

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 CRA performance of **M&I First American Bank, Wausau, Wisconsin** prepared by the **Federal Reserve Bank of Chicago**, the institution's supervisory agency, as of **June 10, 1997**. Management chose to have the bank's CRA performance evaluated using the new CRA regulation which will be mandatory for all large banks effective as of July 1, 1997. 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 Outstanding.

The bank's lending performance is excellent based upon its high loan-to-deposit ratio, a substantial majority of loans within the assessment area and its strong record of lending to businesses of different revenue sizes. The bank's strong community development lending and service efforts evidence this performance. The distribution of loans within the assessment area and lending to borrowers of different income levels was reasonable. The bank is responsive to the credit needs of low- and moderate-income residents, and uses innovative and flexible lending practices.

Although the bank did not have a high level of qualified community development investments and grants, review of local economic conditions and discussions with community representatives indicate that the current level of investment reflects the limited investment opportunities within the assessment area.

Banking services are accessible to all portions of the bank's assessment area. The bank provides a high level of community development services.

The following table indicates the performance level of **M&I First American Bank, Wausau, Wisconsin** with respect to the lending, investment and service tests:

LARGE INSTITUTION PERFORMANCE CRITERIA	M&I FIRST AMERICAN BANK PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
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 M&I FIRST AMERICAN BANK-S ASSESSMENT AREA

Wausau is located in north central Wisconsin, approximately 50 miles north of Stevens Point in Marathon County. The bank has defined its assessment area as Marathon County, which corresponds with the Wausau Metropolitan Statistical Area (MSA). There are a total of 27 census tracts in the assessment area, two of which are moderate-income census tracts. The following chart depicts the census tracts, median family income, and number of households in the assessment area:

Census Tract	Median Family Income	Number of Households	Census Tract	Median Family Income	Number of Households
1.00*	22,147	1,388	12.01	39,888	1,774
6.02*	26,547	1,854	12.02	36,514	1,712
2.00	34,844	1,261	14.00	41,532	1,495
4.00	32,442	2,241	15.00	38,298	1,304
5.00	31,406	1,335	16.00	32,042	1,577
6.01	29,007	926	17.00	30,703	1,112
7.00	29,821	2,176	18.00	32,865	1,442
8.00	39,500	1,372	19.00	34,098	1,873
9.00	31,571	1,051	20.00	33,255	1,087
10.00	41,792	1,372	21.00	33,937	2,030
11.02	37,990	1,092	22.00	28,192	1,085
11.03	36,336	1,439	23.00	31,812	1,980
11.04	33,378	1,796	13.00	43,838	1,956
3.00	43,171	1,804			

*Moderate- income census tracts

Based upon 1990 census data, 115,400 people reside in the assessment area. Minorities comprise approximately 3% of the population (3,292 minority individuals), with Asians (2,430 individuals) comprising the largest percentage of the minority population. The assessment area median family income of \$34,988 is comparable to the State of Wisconsin median family income of \$35,082. The following chart depicts family income levels in the assessment area and state:

Location/ # of Families	Low-Income Families		Moderate-Income Families		Middle-Income Families		Upper-Income Families	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Assessment Area 31,092	5,187	16.7	5,942	19.1	8,679	27.9	11,284	36.3
State of Wisconsin 1,284,297	230,129	17.9	240,790	18.7	339,926	26.5	473,452	36.9

Housing in the assessment area consists primarily of owner-occupied, single-family units. The following charts depict assessment area housing information:

Type of Unit	Number of Units in Assessment Area	Percent of Total
Owner-Occupied Units	31,054	70.9
Total Rental Units	10,493	24.0
Vacant Units	2,227	5.1
Total Housing Units	43,774	100.0

	Assessment Area	State of Wisconsin
Single-Family	75.4%	67.7%
2 - 4 Units	10.9%	13.5%
5 and More Units	7.3%	12.6%
Built Pre-1950	37.8%	36.8%
Median Housing Value	\$54,643	\$62,141

The preceding chart illustrates that housing stock in the assessment area is comparable to the State of Wisconsin, but housing values in the assessment area are slightly lower than the statewide median housing value.

Community representatives contacted during the examination indicated that the Marathon County economy is stable, with agriculture, service and manufacturing industries as the major employers.

The county's agricultural production of dairy, potatoes and ginseng make it one of the leading agricultural producers in the State of Wisconsin. Based upon 1994 U.S. Bureau of Labor Statistics information, the service industry is the leading employer in Marathon County, employing 41,463 of the 73,802 individuals (56%) comprising the workforce. Approximately 17,014 individuals (23%) in the Marathon County workforce are employed in the manufacturing industry. The following are among the area's largest manufacturing employers:

Employer	City	Number of Employees	Product/Service
Kolbe & Kolbe Millwork	Wausau	1300	Wooden Doors & Windows
SNE Enterprises, Inc.	Mosinee	1100	Wooden Windows & Doors
Marathon Cheese Corporation	Marathon	900	Cheese Packaging
Fiskars, Inc.	Wausau	880	Scissors, Cutlery
Marathon Electric Manufacturing Corp.	Wausau	875	Electrical Motors & Generators
Greenheck Fan Corporation	Schofield	800	Ventilation Products
Wausau Paper Mills Company	Brokaw	750	Paper & Sulphite Pulp Processing
Venco Products Incorporated	Schofield	600	Air Movement Equipment
Wausau Metals	Wausau	400	Aluminum Windows

According to Wisconsin Department of Labor information, the April, 1997 seasonally adjusted unemployment rate for Marathon County (3.5%) is comparable to the State of Wisconsin unemployment rate of 3.4% for the same period.

DESCRIPTION OF INSTITUTION

M&I First American Bank, with total assets of \$401 million as of March 31, 1997, is an affiliate of Marshall & Isley Corporation, a multi-bank holding company based in Milwaukee. The bank offers a full array of loan and deposit services from six branch offices located in Wausau, Rib Mountain, Mosinee and Schofield, Wisconsin; one of the branch offices is in a moderate-income census tract. The bank offers additional deposit services through two Wausau drive-up facilities (one in a moderate-income census tract) and 11 automated teller machines (ATMs); two ATMs are located in moderate-income tracts.

The bank's local competition includes: American Community Bank (Wausau), Associated Bank North (Wausau), Firststar Bank Wisconsin, Madison (Wausau Branch), Marathon Savings Bank (Wausau), and Peoples State Bank (Wausau). Additional competition is provided by Intercity State Bank (Schofield) and River Valley State Bank (Rothschild).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

The bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and Fair Housing Act.

LENDING TEST

The bank's loan portfolio was reviewed to evaluate the bank's lending volume, geographic distribution of loans, the distribution of lending by borrower characteristics, community development lending and the use of innovative and flexible lending practices.

Lending Volume

Review of the bank's March 31, 1997 consolidated report of condition revealed a net loan-to-deposit ratio of 83.43% and a net loan-to-asset ratio of 72.70%. The distribution, by loan type, is as follows:

LOAN TYPE	DOLLAR AMOUNT OUTSTANDING (\$000)	PERCENT OF TOTAL LOANS
REAL ESTATE		
Construction	1,521	0.52
Farmland	8,066	2.77
Revolving open-end (1-4)	6,800	2.33
Residential (1-4)	62,441	21.42
Commercial	64,361	22.08
CONSUMER		
Open-end Credit	3,437	1.18
All Other	66,977	22.98
COMMERCIAL AND INDUSTRIAL		
AGRICULTURAL	74,919	25.70
STATE AND POLITICAL OBLIGATION	2,314	0.79
OTHER	565	0.19
	112	0.04

Review of the loan portfolio revealed commercial/industrial lending and commercial real estate loans together comprise 47.78% of the portfolio, followed by residential 1-4 family real estate lending (revolving and closed-end) which comprise 23.75% of the loan portfolio; consumer loans comprise approximately 24.16% of the portfolio.

According to the March 31, 1997 Uniform Bank Performance Report (UBPR), the bank's loan portfolio compared to peer is illustrated in the following chart:



LOAN TYPE	BANK AVERAGE LOAN MIX (%)	PEER AVERAGE LOAN MIX (%)
REAL ESTATE LOANS		
Construction/Development	0.50	4.01
1 - 4 Family Residential	22.82	30.87
Home Equity	2.29	2.38
Other Real Estate	25.62	24.63
Farmland	2.40	0.50
Multi-family	0.12	1.28
Commercial	23.10	20.71
TOTAL REAL ESTATE LOANS	48.94	63.29
LOANS TO INDIVIDUALS	25.87	12.78
CREDIT CARD LOANS	1.24	0.54
COMMERCIAL & INDUSTRIAL LOANS	23.78	16.70
AGRICULTURAL LOANS	1.12	0.44
MUNICIPAL LOANS	0.19	0.42
OTHER LOANS*	0.10	0.30
*Excludes Financial Institution Loans, Acceptances of Other Banks, Foreign Office Loans and Leases, and Lease Financing Receivables		

BANK NET LOAN/LEASE TO DEPOSIT RATIO	PEER NET LOAN/LEASE TO DEPOSIT RATIO
82.14	74.95

The bank's average loan-to-deposit ratio (LTD) for eight quarters ending March 31, 1997 was 85.53%; its LTD ratio is generally consistent with the LTDs of its local competitors. Eight quarter LTDs for the bank and a sample of its local competitors are as follows:

Institution	Asset Size	Loan to Deposit Ratio %
M&I First American Bank	\$400,993	85.53
Marathon Savings Bank	\$107,458	100.96
Peoples State Bank	\$203,586	78.07
Associated Bank North	\$495,014	81.69

Lending in Assessment Area

The bank's origination of new business and farm loans extended from January 1, 1996 through March 31, 1997 was used to evaluate the bank's lending within the assessment area. Review of business and farm loan data revealed that the bank extended 538 commercial and 102 farm loans during the period. The following chart highlights business and farm lending within the assessment area:

Loan Type	# In Assessment Area	Percent
Agriculture	84	82.35
Commercial	452	84.01
Total	536	83.75

The bank and the affiliated M&I Mortgage Corp. 1996 Home Mortgage Disclosure Act (HMDA) lending and first quarter 1997 HMDA lending in the assessment area was also reviewed. M&I Mortgage Corp. HMDA data is included in the review of the bank's performance because the mortgage corp. acts as an agent of the bank in providing long-term mortgages, rather than acting solely as an affiliate. The following chart depicts real estate lending activity in the assessment area:

1996 HMDA Lending		
Entity	# Loans In Assessment Area	Percent
M&I First American Bank	407	90.24
M&I Mortgage Corp.	175	88.83
Total	582	89.81

Review of first-quarter 1997 HMDA reports prepared by the bank indicated that 95% of first-quarter originations were within the assessment area (98 of 103 originations).

Geographic Distribution

The geographic distribution of the sample of business, farm and real estate loans was reviewed to assess lending within the assessment area, and penetration into moderate-income census tracts. Based upon 1990 census data, 2 of the 27 census tracts (1.00 and 6.02) in the assessment area are moderate-income census tracts. Approximately 6.9% of the population (7,924 individuals) in the assessment area reside within these moderate-income census tracts. The following chart depicts the geographic distribution of commercial and farm loans using census tract income:

Census Tract Income Level	# Originated	Percent	Dollar Amount (\$000)	Percent
Low	N/A	N/A	N/A	N/A
Moderate	29	5.4	2,462	4.3
Middle	441	82.3	46,372	81.0
Upper	66	12.3	8,421	14.7
Total	536	100.0	57,255	100.0

In addition to its lending activity in moderate-income census tracts, review of the lending data revealed solid penetration throughout the assessment area, with commercial or farm lending in 25 of the 27 census tracts comprising the assessment area. No lending was noted in middle-income census tracts 21 and 22, which are on the western edge of Marathon County, and furthest away from a branch office.

The geographic distribution of the bank's 1996 HMDA lending revealed solid loan penetration throughout the assessment area, with approximately 5% of total loans extended within moderate-income census tracts, and originations in 25 of the 27 census tracts within the assessment area.

Borrower Characteristics

The fifteen-month sample of business and farm loans was reviewed to assess lending to businesses of different sizes and borrowers of different income. The following chart depicts the distribution of small business and farm loans during the period of January, 1996 through March, 1997:

Distribution of Loans by Loan Amount						
Loan Type	Loans \$100,000 or Less		Loans \$100,000+ to \$250,000		Loans Greater than \$250,000	
	#	\$000	#	\$000	#	\$000
Small Business	364	13,211	91	16,066	83	39,243
Small Farm	88	3,006	11	1,660	3	1,054
Totals	452	16,217	102	17,726	86	40,297

The following table illustrates lending to small businesses and farms. Small businesses are defined as businesses with gross annual revenues of less than \$1 million; small farms are defined as farms with gross annual revenues of less than \$500,000.

Loan Type	#	\$000
Small Business	391	32,290
Small Farm	102	5,720
Total	493	38,010

Approximately 71% of the total small business and farm loan sample was extended for amounts of \$100,000 or less; 77% of the total loan sample was extended to small businesses and small farms, based upon revenue size of the farm or business. .

A review of the bank's and M&I Mortgage Corp.'s 1996 HMDA data reflects solid lending performance with respect to low- and moderate-income applicants:

1996 HMDA Activity of M&I FIRST AMERICAN BANK by Income			
Low- and Moderate-Income Applicants (< 80% of MSA Median Family Income)			
Product Class	# Originations	% Originated	\$ Originated
Conventional	82	89.13	4,459
Refinancing	30	83.33	1,566
Home Improvement	19	67.86	240
Overall	131	83.97	6,265
% of Grand Total	32.83		26.31
L-M Populn./% L-M	7924	6.87	
Total Population	115,400		
Middle-Income Applicants (80 to 121% of MSA Median Family Income)			
Conventional	59	85.51	3,712
Refinancing	34	85.00	2,324
Home Improvement	35	76.09	478
Overall	128	82.58	6,514
% of Grand Total	32.08		27.36
Upper-Income Applicants (> 121% of MSA Median Family Income)			
Conventional	66	84.62	6,345
Refinancing	44	86.27	4,134
Home Improvement	30	76.92	552
Overall	140	83.33	11,031
% of Grand Total	35.09		46.33
Grand Totals			
Conventional	207	86.61	14,516
Refinancing	108	85.04	8,024
Home Improvement	84	74.34	1,270

Grand Total	399	83.30	23,810
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As the preceding chart illustrates, approximately 33% of the bank's 1996 HMDA lending was to low- or moderate-income borrowers. Based upon census data, approximately 36% of the families in the assessment area are low- and moderate-income. Review of first quarter 1997 combined (bank and mortgage corp.) HMDA provided by the bank revealed similar lending patterns; 35 of 106 first quarter originations (33%) were to low- and moderate-income borrowers.

Community Development Lending

The bank regularly engages in community development lending targeted at affordable housing initiatives and other opportunities that benefit low- and moderate-income individuals and areas. The following chart illustrates three community development loans made by the bank since the previous examination:

Loan Amount	Community Development Purpose
\$215,000	Loan to a local economic development group for the purchase of equipment and to construct a new shopping center. A portion of the loan is guaranteed by a community development corporation. The new shopping center will create a number of job opportunities for low- and moderate-income individuals.
\$65,000	Loan to finance construction of a home for a low- and moderate-income family with pre-approved financing through a government agency. The loan will be repaid from the sale of the home to the family.
\$95,000	Loan to purchase a building for a local community organization. The building is located in a moderate-income area.

Innovative or Flexible Lending Practices

The bank engages in innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals and geographies. The M&I Neighborhood Home Loan (NHLP) demonstrates the use of flexible programs or practices in which the bank participated during the examination review period to meet the credit needs of low- and moderate-income individuals and geographies. The program offers 3/1 ARM, 3/3 ARM or 5 Year Balloon loans amortized for terms of 10-30 years. There are no minimum loan amounts or fees charged for the program; underwriting standards allow for higher housing and total debt ratios. The program also allows a 97% loan-to-value ratio on single-family residences and a 95% loan-to-value ratio on two-to-four family residences. During the one- year period covering May 1996 through May 1997, the bank

extended 54 NHLP loans for a total of \$3,160,101.

The bank also participates in the HOME Program administered by the Wisconsin Housing & Economic Development Authority (WHEDA). The HOME program provides home purchase loans to low- and moderate-income families. According to WHEDA, the bank funded 18 loans totaling \$964,792 for 1996.

CONCLUSION

The bank's lending performance is generally strong. During the examination review period, the bank's loan-to-deposit ratio exceeded that of its peers and many of its local competitors. Lending to businesses of different revenue sizes and community development lending were excellent; the bank also made use of innovative and flexible lending practices. Real estate lending to borrowers of different incomes was strong, as the bank's 1996 HMDA and first quarter 1997 preliminary HMDA demonstrate strong distribution among low- and moderate-income borrowers. The bank's penetration of loans in moderate-income census tracts is satisfactory. A substantial majority of real estate, small business and small farm loans were originated within the assessment area and the distribution of loans throughout the assessment area, including moderate-income census tracts, is strong.

INVESTMENT TEST

The bank's investment portfolio, donations and special programs that contribute to local community development efforts were reviewed. Qualified investments or grants were reviewed for innovativeness, responsiveness to credit and community development needs and the degree to which these investments are not routinely provided by private investors. Discussions with management and community representatives revealed that investment opportunities within the assessment area are limited; no qualified investment activity was noted in the bank's investment portfolio. According to bank management and discussions with community representatives, the community does not offer a high degree of qualified investment opportunities.

Degree to Which Investments Are Not Provided by Private Investors

The bank provides a satisfactory level of investment in the form of grants, which support the ongoing operating expenses of community nonprofit organizations in its assessment area. Operating grants, which are essential to the ongoing viability of these organizations, are not routinely available from private investors. A review of internal files revealed the bank made various donations to the Wausau Chamber of Commerce in sponsorship of various activities. The bank also offers annual \$1,000 scholarships to North Central Technical College and two grants (\$1,500 and \$2,000) to University of Wisconsin Marathon Campus.

Responsiveness to Available Opportunities

As discussed under the preceding heading, the current level of investment reflects limited opportunities available to the bank. Discussions with community representatives and bank

management and review of the bank's overall lending and services suggests responsiveness to community development opportunities.

CONCLUSION

The bank's performance under the investment test is rated low satisfactory. The bank has an adequate level of investment based upon the available opportunities in the assessment area.

SERVICE TEST

The bank's retail banking delivery system and community development services were reviewed. The services provided by the bank were reviewed for range and accessibility, innovativeness and responsiveness; alternative systems used for delivering those services were also reviewed to assess their effectiveness. In addition, the distribution of the bank's branches, record of opening and closing branch offices and community development service activity were reviewed.

Retail Banking Services

M&I First American Bank is a full-service bank with six branches and eleven ATMs located within Marathon County. The bank provides lending and deposit services on a uniform basis to consumers, organizations, businesses and government entities. In addition, the bank offers various checking and interest bearing accounts as well as cash management, and investment services through M&I Brokerage Services.

Distribution of Branches Among Geographies

The bank's assessment area includes all of Marathon County. The following chart illustrates the bank's branch and drive-up facility locations, including hours of service and the income levels of communities in which they are located:

OFFICE	HOURS OF SERVICE	DAYS OF SERVICE	CENSUS TRACT	INCOME LEVEL
Wausau Main Office 500 3rd St.	8:00am-5:00pm	Monday-Friday	1.00	Moderate
Drive-up & Business Lobby 2nd & Scott Street	7:30am-6:00pm 7:30am-7:00pm 8:30am-12:00pm	Monday-Thursday Friday Saturday	1.00	Moderate
Cedar Creek Office & Drive-up 10208 Park Plaza	7:30am-6:00pm 7:30am-7:00pm 8:30am-12:00pm	Monday-Thursday Friday Saturday	11.02	Middle
Mason Office & Drive-up 101 Main Street	8:30am-6:00pm 8:30am-7:00pm 8:30am-12:00pm	Monday-Thursday Friday Saturday	12.01	Middle
Rib Mountain Office & Drive-up 5211 Rib Mountain Drive	7:30am-6:00pm 7:30am-7:00pm 8:30am-12:00pm	Monday-Thursday Friday Saturday	13.00	Upper
Westside Drive-up (Wausau) South 28th Ave., & Plaza Drive	7:30am-6:00pm 7:30am-7:00pm 8:30am-12:00pm	Monday-Thursday Friday Saturday	14.00	Middle
29 Super East Banking Office (Schofield - supermarket) 2806 Schofield Ave	9:00am-7:00pm 9:00am-6:00pm 9:00am-3:00pm	Monday-Friday Saturday Sunday	11.03	Middle
Country Market Banking Office (Wausau - supermarket) 220 South 18th Ave	9:00am-7:00pm 9:00am-6:00pm 9:00am-3:00pm	Monday-Friday Saturday Sunday	6.01	Middle

The bank provides flexible hours of service including later week day and weekend hours at its supermarket branches.

Record of Opening and Closing Offices

The bank's record of opening and closing branches has improved the accessibility of banking products and services in the assessment area. The bank's offices and services are reasonably available to moderate-income areas; the bank has one office located in a moderate-income census tract (1.00), and a supermarket branch (census tract 6.02) bordering the only other moderate-income census tract in the assessment area (6.01). Since the previous examination, the bank closed its Wausau Mall branch office (March 31, 1996), which was located in a moderate-income census tract. Management indicated that the branch was closed due to limited activity, and its proximity to the main bank (approximately two blocks). The bank's Mason branch relocated (August 26, 1996) from census tract 12.01 to 11.02, (both middle-income census tracts) in order

to provide better access to the community; the relocation did not have an impact on moderate-income areas. In May 1996, the bank opened a full-service supermarket branch office (middle-income census tract 6.01) located at 220 South 18th Avenue, Wausau.

Alternative Systems for Delivering Retail Banking Services

In an effort to make banking services accessible to all portions of the assessment area, the bank operates 11 full-service ATMs throughout the assessment area. ATM locations and the income levels of the communities in which they are located are listed in the following chart:

ATM LOCATION	CITY	CENSUS TRACT	INCOME LEVEL
Cedar Creek Stores, 10101 Market St.,	Mason	11.02	Middle-Income
M&I First American Bank 10208 Park Plaza,	Mason	11.02	Middle-Income
29 Super Market West 110 S. 17th Ave.	Wausau	5.00	Middle-Income
Country Market 220 South 18th Ave.	Wausau	6.01	Middle-Income
29 Super Market East, 2806 Hwy. 29	Schofield	11.03	Middle-Income
M&I First American Bank 28th Ave. & Plaza Drive	Wausau	14.00	Middle-Income
Wausau Hospital 333 Pine Ridge Blvd.	Wausau	14.00	Middle-Income
M&I First American Bank 500 3rd St.	Wausau	1.00	Moderate-Income
M&I First American Bank 500 3rd St.-Drive-up	Wausau	1.00	Moderate-Income
M&I First American Bank 5211 Rib Mountain Drive	Wausau	13.00	Upper-Income
Wausau Center Mall	Wausau	1.00	Moderate-Income

Additionally, the bank provides account information and banking services through M&I Line, a toll-free telephone number, staffed 24-hours, seven days a week. The bank also offers the Mortgage Assistance Helpline, an on-call program to provide after-hours information for Realtors (Monday through Friday from 5:00pm to 9:00pm).

COMMUNITY DEVELOPMENT SERVICES

The bank provides community development services to several organizations through a number of targeted programs, employee involvement, technical assistance and counseling activities. The bank continues to support the community through numerous development services which include workshops and seminars.

In order to provide better service to the Hmong community, the bank has translated its Community Homebuyers brochures into the Hmong language; the bank also hired a Hmong loan originator in January, 1996. Management's future plans involve training this individual to become a full-service banker for loan and deposit services.

The bank has also conducted three Community Homebuyers Seminars in 1997, promoting the availability of its products; one of the seminars (March 26, 1997) was conducted with the Hmong Association.

Review of the bank's internal CRA files revealed that officers, directors and staff are actively involved in a number of local organizations that provide direct and indirect support of local community development. Bank senior management has devoted considerable time and expertise to housing and community development organizations such as Habitat for Humanity, Wausau Area In-house Network (WIN) and the Marathon County Economic Development Corporation. The bank's community involvement reports for 1996 indicate that directors donated 1,053 hours to various community organizations; officers donated 1,704 hours and employees donated 3,797 hours. Discussions with management indicated employees are encouraged to participate in local community organizations and to understand the importance of their community involvement to the bank; when possible, employees are allowed to attend meetings during working hours.

Range and Accessibility of Services Provided to Geographies

All office locations are full-service branches, and offer services to meet the needs of the assessment area, including moderate-income geographies and individuals. In addition to regular banking services, the bank offers the following services:

\$Basic Checking - The bank expanded its checking product line to include this low-cost alternative. Basic Checking features no minimum balance, and a monthly limit of 10 free checks with 20 cents per check thereafter.

\$Bilingual Services - As previously discussed, the bank has a lender who speaks the Hmong language and has brochures in the Hmong language.

\$Small Business Specialist - The bank has a WHEDA and SBA lender dedicated to working with women- and minority-owned businesses.

CONCLUSION

The bank's performance under the service test is strong. The bank's delivery systems are easily accessible to all portions of the assessment area, including moderate-income areas. The bank's branching activity has improved the delivery and accessibility of services within its assessment area. The bank provides a high level of community development services, a number of which demonstrate responsiveness to community development needs and innovativeness.