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Comptroller of the Currency
Administrator of National Banks

LARGE BANK

Public Disclosure

December 31, 1999

Community Reinvestment Act Performance Evaluation

**American National Bank and Trust Company of Chicago
Charter Number: 13216**

**120 South LaSalle Street
Chicago, Illinois 60603**

Office of the Comptroller of the Currency

**Large Bank Division
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Washington D.C. 20219-0001**

NOTE: This evaluation is not, and should not 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.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of American National Bank and Trust Company of Chicago (ANB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	American National Bank and Trust Company of Chicago 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 arriving at an overall rating.

The major factors that support this rating include:

- A good volume of lending resulting from home purchase and refinance loans. The volume of small loans to businesses extended by the bank was adequate.
- A good distribution of lending by income level of borrower. The distribution of home purchase, refinance, and home improvement loans was excellent, but this performance was tempered by our lack of data to evaluate lending to small businesses.
- An adequate distribution of lending by income level of geography. The distribution of home purchase loans was good, but distribution for refinances, the other significant category of home mortgage loans, was adequate.
- An adequate volume of qualified investments. The investments are responsive to assessment area needs and reflect a moderate level of complexity.

- Adequate access to the bank's services in light of its strategic business focus. The bank's level of community development services was good.

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 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 community.

*This document is an evaluation of the CRA performance of **American National Bank and Trust Company of Chicago** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **December 31, 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 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. These definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate - Any company that controls, is controlled by, or is under common control by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau

in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301), or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Limited-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Operating Subsidiary - Corporations, limited liability corporations or similar entities in which the bank has control through 50% or greater ownership. Bank's may establish or acquire such entities to conduct activities which are part of or incidental to the business of banking.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Description of Institution

ANB is a wholly owned subsidiary of Bank One Corporation (BOC), which is headquartered in Chicago, Illinois. As of December 31, 1999, BOC had total assets of \$269 billion, making it the fifth largest bank holding company in the United States. BOC provides a full range of consumer and commercial financial products and services, and operates banking offices in 14 states: Arizona, Colorado, Florida, Illinois, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Texas, Utah, West Virginia, and Wisconsin. The corporation operates more than 2,000 banking centers and 6,000 ATM's nation-wide. It has subsidiaries in 33 states and international offices on five continents.

ANB is the seventh largest bank in Illinois and ranks 285 in Wisconsin in terms of deposits. As of December 31, 1999, ANB reported total assets of \$11.7 billion, total loans of \$9.9 billion, and a loan-to-deposit ratio of 142%. Tier 1 capital totals \$789 million. ANB's loan portfolio consisted of 28% real estate secured loans, 65% commercial loans, and 1% loans to individuals.

In determining the size and capacity of ANB for CRA evaluation purposes, we specifically considered operating subsidiaries of the bank. None of the bank's operating subsidiaries contributes to the CRA performance of the bank. It should also be noted that none of the bank's operating subsidiaries hindered the bank's CRA performance.

There were six affiliated, non-bank entities and one affiliated bank that contributed to the bank's CRA performance. Refer to Appendix A for identification of the entities and the activities they contributed.

There are no significant financial barriers limiting ANB's ability to meet the identified credit needs within its assessment area.

For purposes of this evaluation ANB, with offices in Illinois and Wisconsin, is considered to be an interstate bank.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last evaluation of the bank is dated December 22, 1994. This evaluation assesses the bank's performance from December 23, 1994 through December 31,

1999. The Investment and Service Tests considered information from the entire evaluation period. The Lending Test considered data from January 1, 1996 to December 31, 1999. January 1, 1996 is the date that the revised regulation and expanded loan reporting requirements became effective. Community development loans, community development investments, community development services, retail banking locations, and retail banking services were reviewed in connection with these tests.

The bank's performance in the Madison, Wisconsin assessment area was evaluated from January 1, 1998 to December 31, 1998. The Madison assessment area was added by the bank due to the opening of a branch there. However, the branch was sold May 1, 1999 and this is no longer one of the bank's assessment areas.

The reader of this Public Evaluation should be aware of the bank's stated strategic focus of serving the needs of middle-market businesses. Middle-market is defined as businesses having between \$5 million and \$150 million in annual revenues. This strategic focus impacts the banking services the bank offers and how they are delivered. The need to consider this strategic focus in evaluating the bank's lending test performance was minimized by management's decision to take credit for the residential real estate lending done by affiliated mortgage companies. Otherwise, the bank's residential real estate lending would have been limited to accommodation loans made to principals of businesses the bank was lending to. The middle-market focus was a factor in the Service Test. We took into account that without a retail focus, the need for branches is not as great.

Data Integrity

The scope of the examination included a review of the accuracy of the bank data analyzed to develop our conclusions and ratings. We tested the data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses and small loans to farms. We also reviewed the accuracy of non-public data for qualified investments, community development services, and community development loans.

The following significant errors were noted in the bank's HMDA and small loans to businesses reporting.

1. The 1996, 1997, and 1998 small loans to businesses data contained a significant level of non-reportable loans. This problem was not noted in the 1999 data. Our sample of loans reported in 1997 and 1998 disclosed a 12% error rate due to reporting standby letters of credit, a 10% error rate

due to reporting renewals, and a 2% error rate for other non-reportable loans. In total, 24% of the loans in our sample were ineligible for reporting as small loans to businesses. Management was unable to correct the 1996 data and we did not use it in our analysis. A partial correction of the 1997 and 1998 data was accomplished. Management filtered the lending data for specific product codes and removed 533 loans from the 1998 data and 255 loans from the 1997 data. Review of the corrected data disclosed that the number of ineligible loans had been reduced, but there was still a 10% error rate. We have used the 1997 and 1998 data in our evaluation, but have taken into account that the volume of loans reported by the bank remains overstated by 10%.

2. A 10% error rate was noted in the revenue data reported in 1999 for small loans to businesses. Higher error rates for revenue data had been noted in previous years. We will use the small loans to business data reported by the bank, but will not consider the revenue data in the evaluation. The result of this exclusion will be that no conclusion is developed for small loans to businesses by income of borrower.

The bank's HMDA loans, qualified investments, community development loans and community development services information was found to be accurate.

The reader should be aware that there were 313 small loans to businesses that management had originally been unable to geocode to the census tract level. Subsequent to reporting the data publicly, 107 additional loans were geocoded to the census tract level and we used the updated information in our examination.

Selection of Areas for Full-Scope Review

We selected a sample of bank assessment areas for full-scope reviews and the remaining assessment areas were reviewed in a more limited manner. The data contained in the tables in Appendix C was evaluated for each bank assessment area, and this data was factored into our conclusions. However, for full-scope assessment areas additional information was developed concerning credit and community development needs, and opportunities for community development activities. We analyzed the geographic distribution of lending in full-scope areas in order to identify areas with little or no lending activity. Also, individual community development loans and services and qualified investments were reviewed to assess qualitative factors such as complexity, innovation, leadership, and responsiveness to identified needs. The Service Test included analysis of the location of bank branches to gauge accessibility.

In accordance with the CRA regulation, our evaluation rates the bank's performance in both states (Illinois and Wisconsin) in which the bank operates. The overall rating for the bank is a blend of the state ratings. In order to develop the rating for each state we reviewed one assessment area in each state using full scope procedures. In Illinois, we performed a full scope review in the Chicago assessment area and this area is the source of 98.4% of the bank's deposits. In Wisconsin, we performed a full scope review in Milwaukee and this area contains .8% of the bank's deposits. Assessment areas receiving limited-scope reviews are Rockford, Illinois and Madison, Wisconsin.

Fair Lending Review

A fair lending analysis of mortgage lending activities was performed to identify questionable patterns of lending on the basis of race. We reviewed mortgage lending activities in both 1998 and 1999. In 1998, we analyzed the HMDA lending of ANB and the First Chicago NBD Mortgage Company on a combined basis. In 1999, we included Bank One Mortgage Company in the analysis also. Bank One Mortgage Corporation is relevant in 1999 due to the merger on 10-2-98 between First Chicago NBD Corporation and Bank One Corporation. The scope of the analysis included home purchase, refinance, and home improvement lending in the bank's Chicago assessment area. We looked at denial rates by race, denial disparities between Whites and Blacks and Hispanics, the bank's market share of lending to Blacks and Hispanics compared to Whites, and the bank's percentage of lending in minority areas in comparison to the percentage of owner-occupied housing units in those areas.

We did not find any indication of disparate treatment in mortgage lending. The percentage of the home purchase and refinance loans made to Blacks and to Hispanics both exceeded the percentage representation of these minorities in the assessment area population. Denial disparities for Blacks were somewhat higher than those noted in the aggregate of all lenders, but it was also noted that the denial rates for the bank were low. For Hispanics, denial disparities generally compare favorably to the aggregate lending data. No concerns were noted when comparing the percentage of the bank's lending to minority dominated census tracts in comparison to the percentage of owner-occupied units in those areas.

State Rating

CRA Rating for Illinois:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

Lending Test

- A good volume of lending resulting from home purchase and refinance loans. The volume of small loans to businesses extended by the bank was adequate.
- A good distribution of lending by income level of borrower. The distribution of home purchase, refinance and home improvement loans was excellent, but this performance was tempered by our lack of data to evaluate lending to small businesses.
- An adequate distribution of lending by income level of geography. The distribution of home purchase loans was good, but distribution for refinances, the other significant category of home mortgage loans, was adequate.

Investment Test

- An adequate volume of qualified investments. The investments are responsive to assessment area needs and reflect a moderate level of complexity.

Service Test

- Adequate access to the bank's services in light of its strategic business focus. The bank's level of community development services was good.

Description of Institution's Operations in Illinois

Chicago and Rockford are the bank's two assessment areas in the state of Illinois. The Chicago assessment area includes six of nine counties of the Chicago MSA including Cook, DuPage, Kane, Lake, McHenry, and Will counties. The Rockford assessment areas consists of the Rockford MSA. The bank operates 20 branches and 8 ATMs in the Chicago assessment area and 1 branch in Rockford.

Refer to the market profile for the Chicago assessment area for demographic and background information on this assessment area.

Scope of Evaluation in Illinois

A full scope review was performed on the Chicago assessment area due to the concentration of the bank's operations, assets, and deposits. This concentration results in performance in the Chicago assessment area receiving primary consideration in developing the ratings for the state and the bank overall. The Rockford assessment area received a limited-scope review.

Information on credit and community development needs within the Chicago assessment area was obtained through ongoing relationships with a variety of community-based organizations. Refer to the Market profile in Appendix C for detailed information

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Test performance in Illinois and the Chicago assessment area was good. The volume of HMDA lending and borrower distribution were the main factors in these conclusions.

Lending Activity

Refer to Tables 1 - 5 in Appendix C for the data used in this analysis.

The bank's volume of lending was good in Illinois due to the volume in Chicago. This conclusion primarily results from the volume of home mortgage lending.

The overall volume of home mortgage lending in Chicago was good based on volumes of home purchase and refinance lending. The majority of the loans were made by affiliated institutions. This is mentioned to avoid confusion regarding the bank's stated business focus.

In Chicago, ANB achieved market ranks in the home purchase and refinance categories that were higher than its market rank in deposits. The volume of home improvement lending in this market was substantially below the bank's rank in deposits, however, this type of lending is not a focus of ANB.

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The volume of small business lending was adequate in the Chicago assessment area. The market rank for small business lending was slightly lower than the bank's deposit market rank. The volume of small farm loans was insignificant and this product is not a stated focus of the bank. This conclusion considers the over reporting of small loans to businesses discussed in the Scope section of the report under Data Integrity.

The bank's volume of community development lending was adequate in Chicago. To help gauge the volume of community development lending in individual assessment areas, the volume of loans was calculated as a percentage of Tier 1 capital. This calculation involved allocating Tier 1 capital to assessment areas based on the percentage of the bank's deposits derived from each assessment area. The volume of community development loans represented 3.8% of Tier 1 capital in Chicago.

Distribution of Loans by Income Level of Geography

Overall, the distribution of loans by income level of geography was adequate. The distribution was adequate in Chicago. The bank's performance was inconsistent across product lines. However, the generally better performance in home purchase lending had a positive influence on this conclusion.

We did not have any unexplained gaps in the bank's lending patterns for the Chicago assessment area. There was one grouping of tracts that was not penetrated during the evaluation period; however, there were very few owner-occupied housing units or businesses in these tracts.

In assessing performance under this assessment criteria we analyzed the percentage distribution of loans by income level of geography and the bank's market share by income level of geography. The percentage distribution information was given more weight because it was based on lending over the entire evaluation period. The market share information in the tables only reflects the bank's lending performance during 1998. This emphasis on percentage distribution information as opposed to market share information is true for the borrower distribution analysis as well.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the data used in this analysis.

For home purchase loans, the geographic distribution was good in Chicago. The percentage of loans made to borrowers residing in low-income geographies

exceeded the percentage of owner-occupied units in those geographies and was excellent. Moderate-income geographies contained a significantly higher percentage of the assessment area's owner-occupied units, and the percentage of the bank's loans made in these areas was somewhat lower than the percentage of owner-occupied units in those geographies, but adequate. The market share data reflected a similar pattern with the bank's market share in low-income census tracts exceeding its overall market share, but the market share in moderate-income census tracts was somewhat lower than the overall market share.

The geographic distribution of home improvement loans was excellent in Chicago, but again, the lending volume was low and lending performance with this product was not given significant consideration because it is not a significant focus of the affiliate. The percentage of loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units. The volume of lending in 1998 was so low that the bank's market share was negligible.

Refinance lending reflects adequate geographic distribution in Chicago. The percentage of the bank's loans made in low-income census tracts was good as the percentage approached the percentage of owner-occupied units in those areas. The percentage of loans in moderate-income census tracts was somewhat lower than the percentage of owner-occupied units, but adequate. The bank's market share in low- and moderate-income census tracts was somewhat lower than the bank's overall market share and reflected adequate performance.

Small Business Loans

Refer to Table 5 in Appendix C for the data used in this analysis.

The geographic distribution of small loans to businesses was adequate in Chicago. The percentage of loans made in low-income census tracts was significantly lower than the corresponding percentage of businesses in those tracts and reflected poor performance. Small business lending in moderate-income geographies was good and these areas contained a higher percentage of businesses than low-income census tracts. The percentage of loans in moderate-income geographies was slightly lower than the percentage of businesses in those geographies.

The market share information indicates similar though slightly stronger performance. In low-income geographies, the market share for small loans to businesses was somewhat lower than the overall market share. In moderate-income tracts the market share for small loans to businesses exceeded the overall market share.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in Appendix C for the data used in this analysis.

The distribution of loans by income level of the borrower was good in Chicago. The lending to moderate-income borrowers was excellent for home purchase, home improvement, and refinance loans. The percent of loans exceeded the percentage of families in this income category. The percentage of loans to low-income borrowers was significantly lower than the percentage of families in this income group for home purchase and refinance loans. Performance, however, was considered adequate when the limited borrowing capacity of low-income borrowers and the high housing cost in the Chicago assessment area were considered.

The market share data supports our conclusion for the Chicago assessment area. The market share for home purchase loans to low- and moderate-income borrowers exceeded the overall market share and was excellent. The market share to moderate-income refinance borrowers also exceeded the overall market share, but low-income borrower market share was somewhat lower for this product. The low market rank and market share in the home improvement category did not lead to a meaningful analysis on this factor.

Small Business Loans

No conclusion was developed for this aspect of the bank's lending performance. This situation is the result of the data integrity issues noted earlier. We did note that a moderate percentage (37%) of the bank's small loans to businesses were in amounts of \$100,000 or less. However, loan size is not a reliable indicator of the extent that the bank's small loans were made to small businesses.

Community Development Lending

The volume of community development lending in Chicago was adequate. The bank's lending in Chicago was primarily related to the development of affordable housing, which was an identified credit need in the assessment area. In Chicago, 67% of the dollars extended were for the development of affordable housing, 30% was for the provision of community services, and the remaining 3% supported economic development. During the evaluation period, the bank's lending helped to create or retain 977 affordable single-family homes and 139 affordable rental housing units. The dollar volume of community development loans represents

3.8% of the amount of Tier I capital allocated to the Chicago assessment area based on the percentage of bank deposits originating there. Examples of some of the bank's CD loans follow:

Orchard Park Townhomes

ANB made a revolving construction loan to a non-profit developer for the development of 45 townhomes near the Cabrini Green public housing project. Twenty-five percent of the units are reserved for lease to a Chicago Housing Authority (CHA) tenant, and the rest of the units will be sold to buyers at market rates. The CHA tenants will have an option to buy the units eventually. The development is part of a plan by HUD, CHA, and the city of Chicago to redevelop Cabrini Green into a mixed-income community. The project is not considered complex, but it does meet a critical need within the assessment area to alleviate areas of concentrated poverty.

Homan Square

The bank provided a construction loan to a for-profit developer for Phase III of the Homan Square development project. Homan Square is an affordable housing project at the site of the former Sears headquarters in Chicago and is an effort to revitalize the North Lawndale community. Phase III will create 44 new, affordable housing units, which are partially subsidized by the New Homes for Chicago Program. ANB has also been involved as an equity investor in previous phases of the development. All phases of the project are expected to create a total of 600 affordable housing units. The development is supported by the city of Chicago and involved the creation of a Tax Increment District to promote development. The use of tax credits, creation of a tax increment district, and the involvement of a not-for-profit organization, a for-profit developer, and the city, made this investment. This project is part of a long-term commitment to revitalize the neighborhood.

Product Innovation and Flexibility

The bank's business loan products reflect adequate flexibility and this emphasis is consistent with its business strategy. The bank offers the SBA Express, Low-doc, 504, and 7A programs; but we do not have information on how these products have resulted in lending to low- or moderate-income areas. As a result of this, they did not receive significant consideration.

Lending Inside Versus Outside of Assessment Areas

ANB had a good focus on lending within its assessment area. During the evaluation period, 89% of the number and 87% of the dollar amount of the bank's HMDA reportable and CRA reportable loans were made within its assessment areas. The in/out calculation was only performed for loans made directly by the bank and did not include affiliate lending or purchased loans.

Conclusions for Areas Receiving Limited Scope Reviews

The bank's Lending Test performance in the Rockford assessment area was inconsistent and weaker than the overall High Satisfactory performance in the state of Illinois. This does not materially affect the overall conclusion due to the small percentage (1.3%) of loans attributable to this assessment area. The adequate lending performance for this area resulted from the adequate borrower and geographic distribution.

INVESTMENT TEST

Refer to Table 12 in Appendix C for the facts and data that support these conclusions.

Conclusions for Areas Receiving Full-Scope Reviews

ANB's performance in the Chicago assessment area under the Investment Test is adequate. In the Chicago assessment area the bank's performance was adequate. The bank's investment performance in the areas receiving limited-scope reviews was not a factor in this rating.

Dollar Amount of Qualified Investments

The volume of qualified investments by the bank is adequate in Chicago. To assist in evaluating the volume of investments in each assessment area, we calculated the volume of investments as a percentage of Tier 1 capital. Tier 1 capital was allocated among the bank's assessment areas based upon the geographic distribution of bank deposits. Investments made in the Chicago assessment area represent 3.3% of Tier 1 capital. There are significant opportunities for community

development qualified investments in the Chicago assessment area, and the bank's level of investments is adequate in relation to these opportunities.

Innovativeness or Complexity of Qualified Investments

Investments with complex characteristics were noted in the Chicago assessment area. There were three projects that were moderately complex, but none were innovative. For two of the complex investments, the bank also made a community development loan for the project. An example of a moderately complex investment is Deborah's Place III. The bank invested in Low-Income Housing Tax Credits, and the project also included Federal Home Loan Bank funds and state funds for development. The project renovated the former Marillac House in the East Garfield Park Neighborhood of Chicago. The housing units will be occupied by single adult women without children who are homeless and have incomes of 50% median income or less. The ground floor of the development will be dedicated to supportive services including a learning center, case management services, and crisis intervention programs. This project is designed to assist in getting homeless women back in the workforce and housing.

Responsiveness of Qualified Investments to Credit and Community Development Needs

ANB's responsiveness to the most pressing needs in its assessment areas is good in Chicago. The need for affordable housing was identified in this assessment area along with financing for small businesses. Twenty percent of the bank's investments were for creation, retention, and/or support of affordable housing. These investments resulted in the creation or retention of 211 units of affordable housing. Another 77% of the bank's investments supported economic development by providing financing for small businesses through a Small Business Investment Company.

Conclusions for Areas Receiving Limited-Scope Reviews

ANB's performance in the Rockford assessment area is inconsistent and stronger than the bank's overall Low Satisfactory performance under the investment test in the state of Illinois. The volume of investments is significant and represents 12.5% of Tier 1 capital allocated to the assessment area. This did not impact the conclusion for the state because the distribution of deposits in this area is small compared to the Chicago area.

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SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Illinois is adequate and the bank's performance in the Chicago assessment area is adequate.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service Test performance in Chicago is adequate. The bank's delivery systems provide adequate accessibility to geographies and individuals of different income levels.

A number of performance context factors were considered in arriving at the conclusion that access to the bank's services is adequate. First, the bank's strategic focus on middle market businesses reduces the need for branches compared to a retail bank and changes the factors considered in branch location decisions. Proximity to businesses becomes a more significant factor, and the geographic area served by a branch is larger. Second, during the evaluation period, two affiliate banks with retail oriented strategies operated in the same geographic area.

Accessibility of Delivery Systems

In the Chicago assessment area, service delivery systems are adequately accessible. There are 20 full service branches of which four are located in the city of Chicago. The remaining branches are located in suburban areas outside of Chicago. One branch is located in a moderate-income area in downtown Elgin, another in an undesignated census tract in downtown Chicago, and the remaining branches are located in middle- and upper-income areas.

In addition to comparing the distribution of branches by income level of geography to the distribution of the area's population by income level of geography, we compared the distribution of branches to the percentage distribution of businesses by income level of geography. This comparison, together with previous comments about the bank's business focus, revealed that the bank's branch distribution is adequate when compared to the distribution of businesses within the Chicago area. We found the proportion of businesses in low- and moderate-income areas is

significantly lower than in middle- and upper-income areas. The percentage of businesses in low- and moderate-income areas is 4.8% and 12.1% compared to 40.3% and 41.5% in middle and upper-income areas, respectively. The remaining 1.3% of businesses are in undesignated areas.

We reviewed the branch distribution to determine if any conspicuous gaps exist within the Chicago area. At first glance, two gaps appear consisting primarily of low- and moderate-income areas. One gap starts south of downtown Chicago and extends south, southeast approximately 15 miles. The second gap exists starting northwest of the Mercantile branch in downtown Chicago and continues in a north, northwesterly direction for about six miles. After reviewing the area's demographics such as the volume and location of businesses and discussions with bank management, we concluded that the bank's distribution of branches was adequate. The bank's branch network is relatively small for the size of the assessment area resulting in large parts of the assessment area not in close proximity to a bank branch. It was also noted that the two areas identified above have a smaller portion of the Chicago area's businesses.

Alternative delivery systems include ATMs, a 24-hour bilingual telephone loan application service, and Internet banking. ANB has eight ATMs available at branch offices. Three of the eight are located at the Mercantile Exchange branch. All ATMs are deposit-taking and all are available 24 hours. In addition, some of the bank's branches are co-located with branches of affiliated Bank One, NA, Illinois and at these locations the affiliate's ATMs are also available to ANB customers. There are no stand-alone ATMs. Bank One Loan-by-Phone allows a consumer to apply for a home equity loan or line of credit, an installment loan, or a credit card. Internet banking allows a consumer or business to open a deposit account, apply for a loan, and access other banking and financial information. Since the bank could not provide specific data to support how effective these services are in reaching low- and moderate-income individuals, these services were not considered when drawing our conclusions.

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income areas. However, low and moderate-income areas have not benefited from branch openings. Upper-income areas in the Chicago area particularly benefited as 10, or 77% of the new co-branded branches were opened in those areas. Two other branches were opened in middle-income areas and one in an undesignated census tract in downtown Chicago. When comparing the distribution of businesses in

Chicago to the location of recently opened branches, it is reasonable that the bank would favor opening branches in middle- and upper-income areas. However, in reviewing the expected level of branch openings by area income levels, one, two and five branch openings would be expected in low- moderate- and middle-income areas, respectively, based on the distribution of businesses in the Chicago area.

No branches were closed since the last CRA examination.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Considering the bank's primary business focus, branch hours and services do not vary in a way to inconvenience its assessment area. All branches are full service, though hours may vary from branch to branch. Thirty percent of branches are open on Saturday. Six co-branded branches offer extended evening and Saturday hours. The Elgin branch, the only branch located in a moderate-income area, offers extended hours and services to ANB customers through its co-branded affiliate. No branches have Sunday hours. Branches offering drive-up service have extended hours as late as 7:00 p.m. There are no services specifically targeted to meet the needs of low- and moderate-income individuals.

Community Development Services

The level of CD services was good in the Chicago assessment area.

Extent of Community Development Services Provided

The level of CD services was good in the Chicago assessment area. CD services were provided to six organizations and bank employees hold leadership positions in four of them. Two of the four leadership positions held were early in the evaluation period and two positions began within the last year. CD services provided included hosting sites for tax return preparation for low-income people at six locations with 133 employees assisting in preparing the tax returns. The Junior Achievement program involves 153 employees acting as consultants to three schools serving primarily low- and moderate-income students. The program provides financial services education. The bank has been involved in both these organizations for the last three years.

Innovativeness and Responsiveness of Community Development Services Provided

ANB's responsiveness to identified credit needs through community development services in the Chicago assessment area is adequate. The services provided

respond to community and economic development needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited scope review, the bank's performance under the Service Test in Rockford is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test in the state of Illinois.

State Rating

CRA Rating for Wisconsin:	<u>Satisfactory</u>
The Lending Test is rated:	<u>Low Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

Lending Test

- An adequate volume of lending. The volume of small loans to businesses was good, but the bank had nominal numbers of home mortgage loans. There were no community development loans made by the bank.
- A good distribution of loans by income level of geography. This conclusion primarily results from the geographic distribution of small loans to businesses. Overall, the geographic distribution of home loans was also good, but again, the volume of loans was nominal.
- The distribution of bank lending by income level of borrower was good, but this performance criteria had minimal weight in the Lending Test rating. The good distribution was noted within the nominal volume of mortgage loans; however, we were unable to develop a conclusion for small loans to businesses due to the lack of data.

Investment Test

- The volume of qualified investments was excellent, and the investments were responsive to the identified need for affordable housing. None of the investments were considered complex or innovative.

Service Test

- Access to the bank's services is adequate, and the opening and closing of branches did not adversely affect communities. No community development services were noted in this state.

Description of Institution's Operations in Wisconsin

Milwaukee and Madison were the bank's two assessment areas in Wisconsin during the evaluation period. There are two branches and two ATMs in Milwaukee and this assessment area is the source of .8% of the bank's deposits. Madison was not delineated as an assessment area at the time of this evaluation since the bank's only branch in the area was closed on May 1, 1999.

Refer to the market profile for the Milwaukee assessment area for demographic and background information on this assessment area.

Scope of Evaluation in Wisconsin

The Milwaukee assessment area received a full-scope review since this area was the largest source of deposits for the bank in the state. Madison was reviewed using limited scope procedures for only a part of the evaluation period.

Information on credit and community development needs in the Milwaukee assessment area were identified from a review of community contacts made over the last two years by OCC staff and other regulatory agencies. We also identified needs and opportunities from published materials, including the consolidated plans of the Cities of Milwaukee, Wauwatosa, and West Allis; and the consolidated plan of the County of Milwaukee. We also consulted press accounts and academic research studies. See the Market Profile in Appendix C for details.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Test performance in Wisconsin was adequate. Good borrower and geographic distribution was noted in the Milwaukee assessment area, but the volume of lending was only adequate.

Lending Activity

Refer to Table 1-5 in Appendix C for the data used in this analysis.

The bank's volume of lending was adequate in Wisconsin and adequate in Milwaukee. This conclusion recognizes the bank's limited presence in the state. In Milwaukee, the bank ranks 52nd in deposit market share with a .1% share.

The bank's overall volume of home mortgage lending was adequate. The majority of the loans were generated by affiliated institutions. In Milwaukee, ANB achieved market ranks in the home purchase, home improvement, and refinance categories which were significantly lower than its market rank in deposits, but were in line with its deposit market share of .1%.

The volume of small business lending was good in the Milwaukee assessment area. ANB ranked 26th in small business lending which compares favorably with its deposit market rank. This conclusion considers the over reporting of small loans to businesses discussed in the Scope section of the report under Data Integrity. There were no small farm loans originated or purchased in this assessment area. Small farm lending was not a stated focus of the bank.

There were no community development loans made in the Milwaukee assessment area during the evaluation period.

Distribution of Loans by Income Level of Geography

Overall, the distribution of loans by income level of geography was good in Milwaukee, but the bank's performance was inconsistent across product lines. The generally better performance in small business and refinance lending had a positive influence on this conclusion.

We did not find any unexplained gaps in the bank's lending patterns for the Milwaukee assessment area.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the data used in this analysis.

For home purchase loans, the geographic distribution was adequate in Milwaukee. The percentage of loans made to borrowers residing in low- and moderate-income geographies was somewhat lower than the percentage of owner-occupied units in those geographies. The bank's market share for this product was negligible and

this data was not analyzed.

The geographic distribution of home improvement loans was excellent in Milwaukee. The percentage of loans made to borrowers in low- and moderate-income tracts exceeded the percentage of owner-occupied units in those tracts. No conclusion could be drawn from the market share analysis due to the bank's negligible market share.

The pattern of lending for home refinance loans reflects excellent geographic distribution in Milwaukee. The percentage of the bank's loans made in low- and moderate-income census tracts significantly exceeded the percentage of owner-occupied units. The market share measures were not fully consistent with the percentage distribution information in those areas. The bank's market share for this product was negligible and this data was not analyzed.

Small Business Loans

Refer to Table 5 in Appendix C for the data used in this analysis.

The geographic distribution of small loans to businesses was good in Milwaukee. The percentage of loans made in low-income geographies exceeded the percentage of businesses in those geographies and was excellent. However, the percentage in moderate-income geographies was slightly lower than the percentage of businesses in those geographies and was considered good. It is also noted that there is a slightly greater percentage of businesses located in moderate-income geographies and performance in this category was given more weight. Market share indicators were consistent with the percentage distribution information. The bank's market share in low-income census tracts exceeded the overall market share and in moderate-income census tracts was somewhat lower than the overall market share.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by borrower income level was good due to the distribution noted with home mortgage loans.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in Appendix C for the data used in this analysis.

The distribution of loans by income level of the borrower was good in Milwaukee. The lending to low- and moderate-income borrowers was excellent for home

improvement loans and good for refinance loans. The percentage of the bank's home improvement loans to moderate-income borrowers significantly exceeded the percentage of families in this income category and was excellent. The percentage of loans to low-income borrowers was also excellent considering the lower rate of home ownership of low-income borrowers. The bank's percentage of refinance loans to moderate-income families was near the percentage of families in this income category and the percentage of loans to low-income families was good given the lower home ownership rate in this group. Performance in home purchase lending was adequate due to the bank's percentage of loans being somewhat below the percentage of moderate-income families. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families, but was considered adequate for reasons previously discussed. The market share data did not provide meaningful information due to the low market rank and market share percentages.

Small Business Loans

No conclusion was developed for this aspect of the bank's lending performance. This situation is the result of the data integrity issues noted earlier. We did note that a moderate percentage (37%) of the bank's small business loans were in amounts of \$100,000 or less. However, loan size is not a reliable indicator of the extent that the bank's small loans were made to small businesses.

Community Development Lending

There were no CD loans made in Milwaukee during the evaluation period.

Product Innovation and Flexibility

The bank made an adequate effort to provide flexible lending products to customers in line with its business strategy. The bank offered a number of loan programs for small- and middle-market businesses. The flexible product offerings included SBA Express, Low-doc, 504, and 7A programs. No information was available on the extent that these programs increased lending to low- or moderate-income areas.

Lending Inside Versus Outside of Assessment Areas

ANB had a good focus on lending within its assessment areas in Wisconsin. During the evaluation period, about 89% of the number and 87% of the dollar amount of the bank's HMDA reportable and CRA reportable loans were made within its assessment areas. The in/out calculation was only performed for loans made directly by the bank and does not include affiliate lending or purchases.

Conclusions for Areas Receiving Limited Scope Reviews

The bank's Lending Test performance in the Dane County (Madison) assessment area was consistent with the bank's lending performance in the state of Wisconsin.

INVESTMENT TEST

Refer to Table 12 in Appendix C for the facts and data that support these conclusions.

Conclusions for Areas Receiving Full-Scope Reviews

ANB's performance under the Investment Test is excellent. In the Milwaukee assessment area performance was excellent. The bank's investment performance in the areas receiving limited-scope reviews did not significantly impact this rating due to the bank's limited market presence.

Dollar Amount of Qualified Investments

The volume of qualified investments by the bank is excellent in Milwaukee. To assist in evaluating the volume of investments in each assessment area, Tier 1 capital was allocated among the assessment areas based upon the percentage distribution of deposits in the bank. The investments made in the Milwaukee assessment area represent 61% of Tier 1 capital. Milwaukee has less than 1% of the bank's deposits, so only a nominal amount of Tier 1 capital was allocated to the Milwaukee assessment area for this calculation. Significant opportunities for community development investments were noted in the Milwaukee assessment area.

Innovativeness or Complexity of Qualified Investments

There were no investments with complex or innovative characteristics in the Milwaukee assessment area. The bank either purchased tax credits indirectly or made a contribution.

Responsiveness of Qualified Investments to Credit and Community Development Needs

ANB's responsiveness to the most pressing needs in its assessment areas is excellent in Milwaukee. The need for affordable housing was identified in this assessment area along with financing for small businesses. In the Milwaukee assessment area, ANB displays an excellent responsiveness to the most pressing need of affordable housing with 100% of its investments in this category. A total of 124 affordable housing units were created or retained by the bank's investments.

Conclusions for Areas Receiving Limited-Scope Reviews

In the Madison assessment area, the bank's performance is inconsistent and weaker than the bank's overall High Satisfactory Investment performance in the state of Wisconsin. The bank had no qualified investments in this assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Wisconsin is adequate and accessibility to banking services is adequate in Milwaukee.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's delivery systems provide adequate accessibility to geographies and individuals of different income levels.

Accessibility of Delivery Systems

In Milwaukee, delivery systems are adequately accessible to areas and individuals of different income levels. Our conclusion is supported by the fact that the bank's deposits represent a very small share (0.1%) of the Milwaukee market's deposits and by the fact that the bank's primary focus is businesses. There are two full service branches, one in the downtown business district and the other in a suburban location. There are no branches in low- or moderate-income areas. A gap analysis of branch locations in the Milwaukee area is not meaningful due to the limited number of branches and the business focus of the bank.

Limited alternative delivery systems include two ATMs, a 24-hour bilingual, telephone loan application service, and Internet banking. Both branches have an ATM but neither is accessible 24 hours. Also, the downtown ATM does not accept deposits. Bank One Loan-by-Phone is a service that allows a consumer to apply for a home equity loan or line of credit, an installment loan, or a credit card. Internet banking allows a consumer or business to open a deposit account, apply for a loan, and access other banking and financial information. The bank could not provide data regarding the effectiveness of these services in reaching low- and moderate-income individuals, and we did not consider them in drawing our conclusions.

Changes in Branch Locations

There were no branch openings or closings in Milwaukee.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Branch hours and services do not vary in a way to inconvenience its assessment area. Full banking services are offered at both branches. In Milwaukee, hours are consistent between the two branches and are offered on Saturday. There are no services specifically targeted to meet the needs of low- and moderate-income individuals.

Community Development Services

The level of CD services was poor in Milwaukee.

Extent of Community Development Services Provided

No CD services were provided in Milwaukee, though significant CD opportunities exist.

Conclusions for Areas Receiving Limited Scope Reviews

Performance in the Madison assessment area is consistent with the bank's overall Low Satisfactory performance for the Service Test in the state of Wisconsin.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan areas that received comprehensive examination review (designated by the term Full-Scope).

Time Period Reviewed	Lending Test: January 1, 1996 through December 31, 1999 Investment Test: December 23, 1994 through December 31, 1999 Service Test: December 23, 1994 through December 31, 1999	
Financial Institution	Products Reviewed	
American National Bank and Trust Company of Chicago, Chicago, IL	Home-purchase and refinanced loans, home-improvement loans, small- business loans, Community-development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Banc One Community Development Corporation	Holding company subsidiary	Community-development loans and equity investments.
Banc One Capital Funding Corporation	Holding company subsidiary	Community-development related loans and services.
Banc One Mortgage Company	Holding company subsidiary	Home-purchase and refinanced loans.
First Chicago NBD Mortgage Company	Holding company subsidiary	Home-purchase and refinanced loans.
Banc One Financial Services	Holding company subsidiary	Home-improvement, mortgage, and refinanced loans.
Bank One, Texas, N.A.	Holding company subsidiary	Community development loans.
First Chicago Leasing Corporation	Subsidiary of Bank One, N.A.	Community development related equity investments.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Illinois		
Chicago, IL MSA	Full-Scope	MSA #1600
Rockford, IL MSA	Limited-Scope	MSA #6880
Wisconsin		
Milwaukee, WI MSA	Full-Scope	MSA #5080
Madison, WI MSA	Limited-Scope	MSA #4720

Appendix B: Summary of State Ratings

RATINGS American National Bank and Trust Company of Chicago				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
American NB	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
Illinois	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Wisconsin	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Chicago, IL MSA	31
Milwaukee - Waukesha, WI MSA	33

Chicago, IL MSA

Demographic Information for Full-Scope Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	1,738	16.1	21.3	37.6	23.4	1.6
Population by Geography	7,261,176	9.8	19.8	41.9	28.5	0.0
Owner-Occupied Housing by Geography	1,595,050	2.9	12.7	47.9	36.5	0.0
Businesses by Geography	260,281	4.8	12.1	40.3	41.5	1.3
Farms by Geography	4,749	0.8	4.2	52.4	42.2	0.2
Family Distribution by Income Level	1,827,143	19.9	17.3	23.9	38.9	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	680,883	18.1	28.8	40.4	12.8	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$44,884 = \$63,800 = 10.5%	Median Housing Value Unemployment Rate November 30, 1999				= \$124,096 = 3.7%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

ANB's assessment area includes six of the nine Counties in the Chicago MSA, Cook, DuPage, Kane, Lake, McHenry, and Will Counties. In terms of deposit market share, ANB is the seventh largest bank in the MSA with a market share of 2.8% according to the June 30, 1999, FDIC Deposit Market Share reports. The largest financial institution, Bank One, NA, Illinois, has a market share of 13.7%.

The suburban portion of the bank's assessment area is predominantly middle- and upper-income communities. There are numerous financial institutions operating in these areas and competing for customers. The credit and community development needs that are present result from the high cost of living in general, the cost of housing, and the lack of land for development in many areas. The needs are not conspicuously concentrated in any single part of the bank's assessment area. They are dispersed throughout it, as is the low- and moderate-income population of the area. The high cost of housing creates the need for affordable rental housing and makes it difficult to obtain home ownership. There is a need for technical assistance and financing for start-up businesses. Additionally, some of the older suburbs are attempting to revitalize their commercial districts.

There are a wide variety of community organizations addressing these needs and thus significant community development opportunities. For example, there are 13 Community Development Financial Institutions, 12 HUD-certified housing

counseling agencies and nine Small Business Development Centers located in the suburbs.

The city of Chicago is included in the bank's assessment area, and the city is an area of significant credit needs and numerous community development opportunities. Credit needs and development opportunities include:

- Small business loans - Community development organizations in every Chicago neighborhood help small businesses develop business plans, improve management systems, and obtain financing. Financial institutions can participate in these efforts with term loans from \$25,000 - \$150,000 and with small lines of credit, especially for minority-owned construction companies
- Commercial Real Estate - Commercial streets in Chicago neighborhoods have many mixed-use buildings. Community development organizations report that financing improvements to these properties can be difficult, but is very important to improving the appearances of and investment prospects in LMI communities.
- Residential Mortgages - Community organizations are particularly concerned with the need for conventional loans from prime lenders for home improvements, refinancing of purchase money mortgages, and home equity loans for consumer purchases. They also report significant, continuing demand for loans with flexible qualifying criteria for home purchases. The need for flexible, affordable financing is particularly important to communities that traditionally have been low-income but now are attempting, with development projects, to attract a wider mix of residents, some with low-incomes and some with high-incomes.
- Assistance to Community Development Financial Institutions (CDFI) - Chicago has a large number of CDFIs that serve the credit needs of individuals and organizations whose projects do not fit conventional bank criteria but may do so in the future. CDFIs active in Chicago include small business micro loan funds and community development loan funds. The needs of credit unions designated by the National Credit Union Administration as serving a low-income population especially came to our attention. All of these nonprofit organizations require cash donations to help support their operations. They also need in-kind donations of equipment and expertise, and they need deposits, loans, equity grants, and near-equity investments.

- Assistance to Nonprofit Community Organizations - Many social service agencies also serve community development needs, and many of these organizations provide financial literacy education, which can help banks expand their markets into low- and moderate-income neighborhoods. These organizations express a need for cash donations and for in-kind donations of expertise to design and deliver these financial literacy programs. They also are seeking participants for Individual Development Account programs.

Chicago also has many other resources available, such as well-endowed foundations and university-based institutes that provide assistance to community organizations. These resources can support community development endeavors of banks and community organizations. The Federal Home Loan Bank, for example, has funds available that can help banks meet the credit needs described above while remaining within traditional bounds of safety and soundness.

Milwaukee - Waukesha MSA

Demographic Information for Full-Scope Area: Milwaukee - Waukesha MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	361	20.8	18.8	41.0	18.6	0.8
Population by Geography	1,263,990	14.4	15.4	43.8	26.3	0.1
Owner-Occupied Housing by Geography	276,149	5.5	11.8	49.4	33.3	0.0
Businesses by Geography	42,019	8.7	11.2	45.3	34.5	0.3
Farms by Geography	767	2.2	6.4	43.4	47.9	0.1
Family Distribution by Income Level	325,904	21.0	17.8	25.2	36.0	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	126,392	25.4	22.2	40.5	11.9	0.0
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$38,758 = \$57,600 = 11.3%	Median Housing Value Unemployment Rate November 30, 1999				= \$71,025 = 2.8%

Source: 1990 U.S. Census and 1999 HUD updated MFI.

ANB's assessment area includes two of the four Counties in the Milwaukee-Waukesha, WI MSA, Milwaukee and Waukesha Counties. According to the 1990 census, these two counties account for 79% of the population in this MSA. In terms of deposit market share, ANB is the 52nd largest bank in the MSA with a

market share of 0.1% according to the June 30, 1999, FDIC Deposit Market Share Reports. The largest financial institution, Marshall and Ilsley Bank have a market share of 18.8%.

Waukesha County lies directly west of Milwaukee County. It's predominantly middle- and upper-income population of 304,000 is concentrated on its eastern border. A mixed suburban and rural county, Waukesha is one of the wealthiest counties in Wisconsin, as measured by median income. It had two low- and moderate-income census tracts at the 1990 census. Low- and moderate-income credit and community development needs in this county are dispersed throughout the population.

Waukesha County, in its 1995 consolidated plan, identified community development needs for affordable rental housing, affordable single-family homes for purchase, home improvement loans, homeless assistance, housing accessible to disabled individuals, day care services, and economic development. These needs arise from the fact that Waukesha is one of the fastest growing counties in Wisconsin, attracting many new residents and businesses.

A review of data on organizations serving community development needs in Waukesha County reveals eighteen organizations. Six serve the entire state, two serve a region that includes Waukesha County, and ten are locally targeted.

- 5 organizations serve small business development and financing needs for companies ranging from well-established small firms to start-up micro enterprises.
- 3 serve the needs of homeless and other indigent persons.
- 2 organizations offer homeownership and financial counseling.
- 2 develop affordable housing.
- 2 provide technical assistance to nonprofit community development organizations.
- 2 provide grants to nonprofit organizations.
- 1 provides social services, as well as job training and homeowner counseling.
- 1 finances affordable housing.

There is adequate opportunity for financial institutions to work with these organizations to help meet the credit and community development needs of the communities they are licensed to serve.

Low- and moderate-income areas in the region are concentrated in Milwaukee County. The 1990 census revealed that 94% of the low- and moderate-income census tracts in the MSA are in Milwaukee County. Also, according to the 1990

census, 48 percent of the census tracts in Milwaukee County are low- and moderate-income census tracts.

Within Milwaukee County, low- and moderate-income areas concentrated in the City of Milwaukee in a large area that extends predominantly north and west of downtown. Smaller concentrations of LMI census tracts also are in the suburban communities of West Allis and Wauwatosa to the west of Milwaukee.

Wauwatosa and West Allis identified needs for: affordable housing for rent and for purchase (especially for first-time homebuyers), improvements to older homes, housing for the elderly, redevelopment of former industrial sites, and environmental remediation of many of these sites. Job training also was identified as a community development need.

In Milwaukee, we identified the following credit and community development needs:

Small Business:

- Business planning assistance
- Equity capital
- Micro loans
- Long-term financing for fixed asset acquisition
- Working capital loans

Banking Services:

- Accessible and affordable banking services, including the placement of more bank branches in low- and moderate-income communities.
- Small amounts of credit for job training expenses and for the purchase and repair of automobiles for travel to work.

Residential Mortgages:

- Affordable single family housing development
- Home buyer counseling
- Purchase money mortgages in small amounts
- Purchase and rehab loans for single family housing
- Affordable multi-family housing development, including financing for predevelopment expenses, construction, and permanent mortgages.

Other Community Development Needs:

- Job training.
- Day care services for children.
- Charitable and in-kind contributions for nonprofit organizations.

Resources for Meeting Credit and Community Development Needs:

Our research identified at least 60 organizations serving community development needs in Milwaukee County, including:

- 14 organizations serving small business development and financing needs for companies ranging from well-established small firms to start-up micro enterprises.
- 10 organizations offering home ownership and financial counseling education.
- 6 that develop single family and multi-family affordable housing.
- 5 that provide social services to a variety of clientele, including homeless persons.
- 4 Community Development Financial Institutions.
- 3 low-income credit unions certified by the National Credit Union Administration.
- 3 providing grants to nonprofit organizations.
- 3 that focus solely on providing job training services to LMI individuals.
- 2 that provide financing and technical assistance to nonprofit community development organizations.

Approximately six of these organizations target their services to minority groups that are predominantly low- and moderate-income and face language barriers when attempting to access financial services. Six of these organizations serve the entire state. Twenty-two are targeted to specific neighborhoods or communities.

Milwaukee has a very capable support network for nonprofit community development organizations. The network includes the Milwaukee Community Foundation, one of the largest such foundations in the United States, an office of the Local Initiatives Support Corporation, and the Employment Training Institute and the Center for Economic Development, both at the University of Wisconsin, Milwaukee. The municipal government of the City of Milwaukee is particularly involved in community development in the city, providing much support to nonprofit organizations and private sector investment with targeted planning and investing.

There are significant opportunities for financial institutions to work with the above organizations to meet the credit needs we identified in the assessment area. Nonprofit and government-sponsored organizations are involved in small business development activities, homebuyer counseling, affordable housing development, financial education, job training, and many other pursuits in the field of community development.

Appendix D: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the bank include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch Delivery Systems and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume - Illinois

LENDING VOLUME		Evaluation Period: 01/01/1996 TO 12/31/1999										
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Chicago	99.2	57,435	8,283,996	8,046	2,426,815	8	2,415	9	29,750	65,498	10,742,976	98.7
Limited Scope												
Rockford	0.8	786	70,104	214	69,683	1	56	0	0	1,001	139,843	1.3

Table 1. Lending Volume - Wisconsin

LENDING VOLUME		Evaluation Period: 01/01/1996 TO 12/31/1999										
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Milwaukee	100.0	2,013	160,161	259	86,031	0	0	0	0	2,272	246,192	82.8
Limited Scope												
Dane County **	0.0	469	47,453	19	3,723	0	0	0	0	488	51,176	17.2

* Deposit Data as of June 30, 1999

** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 2. Geographic Distribution of Home Purchase Loans - Illinois

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Chicago	2.9	3.5	12.7	9.5	47.9	36.5	36.5	50.4	5	2.9	3.8	2.3	2.3	3.5	19,861	98.9
Limited Scope																
Rockford	2.4	1.8	18.5	3.7	51.8	46.1	27.3	48.4	39	0.4	0.8	0.1	0.3	0.8	217	1.1

Table 2. Geographic Distribution of Home Purchase Loans - Wisconsin

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Milwaukee	5.5	3.8	11.8	8.3	49.4	45.9	33.3	42.1	134	0.1	0.0	0.0	0.0	0.1	266	83.9
Limited Scope																
Dane County ***	1.3	0.0	13.7	17.6	64.7	66.7	20.3	15.7	0	0.0	0.0	0.0	0.0	0.0	51	16.1

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 3. Geographic Distribution of Home Improvement Loans - Illinois

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Chicago	2.9	7.8	12.7	23.4	47.9	42.2	36.5	26.7	224	0.0	0.0	0.0	0.0	0.0	1,032	99.4
Limited Scope																
Rockford	2.4	0.0	18.5	33.3	51.8	50.0	27.3	16.7	36	0.2	0.0	0.0	0.3	0.3	6	0.6

Table 3. Geographic Distribution of Home Improvement Loans - Wisconsin

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Milwaukee	5.5	6.3	11.8	28.8	49.4	52.5	33.3	12.5	107	0.0	0.0	0.0	0.0	0.0	80	90.9
Limited Scope																
Dane County ***	1.3	0.0	13.7	25.0	64.7	62.5	20.3	12.5	0	0.0	0.0	0.0	0.0	0.0	8	9.1

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - Illinois

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full Scope																	
Chicago	2.9	2.8	12.7	9.9	47.9	40.3	36.5	46.9	3	3.8	2.4	2.6	3.4	4.5	36,527	98.5	
Limited Scope																	
Rockford	2.4	1.4	18.5	15.6	51.8	48.5	27.3	34.5	34	0.8	0.0	0.3	0.7	1.1	563	1.5	

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - Wisconsin

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full Scope																	
Milwaukee	5.5	10.6	11.8	17.4	49.4	50.4	33.3	21.5	146	0.1	0.0	0.0	0.0	0.1	1,666	80.3	
Limited Scope																	
Dane County ***	1.3	1.0	13.7	24.1	64.7	61.0	20.3	13.9	0	0.0	0.0	0.0	0.0	0.0	410	19.7	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 5. Geographic Distribution of Small Loans to Businesses - Illinois

Geographic Distribution: SMALL BUSINESS																	Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans																		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**																	
Full Scope																																	
Chicago	4.8	2.9	12.1	10.0	40.3	39.1	41.5	45.8	13	1.8	1.3	2.0	1.7	1.9	8,046	97.4																	
Limited Scope																																	
Rockford	10.1	15.4	16.8	22.4	50.3	48.6	22.8	13.6	10	1.7	3.7	2.5	1.5	0.9	214	2.6																	

Table 5. Geographic Distribution of Small Loans to Businesses - Wisconsin

Geographic Distribution: SMALL BUSINESS																	Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans																		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**																	
Full Scope																																	
Milwaukee	8.7	12.0	11.2	10.0	45.3	49.4	34.5	28.6	26	0.3	1.0	0.2	0.4	0.3	259	93.2																	
Limited Scope																																	
Dane County ***	5.6	21.1	21.2	15.8	57.0	57.9	16.3	5.3	0	0.0	0.0	0.0	0.0	0.0	19	6.8																	

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 6. Geographic Distribution of Small Loans to Farms - Illinois

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Chicago	0.8	0.0	4.2	0.0	52.4	12.5	42.4	87.5	53	0.3	0.0	0.0	0.0	1.0	8	88.9
Limited Scope																
Rockford	1.1	0.0	5.2	0.0	68.9	100.0	24.8	0.0	0	0.0	0.0	0.0	0.0	0.0	1	11.1

Table 6. Geographic Distribution of Small Loans to Farms - Wisconsin

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Milwaukee	2.2	0.0	6.4	0.0	43.4	0.0	47.8	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0
Limited Scope																
Dane County ***	0.5	0.0	7.6	0.0	77.8	0.0	14.1	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 7. Borrower Distribution of Home Purchase Loans - Illinois

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Chicago	19.9	5.5	17.3	19.6	23.9	24.7	38.9	46.8	5	2.9	3.1	2.9	3.2	4.7	19,861	98.9
Limited Scope																
Rockford	18.9	3.7	17.7	17.1	25.7	21.7	37.8	50.7	39	0.4	0.0	0.2	0.5	1.0	217	1.1

Table 7. Borrower Distribution of Home Purchase Loans - Wisconsin

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1996 TO 12/31/1999						
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Milwaukee	21.0	5.6	17.8	13.9	25.2	24.1	36.0	38.0	134	0.1	0.0	0.0	0.1	0.1	266	83.9
Limited Scope																
Dane County ***	15.8	3.9	19.7	21.6	28.3	17.6	36.2	37.3	0	0.0	0.0	0.0	0.0	0.0	51	16.1

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 8. Borrower Distribution of Home Improvement Loans - Illinois

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Chicago	19.9	14.4	17.3	24.8	23.9	27.0	38.9	26.6	224	0.0	0.1	0.0	0.0	0.0	1,032	99.4
Limited Scope																
Rockford	18.9	16.7	17.7	33.3	25.7	16.7	37.8	33.3	36	0.2	0.7	0.0	0.2	0.2	6	.6

Table 8. Borrower Distribution of Home Improvement Loans - Wisconsin

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1996 TO 12/31/1999																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Milwaukee	21.0	12.5	17.8	21.3	25.2	36.3	36.0	17.5	107	0.0	0.0	0.0	0.1	0.0	80	90.9
Limited Scope																
Dane County***	15.8	0.0	19.7	25.0	28.3	62.5	36.2	12.5	0	0.0	0.0	0.0	0.0	0.0	8	9.1

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans - Illinois

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full Scope																	
Chicago	19.9	5.3	17.3	18.2	23.9	25.6	38.9	44.7	3	3.8	2.6	4.3	4.5	5.8	36,527	98.5	
Limited Scope																	
Rockford	18.9	5.9	17.7	15.6	25.7	21.8	37.8	37.1	34	0.8	0.2	0.4	0.7	1.4	563	1.5	

Table 9. Borrower Distribution of Home Mortgage Refinance Loans - Wisconsin

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full Scope																	
Milwaukee	21.0	8.8	17.8	15.7	25.2	19.7	36.0	18.1	146	0.1	0.0	0.0	0.0	0.1	1,666	80.3	
Limited Scope																	
Dane County***	15.8	6.8	19.7	17.6	28.3	18.5	36.2	13.9	0	0.0	0.0	0.0	0.0	0.0	410	19.7	

* Based on 1998 Aggregate HMDA Data Only only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

*** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 10. Borrower Distribution of Small Loans to Businesses - Illinois

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Chicago	71.0	-	53.5	37.1	22.4	40.6	1.8	-	8,046	97.4
Limited Scope										
Rockford	71.8	-	61.6	27.6	26.2	46.3	1.7	-	214	2.6

Table 10. Borrower Distribution of Small Loans to Businesses - Wisconsin

Borrower Distribution: SMALL BUSINESS			Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Milwaukee	67.2	-	50.3	33.6	20.9	45.6	0.3	-	259	93.2
Limited Scope										
Dane County****	70.5	-	52.5	42.1	21.1	36.8	0.0	-	19	6.9

* The market consists of all other Small Business reporters in ANB's assessment area and is based on 1998 Aggregate Small Business Data only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for XX% of small loans to businesses reported by ANB.

**** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 11. Borrower Distribution of Small Loans to Farms - Illinois

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Farms With Revenues of \$ 1 million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Chicago	91.0	-	89.4	25.0	12.5	62.5	0.3	-	8	89.9
Limited Scope										
Rockford	93.5	-	92.4	100.0	0.0	0.0	0.0	-	1	11.1

Table 11. Borrower Distribution of Small Loans to Farms - Wisconsin

Borrower Distribution: SMALL FARM			Evaluation Period: 01/01/1996 TO 12/31/1999							
MSA/Assessment Area	Farms With Revenues of \$ 1 million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Milwaukee	93.2	-	95.8	0.0	0.0	0.0	0.0	-	0	0
Limited Scope										
Dane County	96.9	-	95.5	0.0	0.0	0.0	0.0	-	0	0

* The market consists of all other Small Farm reporters in ANB's assessment area and is based on 1998 Aggregate Small Business Data only

** As a Percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

**** Dane County evaluation period is from January 1, 1999 to December 31, 1999.

Table 12. Qualified Investments - Illinois

QUALIFIED INVESTMENTS									
Evaluation Period: 01/01/1996 TO 12/31/1999									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Chicago	0	0	27	25,741	27	25,741	96.7	0	0
Limited Scope									
Rockford	0	0	1	781	1	781	3.3	0	0

Table 12. Qualified Investments - Wisconsin

QUALIFIED INVESTMENTS									
Evaluation Period: 01/01/1996 TO 12/31/1999									
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Milwaukee	0	0	3	4,013	3	4,013	100.0	0	0
Limited Scope									
Dane County	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that remains outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Table 13. Distribution of Branch Delivery System - Illinois

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	Evaluation Period: 01/01/1996 TO 12/31/1999			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population						
	% of Rated Area Deposits	# of Bank Branches	% of Rated Area Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*						
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp			
Full Scope																				
ANB Chicago	99.2	20	95.2	0.0	5.0	30.0	60.0	0	13**	0	0	2	10	9.8	19.8	41.9	28.4			
Limited Scope																				
ANB Rockford	0.8	1	4.8	0.0	0.0	0.0	100.0	0	0	0	0	0	0	5.0	22.2	48.9	23.0			

Table 13. Distribution of Branch Delivery System - Wisconsin

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	Evaluation Period: 01/01/1996 TO 12/31/1999			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population						
	% of Rated Area Deposits	# of Bank Branches	% of Rated Area Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*						
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp			
Full Scope																				
ANB Milwaukee	100.0	2	100.0	0.0	0.0	50.0	50.0	0	0	0	0	0	0	14.4	15.4	43.8	26.3			
Limited Scope																				
ANB Dane County	0.0	0	0.0	0.0	0.0	0.0	0.0	1	1	0	0	0	0	6.9	19.9	58.0	15.3			

* The percentage of the population in the MSA/AA that resides in these geographies.

**These branches are