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GENERAL INFORMATION

The purpose of the Community Reinvestment Act of 1977 (“CRA”), 12 U.S.C. 2901, as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. 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 communities, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its communities. The agency considers the institution’s record of performance when deciding whether to approve any applications submitted by the institution.

This document is an evaluation of the CRA performance of the M&I Citizens American Bank, Merrill, Wisconsin, prepared by the Federal Reserve Bank of Minneapolis, the institution’s supervisory agency, as of May 19, 1997. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

Basis for the Rating

The assessment of the institution’s record takes into account its financial capacity and size; legal impediments; and local economic conditions and demographics, including the competitive environment in which the institution operates. Assessing the institution’s CRA performance is a process that does not rely on absolute standards. Institutions are neither required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its assessment areas. In that light, this evaluation is based on a review of the institution’s loans, investments, and services, as detailed in this evaluation.

INSTITUTION’S CRA RATING: This institution is rated “Satisfactory.”

The CRA evaluation revealed several factors that support the satisfactory rating of the bank’s CRA performance.

First, the bank’s performance under the lending test is rated low satisfactory for the following reasons:

1. The bank’s distribution of loans to borrowers of different incomes as well as to businesses and farms of varying sizes is adequate.
2. The geographic distribution of the bank’s loans is adequate.
3. The bank did not report any qualified community development loans.
4. The bank’s quarterly net loan-to-deposit ratio is high and compares favorably with banks located in its assessment area.
5. A substantial majority of the bank’s loans were to residents, businesses, and farms in the bank’s assessment area.

Although the bank did not report any community development loans, it does offer flexible loan products that benefit the assessment area's low- and moderate-income residents.

Second, the bank's performance under the investment test is rated low satisfactory. The evaluation disclosed a few qualified grants provided by the bank.

Finally, the bank's performance under the service test is rated high satisfactory based on the strong retail services provided for a bank of this size.

The following table indicates the performance level of M&I Citizens American Bank, Merrill, Wisconsin, with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	M&I CITIZENS AMERICAN BANK MERRILL, WISCONSIN PERFORMANCE TESTS		
	LENDING TEST*	INVESTMENT TEST	SERVICE TEST
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			
*The lending test is weighted more heavily than the investment and service tests when deriving the overall CRA rating.			

DESCRIPTION OF INSTITUTION

Based on its size and financial condition, the bank is able to meet the credit needs of its assessment area effectively. The subject bank is an affiliate of Marshall & Ilsley Corporation (“Corporation”), a Milwaukee, Wisconsin-based bank holding company whose total assets were approximately \$14 billion as of December 31, 1996. The bank is subject to CRA’s large bank examination procedures because its holding company’s total assets exceed \$1 billion. This evaluation is the first by the Federal Reserve Bank of Minneapolis since the bank became a member of the Federal Reserve System on May 4, 1995. Previously, the bank was evaluated by the Federal Deposit Insurance Corporation. The bank was rated satisfactory in helping to meet the credit needs of its community at its previous CRA evaluation on April 21, 1993. The bank operates a full-service office; a detached, drive-through facility; and a cash-dispensing-only automated teller machine (“ATM”) at a State Highway 51 truck stop.

According to its March 31, 1997, Report of Condition (“ROC”), the bank’s assets totaled approximately \$67 million. The March 31, 1997, ROC indicates the bank’s major loan category is consumer residential real estate loans, which comprises 52% of its loan portfolio. The balance of the bank’s lending portfolio is composed of 31% commercial, 14% consumer, and 3% agriculture loans. The composition of the bank’s loan portfolio reflects the demand for specific types of loans in the assessment area.

The bank offers a variety of products that serve the credit needs of area residents, including agriculture, consumer, business, community development, and government-guaranteed loans. In addition, the bank provides residential real estate loans for constructing, purchasing, refinancing, and improving homes. The bank offers government-guaranteed loan programs sponsored by the Small Business Administration, Federal and State Departments of Veterans Affairs, the Wisconsin Housing and Economic Development Authority (“WHEDA”), and the Federal Housing Administration (“FHA”). The bank is also active in the HCRI/HOME and the Community Development Block Grant (“CDBG”) programs, which are coordinated with the city of Merrill. These two programs are designed to assist low- and moderate-income first-time homebuyers with zero-interest, deferred loans. The CDBG program also provides home improvement loans to home and rental property owners.

DESCRIPTION OF M&I CITIZENS AMERICAN BANK’S ASSESSMENT AREA

The bank has defined its assessment area as Lincoln County and the northern section of Marathon County in central Wisconsin. The assessment area includes block numbering areas (“BNA”) 9801, 9802, 9803, 9804, 9805, 9806, 9807, 9808, 9809, and 9810 in Lincoln County and census tracts 15 and 23 in Marathon County. All the BNAs in Lincoln County are designated as middle income. The bank’s office is located in Lincoln County, BNA 9809. Based on 1990 census data, the population for Lincoln County is approximately 26,993. The population for the city of Merrill is approximately 9,860. Based on 1996 estimated Wisconsin Department of Administration data, Merrill has a population of 10,322, an almost 5% increase since 1990.

The bank does not have an office in a metropolitan statistical area. However, its assessment area includes two census tracts from the Wausau, Wisconsin, metropolitan statistical area (“MSA”). The assessment area’s MSA tracts are 15 and 23 and are located in the northern section of Marathon County. According to the 1990 census, the population for these two tracts is approximately 10,243. Both tracts are designated as middle income. The assessment area’s total population is 37,236, according to the 1990 U.S. Census.

CRA divides income levels into four categories: low, moderate, middle, and upper. The categorization of a borrower or geography's income level is determined relative to the statewide nonmetropolitan median family income for a non-MSA area and the MSA median family income for an MSA area. Pursuant to CRA's definitions, low-income individuals have incomes of less than 50% of the statewide nonmetropolitan or the MSA median family income, while moderate-income individuals have incomes of at least 50% but less than 80% of this amount. The regulation defines middle-income individuals as persons with incomes of at least 80% but less than 120% of the statewide nonmetropolitan or the MSA median family income. Individuals with incomes of 120% or more of the statewide nonmetropolitan or the MSA median family income are classified as upper-income persons. BNAs and census tracts are classified using similar categories based on the level of the median family income in the geography. Based on 1990 U.S. Census data, the statewide nonmetropolitan and the Wausau MSA median family incomes are \$30,290 and \$34,988, respectively. The income level of BNAs and census tracts is determined using these figures. According to 1997 updated census data, the statewide nonmetropolitan and the Wausau MSA median family incomes are \$39,600 and \$45,200, respectively. These figures are used to classify income levels of borrowers.

According to 1990 census data, the assessment area's median family income is \$30,572, while its median household income is \$26,641. There are 10,309 families and 13,495 households in the assessment area. Approximately 7% of the families and 10% of the households in the assessment area have incomes below the poverty level. The following table summarizes the distribution of household and family incomes for the assessment area.

ASSESSMENT AREA POPULATION BY INCOME LEVEL				
Unit of Measure	Low Income	Moderate Income	Middle Income	Upper Income
Households Compared to Median Household Income	22%	16%	22%	40%
Families Compared to Median Family Income	18%	20%	27%	35%

According to community contacts, as well as information obtained from bank management, the assessment area's economy is considered stable and growing, with manufacturing as the primary industry in the Merrill area. Major employers include a shoe manufacturing company (242 employees), two wire product manufacturers (330 employees), three millwork plants (1,405 employees), and an insurance company (404 employees). The local school system and a local correctional institution together employ approximately 725 persons. According to one contact, wages in the area have generally been lower than other parts of the county and state but have been gradually increasing. The local unemployment rate for 1996 was 5%. One community contact stated there is some shortage of labor in the area but that is balanced by people who commute to Merrill from outside the area.

According to one community contact, local real estate prices have escalated in recent years. Based on 1990 U.S. Census data, the assessment area's median housing value is \$44,368. Wisconsin Department of Revenue figures show that Lincoln County's property values increased more than most Wisconsin counties between 1992 and 1993.

The local banking environment is highly competitive. Merrill has three commercial banks, two savings and loan institutions, and one credit union. In addition, there is a nonbank entity, a brokerage firm, that

competes for deposit customers. Substantial competition also is provided by financial institutions located in Wausau, 18 miles to the south of Merrill.

Examiners contacted a representative of the city government and a representative of a local business association as part of the bank's CRA evaluation. Both contacts provided information regarding the local economy and housing credit needs. Examiners used information from these contacts as well as information from bank management to help evaluate the bank's CRA performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA performance as evaluated based on the lending, investment, and service tests is rated satisfactory.

LENDING TEST

The bank's lending performance, as evaluated under the lending test, is rated low satisfactory. The bank's high quarterly net loan-to-deposit ratio shows that the bank actively originates loans. The loan data show that the bank's lending activity adequately reaches borrowers of varying incomes and sizes. To evaluate the bank for this criteria, a sample of 114 residential real estate loans made in 1996 and first quarter 1997 and 207 commercial and 31 agricultural loans made in 1996 were reviewed. In assigning the overall lending test rating greatest weight was placed on the borrower profiles and geographic distribution of lending. These factors most accurately demonstrate the bank's commitment to serving the credit needs of all borrowers and areas in the assessment area.

Lending Activity

The bank's net loan-to-deposit ratio is high and compares favorably with its competitors' ratios. The bank's quarterly average net loan-to-deposit ratio since June 30, 1995, is 82%. Since June 1995, the bank's quarterly net loan-to-deposit ratio has fluctuated between 77% and 90%.

DATE	NET LOANS (IN THOUSANDS)	DEPOSITS (IN THOUSANDS)	NET LOAN-TO- DEPOSIT RATIO
June 30, 1995	\$46,937	\$57,415	82%
September 30, 1995	\$51,389	\$57,195	90%
December 31, 1995	\$50,055	\$60,772	82%
March 31, 1996	\$46,896	\$58,729	80%
June 30, 1996	\$49,438	\$62,522	79%
September 30, 1996	\$50,522	\$65,301	77%
December 31, 1996	\$48,315	\$61,208	79%
March 31, 1997	\$50,273	\$58,166	86%

The above chart shows that the bank's loan levels have remained relatively constant since its FRS membership date. Some minor fluctuations in loan and deposit levels account for the changes in the bank's ratio.

Not included in the bank's loan-to-deposit ratio is a notable number of real estate loans that were sold on the secondary market since the bank's membership. However, if they were included, the bank's loan-to-deposit ratio would only increase slightly.

According to its December 31, 1996, Uniform Bank Performance Report ("UBPR"), the bank's 78.94% net loan-to-deposit ratio is higher than its national peer group ratio of 62.91%. The bank's ratio places it in the 86th percentile when compared with its peers. A comparison with competitors in its assessment area was also made using quarterly ROC data from June 30, 1995, to March 31, 1997. The following chart identifies the asset sizes as of March 31, 1997, and quarterly average net loan-to-deposit ratios for the bank and its local competitors.

BANK	TOTAL ASSETS (MARCH 31, 1997) (IN THOUSANDS)	QUARTERLY AVERAGE NET LOAN-TO-DEPOSIT RATIO
M&I Citizens American Bank Merrill, Wisconsin	\$67,330	82%
Tomahawk Community Bank, S.S.B Tomahawk, Wisconsin	\$55,244	92%
Lincoln County Bank Merrill, Wisconsin	\$40,502	85%

As shown above, the bank's average net loan-to-deposit is slightly less than the ratios of its competitors. The many financial institutions operating within or near the bank's assessment area create a very competitive credit market for the types of loans offered by the bank. As reflected by the competitor data, it appears the demand for credit in the assessment area is strong. The higher loan-to-deposit ratio for the competitor in Tomahawk is explained by several factors. First, institutions located in Tomahawk are not as directly affected by competition from larger institutions located in Wausau as are those institutions in Merrill. Second, Tomahawk is located approximately 20 miles north of Merrill and has branches of several financial institutions. It is apparent local banks are willing to extend credit to fulfill the needs of local residents, farms, and businesses. Based on the bank's high loan-to-deposit ratio and secondary market lending, the bank's performance reflects good responsiveness to assessment area credit needs.

Assessment Area Concentrations

Based on loans reviewed during the evaluation, the bank makes a substantial majority of its originations to residents, businesses, and farms in its assessment area. The following table shows the percentage of residential real estate, commercial, and agricultural loans by total number and dollar amount originated within the assessment area.

PERCENTAGE OF LOANS IN THE ASSESSMENT AREA		
Loan Type	Total Number of Loans	Total Amount of Loans
Residential Real Estate	89%	83%
Commercial	88%	61%
Agriculture	100%	100%

As the data show, the bank extends a substantial majority of its residential real estate, commercial, and agricultural loans in its assessment area. The bank had a smaller percentage of the total dollar amount of commercial loans in the assessment area because it made several large loans to borrowers outside the assessment area. Based on the high concentration of these loans within the assessment area, the bank's performance in this criteria is very good.

Geographic Distribution of Loans

As previously discussed, the BNAs and census tracts that make up the bank's assessment area are all classified as middle income. There are no low-, moderate-, or upper-income geographies in the assessment area. Although all the BNAs and census tracts are classified middle income, median family and household income varies substantially between these areas. Median family income ranges from \$38,298 in census tract 15, the closest geography to Wausau, to \$26,121 in BNA 9803, located in the northwest corner of Lincoln County. Median household income ranges from \$35,878 in tract 15 to \$21,563 in BNA 9803. This bank did not make any real estate loans in BNA 9803 and only one real estate loan in tract 15. However, the bank made more commercial loans in BNA 9803 than in tract 15. As would be expected, lending is most heavily concentrated in the BNAs located in and adjacent to Merrill. Despite the variation in median income levels within the geographies, the bank's lending is spread throughout the assessment area and is adequate given the size and location of the bank and its competitors.

Borrowers' Profiles

The bank's level of lending reflects adequate loan penetration among borrowers of different income levels and businesses and farms of different sizes. As discussed earlier, the CRA classifies income levels into four categories: low, moderate, middle, and upper. The median household and family incomes for the bank's assessment area are \$26,641 and \$30,572, respectively.

DISTRIBUTION OF LOANS BY BORROWER INCOME LEVEL IN THE ASSESSMENT AREA*				
Loan Type	Low Income	Moderate Income	Middle Income	Upper Income
<u>RESIDENTIAL REAL ESTATE</u>				
Percentage of Total Loans	4%	18%	33%	46%
Percentage of Total Loan Amount	4%	11%	29%	56%
*Income level is determined based on the State of Wisconsin's 1997 nonmetropolitan median family income of \$39,600 and Wausau MSA median family income of \$45,200.				

The bank's level of residential real estate lending to low- and moderate-income borrowers is adequate. As previously mentioned, approximately 38% of the households in the bank's assessment area are classified as low and moderate income. The bank's residential real estate lending (22%) is below the percentage of low- and moderate-income households in the assessment area. The bank's level of residential real estate lending is limited by the percentage of low- and moderate-income households likely to have incomes sufficient to qualify for residential real estate loans in the assessment area. Low-income individuals outside the Wausau MSA have incomes below \$19,800 and are unlikely to qualify for most real estate loans. Moreover, as mentioned previously, a local government official was contacted as part of the evaluation. According to the contact, housing costs in the assessment area have escalated in the last four years. Figures provided by the Wisconsin Department of Revenue regarding property values confirm these impressions. As a result, it has become more difficult for low- and moderate-income individuals to purchase homes in the assessment area.

As discussed in the Description of Institution section, the bank participates actively in the CDBG loan program coordinated by the city of Merrill. Under this program, banks provide loans to low- and moderate-income borrowers who obtain interest-free, deferred loans from the city for down-payment funds. The program also offers home improvement loans to low- and moderate-income borrowers. The bank has made several loans under this program.

The sample of commercial and agriculture loans reviewed during the evaluation showed that the bank originated loans to a significant number of borrowers with gross annual revenues of \$1 million or less. Most of the bank's commercial loans were to such borrowers. Of the 183 loans in the sample, 84% were to businesses with gross annual revenues of \$1 million or less. In addition, 87% of the loans for amounts of \$100,000 or less, 67% of loans between \$100,000 and \$250,000, and 20% of loans greater than \$250,000 went to businesses with \$1 million or less in gross annual revenues. Furthermore, 93% of the bank's loans to such entities had amounts of \$100,000 or less, 7% had amounts between \$100,000 and \$250,000, and 1% had amounts greater than \$250,000. The evaluation revealed the bank originates all of its agricultural loans to small farms. Of the 31 loans in the sample, all were to borrowers with gross annual revenues of \$1 million or less. In addition, almost all the sampled farm loans had amounts of \$100,000 or less. This distribution of small business and farm loans is consistent with the bank's asset size, legal lending limit, and overall assessment area economic conditions.

The bank's lending to residential real estate borrowers of different income levels, although relatively low, is reasonable given economic, demographic, and competitive factors in the market. The small business and small farm lending is also reasonable given that most local businesses are small.

Community Development Lending Activities

The bank did not report any community development loans. According to bank management, there are limited opportunities to finance community development projects. Consequently, the bank's lack of community development loans reflects the lack of community development opportunities in the assessment area.

Product Innovation and Flexibility

The bank has flexible lending standards and innovative products designed to address the credit needs of low- and moderate-income individuals in the assessment area. According to a community contact, the bank has flexible lending standards and participates in Merrill's community development block grant and HCRI/HOME programs to facilitate home rehabilitation and to assist first-time homebuyers in Merrill. These programs help low- and moderate-income individuals obtain housing loans. The bank has made numerous such loans since its membership date.

The bank has developed the Neighborhood Home Loan Program ("NHLP"). NHLP is a low down payment, residential real estate loan program that the bank implemented in 1997. Qualified applicants can purchase a home with a minimum 3% down payment and no private mortgage insurance. As of the evaluation date, the bank has made several NHLP loans. The bank has initiated marketing efforts to promote the program. The bank also offers WHEDA, FHA, and VA loans that often help low- and moderate-income individuals purchase or rehabilitate homes.

In conclusion, the bank's performance as evaluated under the lending test is rated low satisfactory. While the bank's loan-to-deposit ratio is very good and lending is concentrated in the assessment area, the geographic distribution of lending and distribution of loans between borrowers of various income levels is only adequate. The bank offers flexible underwriting criteria for some types of loans primarily through

government loan products. NHLP is somewhat innovative in that it does not involve government participation. The lack of any community development lending also detracts from a higher rating.

INVESTMENT TEST

The bank's level of qualified community development investments was evaluated and is rated needs to improve. The bank has no qualified community development investments.

Investment and Grant Activity

Discussions with bank management and review of the bank's investment portfolio showed that the bank is very willing to become involved in local investment activity. However, opportunities for investments that may be considered qualified investments under CRA are not readily available in the bank's assessment area. A review of the bank's investment portfolio revealed notable investment activity; however, the investments do not meet the criteria to be considered qualified investment as defined under CRA.

Based on information provided to examiners during the examination, the bank has made a few donations that can be considered qualified investments. Since mid-1995, the bank has provided several donations to a local nursing home that serves the needs of mostly low- and moderate-income elderly individuals. In August 1995, the bank also provided donations to an organization that provides housing to low- and moderate-income individuals and to a local food shelf. Although the bank has few qualified investments, its donations to businesses and charitable organizations that provide services to low- and moderate-income individuals support the low satisfactory rating.

SERVICE TEST

The bank's performance under the service test is rated high satisfactory based on the strong retail delivery system for the bank's size.

Retail Banking Services, Changes in Branch Locations, and Business Hours

The bank offers a variety of deposit products and retail banking services to meet the needs of its customers. Its personal checking and savings products include Basic Checking, which has no monthly maintenance fee and the first 10 checks are free; Senior Checking, which is a no-fee account for people 55 years of age or older; Statement Savings, which has no monthly fee for minors (under 18 years of age), seniors (55 years of age or older), or for individuals whose balances do not fall below \$50.00 per month; and MiConnection Checking, which has no monthly fee if the customer's paycheck is deposited electronically at the bank. In addition to these low-cost services, the bank offers interest-bearing checking, money market, savings, and certificate of deposit accounts for individuals.

The bank is affiliated with 29 financial institutions located in Wisconsin. The bank and its Wisconsin affiliates operate an interbank system, which permits customers to make deposits, cash checks, and make loan payments through any affiliate office located in the state.

The bank offers a service known as Mi Line. The Mi Line is an automated voice response system that allows customers to access deposit and credit account information 24 hours a day. Information accessible through the Mi Line includes deposit and loan balances, current interest rates, and checks cleared since the last statement. The service also permits transfers of funds between deposit accounts. Customers may also

access account information using M&I Direct PC Banking System, which can retrieve interest rate information, issue payments, transfer money between accounts, reconcile accounts, and review transaction activity.

The Corporation has established the M&I Direct Telephone Bill Pay, which permits bank customers to pay bills via telephone. Bank customers can access M&I Direct Telephone Bill Pay 24 hours a day, seven days a week. Through M&I Direct Telephone Bill Pay, bank customers can issue payments to any payee. The bank collects a monthly fee for this service.

Many of these services are made possible in large part through the resources made available from its affiliation with the Corporation's banking system.

The bank has one full-service main office in downtown Merrill, with a detached drive-up facility located adjacent to the main building. The hours of operation for these facilities are detailed below.

Lobby:	Monday to Thursday	8:00 a.m. to 5:00 p.m.
	Friday	8:00 a.m. to 7:00 p.m.
Drive-up	Monday to Thursday	7:30 a.m. to 5:00 p.m.
	Friday	7:30 a.m. to 7:00 p.m.
	Saturday	7:30 a.m. to noon

The bank also operates an ATM that only dispenses cash; it is located at a truck stop on State Highway 51 east of Merrill. The bank offers the M&I Bank Card, which also can be used as a debit card anywhere VISA is accepted. The bank uses the TYME network for its ATM and ATM cards.

As previously discussed, the BNAs and census tracts that make up the bank's assessment area are classified as middle income; there are no low-, moderate-, or upper-income geographies in the assessment area. The bank's office and ATM are located in the southern portion of the assessment area. Telephone and computer banking services are available throughout the area. In addition, the TYME network makes ATM services widely available.

Since the bank's membership, there have not been any branch openings or closings. In general, the bank's office locations, its ATM, and its retail banking services are easily accessible in all areas of the assessment area.

Community Development Services

The bank's participation in community development services, as defined by CRA, is very restricted because of the limited opportunities for community development activities in the assessment area. According to the community contacts, the bank is very supportive of activities that promote the economic and social health of the community. However, most of these activities do not qualify as community development services.

The bank has provided a few community development services since becoming an FRS member bank. In mid-1996, a bank loan officer spoke at a local high school regarding the credit application process, credit bureau reports, bank products, and loan qualification procedures. The bank also provided a real estate seminar for first-time homebuyers in March 1996. During this seminar, local attorneys, realtors, and a bank loan officer discussed mortgage types and loan qualification procedures.

Overall, the bank's performance under the service test is rated high satisfactory. The rating is based on the

very good accessibility of the bank's services in its assessment area, the strong retail service products for a bank of this size, and the existence of a few qualified community development services.

GENERAL

The bank has not received any CRA-related complaints since its membership in May 1995. Also, the evaluation did not reveal any violations of the substantive provisions of the fair housing and fair lending laws and regulations. However, the examination revealed a violation of the technical provisions of Regulation B--Equal Credit Opportunity Act. Bank management corrected the violation before conclusion of the examination.

APPENDIX A

Scope of Examination			
The bank has defined one assessment area for purposes of CRA. The assessment area is Lincoln County and the northern section of Marathon County, Wisconsin. An on-site evaluation was performed at the bank's only office in Merrill.			
Time Period Reviewed	We reviewed the bank's CRA performance based on its activities since the bank's membership into the Federal Reserve System on May 4, 1995. The loan data reflected in the report is based on 1996 small business and small farm loan originations and 1996 and first quarter 1997 residential real estate loan originations.		
Financial Institution M&I Citizens American Bank, Merrill, Wisconsin			Products Reviewed Residential real estate loans Commercial loans Agricultural loans
Affiliate(s) Not Applicable			
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited	Other Information
Assessment Area Lincoln County and Northern Marathon County, Wisconsin	On-site	Merrill	

PUBLIC DISCLOSURE

May 19, 1997

Date of Evaluation

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

M&I Citizens American Bank

Name of Depository Institution

095531050000

Identification Number of Institution

Merrill, Wisconsin

Address of Institution

Federal Reserve Bank of Minneapolis
250 Marquette Avenue
Minneapolis, Minnesota 55401-2171

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.