

## 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 Lake Country Bank, Hartland, Wisconsin** prepared by the **Federal Reserve Bank of Chicago**, the institution's supervisory agency, as of **December 1, 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 CFR Part 228.

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

The bank's lending performance is very strong, based upon its loan-to-deposit ratio in comparison to peers, a high concentration of loans within the assessment area, a reasonable penetration of lending throughout the assessment area, and a representative distribution of loans among borrowers of different income levels and businesses of different sizes. Although the bank's participation in qualified community development loans, investments, and services was minimal, a review of local economic conditions and interviews with community representatives revealed that there are few such opportunities available within the assessment area. Banking services are generally accessible to all portions of the bank's assessment area and business hours and products meet the needs of the community. Branch closings did not adversely affect the availability of services to residents of the assessment area.

The following table indicates the performance level of **M&I Lake Country Bank, Hartland, 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** record of meeting community credit needs. @

PERFORMANCE LEVELS	M&I LAKE COUNTRY BANK		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	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 LAKE COUNTRY BANK'S ASSESSMENT AREA**

The bank's assessment area is defined as Waukesha County, one of four counties that comprise the Milwaukee-Waukesha Metropolitan Statistical Area (MSA 5080). Waukesha County, located immediately west of Milwaukee County, is the wealthiest and one of the fastest growing counties in the state. The assessment area includes 63 census tracts, one of which has no population, and which, therefore, will not be considered in this report. Of the remaining 62 census tracts, one is designated as moderate-income, 22 are middle-income, and 39 are upper-income.

According to 1990 U.S. Census data, the assessment area's population is 304,715, of which 27% are under age 18 and 10% are over age 65. The largest communities, with population shown parenthetically, in the assessment area include: Waukesha (56,958), Brookfield (35,184), New Berlin (33,592), Menomonee Falls (26,840), and Muskego (16,813). Hartland, where the bank is headquartered, has a population of 6,906.

Median family income in Waukesha County is \$49,096, which compares to \$39,005 for the Milwaukee-Waukesha MSA and to \$35,082 for the State of Wisconsin. Low- and moderate-income families represent 8% and 12%, respectively, of families within the assessment area. The housing stock in Waukesha County includes 110,452 units with a median value of \$96,083, which compares to \$76,108 and \$62,141 in MSA 5080 and the State of Wisconsin, respectively. Of these units, 74% are owner-occupied, 22% are rental, and 4% are vacant. One-to-four family residences represent 85% of the available housing units.

Waukesha County is primarily urban in nature, although farming operations can be found in certain areas, especially in the southwest portion of the county. The economy of Waukesha County is strong, as evidenced by low unemployment, a growing residential population, and an expanding workforce. According to the Wisconsin Department of Workforce Development, preliminary unemployment rates for October, 1997, in Waukesha County, MSA 5080, and the State of Wisconsin were 2.0%, 3.1%, and 2.8%, respectively. The preliminary unemployment rate from the U.S. Bureau of Labor Statistics for the entire country for October, 1997 was 4.4%. Large employers in the assessment area include Quad Graphics, Inc., G.E. Medical Systems Group, Waukesha Health System, Inc., and Community Memorial Hospital of Menomonee Falls.

**DESCRIPTION OF INSTITUTION**

M&I Lake Country Bank, with assets of \$255.0 million at September 30, 1997, is a wholly-owned subsidiary of Marshall & Ilsley Corporation, a multi-bank holding company, in Milwaukee, Wisconsin. The bank maintains six full-service banking locations in Waukesha County: the main office, which is located in Hartland, two branches in Oconomowoc, and one branch each in North Lake, Pewaukee, and Delafield. In addition, the bank operates six automated teller machines (ATMs); four of the ATMs are located at branch offices and two are located at off-site locations in Hartland and Oconomowoc.



Loan-to-Deposit Ratio of M&I Lake Country Bank, Its Nationwide Peer Group, and Other Local Competitors (Ranked from Highest to Lowest Six-Quarter Average Loan-to-Deposit Ratio)								
Bank One, Wisconsin	\$8,963	106%	107%	103%	110%	120%	142%	115%
Guaranty Bank, S.S.B.	\$462	108%	109%	115%	123%	112%	110%	113%
Great Midwest Bank, S.S.B.	\$370	109%	110%	114%	115%	111%	108%	111%
First Bank of Oconomowoc (2)	\$157	105%	102%	104%	100%	101%	93%	101%
<b>M&amp;I Lake Country Bank</b>	<b>\$255</b>	<b>94%</b>	<b>94%</b>	<b>89%</b>	<b>86%</b>	<b>88%</b>	<b>86%</b>	<b>90%</b>
Firststar Bank Milwaukee, N.A.	\$8,075	94%	92%	86%	77%	83%	87%	86%
Associated Bank Milwaukee	\$726	95%	90%	89%	79%	81%	83%	86%
Mutual Savings Bank	\$1,806	96%	97%	82%	82%	81%	79%	86%
Lincoln State Bank (2)	\$138	86%	84%	83%	85%	80%	79%	83%
Ixonia State Bank	\$107	83%	85%	87%	80%	80%	79%	82%
State Financial Bank (2)	\$256	77%	79%	84%	80%	77%	77%	79%
Citizens Bank of Mukwonago (2)	\$213	76%	73%	72%	69%	71%	70%	72%
Nationwide Peer Group (1)	N/A	72%	72%	71%	71%	70%	70%	71%
Waukesha State Bank	\$392	63%	66%	68%	66%	70%	70%	67%
Tri City National Bank	\$438	66%	68%	69%	67%	67%	64%	67%
(1) M&I Lake Country Bank's peer group is peer group #7, which includes institutions with assets of \$100-\$300 million and with 3 or more offices in a metropolitan area. (2) These banks are in the same peer group as M&I Lake Country Bank.								

As the preceding chart illustrates, the bank's loan-to-deposit ratio has consistently outperformed its nationwide peer group, three out of four of its local peer group competitors, and most of its other local competitors. This chart also shows that the bank's quarterly loan-to-deposit ratio has increased significantly during the past six quarters, which is due to a

continuing growth in net loans outstanding. This growth is illustrated in the following chart:

<b>Loans and Leases Outstanding, Net of Unearned Income and Allowance for Loan and Leases Losses (\$000)</b>						
	<b>06-30-96</b>	<b>09-30-96</b>	<b>12-31-96</b>	<b>03-31-97</b>	<b>06-30-97</b>	<b>09-30-97</b>
Loans & leases, net	177,999	188,676	195,092	204,410	209,672	212,152
Increase over previous quarter	N/A	10,677	6,416	9,318	5,262	2,480

The distribution of the bank's loan portfolio (gross), as shown in the its quarterly Consolidated Reports of Condition at September 30, 1997, is as follows:

<b>Distribution of Loan Portfolio at September 30, 1997</b>		
<b>Loan Type</b>	<b>Dollar Amount Outstanding (\$000)</b>	<b>% of Total Loans</b>
<b>REAL ESTATE LOANS</b>		
Construction/Development	21,671	10.09
Secured by farmland	209	0.10
Revolving open-end (1-4)	15,343	7.14
Residential (1-4)	67,945	31.64
Commercial	63,646	29.64
Multi-family	6,270	2.92
Total Real Estate Loans	175,084	81.53
<b>CONSUMER LOANS</b>		
Open-end credit	1,346	0.63
All other	5,341	2.49
<b>COMMERCIAL AND INDUSTRIAL LOANS</b>	32,306	15.04
<b>STATE AND POLITICAL SUBDIVISION LOANS</b>	26	0.01
<b>OTHER LOANS (excludes consumer loans)</b>	654	0.30

The previous chart shows that the bank's loan portfolio is heavily concentrated in real estate loans, representing over 81% of total loans outstanding, with residential 1-4 family property loans having the highest concentration, followed closely by commercial real estate transactions. Commercial loans in total (construction/development, commercial real estate, commercial and industrial loans, and all other loans) represent 55% of the bank's loan

portfolio.

Lending in the Assessment Area

The bank's analyses of loan activity reported under the Home Mortgage Disclosure Act (HMDA) from January, 1995 through June, 1997 and of new business lending from January, 1996 through June, 1997 were used to evaluate the bank's lending activity within the assessment area. This review is summarized in the following charts:

<b>HMDA-Reportable and Business Loans Made Within the Assessment Area</b>						
<b>Loan Type</b>	<b>1995</b>		<b>1996</b>		<b>1997 (1)</b>	
	<b>#</b>	<b>% Within</b>	<b>#</b>	<b>% Within</b>	<b>#</b>	<b>% Within</b>
HMDA loans - number	198	81%	176	80%	100	81%
Business loans:						
Number of loans	N/A	N/A	540	79%	228	66%
Dollar amount	N/A	N/A	\$46,488	75%	\$23,488	74%
(1) Through June 30, 1997 N/A - Not applicable						

As can be seen from this chart, the bank is making the majority of its HMDA-reportable and business loans within its assessment area.

Geographic Distribution

The geographic distribution of HMDA-reportable and business loans for 1996 and 1997 (through June 30) was also reviewed to assess the bank's lending within the assessment area, which includes no low-income and one moderate-income census tract (#2027.00). Lending opportunities within this moderate-income census tract are limited because its population is only 1,301, or 0.43% of the total population of the assessment area, and includes only 91 owner-occupied housing units.

HMDA data for 1996 indicates that no loans were made in the moderate income tract, 67 loans were made in 12 of the 22 middle-income census tracts, and 109 loans were made in 24 of the 39 upper-income census tracts. HMDA data for the first six months of 1997 indicates that no loans were made in the moderate-income census tract, 35 loans were made in 11 of 22 middle-income census tracts, and 65 loans were made in 21 of 39 upper-income census tracts.

The analysis of business loans revealed an even greater dispersion of loans by the bank throughout its assessment area. For 1996, the bank made three loans totaling \$682,000 in the moderate-income census tract, 248 loans totaling \$21,054,000 in 17 of 22 middle-income

census tracts, and 289 loans totaling \$24,752,000 in 32 of 39 upper-income census tracts. For the first six months of 1997, the bank made no loans in the moderate-income census tract, 96 loans totaling \$8,451,000 in 12 of 22 middle-income census tracts, and 132 loans totaling \$15,037,000 in 28 of 39 upper-income census tracts.

The census tracts with the greatest loan activity are those where a banking office is located and the census tracts immediately surrounding these tracts. Census tracts with no lending activity are generally those located farthest away from the bank's offices.

Borrower Characteristics

The bank's analyses of HMDA and business lending discussed above were also used to assess the bank's lending to borrowers of different incomes and to businesses of different sizes. This review is summarized in the following charts:

HMDA-Reported Loans Within the Bank's Assessment Area By Borrower Income Characteristics								
Borrower Income Classification	1995		1996		1997 (1)		Total	
	#	%	#	%	#	%	#	%
Low-income	5	3%	6	3%	1	1%	12	3%
Moderate-income	15	8%	15	9%	10	10%	40	8%
Middle-income	54	27%	46	26%	17	17%	117	25%
Upper-income	124	63%	109	62%	72	72%	305	64%
Total	198	100%	176	100%	100	100%	474	100%

(1) Through June 30, 1997

Business Loans by Annual Revenues of Borrower								
	1996				1997 (1)			
	# of Loans	%	Loan Amount (\$000)	%	# of Loans	%	Loan Amount (\$000)	%
Small Business (2)	531	78%	40,467	65%	228	66%	18,604	59%
Large Business	153	22%	21,596	35%	115	34%	12,975	41%
Total	684	100%	62,063	100%	343	100%	31,579	100%

(1) Through June 30, 1997.  
 (2) A small business is defined as one having annual revenues of \$1 million or less.

The former chart shows that 3% and 8%, respectively, of all HMDA loans reported during this period were made to low- and moderate-income individuals. While these percentages are less than the 1990 population demographics of 8% low-income and 12% moderate-income, they are considered reasonable because historically lower-income families are less likely to seek real estate loans. Also, there is substantial competition from other lenders within the assessment area for real estate loans. The latter chart illustrates that the bank is serving commercial borrowers making substantial loans to both small and large businesses.

### Community Development Lending

Discussions with bank management and interviews conducted with community representatives, along with a review of the demographic data of the assessment area, indicated that there are very limited opportunities for the bank to participate in qualified community development loans. Bank management has evidenced their interest and intention to assist low- and moderate-income geographies and individuals and are continually exploring such opportunities within the assessment area. However, there are no community development initiatives targeting the only moderate-income census tract in Waukesha County nor any other portions of the county. There is an identified need for affordable housing in the county to provide a local labor force to serve the businesses in the area, but there have been no concrete efforts made to address this issue by public or private organizations in the past two years. Nonetheless, the bank has originated one WHEDA home loan for \$55,650, as well as two SBA loans totaling \$365,000, since January 1, 1996. In addition, the bank has 13 SBA loans totaling \$2,113,000 on its books as of September 30, 1997.

Greater opportunities for community development lending exist in other communities outside of the bank's assessment area, such as Milwaukee County and the City of Milwaukee. These areas, however, are being served by other M&I Bank affiliates, mitigating the bank's need to seek such opportunities outside of their assessment area.

### Innovative or Flexible Lending Practices

The bank offers the full array of lending products that are available to all members of the M&I family, including those available through M&I Mortgage Corporation. These include numerous fixed and variable rate mortgage loan products, secured and unsecured personal lines of credit, construction loans, home equity lines of credit (HELOC), business loans, student loans, credit cards, and government-assisted loan programs.

One of the bank's HELOC products allows the customer to borrow up to 100% of the equity in the house. Another HELOC product provides the customer with the flexibility to convert all or a portion of the line of credit to a fixed-rate amortizing loan; each repayment on the fixed-rate loan replenishes the available line of credit, and up to four fixed-rate conversions are allowed during the life of the line of credit.

The bank participates in the WHEDA HOME program, which provides mortgage loans to

low- or moderate-income individuals or families. Most residents of the assessment area do not qualify for this program due to their generally high median family income; however, as previously noted, the bank has made one WHEDA home loan in the past two years.

## **CONCLUSION**

The bank's overall lending performance is considered *high satisfactory*. The bank's loan-to-deposit ratio well above its national peer group and above most local competitors. The majority of the bank's lending activity is within its assessment area and the dispersion of loans throughout the assessment area is considered good. Lending to borrowers of different incomes and to businesses of different sizes was reasonable, especially considering the high median family income within the assessment area. The minimal amount of community development lending is a direct result of the limited amount of community development activities targeted to low- and moderate geographies and individuals within the assessment area.

## **INVESTMENT TEST**

The bank's investment portfolio, donations, and special programs that contribute to community development were reviewed. Investments were also reviewed for innovativeness and responsiveness to the community development needs within the bank's assessment area. Although no qualified investment activity was noted in the bank's portfolio, discussions with bank management and community representatives, as well as a review of local economic conditions and demographic data revealed that the lack of investment activity is the result of limited opportunities rather than an unwillingness to make qualified investments within the assessment area. The bank does routinely make donations and grants to community-based organizations, such as local chambers of commerce, Jaycees, Lions Clubs, Kiwanis Clubs, libraries, fire departments, Boy Scouts of America, and community funds.

## **CONCLUSION**

The bank's investment performance is considered to be *low satisfactory*. The lack of qualified investment opportunities is a significant factor in determining the bank's overall performance.

## **SERVICE TEST**

The bank's retail banking delivery system and community development services were reviewed. The services provided by the bank were evaluated for range, accessibility, innovativeness, and responsiveness; alternative systems for delivering these services were also reviewed. 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 Lake Country Bank is a full-service bank operating six offices and six ATMs within the assessment area. The bank provides a wide range of loan and deposit products. In addition to extending residential mortgage loans directly, lending personnel act on behalf of the bank's affiliate, M&I Mortgage Corporation, which enables the bank to extend a broader variety of mortgage loans to customers. All of the bank's facilities are located in the northern one-half of Waukesha County. Portions of the bank's assessment area overlap other M&I affiliate bank's assessment areas; thus, the bank's customers have reasonable access to ATM machines operated by these other affiliates. The following chart illustrates the bank's branch and ATM locations, drive-up facilities, and hours of operation:

Banking Facilities and Hours of Operation					
Branch Name and Address and ATM Location	Census Tract Number	Hours of Operation			
		Lobby		Drive-Up	
Main Office 112 E. Capitol Drive Hartland, Wisconsin ATM location: Off-site	2036.00	M-Th pm	9:00 am - 5:00	M-Th pm	8:00 am - 5:30
		Friday pm	9:00 am - 6:00	Friday pm	8:00 am - 6:00
		Saturday	9:00 am - Noon	Saturday	9:00 am - Noon
Delafield Office 2700 Golf Road Delafield, Wisconsin ATM location: On-site	2037.00	M-Th pm	9:00 am - 5:00	M-Th pm	8:00 am - 5:30
		Friday pm	9:00 am - 6:00	Friday pm	8:00 am - 6:00
		Saturday	9:00 am - Noon	Saturday	9:00 am - Noon
North Lake Office W315 N7685 State Hwy 83 North Lake, Wisconsin ATM location: On-site	2035.00	M-Th pm	9:00 am - 5:00	M-Th pm	9:00 am - 5:00
		Friday pm	9:00 am - 6:00	Friday pm	9:00 am - 6:00
		Saturday	Closed	Saturday	9:00 am - Noon
Oconomowoc Office 1456 Summit Avenue Oconomowoc, Wisconsin ATM locations: On-site and Off-site	2043.00	M-Th pm	9:00 am - 5:00	M-Th pm	8:00 am - 5:30
		Friday pm	9:00 am - 6:00	Friday pm	8:00 am - 6:00
		Saturday	9:00 am - Noon	Saturday	9:00 am - Noon
Oconomowoc North Office 326 E. Wisconsin Avenue Oconomowoc, Wisconsin ATM location: None	2043.00	M-Th pm	9:00 am - 5:00	M-Th pm	8:00 am - 5:30
		Friday pm	9:00 am - 6:00	Friday pm	8:00 am - 6:00
		Saturday	9:00 am - Noon	Saturday	9:00 am - Noon
Waukesha/Highway J Office N14 W23999 Stone Ridge Rd Pewaukee, Wisconsin	2033.02	M-Th pm	9:00 am - 5:00	M-Th pm	8:00 am - 5:30
		Friday pm	9:00 am - 6:00	Friday pm	8:00 am - 6:00

Banking Facilities and Hours of Operation			
ATM location: On-site		Saturday 9:00 am - Noon	Saturday 9:00 am - Noon

All six of the bank's ATMs have drive-up access. Two of them are not located on bank premises, and the off-site ATM located in Oconomowoc is limited to cash withdrawals only.

#### Record of Opening and Closing Offices

In September, 1995, the bank closed four branch locations. The closing of these offices was caused in part by Marshall and Ilsley Corporation's August, 1994 acquisition of Valley Bank, whose office locations duplicated some existing M&I offices, and by a simultaneous reorganization of M&I's affiliate bank structure. The Highway SS office in Pewaukee was absorbed into the new Delafield office, approximately three miles away. The Ryan Street office in Pewaukee was closed because of profitability considerations and because of its close proximity to the bank's other facilities in Hartland and on Highway J in Pewaukee. The Stone Bank office was closed due to profitability concerns and because of its close proximity to the bank's North Lake office. The Brookfield office was closed because that area was already being served by two other M&I Bank affiliates. None of the closed offices was in a low- or moderate-income geography.

The bank formerly maintained an ATM kiosk in a small shopping center in Hartland. When the lease expired in December, 1996, the bank sold the facility to a competing thrift institution, which already operated a branch in the shopping center. This ATM location is within one mile of the bank's Hartland office, and did not have a significant impact on its customers; also the bank maintains another ATM in Hartland.

In October, 1997, Marshall & Ilsley Corporation acquired Security Bank, S.S.B., and allocated its various retail banking offices to existing M&I affiliates. As a result, M&I Lake Country Bank added a second branch location in Oconomowoc.

#### Alternative Systems for Delivering Retail Banking Services

The bank has a number of alternate delivery systems to allow customers access to account information and to other M&I services. Bank-by-mail allows deposits to be made without going to a bank location. Bank-by phone (AMiLine®), available 24 hours each day, is an automated voice response system that allows customers to receive confidential information on their personal accounts as well as current interest rate information via telephone. PC banking (AMiDirect®) provides customers with 24-hour banking through the use of a personal computer. Also, Marshall & Ilsley maintains a website where anyone with Internet access can obtain information about M&I deposit accounts, loan accounts, and other services. Finally, all M&I customers can use any M&I affiliates' ATMs without charge; the M&I ATM network includes over 220 locations throughout Wisconsin.

### Community Development Services

The demographics of the bank's assessment area, that is, mostly middle- and upper-income census tracts, a high median family income level, and high housing values, indicate that the need for community development services is limited, which, in turn, limits the bank's opportunities to participate in such activities. Examples of community development services that the bank has provided include:

- ! Personal Economics Program (PEP) - The PEP program is designed as a partnership between schools and local businesses to help students become better money managers. Volunteer bankers discuss/educate students about credit awareness and counseling, financial management skills, careers in banking, and other related topics. During the 1996-1997 school year, a bank employee provided 11 presentations to students at Hartland North school.
- ! Wisconsin Bankers Association (WBA) Community Economic Development Committee - The goal of this committee is to make money more accessible to businesses in communities throughout Wisconsin. One of the bank's officers is a member of the committee and has worked on a project involving WBA Team Network, which analyzes business plans of companies and recommends a realistic financing package. The team assists with loan application preparation, screens interested applicants, assists with the completion of business plans, and other related services. In addition to these activities, the bank's loan officer is also working on a WBA handbook called Bank Financing for New and Growing Businesses.
- ! Alverno College, Academic Advisory Council - Several bank lending officers volunteer their time to assist college seniors majoring in business or business management in critiquing a business plan the students have developed, interviewing the students, and providing other feedback and guidance concerning interviewing skills, professionalism, and general business knowledge. Alverno College is a liberal arts women's school in Milwaukee.

Additionally, directors, officers and employees are actively involved in a number of local organizations that provide direct and indirect support of local community development and assistance to low- and moderate-income individuals. These include the Hartland, Pewaukee, Waukesha, Oconomowoc, and Nashotah Chambers of Commerce, the Waukesha County Land Development Committee, the Rescue Mission, the Waukesha County Association of Retarded Citizens, and the Tyme Out Youth Center. The bank also provides free monthly blood pressure screenings at its Hartland office for anyone who is interested.

### Range and Accessibility of Services Provided to Geographies

All of the bank's offices are full-service locations and offer services to meet the needs of the assessment area, including the moderate-income geography and low-and moderate-income

individuals. Included among the banking services available are the following:

- ! Basic Checking - This is a low-cost account which features no minimum balance, a \$3.00 monthly maintenance fee, and a monthly limit of ten free debits. This account is targeted to low- and moderate- income individuals and to others who have minimal check-writing needs.
- ! Banking for Young Adults - This package of accounts is targeted toward students and young adults and offers low fees, no minimum balance requirements, and a no annual fee credit card (for ages 18 and over and subject to credit approval).
- ! Prestige and Prestige Plus Package - These are services designed to attract and retain customers aged 50 and over and offer no fees and a low-interest rate credit card (subject to credit approval).
- ! Small Business Checking - This is a low activity checking account designed for small businesses, non-profit organizations, and governmental units. It requires a low average collected account balance, and offers 15 free checks per month and low monthly fees.

## **CONCLUSION**

The bank's performance under the service test is considered *low satisfactory*. The bank's system of delivering services, including alternate delivery systems, makes all products and services accessible to all portions of the assessment area. The record of closing branches has not adversely affected the accessibility of its delivery systems, particularly to the moderate-income geography in the assessment area. Business hours and services are reasonable. However, the bank's level of community development services is low, primarily due to the limited number of such opportunities that are available in the assessment area.