milwaukee	Fond du Lac
National Exchange Bank and Trust	Fond du Lac	Fond du Lac
AnchorBank, S.S.B.	Madison	Oshkosh & Ripon
Horicon State Bank	Horicon	Ripon

The bank offers a variety of credit products to consumers, small businesses and small farms in its combined assessment area. The types of credit offered by the bank include commercial, residential real estate mortgage (including fixed- and adjustable-rate, home equity and construction loans), agricultural, consumer and student loans. The bank also participates in several government guaranteed loan programs including those offered by the Small Business Administration (SBA), the State and Federal

Veterans Administration (VA), and the Wisconsin Housing and Economic Development Authority (WHEDA).

The bank's loan portfolio as of September 30, 2000 reflects a significant level of diversification within the consumer and commercial lending categories, as detailed in Table 2.

Table 2		
M&I CENTRAL STATE BANK'S LOAN PORTFOLIO		
AS OF SEPTEMBER 30, 2000		
Loan Type	Amount (\$000s)	% of Total Loans
1-4 Family Residential Real Estate	139,465	44.7%
Commercial Real Estate	45,039	14.4%
Commercial and Industrial	55,921	17.9%
1-4 Family Residential Real Estate – Revolving	12,436	4.0%
Consumer	14,639	4.7%
Multi-family Real Estate	9,827	3.2%
Construction and Land Development	4,613	1.4%
State and Political Subdivisions	12,047	3.9%
Agricultural (including farmland)	17,974	5.8%
Total	311,961	100.0%
<i>Note: Loans and Leases totaled approximately 67% of total assets as of September 30, 2000.</i>		

The largest percentage of the bank's portfolio based upon dollar amount is 1-4 family residential real estate loans followed by commercial real estate loans. Total residential real estate lending represents 48.7% while all commercial lending, including commercial real estate lending, represents 32.3% of the bank's loan portfolio.

DESCRIPTION OF M&I CENTRAL STATE BANK'S ASSESSMENT AREAS

The bank has defined two separate assessment areas, which include portions of Winnebago, Fond du Lac and Green Lake counties. The first assessment area is hereinafter referred to as the "Winnebago Assessment Area", and the second assessment area will be referred to as the "non-MSA Assessment Area". The two assessment areas together consist of 41 geographies (census tracts or block numbering areas), that include one low-, six moderate-, 29 middle-, and five upper-income geographies.

The population of the combined assessment area is 149,503 and the median family income is \$33,058, based on 1990 census data. Low- and moderate-income families represent 16.3% and 19.2%, respectively, of all families in the combined assessment area, which is generally consistent with the corresponding percentages for the State of Wisconsin (State) overall and for all non-metropolitan areas within the State. Current demographic information indicates that the population has grown moderately and that median family income has grown significantly since the 1990 census. The changes in

demographic characteristics will be detailed in the discussions of each of the two assessment areas that follow.

Winnebago Assessment Area

The Winnebago Assessment Area includes 20 census tracts encompassing a large portion of Winnebago County. The assessment area, which includes one low-income, five moderate-income and 14 middle-income census tracts, is also part of the Appleton-Oshkosh-Neenah MSA (MSA 0460). This MSA includes Outagamie, Winnebago and Calumet Counties.

The following table details population and median family income characteristics for this assessment area, Winnebago County, the MSA and the State, based upon 1990 census data:

Table 3 COMPARISON OF SELECTED DEMOGRAPHIC DATA FROM M&I CENTRAL STATE BANK'S WINNEBAGO ASSESSMENT AREA AND OTHER REGIONS						
Region	Population	Median Family Income	% of Families in Each Income Level			
			Low- Income	Moderate- Income	Middle- Income	Upper- Income
Winnebago Assessment Area	75,112	\$33,052	19.9%	22.1%	29.5%	28.5%
Winnebago County	140,320	\$35,821	17.1%	20.1%	28.9%	33.9%
MSA 0460	315,121	\$37,202	15.4%	18.8%	30.3%	35.6%
State	4,891,769	\$35,082	17.9%	18.7%	26.5%	36.9%
<i>Note: Approximately 6.0% of the families in the assessment area, 5.3% in Winnebago County, 4.9% in the MSA and 7.6% in the State have incomes below the poverty level.</i>						
<i>Source: 1990 Census Data</i>						

The Winnebago assessment area includes a higher number of low- and moderate-income families than the county as a whole, the MSA or the State as the preceding table indicates. This is primarily due to the fact that the bank's assessment area includes six of the MSA's nine low- and moderate-income census tracts. Furthermore, none of the upper-income census tracts in the county are within the bank's assessment area. The median family income is also generally lower than that of the county, MSA, and State, due to a higher percentage of low- and moderate-income families in the assessment area.

The population of Winnebago County increased by an estimated 11% between 1990 and 2000 to 155,922 according to the State of Wisconsin Department of Administration (WDA). This rate of increase is slightly higher than the State's 8.6% figure for the same period. The largest city in the county, Oshkosh (2000 population: 63,192), has seen the largest numerical increase and represents approximately 50% of the total increase in the county's population during the decade. The 5th largest city in the county, Algoma (2000 population: 4,835), has had the highest percentage growth (38%) in the county. Both cities are located in the bank's assessment area.

Median family income in Winnebago County has increased significantly since the 1990 census. Current information from the Department of Housing and Urban Development (HUD) indicates that the county's estimated median family income is \$56,600 for 2000, an increase of 58.0% since 1990. This compares favorably to the estimated growth of 55.1% for all metropolitan areas of the State and 54.8% for the State overall.

Winnebago County's economy is generally strong. Unemployment in the county remains near its lowest levels in a decade and remains one of the lowest in the State. The county's December 2000 unadjusted unemployment rate of 2.0% was the 5th lowest in the State - Dane County had the lowest rate at 1.3% - according to the State of Wisconsin Department of Workforce Development (DWD). The recent downturn in the national and state economies has not significantly affected the county's current economic outlook. Winnebago County's unemployment rate has increased by only 0.3% in the past year, as several counties in the State have seen their unemployment rates increase by 0.5% or more.

The largest private sector employers (1,000 employees or more) in the county include Kimberly Clark Corp. (paper products), Menasha Corp. (paper products) and Oshkosh Truck Corp. (trucks). There are also a number of other manufacturers, hospitals and other health care providers in the area with 1,000 employees or more, according to the DWD.

There are 29,451 housing units in the assessment area based upon 1990 census data, of which 60.3% are owner-occupied and 34.4% are renter-occupied. There has been an 18% increase in the number of total housing units built or otherwise made available in the past 10 years according to the WDA. The median housing value of homes in the assessment area is \$56,981 compared to \$59,714 for the county, \$61,999 for the MSA and \$62,141 for the State based on 1990 census data. The median sales price of a home in Winnebago County increased by 8.7% to \$99,700 from December 1999 to December 2000, based on information provided by the Wisconsin Realtors Association (WRA). The median price of homes has increased by 5.1% to \$118,400 for the State during the same period.

A review of the housing affordability index details the relative affordability in the assessment area compared to the State. The affordability index (ratio) is calculated by dividing the median housing value by the median family income for a given area. An area with a higher ratio generally has less affordable housing than an area with a lower ratio.

The affordability ratio is 1.72 for both the assessment area and the county, compared to 1.67 and 1.77 for the MSA and the State, respectively, suggesting that the housing affordability in this assessment area is comparable to that of the MSA and the State based upon 1990 census data. The county's affordability ratio remains relatively stable at 1.76, using recent home sales data and the HUD-adjusted MSA median family income as proxies for median housing values and median family income. The same ratio for the State, however, has increased to 2.18, primarily a result of significant increases in housing values and growth in certain counties surrounding the Madison, Milwaukee and La Crosse MSAs. The

ratio for the Appleton-Oshkosh-Neenah MSA is approximately 1.88 using data provided by the National Association of Realtors and HUD. The higher relative affordability of housing in the Appleton-Oshkosh-Neenah MSA is attributable to higher sales prices and growth in Outagamie County compared to the other two counties in the MSA.

Non-MSA Assessment Area

The non-MSA assessment area includes 18 census tracts and two block numbering areas (BNAs), encompassing a majority of Fond du Lac County and a smaller portion of the eastern section of Green Lake County. The assessment area includes one moderate-, 14 middle- and five upper-income geographies. Fond du Lac County, which is directly south of the Appleton-Oshkosh-Neenah MSA, is readily accessible by U.S. Highway 41 from either the MSA to the north or the Milwaukee MSA to the south. Green Lake County is adjacent to and west of Fond du Lac County.

The following table provides the population, median family income and percentage of families in each income designation for the assessment area, each county, all non-metropolitan areas in the State and the State of Wisconsin (State), based upon 1990 census data:

Table 4 COMPARISON OF SELECTED DEMOGRAPHIC DATA FROM M&I CENTRAL STATE BANK'S NON-MSA ASSESSMENT AREA AND OTHER REGIONS						
Region	Population	Median Family Income	% of Families in Each Income Level			
			Low- Income	Moderate- Income	Middle- Income	Upper- Income
Non-MSA Assessment Area	74,931	\$33,068	12.9%	16.5%	27.3%	43.3%
Fond du Lac County	90,083	\$34,258	11.9%	15.9%	26.6%	45.6%
Green Lake County	18,651	\$30,284	16.8%	19.4%	27.4%	36.4%
Non-Metropolitan Areas (1)	1,560,597	\$30,290	17.6%	19.5%	25.4%	37.5%
State	4,891,769	\$35,082	17.9%	18.7%	26.5%	36.9%

(1) In the State of Wisconsin combined.
 Note: approximately 6.1% of the families in the assessment area, 5.6% in Fond du Lac County, 7.4% in Green Lake County, 7.9% in all non-metropolitan areas of the State and 7.6% in the State have incomes below the poverty level.
 Source: 1990 Census Data.

The bank's non-MSA assessment area has similar demographic characteristics in comparison to those of all other non-metropolitan areas in the State. Low- and moderate-income families are a smaller percentage of the population and incomes are generally below those of the State, consistent with all non-metropolitan areas of the State. In the assessment area, however, median family income is closer to the levels of the State and the Appleton-Oshkosh-Neenah MSA (Table 3) primarily due to the region's proximity to the MSA.

The populations of Fond du Lac and Green Lake Counties increased by an estimated 8% and 5%, respectively, between 1990 and 2000 to 97,313 in Fond du Lac County and 19,608 in Green Lake County according to the WDA. The city of Fond du Lac is the largest community in Fond du Lac County with an estimated 2000 population of 41,618, followed by Ripon with an estimated population of 7,639. Both are in the bank’s assessment area. The bank’s assessment area encompasses approximately 50% of the population of Green Lake County, but does not include the county’s largest city, Berlin (2000 population: 5,432).

Recent HUD 2000 estimates indicate that median family income increased by 52.1% since 1990 to \$52,100 in Fond du Lac County and by 53.5% to \$46,500 in Green Lake County. These are significant increases, although they are slightly lower than the 54.2% increase since 1990 for all non-metropolitan areas of the State and the 54.8% increase for the State overall.

Selected unemployment figures for the two-county region and the State are detailed below based upon information from the DWD:

Table 5 SELECTED UNEMPLOYMENT DATA BY COUNTY AND STATE			
Region	December 1999	December 2000	Ranking in State (1)
Fond du Lac County	2.3%	2.9%	20 th
Green Lake County	4.6%	4.4%	50 th
State of Wisconsin	2.6%	3.0%	N/A

(1) Rankings are as of December 2000 based on 72 counties in the State.
Note: The unemployment figures above are not seasonally adjusted.

Fond du Lac County’s economic strength lies in its proximity to the Appleton-Oshkosh-Neenah and Milwaukee MSAs, as well as the presence of the operations of several large corporations in the county. A large portion of the county’s workforce commutes to these two regions (MSAs) and to Dodge County located directly south, according to the WDA. The largest private sector employers in the county (with 1,000 employees or more) include Brunswick Corporation (marine engines), Agnesian Healthcare, Inc. (health care), Raytheon Corp. (washing machines) and Giddings & Lewis (machine tools). The 10 largest private sector companies employ approximately 20% of the county’s workforce.

The Green Lake County economy is dependent upon recreation and tourism, according to the WDA, due to the presence of Green Lake, the deepest lake in Wisconsin, and the presence of a highly regarded resort and a number of highly rated golf courses. There are, however, no major corporations, universities or medical centers in the county. Many of the towns in the county could be considered “bedroom communities” for the larger metropolitan areas nearby. Almost 47% of the county’s residents worked outside of the county, primarily in Fond du Lac County, according to the WDA, based upon the most recent available figures.

There are 29,737 housing units in the assessment area based upon 1990 census data, of which 65.3% are owner-occupied and 28.9% are renter-occupied. While population in the two counties has grown by 5% - 8% in the past decade, total housing has increased by approximately 14% (WDA). The affordability ratios for the assessment area, the two counties (Fond du Lac and Green Lake) and for all non-metropolitan areas of the State are similar based on 1990 census data; the ratios are 1.61, 1.63, 1.60 and 1.65, respectively. Information obtained from the WRA for Fond du Lac County suggests that home prices in the region have not increased considerably during the past year. Median home prices in the county increased 1.3% in 2000 to \$95,300. The affordability ratio for Fond du Lac County has remained relatively stable at year-end 2000 at 1.68 based upon housing data provided by the WRA and HUD's estimated 2000 median family income in the Appleton-Oshkosh-Neenah MSA. The MSA median family income was used since Fond du Lac County's demographic characteristics parallel the MSA's characteristics rather than all other non-metropolitan areas of the State. Similar housing data is not currently available for Green Lake County.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

M&I Central State Bank's performance under the lending, investment and service tests is summarized in each section below.

LENDING TEST

The assessment of M&I Central State Bank's performance includes its overall lending activity, community development lending, lending concentration, geographic distribution of lending, distribution of lending to borrowers of different income levels, lending to small businesses and small farms and product innovation and flexibility.

Lending Volume

The bank's overall lending levels reflect a generally strong responsiveness to credit needs within its combined assessment area. The bank's average net loan-to-deposit ratio over the past twelve quarters is 89.36%, and compares favorably to that of its national peer group, which is 76.51%. The following table compares the bank's net loan-to-deposit ratio to that of its competitors and its peers:

Table 6		
A COMPARISON OF NET LOAN-TO-DEPOSIT RATIOS FOR M&I CENTRAL STATE BANK AND ITS COMPETITORS		
Bank	Total Assets as of 12/31/00 (\$ in millions)	12-Quarter Average through 12/31/00
Bank One, Wisconsin	\$7,695.7	125.20%
Horicon State Bank	\$296.2	106.40%
West Pointe Bank	\$143.0	104.05%

Bank	Total Assets as of 12/31/00 (\$ in millions)	12-Quarter Average through 12/31/00
Associated Bank, N.A.	\$763.9	98.71%
F&M Bank-Wisconsin	\$2,212.9	94.90%
Firststar Bank, N.A.	\$72,593.6	94.15%
Associated Bank Lakeshore, N.A.	\$623.6	91.86%
M&I Central State Bank	\$461.1	89.36%
National Exchange Bank and Trust	\$729.1	88.55%
American Bank	\$171.5	86.01%
Mutual Savings Bank (1) (2)	\$1,780.4	80.71%
PEER	N/A	76.51%
AnchorBank, S.S.B. (1)	\$3,042.3	N/A
Fox Valley Savings & Loan (1)	\$241.8	N/A
<i>N/A - Not available</i>		
<i>(1) Total assets as of September 30, 2000</i>		
<i>(2) Ratio is an 11-quarter average through September 30, 2000</i>		

Combined Assessment Area Concentration

A substantial percentage of the bank's total 1998, 1999 and year-to-date 2000 HMDA-reportable lending was originated within its combined assessment area. The analysis of the bank's lending includes its own HMDA-reportable loans as well as those of its affiliate, M&I Mortgage Corp., including those loans referred to it by this bank. Table 7 details the volume and percentages of 1998, 1999 and year-to-date 2000 HMDA-reportable loans that were originated within the bank's combined assessment area by product type.

Loan Product	Total Number of Mortgages			Percentage of Lending Activity within its Combined Assessment Area		
	1998	1999	YTD 2000 (1)	1998	1999	YTD 2000 (1)
Home Purchase	299	295	183	72%	75%	68%
Refinancing	775	478	142	79%	82%	73%
Home Improvement	127	108	81	84%	84%	81%
Total Mortgage Loans	1,201	881	406	78%	80%	72%
<i>(1) Year-to-date data through September 30, 2000</i>						

A significant percentage of the number and dollar amount of the bank's 1998 and 1999 small business- and small farm-reportable lending, was also originated in its combined assessment area. Small business

loans are commercial loans with original amounts of \$1 million or less and small farm loans are agricultural purpose loans with original amounts of \$500,000 or less. Small business and small farm lending data is reflected in the table below:

Year	Loan Product	Total Originations		Within the Assessment Area			
		#	\$(000s)	#	%	\$(000s)	%
1998	Small Business	604	\$76,672	511	85%	\$59,051	77%
	Small Farm	341	\$15,525	289	85%	\$12,324	79%
1999	Small Business	401	\$58,538	346	86%	\$45,720	78%
	Small Farm	228	\$13,300	212	93%	\$12,115	91%

Note: Year-to-date data for 2000 is not available.

As Tables 7 and 8 illustrate, more than 70% of HMDA-reportable loans and 85% or more of the bank's small business and small farm lending is originated within its combined assessment area. The bank's lending reflects a high responsiveness to its combined assessment area's credit needs.

Geographic Distribution

Non-MSA Assessment Area

The geographic distribution of the bank's HMDA-, small business- and small farm-reportable lending is generally strong. The bank originated two mortgage loans in the one moderate-income census tract in its non-MSA assessment area for the three-year period under review. Data for the aggregate is not available, as the assessment area is not part of an MSA. Nevertheless, opportunities to lend in the moderate-income tract are limited since there were only 324 housing units in the tract, including approximately 50 owner-occupied units based upon 1990 census data. Furthermore, the median family income in the tract is 67.8% of the State's non-metropolitan median family income, near the lower end of the moderate-income category. These factors suggest that there may be only a limited number of potential borrowers in any given year. There are no low-income tracts in the assessment area.

The opportunities for small business and small farm lending and actual lending in the sole moderate-income tract have been limited based on a review of bank and aggregate lending volumes for 1998 and 1999. The bank's small business originations ranged between 2% in 1998 to 4% in 1999 of total lending; small business loans in the one moderate-income tract totaled 4 each year. In comparison, the percentage of the aggregate's total small business lending in the moderate-income census tract was 7% in 1998 and 6% in 1999. The bank did not have any small farm loans in either year in the one moderate-income tract due to its largely urban nature. Aggregate data indicates that a negligible number of small farm loans were made in the sole moderate-income tract during the same period.

Winnebago Assessment Area

The geographic distribution of the bank's loans in its Winnebago assessment area is generally strong. The following two tables reflect the bank's 1998 and 1999 HMDA-reportable lending in the Winnebago assessment area:

Table 9 COMPARISON OF M&I CENTRAL STATE BANK AND AGGREGATE HMDA-REPORTABLE LENDING IN 1998 IN THE WINNEBAGO ASSESSMENT AREA				
Census Tract	Bank		Aggregate (1)	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
Low-income	1	<1%	31	1%
Moderate-income	58	11%	567	15%
Middle-income	472	89%	3,182	84%
Upper-income (2)	N/A	N/A	N/A	N/A
Total	531	100%	3,780	100%

(1) Aggregate data excludes M&I Central State Bank originations.
(2) There are no upper-income census tracts in the assessment area.
N/A= Not applicable

Table 10 COMPARISON OF M&I CENTRAL STATE BANK AND AGGREGATE HMDA-REPORTABLE LENDING IN 1999 IN THE WINNEBAGO ASSESSMENT AREA				
Census Tract	Bank		Aggregate (1)	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
Low-income	2	1%	20	<1%
Moderate-income	42	12%	488	16%
Middle-income	313	87%	2,450	83%
Upper-income (2)	N/A	N/A	N/A	N/A
Total	357	100%	2,958	100%

(1) Aggregate data excludes M&I Central State Bank originations.
(2) There are no upper-income census tracts in the assessment area.
N/A= Not applicable

The distribution of the bank's HMDA-reportable lending in low- and moderate-income geographies is generally strong. Bank lending compares favorably with the percentage of aggregate lending in the six low- and moderate-income tracts on a year-to-year basis as detailed in the preceding tables. Additionally, bank lending represents approximately 9% of the total of 1998 and 1999 aggregate lending in low- and moderate-income tracts. The bank's HMDA-reportable lending in the moderate-income census tracts through September 30, 2000 represented 12% (23 loans) of the bank's total loan

originations during the year. The bank did not originate any loans in the one low-income tract.

The geographic distribution of the bank's small business loans as detailed in Tables 11 and 12 is strong. The geographic distribution of the bank's small business originations ranged between 23% in 1998 to 24% in 1999 of total lending. In comparison, the percentage of the aggregate's total small business lending in moderate-income census tracts was 18% in 1998 and 17% in 1999.

In addition, an analysis of the bank's small business lending by original loan amount indicates that a significant percentage of the bank's loans with an original amount of \$100,000 or less were originated in low- and moderate-income census tracts. Table 11 indicates that 22% of the bank's 1998 loans in low- and moderate-income tracts were in original amounts of \$100,000 or less compared to 18% for the aggregate. Table 12 indicates that 27% of the bank's 1999 loans in low- and moderate-income tracts were in original amounts of \$100,000 or less compared to 18% for the aggregate.

Table 11 COMPARISON OF 1998 M&I CENTRAL STATE BANK AND AGGREGATE SMALL BUSINESS LENDING IN LOW- AND MODERATE-INCOME CENSUS TRACTS TO ORIGINAL LOAN AMOUNT AND BORROWER REVENUE, IN THE WINNEBAGO ASSESSMENT AREA				
Original Loan Amount	Bank		Aggregate (1)	
	# of Loans in Low- and Moderate- Income tracts	% of Total Loans in Low- and Moderate- Income tracts	# of Loans in Low- and Moderate- Income tracts	% of Total Loans in Low- and Moderate- Income tracts
<= \$100,000	44	22%	182	18%
> \$100,000 to \$250,000	13	22%	29	18%
> \$250,000	10	25%	17	15%
Total	67	23%	228	18%
Revenues of \$1 million or less	52	24%	136	17%

(1) Aggregate data excludes M&I Central State Bank originations.

Original Loan Amount	Bank		Aggregate ⁽¹⁾	
	# of Loans in Low- and Moderate- Income Tracts	% of Total Loans in Low- and Moderate- Income Tracts	# of Loans in Low- and Moderate- Income Tracts	% of Total Loans in Low- and Moderate- Income Tracts
<= \$100,000	35	27%	150	18%
> \$100,000 to \$250,000	6	19%	17	14%
> \$250,000	4	14%	12	15%
Total	45	24%	179	17%
Revenues of \$1 million or less	37	26%	123	17%

(1) Aggregate data excludes M&I Central State Bank originations.

Bank lending represented a higher percentage of loans in original amounts of \$1 million or less compared to the aggregate in each year. Furthermore, the bank's share of total small business loans made in low- and moderate-income tracts by all such reporters was 38% in 1998 and 23% in 1999. Lastly, a substantial majority of the bank's small business loans, in each year, in the low- and moderate-income tracts were in original amounts of \$100,000 or less, amounts typically needed by smaller business. The bank did not originate any small farm loans in its low- or moderate-income tracts. The aggregate's lending in these tracts was also negligible in number. These tracts, located in the downtown Oshkosh area, are primarily urban in nature and would provide limited opportunities.

Lending Distribution by Borrower's Income or Business Revenue

The bank's overall lending to borrowers of different income levels and businesses and farms of different revenue sizes reflects a generally strong level of penetration. The following tables and narrative illustrate the distribution of the bank's HMDA-reportable lending by borrower income characteristics, and small business and small farm lending based upon the loan size and revenue size of the business or farm.

Non-MSA Assessment Area

The bank has a strong record of lending to borrowers of different income levels based on its HMDA-reportable lending data, the income characteristics of the assessment area population and the housing market within the two-county region. Approximately 29% of the assessment area families are low- and moderate-income; 6% of families have incomes below the poverty level, based upon 1990 census data. The bank's lending to low-and-moderate income individuals has increased from 16% in 1998 to 24% for year-to-date 2000. Table 13 provides the distribution of HMDA-reportable loans to low- and moderate-income borrowers in the assessment area over the three-year period:

Table 13 INCOME DISTRIBUTION OF M&I CENTRAL STATE BANK'S HMDA-REPORTABLE LENDING IN THE NON-MSA ASSESSMENT AREA							
Income Level of Borrower	HMDA-Reportable Loans						Percentage of Families Within the Assessment Area (1990 census data) (2)
	1998		1999		YTD 2000 (1)		
	#	%	#	%	#	%	
Low-income	21	3%	28	5%	12	6%	12.9%
Moderate-income	86	13%	87	17%	38	18%	16.5%
Middle-income	217	32%	167	32%	66	31%	27.3%
Upper-income	346	52%	242	46%	98	46%	43.3%

(1) Year-to-date data through September 30, 2000.
 (2) 6.1% of families have incomes below the poverty level.
 Note: HMDA-reportable loans are loans originated and reported by the bank and its affiliate, M&I Mortgage Corp.

The bank's overall small business and small farm lending within the non-MSA assessment area is very strong. The bank originates the majority of its reported small business and small farm loans in amounts of \$100,000 or less, amounts typically needed by very small businesses and farms. A higher percentage of such loans suggests that the bank targets these types of commercial enterprises. The following table details the bank's distribution of 1998 reportable small business and farm lending by loan size:

Table 14 M&I CENTRAL STATE BANK'S 1998 DISTRIBUTION OF SMALL BUSINESS AND SMALL FARM LOANS BY LOAN SIZE IN THE NON-MSA ASSESSMENT AREA				
Original Loan Amount	Small Business		Small Farm	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
<= \$100,000	166	77%	179	89%
> \$100,000 to \$250,000	29	13%	17	8%
> \$ 250,000 up to maximum (1)	21	10%	5	3%
Total	216	100%	201	100%

(1) Maximum loan amount is \$1 million for small business loans and \$500,000 for small farm loans.

The following table provides similar data for 1999:

Table 15

M&I CENTRAL STATE BANK'S 1999 DISTRIBUTION OF SMALL BUSINESS AND SMALL FARM LOANS BY LOAN SIZE IN NON-MSA ASSESSMENT AREA				
Original Loan Amount	Small Business		Small Farm	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
<= \$100,000	109	70%	128	80%
> \$100,000 to \$250,000	24	15%	28	17%
> \$ 250,000 up to maximum (1)	24	15%	4	3%
Total	157	100%	160	100%

(1) Maximum loan amount is \$1 million for small business loans and \$500,000 for small farm loans.

A secondary analysis of the bank's performance with respect to lending to small businesses and farms is its lending to businesses and farms with revenues of \$1 million or less, independent of original loan amount. In 1998, approximately 80% of small business loans and 100% of small farm loans were made to borrowers with revenues of \$1 million or less. The ratios for 1999 were comparable to prior year figures, for both loan products.

Winnebago Assessment Area

The bank's record of lending to borrowers of different income levels in the Winnebago assessment area is strong. Table 16 provides the distribution of HMDA-reportable loans to low- and moderate-income borrowers in the assessment area over the three-year period:

Table 16 INCOME DISTRIBUTION OF M&I CENTRAL STATE BANK'S HMDA-REPORTABLE LENDING IN WINNEBAGO ASSESSMENT AREA							
Income Level of Borrower	HMDA-Reportable Loans						Percentage of Families Within the Assessment Area (1990 census data) (2)
	1998		1999		YTD 2000 (1)		
	#	%	#	%	#	%	
Low-income	35	7%	38	11%	9	5%	19.9%
Moderate-income	90	17%	76	21%	48	25%	22.1%
Middle-income	179	34%	95	27%	66	34%	29.5%
Upper-income	227	42%	148	41%	69	36%	28.5%

(1) Year-to-date data through September 30, 2000.
(2) 6.0% of families have incomes below the poverty level.
Note: HMDA-reportable loans include loans originated and reported by the bank's affiliate, M&I Mortgage Corp.

The information in Table 16 indicates that the bank's lending to low- and moderate-income borrowers, as a percentage of all HMDA-reportable loans made each year, is lower than the percentage distribution of such families in the assessment area. This is not unusual, however, since low- and moderate-income individuals and families often have difficulties in saving for a down payment. In

addition, 6% of the families in this assessment area have an annual income that is below the poverty level. Families in this situation are even less likely unlikely to be homeowners due to their very low income in relation to housing prices. Housing prices that increase at a faster rate than family income further limit opportunities for homeownership by low- and moderate-income families. Thus, the bank’s lending to low- and moderate-income borrowers is considered to be reasonable.

The percentages of the bank’s HMDA-reportable lending to low- and moderate-income borrowers have increased each period from 1998 through September 30, 2000, as shown in Table 16. These percentages are lower than aggregate lending levels for the same periods. Nevertheless, bank lending represented over 10% of all HMDA-reportable loans made to low- and moderate-income borrowers for 1998 and 1999 combined. This large volume of bank and affiliate lending occurred despite the presence of a number of other mortgage lenders in this market and an increase in interest rates. This is a clear indication that the bank’s performance in meeting the mortgage loan needs of low- and moderate-income borrowers is strong despite the fact that the percentage distributions of the bank’s loans to low- and moderate-income borrowers are less than those of the aggregate. Furthermore, the bank’s percentages have generally been trending upward.

A significant percentage of the bank’s 1998 and 1999 small business lending in the assessment area is in original amounts of \$100,000 or less, as shown in tables 17 and 18 below.

Table 17 M&I CENTRAL STATE BANK’S 1998 DISTRIBUTION OF SMALL BUSINESS AND SMALL FARM LOANS BY LOAN SIZE IN THE WINNEBAGO ASSESSMENT AREA				
Original Loan Amount	Small Business		Small Farm	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
<= \$100,000	197	67%	81	92%
> \$100,000 to \$250,000	58	20%	7	8%
> \$ 250,000 up to maximum (1)	40	13%	0	0%
Total	295	100%	88	100%

(1) Maximum loan amount is \$1 million for small business loans and \$500,000 for small farm loans.

Table 18

M&I CENTRAL STATE BANK'S 1999 DISTRIBUTION OF SMALL BUSINESS AND SMALL FARM LOANS BY LOAN SIZE IN THE WINNEBAGO ASSESSMENT AREA				
Original Loan Amount	Small Business		Small Farm	
	# of Loans	Percentage of Loans	# of Loans	Percentage of Loans
<= \$100,000	130	69%	46	88%
> \$100,000 to \$250,000	31	16%	5	10%
> \$ 250,000 up to maximum (1)	28	15%	1	2%
Total	189	100%	52	100%

(1) Maximum loan amount is \$1 million for small business loans and \$500,000 for small farm loans.

In addition, 75% of small business loans and 100% of small farm loans were originated to businesses and farms with revenues of \$1 million or less. The bank's overall share of loans to these businesses in the assessment area was significant as well. M&I Central State Bank originated approximately 22% of the number of all reportable small business loans in the assessment area during the two-year period.

Community Development Lending

The bank's community development lending in the combined assessment area is satisfactory. The bank extended \$69,500 to a company that provides transportation for low- and moderate-income individuals and the elderly within the City of Oshkosh. The bank also extended \$62,700 to a company that employs low- and moderate-income individuals in its logging operations that are located in a low-income census tract outside the bank's assessment area; the company's headquarters is in Oshkosh. Both loans were originated in 2000.

The bank has also extended loans to other companies and individuals that serve a community development purpose. These loans, however, were included in the analysis of lending to borrowers of different income levels and/or the geographic distribution of lending. Nevertheless, including this lending in the community development section highlights the bank's efforts within the communities it serves. These loans include five loans totaling \$928,000 for affordable housing for LMI families in Green Lake County and the City of Oshkosh. An additional loan of \$190,000 was provided to an agency that in turn lends money to low- and moderate-income individuals of Hmong descent who reside in the combined assessment area.

There are a limited number of community development lending opportunities in the assessment area, according to bank management. Representatives of organizations in the communities the bank serves indicated somewhat similar views. There are a number of low- and moderate-income tracts in the combined assessment area, primarily in the cities of Oshkosh and Fond du Lac. Government organizations have been increasingly active in Fond du Lac and especially in the City of Oshkosh where the need is greatest, providing fewer opportunities for banks to participate since these organizations are primarily financed through public funds. Local private agencies stated that private sources met their

basic funding needs in lieu of bank funding. These same representatives, however, also stated that banks in general needed to be more proactive in lending to existing agencies and supporting programs. An analysis of the bank's combined assessment area reveals that there are a number of organizations that engage in qualified community development activities with which there has been limited contact. Alternatively, the bank has noted its involvement with two organizations, one private and one government, that provide homes or homeowner assistance to low- and moderate-income individuals in its combined assessment area. The bank's participation has not yet resulted in any additional financial assistance to these entities; however, since both organizations only recently began the process to find those they intend to serve.

The bank provides innovative products and has flexible lending standards designed to assist and meet the credit needs of low- and moderate-income individuals, small businesses and small farms. The bank participates in several government-sponsored loan programs. The bank made 11 loans through Farm Service Agency for \$1.55 million, seven loans through SBA for \$447,000, 55 loans through WHEDA for \$3.43 million, seven WHEDA CROP loans for \$107,000, 12 Federal Housing Administration loans (FHA) for \$928,000, 33 Federal and State VA loans for \$3.5 million, and 26 State Petroleum Environmental Cleanup Fund Act (PECFA) loans for \$1.1 million. Although these loans have been included in the preceding analysis of the bank's lending, reference here is to the bank's participation in such programs to benefit low- and moderate-income families and small businesses and farms. The bank also participates in two programs run by ADVOCAP and C-CAP, and the Neighborhood Home Loan Program (NHLP) managed by M&I Mortgage Corp. that provide homeowner assistance to low- and moderate-income buyers, such as low or interest free down payment assistance. The bank has made nine loans through ADVOCAP totaling \$479,000, five loans through C-CAP totaling \$9,000, and one loan through NHLP for \$112,000.

CONCLUSION

Non-MSA Assessment Area

The bank's lending test performance in the non-MSA assessment area is considered generally strong. The geographic distribution of the bank's lending is generally strong, considering the limited opportunities available in the one moderate-income tract. The bank's HMDA-reportable lending is limited by the low number of owner-occupied housing units, whereas the limited number of small business loans made by the aggregate indicates the low demand for commercial loans in the census tract. Lending to businesses of different sizes and borrowers of different income levels, especially to low- and moderate-income borrowers, is strong given the demographic characteristics of the assessment area. The bank's HMDA-reportable lending to low- and moderate-income borrowers increased on a year-to-year basis and represents 24% of the bank's total lending as of September 30, 2000, while a substantial majority of the bank's small business and small farm lending was in original amounts of \$100,000 or less and to businesses with revenues of \$1 million or less.

Winnebago Assessment Area

The bank's performance under the Lending Test in the Winnebago assessment area is considered strong based upon several factors. The level of the bank's HMDA-reportable lending in low- and moderate-income tracts is below that of aggregate levels, while its level of small business lending in these same income tracts exceeds the aggregate by a significant margin. The bank's lending in low- and moderate-income tracts is approximately 24% of its total small business lending by volume, whereas the aggregate's is approximately 17%. Lending to businesses of different revenue sizes and borrowers of different income levels is strong and compares favorably to aggregate levels. Approximately 68% of small business loans and 90% of small farm loans were in original amounts of \$100,000 or less. Furthermore, the bank originated almost 22% of the total 1998 and 1999 small business-reportable loans in the assessment area. The bank's HMDA-reportable lending to low- and moderate-income families ranged between 24% and 32% during the period analyzed, while the aggregate's ranged between 28% and 38%.

Combined Assessment Area

The bank's overall performance under the lending test is considered generally strong. The bank's loan-to-deposit ratio is higher than that of its national peer and compares favorably to those of its local competitors. A majority of the bank's HMDA-reportable and small business/small farm lending activity is originated within its combined assessment area. The geographic distribution of the bank's lending and its lending to borrowers of different income levels are also generally strong. Although the bank's community development lending is not substantial, the fact that a large portion of community development funding and services are provided by other means, suggests that the bank's community development lending is adequate. Community representatives support the bank's generally strong performance with statements that the bank meets the credit needs of the communities it serves. Furthermore, the bank participates in loan programs that are innovative and responsive to the combined assessment area's credit needs.

INVESTMENT TEST

A review was conducted of the bank's qualified investment and grant activity in the combined assessment area including responsiveness to community development needs, to assess its performance under the Investment Test.

Qualified Investment Activity

M&I Central State Bank's community development donations totaled approximately \$500 each year in 1998, 1999 and year-to-date 2000 to agencies that provided shelter and clothing, legal services, basic social services and educational assistance to low- and moderate-income families. In addition, the bank provided \$75 per year to an organization that focuses on commercial development in the moderate-

income area of the city of Fond du Lac; \$50 in 1999 and 2000 to an organization that provides transportation for low- and moderate-income residents of Oshkosh; and \$50 per year to an organization that provides financial and social assistance to newly arrived Hmong immigrants and refugees. A majority of these Hmong residents are low- or moderate-income individuals. The bank did not have any qualifying investments other than grants/donations during the period.

Although donations to the following organizations do not qualify as investments, bank management stressed that these organizations did, to an extent, also benefit low- and moderate-income families in the assessment area. These organizations included Head Start, Big Brothers/Big Sisters, local United Way agencies and Lutheran Social Services. Donations to these organizations ranged between \$6,000 and \$8,000 per year.

Responsiveness to Available Opportunities

The bank's responsiveness to available opportunities is adequate. Financing for a number of community development projects is provided by government or other private sources, limiting qualified investment opportunities for the bank according to community representatives. Representatives also stated that these organizations generally meet the needs within both assessment areas overall. The bank is currently pursuing opportunities to participate in two separate low- and moderate-income housing initiatives in its combined assessment area in the near future.

CONCLUSION

The bank's overall performance under the investment test is considered low satisfactory. The level of the bank's total qualified investments and level of responsiveness to the combined assessment area needs are considered adequate despite the limited number of opportunities for it to make qualified investments or donations in the combined assessment area.

SERVICE TEST

The assessment of the bank's performance in the combined assessment area under the service test includes an evaluation of the accessibility of its delivery systems; reasonableness of business hours and services in meeting the needs of its combined assessment area; changes in branch locations; and the level of community development services.

Retail Banking Services

M&I Central State Bank maintains eight full-service branch offices, one limited-service loan production office, and eight ATMs located within its combined assessment area. Bank customers may also conduct banking business at no cost at any one of more than 200 banking offices and over 200 ATM locations within Wisconsin that are operated by other M&I affiliate banks. The bank provides a variety

of traditional and government-sponsored loan products, various checking and interest-bearing deposit accounts, and cash management and investment services. The bank’s Basic Checking account is a low fee/no minimum balance checking account to benefit low- and moderate-income individuals. Similarly, its Small Business Checking account offers affordable monthly account fees for small businesses, farms, and other organizations that have low monthly account activity. The bank provides alternative delivery of banking services through MiWeb, its personal computer home banking; MiLine, a voice response system, available 24 hours each day through a toll-free telephone line, that provides account inquiry access and limited funds transfer capabilities; and MiDirect, a toll-free customer service hotline staffed 24 hours a day by banking representatives, who can provide many banking services to customers.

Distribution of Branches Among Geographies

The bank’s combined assessment area includes one low-income and six moderate-income census tracts. The bank’s main office and one ATM are located in the low-income census tract, which also serves four of the moderate-income census tracts. Furthermore, the bank’s Oshkosh Suburban West office is close to a fifth moderate-income census tract and its Fond du Lac branch is near the sixth moderate-income census tract. The following table details the bank’s branch and drive-up facility locations, the income levels of the communities in which they are located, and the days and hours of service.

Table 19 M&I CENTRAL STATE BANK’S BRANCH NETWORK				
Branch Location	County Census Tract No. Income Designation	Hours of Operation		
Oshkosh (Main office) 50 Pearl Avenue	Winnebago 0006.00 Low	Lobby	9:00 am – 4:30 pm	Monday – Friday
		Drive-up	7:30 am – 6:00 pm 9:00 am – Noon	Monday – Friday Saturday
Fairwater 407 Main Street	Fond du Lac 0417.00 Middle	Lobby	9:00 am – 12:30 pm 9:00 am – 4:00 pm 9:00 am – 6:00 pm	Monday – Wednesday Thursday Friday
		Drive-up	9:00 am – 12:30 pm 9:00 am – 4:00 pm 9:00 am – 6:00 pm	Monday – Wednesday Thursday Friday
Fond du Lac 33 West Pioneer Road (ATM on site)	Fond du Lac 0407.00 Middle	Lobby	9:00 am – 5:00 pm 9:00 am – Noon	Monday – Friday Saturday
		Drive-up	8:00 am – 6:00 pm 9:00 am – Noon	Monday – Friday Saturday
Fond du Lac LPO (1) 490 West Rolling Meadow Dr.	Fond du Lac 0412.00 Middle	Lobby	9:00 am – 5:00 pm	Monday – Friday & by Appointment

Table 19 M&I CENTRAL STATE BANK'S BRANCH NETWORK				
Branch Location	County Census Tract No. Income Designation	Hours of Operation		
Oshkosh Copps SMB (2) 1200 South Koeller Rd. (ATM on site)	Winnebago 0013.00 Middle	Lobby	9:00 am – 7:00 pm 9:00 am – 4:00 pm	Monday – Friday Saturday
Oshkosh Suburban West 2100 Omro Road	Winnebago 0018.00 Middle	Lobby	9:00 am – 5:00 pm 9:00 am – 6:00 pm 9:00 am - Noon	Monday – Thursday Friday Saturday
		Drive-up	7:30 am – 5:30 pm 7:30 am – 6:00 pm 9:00 am – Noon	Monday – Thursday Friday Saturday
Ripon 333 Blackburn Street (ATM on site, and there is also an off-site ATM in town)	Fond du Lac 0415.00 Middle	Lobby	8:30 am – 5:00 pm 9:00 am – 11:30 am	Monday – Friday Saturday
		Drive-up	7:30 am – 5:30 pm 7:30 am – 6:00 pm 8:30 am – 11:30 am	Monday – Thursday Friday Saturday
Ripon West 1074 West Fond du Lac Street (ATM on site)	Fond du Lac 0416.00 Upper	Lobby	10:00 am – 4:00 pm 10:00 am – 5:00 pm	Monday – Thursday Friday
		Drive-up	8:30 am – 5:30 pm 8:30 am – 6:00 pm 8:00 am – Noon	Monday – Thursday Friday Saturday
Rosendale 100 Lafayette Street (No on-site ATM, there is an off-site ATM in town)	Fond du Lac 0414.00 Upper	Lobby	10:00 am – 3:00 pm 8:00 am – 5:00 pm	Monday – Thursday Friday
		Drive-up	10:00 am – 4:00 pm 8:00 am – 5:30 pm	Monday – Thursday Friday

(1) This is a loan production office, which is not a full-service banking facility.
 (2) This is a supermarket branch location.

The bank’s office and drive-up hours are reasonable given the needs of the communities within which it operates. The Fairwater and Rosendale offices are located in small communities (with populations of approximately 325 and 900, respectively) for which Saturday business hours would not be economical. Customers of these branches can obtain banking services on Saturday at the Ripon branch, approximately eight miles from each of these two communities.

Record of Opening and Closing Offices

The bank sold its Brandon, Wisconsin branch in April 1999 to another bank, which continues to operate the facility. There is also another bank located in Brandon. Consequently, the residents of this area have not been adversely affected by this transaction as other financial institutions continue to service the area.

The bank closed its Pickett, Wisconsin branch in December 1999 for economic reasons. The branch

closing may have been an inconvenience to the estimated 125 residents of Pickett; however, there has been no serious adverse impact to them due to the availability of many financial institutions within 10-15 miles in Ripon and Oshkosh.

Community Development Services

Bank officers, employees, and directors use their banking-related knowledge and skills to support local community organizations by serving as officers, board members, and committee participants for these groups. The goals and missions of these organizations include promoting business and economic development, creating affordable housing opportunities, and providing human and social services to low- and moderate-income families in the communities they serve. Examples of organizations served by these bank representatives include: City of Fond du Lac Economic Development Revolving Loan Fund; Oshkosh Commercial Development Corporation; Downtown Oshkosh, Inc.; Westside Association; ADVOCAP, Inc.; United Way (multiple chapters); Big Brothers/Big Sisters; Winnebago County Family Support Advisory Committee; and The Salvation Army. In addition, the bank periodically provides first-time homebuyers seminars, both on its own and in cooperation with organizations and agencies such as ADVOCAP, Inc., WHEDA, and the Oshkosh/Winnebago County Housing Authority, that include topics such as credit repair, saving for a down payment, and availability of affordable housing assistance grants.

CONCLUSION

The bank's service test performance in the combined assessment area is generally strong. The various loan and deposit services offered by the bank and its affiliate, M&I Mortgage Corp., meet the needs of the residents, businesses, farms, organizations and governmental units living and operating in the bank's combined assessment area. The bank's branch offices are reasonably located and the hours maintained are reasonable to meet the banking needs of the combined assessment area. Alternate delivery systems, including ATMs, provide access to banking services. The closing of one branch and the sale of another did not have a significant impact on the availability of banking services in the vicinity of those branches. The level of community development services is generally strong.

GENERAL

The bank is in compliance with the substantive portions of antidiscrimination laws and regulations, including the Equal Credit Opportunity and Fair Housing Acts. A significant portion of consumer loan underwriting has been centralized; this function has been reviewed in a separate examination of centralized loan underwriting functions. The bank has developed standards, policies and procedures in compliance with fair lending regulations and has applied them in a consistent manner. Interviews with community representatives revealed no evidence of prohibited discriminatory lending activity.