

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 Central Bank & Trust, Marshfield, Wisconsin** prepared by the **Federal Reserve Bank of Chicago**, the institution's supervisory agency, as of **July 28, 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, a high concentration of loans within the assessment area and its strong record of lending to small businesses. The bank's community development lending is generally strong. The distribution of loans within the assessment area and lending to borrowers of different income levels are reasonable. The bank uses innovative and flexible lending practices to benefit small farms and businesses in the assessment area.

Although the bank did not have a high level of qualified community development investments, a review of local economic conditions and discussions with community representatives indicate that the current level of investment does not reflect the bank's responsiveness or commitment, but limited investment opportunities within the assessment area.

Banking services are generally 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 Central Bank & Trust, Marshfield, Wisconsin** with respect to the lending, investment and service tests. Based on the component test ratings for large banks, the assigned composite rating is **A**satisfactory record of meeting community credit needs.@

LARGE INSTITUTION PERFORMANCE CRITERIA	M&I CENTRAL BANK & TRUST		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

DESCRIPTION OF M&I CENTRAL BANK & TRUST ASSESSMENT AREA

Marshfield is located in north central Wisconsin, approximately 40 miles west of Stevens Point, in Wood County. The bank has defined an assessment area as 25 block numbering areas (BNAs) in Clark and Wood Counties and one census tract in Marathon County. The following chart depicts characteristics of the geographies in the assessment area:

BNA/Census Tract	Median Family Income	Number of Households	BNA/Census Tract	Median Family Income	Number of Households
9501	29,565	1,623	21.00	33,937	2,030
9502*	23,951	1,458	106.00	32,586	2,191
9503	24,767	1,462	107.00	35,625	1,399
9504	26,504	1,180	108.00	30,562	998
9505	27,238	1,541	109.00	35,307	1,297
9506	26,902	1,417	110.00	31,417	2,047
9507	28,889	1,468	111.00	32,123	1,525
9508*	23,862	1,068	112.00	29,423	1,668
101.00	31,151	1,459	113.00	33,418	2,064
102.00	35,350	1,415	114.00	38,820	2,156
103.00	27,422	1,613	115.00	44,190	1,604
104.00	35,466	1,333	116.00	35,731	1,593
105.00	34,323	1,360	117.00	36,304	1,783
*Moderate- income BNA					

Based upon 1990 census data, 111,012 people reside in the assessment area; minorities comprise less than two percent of the population. Asians are the largest minority group within the assessment area, followed by Native Americans, and individuals of Hispanic origin. The median family income for the assessment area is \$32,242; slightly below the Wisconsin state median family income of \$35,082 and slightly above the Wisconsin state non-metropolitan median family income of \$30,290.

The following chart depicts family income levels in the assessment area, in comparison to state income levels:

Area/Number of Families	Low-Income Families		Moderate-Income Families		Middle-Income Families		Upper-Income Families	
	#	%	#	%	#	%	#	%
Assessment Area 29,894	4,797	16.0	5,484	18.3	7,293	24.4	12,320	41.2
State of Wisconsin 1,284,297	230,129	17.9	240,790	18.7	339,926	26.5	473,452	36.9
Non-metropolitan State of Wisconsin 420,033	73,737	17.6	81,765	19.5	107,060	25.5	157,471	37.5

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

HOUSING DATA	ASSESSMENT AREA	PERCENT OF TOTAL
Owner-Occupied Units	30,568	69.7
Rental Units	10,156	23.1
Vacant Units	3,151	7.2
Total Housing Units	43,875	100.0

HOUSING DATA	ASSESSMENT AREA	STATE OF WISCONSIN	NON-METROPOLITAN STATE
Single-Family	77.0%	67.7%	75.8%
2 - 4 Units	7.3%	13.5%	7.2%
5 or More Units	6.7%	12.6%	5.7%
Built Pre-1950	37.9%	36.8%	38.6%
Median Housing Value	\$47,301	\$62,141	\$50,092

Dairy farming is the major agricultural activity in Clark and Wood Counties, with some cranberry farming operations located in the southern portion of Wood County. University of Wisconsin economic research data for the year, 1996 through the first quarter of 1997 suggests slow, stable growth in Central Wisconsin, led by increased employment in the industrial and service sectors.

Industrial employment increased by 400 between March, 1996 and March, 1997. Approximately 2,600 jobs were created in the service and trade industries during the same period. The following chart details the major employers in the Marshfield area:

COMPANY	PRODUCT/SERVICE	EMPLOYEES
Marshfield Clinic	450-physician multi-specialty private clinic	2,575
St. Joseph's Hospital	524-bed acute care hospital	1,904
Roehl Transport, Inc.	Transportation/general commerce	1,284
Weyerhaeuser Company	Wood doors	744
Wick Building Systems	Manufactured housing	705
de Boer Inc.	Transportation/general commerce	660
Land O=Lakes	Processed cheese	479
Felker Bros. Corp.	Stainless steel fabrication	315
Fleming Companies- Marshfield Division	Wholesale groceries	270

According to the Wisconsin Department of Labor, the seasonally-adjusted unemployment rates for Clark and Wood Counties were 5.5% and 4.5% respectively, for June, 1997.

DESCRIPTION OF INSTITUTION

M&I Central Bank & Trust with total assets of \$204.8 million as of March 31, 1997, is an affiliate of Marshall & Ilsley Corporation, a multi-bank holding company in Milwaukee, Wisconsin. Commercial real estate and commercial/industrial lending comprised approximately 34% of the portfolio as of March 31, 1997. The bank offers a full array of loan and deposit services. The bank operates four branch offices in the assessment area, all located in middle-income geographies. The bank offers additional banking services through five automated teller machines (ATMs) located in Marshfield and Neillsville.

The bank derives local competition from a number of financial institutions, including: Associated Bank North (branches of Wausau), Firststar Bank Wisconsin (branch of Madison), First Financial Bank (branch of Stevens Point) and Pioneer Bank (branch of Auburndale). Additional competition is derived from a number of local credit unions and Marshfield Savings Bank.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

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

LENDING TEST

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

Lending Volume

A review of the bank's March 31, 1997 Consolidated Report of Condition revealed a net loan-to-deposit ratio of 89.78% and a net loan-to-asset ratio of 77.21%. The distribution by loan type is as follows:

LOAN TYPE	DOLLAR AMOUNT OUTSTANDING (\$000)	PERCENT OF TOTAL LOANS
REAL ESTATE		
Construction	663	0.42
Secured by Farmland	16,316	10.32
Revolving open-end (1-4)	2,018	1.28
Residential (1-4)	42,517	26.88
Commercial	21,460	13.57
Multi-family	2,190	1.38
CONSUMER		
Open-end Credit	1,675	1.06
All Other	27,846	17.61
COMMERCIAL AND INDUSTRIAL		
AGRICULTURAL	32,400	20.49
STATE AND POLITICAL OBLIGATION	10,694	6.76
OTHER	258	0.15
	123	0.08

A review of the loan portfolio revealed commercial/industrial lending and commercial real estate loans together comprised approximately 34% of the portfolio, followed by residential real estate lending which comprised approximately 30% of the loan 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	0.41	2.17
1 - 4 Family Residential	28.40	32.96
Home Equity	0.98	0.84
Other Real Estate	24.88	22.09
Farmland	10.00	3.48

LOAN TYPE	BANK AVERAGE LOAN MIX (%)	PEER AVERAGE LOAN MIX (%)
Multi-family	1.40	0.66
Commercial	13.48	15.32
TOTAL REAL ESTATE LOANS	53.69	60.45
LOANS TO INDIVIDUALS	18.83	15.53
CREDIT CARD LOANS	1.12	0.49
COMMERCIAL & INDUSTRIAL LOANS	20.71	14.18
AGRICULTURAL LOANS	6.53	3.39
MUNICIPAL LOANS	0.13	0.51
OTHER LOANS*	0.10	0.18
*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
88.64	71.51

As the preceding data illustrates, the bank's net loan to deposit ratio exceeds peer levels. Real estate lending levels are lower than peer by almost 7%, and commercial and industrial loans exceed peer by the same margin; however, loans to individuals are slightly higher than peer. Management and community representatives indicated that the composition of the loan portfolio is reflective of the bank's traditional lending strengths and its focus on meeting the individual needs of its assessment area.

The bank's loan-to-deposit ratio for the eight quarters ending March 31, 1997 averaged 85.19%. The following chart illustrates the eight-quarter average loan-to-deposit ratios for the bank and two of its local competitors:

INSTITUTION	ASSET SIZE (000s)	AVERAGE LOAN-TO-DEPOSIT RATIO
M&I Central Bank & Trust	\$204,834	85.19
Marshfield Savings Bank	\$93,748	118.39
Citizens State Bank of Loyal, Loyal	\$60,387	77.45

The preceding table indicates that the bank's loan-to-deposit ratio is generally consistent with the loan-to-deposit ratios of its other local competitors.

Lending in Assessment Area

Business and farm loans extended in 1996 were reviewed to determine the bank's level of lending within the assessment area. The bank made 625 business and 696 farm loans during the period. The following chart highlights business and farm lending within the assessment area:

LOAN TYPE	# IN ASSESSMENT AREA	% IN ASSESSMENT AREA
Farm	656	94.25
Business	572	91.52
Total	1228	92.96

An analysis of affiliate and bank home purchase and refinancing real estate loans with original amounts over \$50,000 from July 1, 1996 through June 30, 1997 was conducted. The analysis indicated that 65 of 74, 1996 originations (87.84%) and 31 of 38 originations through June 30, 1997 (81.58%) were made within the assessment area. A random sample of 40 real estate loans with original amounts less than \$50,000 was also reviewed to assess lending in the assessment area; 35 of 40 loans selected (87.50%) were made within the assessment area.

Geographic Distribution

The geographic distribution of business, farm and real estate loans was also reviewed to assess lending within the assessment area, including moderate-income areas. Two of the 26 geographies in the assessment area (9502 and 9508) are moderate-income areas, according to 1990 census data. Approximately 6.4% of the population (7,120 individuals) in the assessment area resides within moderate-income BNAs. The following chart depicts the geographic distribution of business and farm loans by census tract income:

LOAN TYPE	NUMBER	TYPE OF GEOGRAPHY (%)			
		Low	Moderate	Middle	Upper
Business	572	N\A	0.5%	99.5%	0.0%
Farm	656	N\A	4.1%	95.9%	0.0%

Although the bank's business loan penetration in moderate-income BNAs appears low, the rural nature of BNAs 9502 and 9508 indicate the bank's business loan penetration is reasonable. In addition, BNA 9502 overlaps the assessment area of an M&I affiliate bank located in Eau Claire. A review of the bank's 1996 business and farm loan activity revealed reasonable penetration within the assessment area, with business or farm lending in 20 of the 26 geographies comprising the assessment area. No lending was noted in BNAs 112, 113, 116, 117 which are middle-income, and BNAs 114 and 115, which are upper-income. These BNAs overlap the assessment area of an M&I affiliate bank located in Stevens Point.

An analysis of affiliate and bank real estate lending for loans with original amounts over \$50,000 revealed purchase or refinancing activity in 15 of the 26 geographies in assessment area for 1996; one loan was made in a moderate-income BNA. Home purchase or refinancing mortgage loans were made in 11 different geographies within the assessment area for the first six months of 1997. A random sample of 40 real estate loans having original amounts less than \$50,000 was also reviewed to assess geographic distribution. Loans were extended in 13 different geographies in the assessment area, including one loan in a moderate-income BNA.

Borrower Characteristics

The bank's 1996 small business and small farm lending was analyzed to assess lending to businesses of different sizes. The following chart depicts the distribution of small business and farm originations extended in the assessment area during calendar year, 1996:

Distribution of Loans by Loan Amount						
LOAN TYPE	LOANS \$100,000 or LESS		LOANS \$100,000+ to \$250,000		LOANS GREATER THAN \$250,000	
	#	\$	#	\$	#	\$
Small Business Loans	471	12,913,000	65	10,618,000	36	14,761,000
Small Farm Loans	594	12,437,000	53	7,500,000	9	3,327,000
Totals	1,065	25,350,000	118	18,118,000	45	18,088,000

A total of 82.34% of the number of small business loans and 90.55% of the number of small farm originations in the assessment area were in amounts of \$100,000 or less.

The following table illustrates lending to small businesses and farms with gross annual revenues of \$1 million or less:

LOAN TYPE	#	\$
Small Business Loans	483	22,393,000
Small Farm Loans	652	22,916,000
Total	1,135	45,309,000

Approximately 92% of the number of small business and small farm loans in the same sample, were extended to businesses and farms with gross annual revenues less than \$1 million.

This performance indicates strong bank lending to small business and small farming operations, based upon the total volume of small business and small farm lending, the high proportion of small business and small farm lending to businesses with revenues of less than \$1,000,000 and the high percentage of loans in amounts of less than \$100,000.

A review of affiliate and bank purchase and refinancing real estate loans with original amounts of \$50,000 or more during the review period, revealed that 10.42% of purchase and refinancing loans (10 of 96) were to low- or moderate-income borrowers. In comparison, approximately 34% of the families in the assessment area are low- or moderate-income, based upon 1990 census data. Although income information for real estate loans with original amounts of less than \$50,000 was not collected, review of origination amounts indicated that approximately 78% of the sampled real estate loans were for amounts of \$36,000 or less. Based upon the median housing value for the assessment area (\$47,301) a large percentage of these loans would be expected to benefit low- or moderate-income borrowers.

Community Development Lending

The bank regularly engages in community development lending; the following chart illustrates examples of community development loans made by the bank since the previous examination:

LOAN AMOUNT(S)	DESCRIPTION- COMMUNITY DEVELOPMENT LOANS
120,000	Equipment loan for business start-up
479,000 250,000	SBA and WHEDA loans for a hardware store.
58,100	Neighborhood Home Loan Program* loan to moderate- income individual
55,775	Neighborhood Home Loan Program* loan to moderate- income individual

* See Innovative or Flexible Lending Practices for a discussion of this loan program.

The bank's community development lending includes examples of lending to support affordable housing and economic development.

Innovative or Flexible Lending Practices

The bank engages in innovative and flexible lending practices designed to address the credit needs of low- and moderate-income individuals, small business and small farm owners and residents and businesses located in low- and moderate-income geographies. The bank participates in the Wisconsin Housing & Economic Development Authority (WHEDA) Credit Relief Outreach Program (CROP) and WHEDA HOME Program, Small Business Administration (SBA) and Farm Service Agency (FSA) loan programs. The following chart depicts the number and amounts of loans outstanding as of April 30, 1997:

PROGRAM	NUMBER	\$ OUTSTANDING
FSA	50	5,943,400
SBA	14	1,768,496
WHEDA	32	270,585

The bank's participation with FSA and the WHEDA CROP programs provide vital low interest rate financing for small farm operations and beginning farmers. The WHEDA HOME program provides home purchase loans to low- and moderate-income families. In April, 1997, the bank began participating in the M&I Neighborhood Home Loan Program (NHLP), which offers flexible underwriting criteria, low loan fees, a 97% loan-to-value for single family residence and a 95% loan-to-value for two-to-four family residences.

CONCLUSION

The bank's overall loan volume, lending in the assessment area and geographic distribution is considered strong. The bank's loan-to-deposit ratio exceeded that of its peers and generally that of its local competitors. Lending to businesses of different revenue sizes and the bank's use of innovative and flexible lending practices were strong. Community development lending was reasonable. Real estate lending to borrowers of different income levels was reasonable; the sample of real estate loans of \$50,000 or less suggests strong penetration among low- or moderate-income applicants. The bank's overall penetration of loans in moderate-income BNAs was reasonable. A substantial majority of real estate, small business and small farm loans were originated within the assessment area.

INVESTMENT TEST

The bank's investment portfolio, donations and special programs that foster community development were reviewed. Qualified investments or grants were reviewed for innovativeness, responsiveness to community 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. Although no qualified investment activity was noted in the bank's portfolio, discussions with bank management and community representatives and a review of local economic conditions reveal that the lack of investment activity is the result of limited opportunity, rather than unwillingness to invest within the assessment area.

Degree to Which Investments Are Not Provided by Private Investors

The bank has a reasonable level of investment in the form of grants and donations, which support the ongoing operating expenses of community 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 that the bank made various small donations to the Marshfield and Neillsville Chambers of Commerce. Additionally, the bank donates office space to the Neillsville Chamber of Commerce. The bank also contributes \$8,600 annually in sponsorship of the quarterly University of Wisconsin Economic Indicator Report for the Marshfield and Neillsville area.

Responsiveness to Available Opportunities

The bank's current level of investment generally reflects opportunities available to the bank within its assessment area. Discussions with bank management and community representatives, in addition to a review of the bank's overall lending and service performances, suggests general responsiveness to community credit and community development needs.

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 within its assessment area.

SERVICE TEST

The bank's system for delivering retail banking and community development services was 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. 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 Central Bank & Trust is a full-service bank with five branches and six ATMs located in Wood and Clark Counties. The bank provides loans to consumers, organizations, businesses and government entities in accordance with uniform nondiscriminatory lending standards. In addition, the bank offers various checking and interest bearing accounts, including accounts targeted to all segments of the assessment area.

Distribution of Branches Among Geographies

The bank's assessment area includes Wood and Clark Counties, including one census tract in Marathon County. The following chart illustrates the bank's branch and drive-up facility locations and hours of operation. All bank branches are located in middle-income geographies:

M&I BRANCH NAME & LOCATION	HOURS OF BUSINESS

	LOBBY	DRIVE-UP	WALK-UP
Central Office 101 W. 4th Street, Marshfield	M-Th 8:30 am - 4:30 pm Friday 8:30 am - 6:00 pm	M-Th 8:30 am - 4:30 pm Friday 8:30 am - 7:00 pm Saturday 8:30 am - 12:00 pm	Saturday 8:30 am - 12:00 pm
Tri-County Office 1305 N. Central Ave., Marshfield	M-Th 8:30 am - 4:30 pm Friday 8:30 am - 6:00 pm Saturday 8:30 am - 12:00 pm	M-Th 8:30 am - 4:30 pm Friday 8:30 am - 7:00 pm Saturday 8:30 am - 12:00 pm	No Walk-up hours
Neillsville Office 106 W. Division Street, Neillsville	M-Th 9:00 am - 4:30 pm Friday 9:00 am - 5:00 pm	M-Th 8:30 am - 5:00 pm Friday 8:30 am - 6:00 pm Saturday 8:30 am - 12:00 pm	No Walk-up hours
Loyal Office 204 S. Main Street, Loyal	M-Th 8:30 am - 3:00 pm Friday 8:30 am - 5:00 pm	M-Th 8:30 am - 6:00 pm Friday 8:30 am - 6:00 pm Saturday 8:30 am - 12:00 pm	M-Th 3:00 pm - 5:00 pm Friday 5:00 pm - 6:00 pm Saturday 8:30 am - 12:00 pm
Chili Office N5726 Oak St. Chili*	Monday, Wednesday & Friday 9:00 am - 2:30 pm	No Drive-up hours	No Walk-up hours

*No lender on premises- loan applications are available

The bank also operates six full-service ATMs throughout the assessment area. All bank ATMs are located in middle-income geographies. ATM locations and the geographies in which they are located are listed in the following chart:

ATM LOCATION	STREET ADDRESS	CITY/GEOGRAPHY
Marshfield Clinic	1000 North Oak Avenue	Marshfield/106
M&I Central Bank & Trust	101 W. 4th Street	Marshfield/106
Auto Stop	10492 S. State Highway 13	Marshfield/107
M&I Central Bank & Trust	106 W. Division Street	Neillsville/9507
The Store	1304 S. Central Avenue	Marshfield/105
Rainbow Foods	1613 North Central Avenue	Marshfield/102

Record of Opening and Closing Offices

The bank’s record of opening and closing of branches has maintained the accessibility to products and services in the assessment area. The bank’s offices and services are reasonably accessible to low- and moderate- income individuals and within moderate-income geographies, in consideration of local competition, including other M&I affiliate banks.

Alternative Systems for Delivering Retail Banking Services

The bank provides account information and banking services through M&I Line, a 24-hour,

seven-day, toll-free number which provides access to customer deposit and loan account information. The bank also offers M&I Direct, a system that provides account access through a personal computer.

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. Examples of community development services are listed below:

- C Personal Economic 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/teach banking skills banking careers, interviewing skills and credit awareness/ counseling. During the 1996-1997 year, bank employees participated in three presentations to Neillsville high school students.

- C Youth Apprenticeship Program - The program is designed to provide student apprenticeships in local financial institutions currently, the bank has four student interns and has employed one student from the program.

Review of the bank's internal CRA files also revealed presentations to local grammar schools regarding money management skills. Additionally, 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 have taken leadership roles in organizations such as the Marshfield, Neillsville and Loyal Chambers of Commerce and Neillsville Economic Development Committee. A member of senior management played an integral role in the forming of the Clark County Economic Development Corporation.

Innovativeness and Responsiveness

The bank is responsive to credit and community development service needs. The bank's CRA files reflect willingness to consider and participate in organizations or programs that service community needs.

Range and Accessibility of Services Provided to Geographies

With the exception of the Chili office, all locations are full-service branches and offer services to meet the needs of the assessment area, including moderate-income geographies and individuals. Although the Chili office does not have a lender on-site, applications are available and customers can schedule appointments with a lender as necessary.

In addition to regular banking services, the bank offers the following services:

- \$ Low Cost Checking - Targeted towards low- and moderate-income individuals. Basic

Checking features no minimum balance, a \$3.00 monthly maintenance fee and a monthly limit of 10 free debits and ATM access.

- C M&I Young Adults Package - Targeted toward the 18-25 age group; it offers low fees, no minimum balance and no annual fee credit card (subject to credit approval).
- C M&I Clubs for Young Savers - Savers clubs for infant through 14 years, and Minor Savers for ages 15-17. The clubs have quarterly newsletters, contests and giveaways.
- \$ Small Business and Farm Specialists - The bank has lenders specializing in agriculture (FSA and WHEDA) and SBA lending programs.

CONCLUSION

The bank's performance under the service test is considered to be strong. The bank's delivery systems are accessible to all portions of the assessment area, including moderate-income areas. The bank's branching activity has not negatively impacted the delivery/accessibility of services within its assessment area. The bank provides a high level of community development services, a number of which demonstrate innovativeness and responsiveness to community development needs.