

PUBLIC DISCLOSURE

August 16, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

M&I BANK OF MENOMONEE FALLS

RSSD Number: 554147

P.O. Box 387
Menomonee Falls, Wisconsin 53052

FEDERAL RESERVE BANK
OF CHICAGO

230 South LaSalle
Chicago, Illinois 60604

Note: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **M&I Bank of Menomonee Falls, Menomonee Falls, Wisconsin**, prepared by the **Federal Reserve Bank of Chicago**, the institution's supervisory agency, as of **August 16, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

INSTITUTION'S RATING: This institution is rated Satisfactory.

The bank's lending, services and investment efforts are considered strong and support community development within its assessment area. The bank's loan-to-deposit ratio and overall lending volume within its assessment area reflect solid performance. The bank's lending to low- and moderate-income borrowers and to small businesses also evidence strong performance. A review of the loan portfolio revealed that the bank has engaged in a significant level of community development lending and has taken leadership roles in community development organizations although its community development service and lending opportunities are limited. The bank has made a generally strong level of qualified grants/donations since the previous examination.

The following table details the performance level of **M&I Bank of Menomonee Falls, Menomonee Falls, 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.

PERFORMANCE LEVELS	M&I Bank of Menomonee Falls		
	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 BANK OF MENOMONEE FALLS' ASSESSMENT AREA

Menomonee Falls is located in Waukesha County, approximately 20 miles northwest of downtown Milwaukee. The assessment area consists of 26 census tracts in Waukesha and Washington Counties. These census tracts represent a portion of the Milwaukee-Waukesha MSA (5080). There are no low- or moderate-income census tracts in the assessment area.

Approximately 122,000 individuals reside in the assessment area, based upon 1990 census data.

The following table details demographic information for each census tract in the assessment area:

M&I Bank of Menomonee Falls – Assessment Area Census Tracts				
Census Tract	County	Population	Median Family Income	Tract Income Level
4702.00	Washington	9,736	\$46,460	Middle
2001.02	Waukesha	5,163	\$42,000	Middle
2001.03	Waukesha	3,617	\$44,667	Middle
2005.00	Waukesha	1,959	\$43,594	Middle
2006.00	Waukesha	2,079	\$37,716	Middle
2033.02	Waukesha	5,264	\$46,375	Middle
2034.02	Waukesha	7,918	\$44,475	Middle
4601.01	Washington	4,301	\$51,866	Upper
4601.02	Washington	4,642	\$54,541	Upper
4701.00	Washington	4,230	\$49,375	Upper
2001.01	Waukesha	4,627	\$47,731	Upper
2002.00	Waukesha	5,576	\$48,948	Upper
2003.00	Waukesha	3,584	\$48,832	Upper
2004.00	Waukesha	3,190	\$47,456	Upper
2007.00	Waukesha	3,918	\$47,309	Upper
2008.01	Waukesha	4,750	\$65,717	Upper
2008.02	Waukesha	7,322	\$61,136	Upper
2009.01	Waukesha	4,054	\$53,999	Upper
2009.02	Waukesha	4,094	\$68,702	Upper
2010.00	Waukesha	6,374	\$65,599	Upper
2011.00	Waukesha	464	\$50,767	Upper
2011.01	Waukesha	3,677	\$57,722	Upper
2012.00	Waukesha	8,486	\$76,946	Upper
2033.01	Waukesha	3,378	\$50,772	Upper
2034.01	Waukesha	6,000	\$52,901	Upper
Assessment Area Totals		121,997	\$52,392	

The assessment area median family income of \$52,392 is significantly higher than the Milwaukee MSA median family income of \$39,005 and the State of Wisconsin median family income of \$35,082. Personal income levels within the assessment area are generally higher, as only 17.2 percent of the families in the assessment area are considered low- or moderate-income. Less than two percent of the families in the assessment area have incomes below the poverty level.

There are approximately 43,900 owner-occupied housing units within the assessment area.

Housing within the assessment area is largely owner-occupied and single-family, with a median owner-occupied housing value of \$101,520 based upon 1990 census data. The following table details assessment area housing characteristics in comparison to those of MSA 5080 and State of Wisconsin:

	Owner-Occupied Units		Single-Family Units		2-4 Units		Multifamily Units		% Units Built Prior to 1950
	#	%	#	%	#	%	#	%	
Assessment Area	35,332	80.5	33,883	77.2	4,077	9.3	4,898	11.2	13.9
MSA 5080	319,660	56.9	297,173	52.9	143,876	25.6	109,549	19.5	37.8
State of Wisconsin	1,215,324	59.1	1,341,491	65.3	327,996	16.0	258,847	12.6	36.8

Community representatives contacted during the examination also indicated that the supply of new housing in the assessment area continues to expand. Representatives expect continued expansion in the housing market, as there is still an adequate supply of land for development. Community representatives also indicated that lower-end single family homes in Waukesha County are currently priced in the \$125,000 price range. The second quarter, 1999 median sales prices for homes sold in Washington and Waukesha Counties were \$141,900 and \$166,100, respectively according to the Wisconsin Realtors Association.

The assessment area’s proximity to the City of Milwaukee, and neighboring communities such as Brookfield, Waukesha and Sussex, provides a wide variety of employment opportunities for individuals residing within the assessment area. The following table details selected large employers in the assessment area:

Employer	Location	# of Employees	Type of Business
GE Medical Systems	Waukesha	2,250	Medical equipment
Quad Graphics Inc.	Sussex-Pewaukee	2,000	Commercial printing
Waukesha Engine	Waukesha	940	Natural gas engines
Generac Corporation	Waukesha	700	Generator sets
Milwaukee Electric Tool Corp.	Brookfield	700	Electric/portable tools
Custom Products Corporation	Menomonee Falls	700	General machine shop
Hydrite Chemical Corporation	Brookfield	600	Industrial chemical
Wacker Corp.	Menomonee Falls	500	Construction equipment
Wisconsin Centrifugal	Waukesha	500	Centrifugal machine parts
US Filter/Envirex Inc.	Waukesha	450	Water treatment equipment
Navistar- Waukesha Manufacturing	Waukesha	425	Ductile Castings

Seasonally unadjusted June 1998 and 1999 unemployment rates for the State of Wisconsin, Waukesha County and Washington County in comparison to national unemployment rates, are detailed in the following table:

June 1998 and 1999 Seasonally Unadjusted Unemployment Rates		
Area	June 1998	June 1999
Waukesha County	2.6%	2.2%
Washington County	3.0%	2.3%
State of Wisconsin	3.5%	3.1%
National	4.7%	4.5%

The unemployment rates in the State of Wisconsin and Waukesha and Washington Counties reflect a strong local economy and continued historic low unemployment rates within the State of Wisconsin.

DESCRIPTION OF INSTITUTION

M&I Bank of Menomonee Falls, with total assets of \$417,575,000 as of June 30, 1999, is an affiliate of Marshall & Ilsley Corporation, a multi-bank holding company based in Milwaukee. The bank offers a variety of loan and deposit products from each of its five full-service branches (two in Menomonee Falls and one office each in Germantown, Richfield -Hubertus and Sussex). Additional deposit services are provided through six automated teller machines (ATMs) operated by the bank.

Discussions with bank management identified the following institutions as the bank's primary local competition: Waukesha State Bank, and branches of Firststar Bank-Milwaukee, N.A., Guarantee Bank S.S.B.(Milwaukee), Associated Bank Milwaukee, St. Francis F.S.B.(Milwaukee) and Tri-City National Bank (Oak Creek).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's loan portfolio and loan originations were reviewed to evaluate the bank's overall loan volume, lending in its assessment area, geographic loan distribution, distribution of lending to borrowers of different income levels and to businesses of different revenue sizes, community development lending and the use of flexible and innovative lending practices.

The bank's March 31, 1999 Consolidated Report of Condition revealed net outstanding loans of \$206,790,000, total deposits of \$350,183,000 and a net loan-to-deposit ratio 59.05%. A review of the bank's March 31, 1999 Uniform Bank Performance Report (UBPR) revealed the bank's strengths relative to 1-4 family residential real estate lending and commercial/industrial lending. Residential real estate lending represents 36.80% of the bank's loan portfolio and commercial industrial lending represents 29.41% of the loan portfolio. In comparison, 1-4 family residential real estate lending represents 30.84% of total outstanding loans for the bank's national peer group - those insured commercial banks with assets between \$300 million and \$500 million with 3 or more banking offices. The bank's percentage of outstanding commercial and industrial loans (29.41%) exceeded that of its national peer group (17.76%).

The following chart details the bank's average loan-to-deposit ratio for the preceding six quarters ending June 30, 1999, in comparison to two of its local competitors and its national peer group.

COMPARATIVE LOAN TO DEPOSIT RATIOS - M&I BANK OF MENOMONEE FALLS, LOCAL COMPETITORS, AND NATIONAL PEER GROUP		
Institution	Asset Size (000)	Six Quarter Avg. Loan to Deposit Ratio
M&I Bank of Menomonee Falls	\$417,575	59.95%
Guaranty Bank SSB (Milwaukee)	\$1,030,290	128.29%
Associated Bank (Milwaukee)	\$2,598,059	87.63%
National Peer Group	\$300,000 to \$500,000	73.40%

The bank's six-quarter loan-to-deposit ratio is below that of two of its competitors and its national peer group. One of the contributing factors to the bank's lower loan-to-deposit ratio is its practice of securitizing real estate loans. As of March 31, 1999, the bank had \$40,999,000 in securitized real estate loans in its portfolio; the March loan-to-deposit ratio would have been approximately 70.76% if these loans had been factored back into the bank's real estate loan totals.

Lending in Assessment Area

The bank's analysis of 1997 and 1998 real estate and small business loan originations was reviewed to assess the percentage of total lending within the assessment area. The following table highlights lending in the assessment area by loan type and total loans.

M&I BANK OF MENOMONEE FALLS - 1997 and 1998 LOANS IN THE ASSESSMENT AREA				
	1997		1998	
PRODUCT	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Real Estate-Purchase*	136	56%	143	54%
Real Estate-Refinance*	169	67%	493	71%
Home Improvement*	57	83%	35	69%
Small Business	344	72%	341	71%
Small Farm	0	N/A	0	N/A
TOTAL LOANS	706	67.6%	1,012	68.1%

Product percentages are of total by loan type;

*Includes M&I Mortgage Corp. lending

In addition, a review of year-to-date 1999 mortgage lending indicates that 236 of 376 (62.76%) mortgage loans were originated within the assessment area, consistent with 1997 and 1998 mortgage lending levels in the assessment area.

Geographic Distribution

The bank's analysis of 1997 and 1998 real estate and small business lending was reviewed to assess the geographic distribution of the bank's lending within its assessment area. The assessment area is comprised of 26 census tracts; seven of the census tracts are middle-income and the remaining 19 tracts are upper-income. There are no low- or moderate-income tracts

within the assessment area or adjacent to it.

M&I BANK OF MENOMONEE FALLS		
Assessment Area Geographic Distribution by Census Tract Income Level		
Census Tract Income Level / Product	# of Assessment Area Tracts with Originations-1997	# of Assessment Area Tracts with Originations-1998
Middle-Income Tracts		
RE-Purchase	7	7
RE-Refinance	5	6
RE-Home Improvement	5	5
Small Business Loans	7	6
Upper-Income Tracts		
RE-Purchase	14	13
RE-Refinance	10	16
RE-Home Improvement	9	6
Small Business Loans	18	16
Tract distribution: 7 Middle- and 19 upper-income		

A review of 1997 and 1998 geographic distribution revealed a satisfactory dispersion of loans in those census tracts within the assessment area.

Borrower Characteristics

The bank’s analysis of 1997 and 1998 real estate and small business loans was reviewed in order to assess the bank’s lending to low- and moderate-income individuals and to businesses of different revenue sizes. Small business loans are defined in the regulation as those commercial loans with original amounts of \$1 million or less. Within the category of small business lending, lending to those businesses with gross annual revenues of one million dollars or less and in original amounts of \$100,000 or less were also reviewed. In addition, certain comparisons of 1997 and 1998 lending were made to 1996 and year-to-date 1999 bank lending levels to ascertain any trends.

The following table highlights the bank’s 1997 and 1998 real estate lending to low- and moderate-income borrowers:

M&I BANK OF MENOMONEE FALLS – 1997 and 1998 REAL ESTATE LENDING TO LOW- and MODERATE-INCOME BORROWERS				
Product	1997		1998	
	# Low Income	#Moderate-income	# Low Income	#Moderate-income
Home Purchase	2	5	6	22
Refinance	4	8	18	64

Home Improvement	2	9	3	4
Totals	8	22	27	90

An analysis of bank real estate lending based upon applicant income revealed approximately 8.29% of 1997 loan originations (30 of 362 real estate) were to low- or moderate-income borrowers. The bank’s 1998 lending to low- and moderate-income borrowers increased significantly, as approximately 17.44% (117 of 671 total loans) of 1998 originations were to low- or moderate-income borrowers. In year-to-date 1999, the bank extended a total of 236 loans in the assessment area of which 62 (26.71%) were to low- or moderate-income borrowers. A further analysis of 1998 mortgage lending revealed that the bank’s percentage of lending to low- and moderate-income borrowers exceeded aggregate lending levels; 12.52% of 1997 and 12.72% of 1998 aggregate loans were originated to low- or moderate-income borrowers. Approximately 17% of the families in the assessment area are considered low- or moderate-income in comparison based upon 1990 census data.

The following table summarizes the review of 1997 and 1998 analysis of small business lending based upon original loan amount:

M&I BANK OF MENOMONEE FALLS – 1997 and 1998 ASSESSMENT AREA SMALL BUSINESS LENDING BY LOAN AMOUNT						
Loan Type	\$100,000 or less		\$100,001-\$250,000		Over \$250,000	
	Number	Percent	Number	Percent	Number	Percent
1997 Small Business	252	73.0	54	16.0	38	11.0
1998 Small Business	213	62.0	64	19.0	64	19.0

The percentage of the bank’s small business lending with original amounts of \$100,000 or less increased from 68% in 1996 to 73% in 1997 and then declined to 62% in 1998.

A review of small business loans relative to business revenue size indicates that 62.7% of 1997 small business loans (215 of 343) and 54.41% of 1998 small business loans (185 of 340) were to businesses with gross annual revenues of \$1 million or less. A review of 1996 lending indicates that 62.62% of small business loans were originated to firms with gross annual revenues of less than \$1 million, in comparison.

The aggregate of 73 lenders in Waukesha County reported a total of 5,810 loans in 1997 in the county; 50.95% of aggregate lending (2,960 loans) was originated to businesses with gross annual revenues of \$1 million or less. M&I Bank of Menomonee Falls had the sixth largest number of small business loans among the reporters in Waukesha County in 1997. The aggregate of all 40 reporting lenders extended a total of 1,854 loans in Washington County in 1997; 1,087 loans (58.63%) were originated to those small businesses with revenues less than \$1 million. M&I Bank of Menomonee Falls was the fourth largest small business loan originator in Washington County.

Included in the analysis and review of the bank’s small business lending is a number of small business loans made under a Menomonee Falls downtown revitalization program. The bank originated 15 loans ranging from \$5,000 to \$375,000 since the previous examination.

Community Development Lending

A review of the bank’s loan originations revealed that the bank has taken a leadership role relative to community development lending and extended the following loans since the previous examination:

M&I BANK OF MENOMONEE FALLS COMMUNITY DEVELOPMENT LENDING	
Loan Amount	Description
\$375,000	Finance construction costs for a thirty-five lot Menomonee Falls subdivision targeted for low- and moderate-income borrowers or first-time homebuyers.
\$900,000	Finance sewer and water hook-up and recreational facilities for an organization that serves disabled individuals in the Milwaukee and Waukesha areas.
\$375,000	Renovation/improvement costs for a sixteen family apartment building in Menomonee Falls - the project is to provide affordable rental units

In addition, the bank is an investor in a loan consortium with 12 other financial institutions and Community Housing Initiative, Inc. The program provides affordable housing rehabilitation loans in Waukesha and Washington County targeting individuals earning less than eighty percent of the median county income. Sixteen loans have been extended since the previous examination; the bank’s 5.88% share of the loan pool totals \$8,558 in Waukesha County and the bank’s share of 5 loans in Washington County totals \$4,922.

Innovative or Flexible Lending Practices

The bank participates in loan programs that have flexible and innovative lending features designed to meet the credit needs of low- and moderate-income individuals. A review of bank records indicated that the bank has originated loans under the Wisconsin Housing and Economic Development Authority (WHEDA) Home Program. The bank extended 20 WHEDA loans totaling \$1,573,000 since the previous examination. The bank also offers the M&I Neighborhood Home Loan Program; however, discussions with management indicated that the bank has not experienced a significant demand for the product in its assessment area.

CONCLUSION

The bank’s overall lending performance is considered strong. The bank’s six-quarter average loan-to-deposit ratio decreased slightly and is below the level of its national peer group; however, this ratio is a result of the bank’s practice of securitizing 1-4 family real estate mortgage loans. The bank has a strong level of lending to borrowers of different income levels and to small businesses. A review of the bank’s loan portfolio, revealed that the bank has taken a leadership role in community development lending, and offers loan programs which feature flexible and innovative underwriting standards designed to meet the needs of low- and moderate-income borrowers.

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 securities activity was noted in the bank's investment portfolio.

Degree to Which Investments are not Provided by Private Investors

The bank provides a reasonable level of investments in the form of grants, which support the operating expenses of nonprofit organizations in its assessment area consistent with the opportunities available. A review of the bank's 1997, 1998 and 1999 contributions year-to-date, revealed that the bank had total contributions of \$39,912, in 1997, \$32,846 in 1998 and \$17,298 in 1999 (through July). Approximately \$4,200 was identified in qualifying grants/donations to various local organizations, which promote community development or community development related services for low- and moderate-income individuals.

Responsiveness to Available Opportunities

The bank's current level of investment reflects limited opportunities for qualified investments within its assessment area. Community representatives contacted during this and previous examinations indicate that the bank is responsive to those qualified investment opportunities which are available in its assessment area.

CONCLUSION

The bank's performance under the investment test is generally strong. The bank has an adequate level of CRA investment activity relative to the available investment opportunities in its assessment area.

SERVICE TEST

The bank's systems for delivering retail banking and community development services were reviewed for range and accessibility, responsiveness and innovation. The bank's alternative service delivery systems were also reviewed. Additionally, the distribution of bank branches, its record of opening and closing branch offices and community development service activity were reviewed.

Retail Banking Services

M&I Bank of Menomonee Falls is a full-service bank with five office locations and six ATMs located within its assessment area. The bank offers a full variety of deposit services, business, consumer and real estate loans to businesses, local governments and individuals within its assessment area.

Distribution of Branches Among Geographies

The following table details the bank’s branch/drive-up facility locations and hours of operation:

M&I Bank of Menomonee Falls – Locations and Hours of Service				
Branch Location	Census Tract	Hours of Operation		
Menomonee Falls-Main N82 W15415 Appleton Ave. 53051	2002.00	Lobby: Drive-Up:	9:00am-5:00pm 9:00am-6:00pm 9:00am-12:00pm 7:30am-7:00pm 9:00am-12:00pm	Monday-Thursday Friday Saturday Monday-Friday Saturday
Germantown W156 N1150 Pilgrim Road Germantown 53022	4702.00	Lobby: Drive-Up:	9:00am-5:00pm 9:00am-6:00pm 9:00am-12:00pm 8:30am-6:00pm 8:30am-7:00pm 9:00am-12:00pm	Monday-Thursday Friday Saturday Monday-Thursday Friday Saturday
Menomonee Falls SMB N81 W15182 Appleton Ave. 53051	2001.03	Lobby: Drive-Up:	10:00am-7:00pm 9:00am-3:00pm 10:00am-2:00pm N/A	Monday-Friday Saturday Sunday
Richfield- 1301 State Highway 175 Hubertus 53033	4601.02	Lobby: Drive-Up:	9:00am-5:00pm 9:00am-6:00pm 8:30am-6:00pm 9:00am-12:00pm	Monday-Thursday Friday Monday-Friday Saturday
Sussex- N64 W25050 Prospect Circle Sussex 53089	2034.01	Lobby: Drive-Up:	9:00am-5:00pm 9:00am-6:00pm 9:00am-12:00pm 8:30am-6:00pm 9:00am-12:00pm	Monday-Thursday Friday Saturday Monday-Friday Saturday

Record of Opening and Closing Offices

The bank closed a former Menomonee Falls Security Bank branch (10-10-97) since the previous examination. The branch was acquired as a result of corporate merger activity; a third office was not considered feasible since the bank had two existing branches in Menomonee Falls. The bank also relocated its Sussex branch to a more accessible area of the town. A review of the bank’s public files revealed no negative comments relative to the impact of its branch closing/relocation activity.

Alternative Systems for Delivering Retail Banking Services

The bank also provides services through ATMs located at the following locations in addition to deposit and loan products offered at bank offices:

M&I BANK OF MENOMONEE FALLS- ATM LOCATIONS	
ATM LOCATIONS	ADDRESSES
M&I Bank of Menomonee Falls	W156 N11150 Pilgrim Road, Germantown
SuperSaver	N81 W15182 Appleton Avenue, Menomonee Falls
M&I Bank of Menomonee Falls	N82 W15415 Appleton Avenue, Menomonee Falls

Community Memorial Hospital	W180 N8085 Town Hall Road, Menomonee Falls
M&I Bank of Menomonee Falls	N64 W25050 Prospect Circle, Sussex
M&I Bank of Menomonee Falls	1301 State Highway 175, Hubertus

Range and Accessibility of Services Provided

The bank offers an array of services that meet the credit and deposit needs of its assessment area, including low- and moderate-income individuals and small businesses. The bank offers the following services in addition to its basic banking services:

- Basic Checking- a low-fee account, featuring no minimum balance requirement and 10 free withdrawals for each statement cycle.
- Young Adult Checking- a low-cost account targeted to individuals in the 18-25 age group, offering no minimum balance, a low monthly maintenance fee and a no annual fee credit card (subject to credit approval).
- Mi-Line - an automated voice response system that is available 24 hours each day, a bank-by phone service that allows customers to receive confidential information on their personal accounts as well as current interest rate information via telephone.
- Mi-Direct- a PC banking service that provides customers with 24-hour banking access through the use of a personal computer.
- M&I bank affiliate ATMs - bank customers have free access to any M&I bank affiliate ATMs without charge. The M&I ATM network includes over 200 locations within Wisconsin; M&I bank account holders may also make deposits and withdraw funds at any other M&I bank location within Wisconsin.

Community Development Services

The bank and its senior management have taken leadership roles in the limited number of local organizations that promote community development. Management also permits bank staff to attend outside organization meetings during working hours whenever possible. Bank senior management have leadership roles in the following organizations: Community Housing, Incorporated; Waukesha County Economic Development Corporation; Sussex/Lisbon Senior Transportation Task Force; Greater Germantown Development Committee; Menomonee Falls Chamber of Commerce; Greater Menomonee Falls Committee; Delphi House (a provider of social services to a largely lower-income client base); and the Wisconsin Housing and Economic Development Authority (WHEDA).

CONCLUSION

The bank's performance under the service test is strong. The bank's primary and alternative service delivery systems are accessible within its assessment area. Bank offices and hours of service are reasonably suited to meet the needs of the bank's customers. The bank's record of opening and closing offices has not adversely affected the accessibility of its products and services to low- and moderate-income individuals residing within its assessment area. The bank offers accessibility to various services and offices within the State of Wisconsin through its affiliate relationships.

GENERAL

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