



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

March 17, 2004

**COMMUNITY REINVESTMENT ACT (CRA)
PERFORMANCE EVALUATION**

**First National Bank
Charter Number 21610**

**111 Jefferson Street
Waupaca, WI 54981**

**Comptroller of the Currency
Milwaukee Field Office
1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226**

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

Description of Institution

First National Bank (FNB) is a \$403 million financial institution headquartered in Waupaca, Wisconsin. FNB is 81% owned by Waupaca Bank Corp., a one-bank holding company with total assets of \$403 million. Numerous shareholders hold the remaining 19% ownership. The bank is comprised of the main office (Waupaca) and three full-service branches (Chetek, Iola, and Weyauwega) in Wisconsin and three full-service branches (Childress, Pampa, and Shamrock) in Texas. The Pampa and Shamrock branches were originally a separate charter under the holding company and were merged with FNB in October 2000. The Childress branch was acquired in January 2001. FNB also operates a total of 13 ATMs; five of which are deposit taking. Four of the 13 ATMs were installed subsequent to the bank's last CRA examination dated August 21, 1998.

FNB has two Assessment Areas (AA), one in Wisconsin and one in Texas. The Wisconsin AA includes all of Waupaca County and the southern two-thirds of Barron County. The Texas AA includes all of Childress, Gray, and Wheeler Counties. The assessment areas meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas. For additional information on FNB's assessment areas, see Market Profile – Demographic Information Tables in Appendix B.

FNB offers a full array of banking products and services including business, real estate and consumer purpose loans and various deposit products. FNB has Tier 1 capital of \$30.6 million (7.6% of total assets) and net loans at 85% of total assets. The loan portfolio is comprised primarily of commercial loans (50%) and one-to-four family residential loans (31%). In addition, 10% of the loan portfolio is agricultural loans, 6% is loans to individuals, and 3% is multifamily loans. All financial information is as of December 31, 2003. For additional information on the products and services offered by FNB, please refer to the bank's CRA Public File.

There are no legal, financial, or other constraints that could impair the bank's ability to meet the credit needs of the community. The bank received a "Satisfactory" rating at the last CRA examination dated August 21, 1998 under the small bank CRA standards.

Evaluation Period

The evaluation period for the Lending Test, excluding Community Development (CD) Loans, is January 1, 2002 through December 31, 2002. The evaluation period for the Investment Test, the Service Test, and CD Loans is January 1, 2002 (the date the bank became a large bank for purposes of the CRA evaluation) through March 17, 2004 (the start date of this examination).

Products included in FNB's Lending Test analysis are home mortgage loans, small loans to businesses, small loans to farms, and CD loans. Multifamily loans are not a significant product of FNB, so an analysis of this product would not be meaningful.

Overall CRA Rating

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

The following table indicates the performance level of **First National Bank** with respect to the lending, investment, and service tests:

Performance Levels	First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		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 bank’s rating is based on the full-scope reviews of its two assessment areas, namely the Wisconsin and Texas AAs. Due to small business lending consistently representing the largest portion of FNB’s total loan portfolio, the most weight was placed on this area for both AAs. One-to-four family residential real estate lending is also a significant portion of the bank’s operations and was given consideration in both AAs in the evaluation. Minimal weight was given to small farm lending in both AAs, as this is a small part of the bank’s lending activities. The bank originated only nine multifamily loans during the evaluation period; therefore, an analysis was not considered meaningful and consequently not sampled.

FNB is not a reporter under the Home Mortgage Disclosure Act (HMDA). Additionally, the bank did not have any reports to provide the total number and dollar of loans originated during the evaluation period. Since loan reports did not distinguish between purchase, home improvement, or refinance, we sampled 30 home mortgage loans made in each AA during the evaluation period.

The major factors that support this overall rating are detailed on the following pages:

State Rating

CRA Rating for Wisconsin:	Satisfactory
The lending test is rated:	Outstanding
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

Description of Institution's Operations in Wisconsin

Refer to the market profile for the Wisconsin AA in appendix B for detailed demographics and other performance context information.

Scope of Evaluation in Wisconsin

FNB has one assessment area in the state of Wisconsin. This assessment area received a full-scope review. Due to the limited community development opportunities in the assessment area the lending test was weighted most heavily when determining the state rating. Due to small business loans consistently being the largest portion of FNB's loan portfolio, the most weight was given to this group in the lending test. One-to-four family residential real estate lending is also a significant portion of the bank's operations and was given consideration in the evaluation. Minimal weight was given to small farm lending, as this is a small part of the bank's lending activities.

FNB is not a reporter under the Home Mortgage Disclosure Act (HMDA). Additionally, the bank did not have any reports to provide the total number and dollar of loans originated during the evaluation period. Since loan reports did not distinguish between purchase, home improvement, or refinance, we sampled 30 home mortgage loans made in the AA during the evaluation period. Conclusions for home mortgage lending are based on the results of these samples. Multifamily loans were not sampled due to the small number of loans originated in 2002 (9) and their small percentage of the total loan portfolio (3%).

One community contact with a representative from local government was performed during this examination. The contact indicated there are a limited number of community development opportunities in the area due to its rural nature, lack of low-income areas, and limited moderate-income areas. The contact also stated for the most part all financial institutions in the area are involved in the community. FNB was mentioned as one of the most involved.

Lending

Refer to Table 1 through 12 in Appendix C for facts and data used to evaluate the bank's lending.

FNB's performance under the lending test in the Wisconsin AA is rated Outstanding. The

geographic distribution of loans in the moderate-income geography is excellent. The level of lending to small businesses and small farms is excellent and to low- and moderate-income individuals (LMI) is good. The bank's flexible loan products provide additional credit avenues for small businesses, small farms, and LMI individuals.

The bank's geographic distribution of small loans to businesses in the Wisconsin AA is excellent. The bank's borrower distribution of small loans to businesses with revenues of \$1 million or less is good. 8.5% of the bank's small loans to businesses were made to businesses in the moderate-income geography, while 7.8% of the AA's businesses are located there. Additionally, the bank's market share of loans in the moderate-income geography of 64.0% is well above its overall small loans to businesses market share of 45.6%. Both of these market shares rank first for all lenders that originated at least one loan in the respective areas in 2002. Table 11 reports loans to businesses with revenues of \$1 million or less as 46.3% of the bank's reportable small loans to businesses. However, 842 of the 1,956 small loans to businesses were made to two businesses with revenues greater than \$1 million. These loans are individual notes under two floor plan lines. An analysis of the bank's small loans to business lending subtracting 839 of the 842 floor plan notes from the total of small loans to businesses reveals a total of 1,116 loans. Using this adjusted total, the percent of small loans to businesses with revenues of \$1 million or less increases to 81.2% compared to the 81.9% of area businesses that had revenues of \$1 million or less. Additionally, FNB's lender market share of loans to businesses with revenues \$1 million or less of 51.1% ranks first, with the next ranked financial institution's market share being a distant second at 8.8%. This performance is considered excellent.

The bank's geographic distribution of mortgage loans in the Wisconsin AA is excellent. The bank's distribution of mortgage loans to low- and moderate-income individuals is good. Loans to borrowers in the moderate-income geography accounted for 10.0% of the sampled loans, while only 6.3% of the owner-occupied units are located in this area. While the bank's lending performance to moderate-income borrowers is below the demographic characteristics of the area (13.3% of bank loans compared to 20.7% of families), the lending performance to low-income borrowers is well above the percent of families in this income category (36.7% of loans compared to 17.7% of families). This performance is considered good.

FNB's distribution of small loans to farms with revenues of \$1 million or less in the Wisconsin AA is excellent. The bank's geographic distribution of small loans to farms is considered good. 99.5% of the bank's small loans to farms were made to farms with revenues of \$1 million or less, while 96.4% of the farms in the AA have this income designation. While FNB's lending performance in the moderate-income geography is below the demographic characteristics of the area (4.7% of loans compared to 7.4% of farms), the bank's market share in the moderate-income geography is above its overall market share for small loans to farms of 45.6%. Additionally, the bank ranks first in both overall lender market share and lender market share in the moderate-income geography for small loans to farms.

FNB's lending activity is excellent. The bank's small business loan market share of 45.6% and small farm loan market share of 45.6% compares favorably to its deposit market share in

the Wisconsin AA of 11.3%. Market share for mortgage loans was not available. The bank is not a HMDA reporter since this AA is in a non-MSA area.

Eighty-five percent of FNB's loans originated by branches in Wisconsin were made within the bank's AA, which is considered a substantial majority.

Community development lending had a neutral effect on the bank's lending test rating. Although FNB did not make any community development loans, this is considered reasonable in light of the limited opportunity for community development activities in the assessment area and the bank's relatively small size.

FNB has used flexible and guaranteed lending programs to address the needs of LMI borrowers, small businesses, and small farms in the Wisconsin AA. Use of these programs has a positive impact on the lending test rating. Programs used by the bank include the following: Wisconsin Housing and Economic Development Authority (WHEDA) home loans, loans guaranteed by a local Economic Development Corporation (EDC), and loans guaranteed by the USDA Farm Services Agency (FSA). During the evaluation period the bank originated five loans in the Wisconsin AA under these programs totaling \$1.8 million.

Investments

In evaluating the bank's qualified investments, we considered community development opportunities in the AA, as well as the capacity for the local infrastructure to create qualified investments. Opportunities for qualified investments are very limited in this AA due to the lack of low-income geographies, limited number of moderate-income geographies, and the existence of only a few community development organizations. In addition, FNB lacks the expertise to create these opportunities. The bank does participate with social service and economic development agencies in the AA (see the Services test section below).

Refer to Table 14 in Appendix C for facts and data used to evaluate the bank's level of qualified investments.

Performance under the investment test in the Wisconsin AA is rated Low Satisfactory.

FNB's volume of qualified investments is adequate considering the limited opportunities available in the AA. The bank's investments consist of several cash donations to various community development organizations totaling \$14,441. The organizations provide economic development in the AA and community services to low- and moderate-income individuals.

Services

Refer to Table 15 in Appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Performance under the service test in the Wisconsin AA is rated High Satisfactory.

FNB's offices and retail services are readily accessible to geographies and individuals of all income levels. FNB operates its main office and three full-service branches in the Wisconsin AA. FNB has not opened or closed any branches in this AA during this evaluation period. Alternative delivery systems include 11 ATMs disbursed throughout the AA as well as telephone and internet banking. There are no low-income areas in the AA. One branch, one deposit-taking ATM and one cash dispensing ATM are located in the single moderate-income geography in this AA. 23% of all LMI families in the AA are in geographies where FNB has branches or ATMs. The bank does not maintain information on how low- and moderate-income individuals or geographies specifically benefit from the telephone or internet systems. Therefore, we did not place significant weight on these systems in our CRA performance conclusions.

FNB's community development services are considered good. Several FNB employees are involved with community development agencies in the Wisconsin AA. The employees serve as directors, treasurers, and chairmen for these agencies. These employees provide technical and financial expertise to the respective agencies, including an industrial development board, a community development board, an economic development corporation, and local chapters of national social service agencies.

State Rating

CRA Rating for Texas:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	Low Satisfactory

Description of Institution's Operations in Texas

Refer to the market profiles for the Texas AA in appendix B for detailed demographics and other performance context information.

Scope of Evaluation in Texas

FNB has one assessment area in the state of Texas. This assessment area received a full-scope review. Due to the limited community development opportunities in the assessment area the lending test was weighted most heavily when determining the state rating. Due to small business loans consistently being the largest portion of FNB's loan portfolio, the most weight was given to this group in the lending test. One-to-four family residential real estate lending is also a significant portion of the bank's operations and was given consideration in the evaluation. Minimal weight was given to small farm lending, as this is a small part of the bank's lending activities.

FNB is not a reporter under the Home Mortgage Disclosure Act (HMDA). Additionally, the bank did not have any reports to provide the total number and dollar of loans originated during the evaluation period. Since loan reports did not distinguish between purchase, home improvement, or refinance, we sampled 30 home mortgage loans made in the AA during the evaluation period. Conclusions for home mortgage lending are based on the results of these samples. Multifamily loans were not sampled due to none being originated in the Texas AA in 2002.

One community contact with a representative from a local Chamber of Commerce was performed during this examination. The contact indicated there are a limited number of community development opportunities in the area due to its rural nature, lack of low-income areas, and limited moderate-income areas. Affordable housing units was identified as a need in the community. The contact stated overall financial institutions in the area are meeting the community's credit needs. He specifically mentioned FNB as one of the aggressive lenders in the area. He also specifically mentioned that employees of FNB are active members in the community.

Lending

Refer to Tables 1 through 12 in Appendix C for the facts and data used to evaluate the bank's lending.

FNB's performance under the lending test in the Texas AA is rated High Satisfactory. Overall, the level of lending to small businesses and small farms is excellent. The level of lending to LMI individuals is adequate. The bank's geographic distribution of loans in moderate-income geographies is considered good. The bank's flexible loan products provide additional credit avenues for small businesses and small farms in the AA.

The bank's geographic distribution of small loans to businesses in the Texas AA is excellent, including loans to businesses in moderate-income geographies. The bank's borrower distribution of small loans to businesses with revenues of \$1 million or less is also excellent. 21.8% of small loans to businesses were originated to businesses in the moderate-income geographies, while only 14.4% of the businesses in the AA are located in these geographies. Additionally, 95.3% of reported loans were made to businesses with revenues of \$1 million or less, as compared to 75.2% of the businesses in the AA having this income designation. FNB ranks first in all lender market shares for small loans to businesses and loans to businesses with revenues \$1 million or less.

FNB's distribution of mortgage loans to low- and moderate-income individuals is adequate. While the bank's lending performance to moderate-income borrowers is below the demographic characteristics of the area (6.7% of bank loans compared to 15.1% of families), the lending performance to low-income borrowers approximates the percent of families in this income category (16.7% of loans compared to 18.4% of families). This performance is considered adequate. The bank's geographic distribution of mortgage loans in moderate-income geographies is considered good.

FNB's distribution of small loans to farms with revenues of \$1 million or less in the Texas AA is excellent. 97.5% of the bank's small loans to farms were originated to farms with revenues of \$1 million or less, while 93.6% of the farms in the AA have revenues of \$1 million or less. Minimal weight was given to the bank's geographic distribution of small loans to farms, as only four farms are located in the two moderate-income areas in this AA.

FNB's lending activity is excellent. The bank's small business loan market share of 34.5% and small farm loan market share of 56.8% compare favorably to its deposit market share in the Texas AA of 30.7%. Market share for mortgage loans was not available. The bank is not a HMDA reporter since this AA is in a non-MSA area.

Eighty-seven percent of FNB's loans originated by branches in Texas were made within the bank's AA, which represents a substantial majority.

Community development lending had a neutral effect on the bank's lending test rating. Although FNB did not make any community development loans, this is considered reasonable in light of the limited opportunity for community development activities in the assessment area and the bank's relatively small size.

FNB has used guaranteed lending programs to address the needs of small businesses and small farms in the Texas AA. Use of these programs has a positive impact on the lending

test rating. Programs used by the bank include loans guaranteed by a local Economic Development Corporation (EDC) and loans guaranteed by the USDA Farm Services Agency (FSA). During the evaluation period the bank originated eight loans in the Texas AA under these programs totaling \$1.6 million.

Investments

In evaluating the bank's volume of qualified investments we considered community development opportunities in the assessment area as well as the capacity for the local infrastructure to create qualified investments. Opportunities for qualified investments are very limited in this AA due to the lack of low-income geographies, limited number of moderate-income geographies, the existence of only a few community development organizations, and a limited number of financial institutions with access to any significant financial resources. In addition, the bank lacks the expertise to create these opportunities. The bank does participate with social service and economic development agencies in the AA (see the Services test section below).

Refer to Table 14 in Appendix C for facts and data used to evaluate the bank's level of qualified investments.

Performance under the investment test in the Texas AA is rated Low Satisfactory.

FNB's investment activity in the Texas AA is adequate considering the limited opportunities available in the AA. FNB's investments consist of several cash donations to various community development organizations totaling \$5,115. The organizations provide economic development in the bank's AA and community services to low- and moderate-income individuals.

Services

Refer to Table 15 in Appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Performance under the service test in the Texas AA is rated Low Satisfactory.

FNB's offices and retail services are reasonably accessible to geographies and individuals of all income levels. FNB operates three branches in the Texas AA. Alternative delivery systems include two ATMs, as well as telephone and internet banking. There are no low-income areas in the AA and only two moderate-income geographies in this AA. 38% of all LMI families in the AA are in geographies where FNB has branches or ATMs. As mentioned in the Service Test for the Wisconsin AA, the bank does not maintain information on how low- and moderate-income individuals or geographies specifically benefit from the telephone or internet systems. Therefore, we did not place significant weight on these systems in our CRA performance conclusions.

FNB's community development services are considered good. Several FNB employees are involved with three community development agencies in the AA. The employees serve as board and committee members who provide technical and financial expertise to the organizations. These organizations include two local chapters of national social service agencies and a local crisis center. All agencies provide community services targeted to low- or moderate-income individuals.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of illegal discrimination or other illegal credit practices.

Appendix B: Market Profile – Demographic Information Tables

Wisconsin Assessment Area

Demographic Information for Full Scope Area: Wisconsin (Waupaca and Barron Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	21	0.0%	4.8%	90.4%	4.8%	0.0%
Population by Geography	79,882	0.0%	6.1%	89.3%	4.6%	0.0%
Owner-Occupied Housing by Geography	35,419	0.0%	6.4%	88.4%	5.2%	0.0%
Business by Geography	4,201	0.0%	7.8%	87.6%	4.6%	0.0%
Farms by Geography	851	0.0%	7.4%	88.6%	4.0%	0.0%
Family Distribution by Income Level	21,595	17.7%	20.7%	25.9%	35.7%	0.0%
Distribution of Low and Moderate Income Families throughout AA Geographies	8,292	0.0%	8.2%	88.4%	3.4%	0.0%
Median Family Income	= \$30,290	Median Housing Value		= \$48,288		
HUD Adjusted Median Family Income for 2002	= \$50,800	Unemployment Rate**		Waupaca County	= 7.9%	
Households Below Poverty Level	= 10.7%			Barron County	= 9.2%	
				Wisconsin	= 6.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

(**) WI Department of Workforce Development, February 2004.

Source: 1990 US Census and 2002 HUD updated MFI.

Waupaca and Barron are rural counties with a total population of 79,882 (based on 1990 census data). The main industries in Waupaca County are nursing and residential care facilities, educational services, and food services. In spite of a decline in recent years, manufacturing remains an important industry in Waupaca County. Major employers include Waupaca Foundry, Inc., Wisconsin Veteran’s Home, and the County of Waupaca. The main industries in Barron County are food manufacturing, educational services, gambling and recreation industries. Major employers include Jennie-O Turkey Store, Inc. and St. Croix Casino.

With 11.3% of the market deposits, FNB ranks fourth of 23 financial institutions with at least one branch in the AA. The major competitors are First State Bank, which has five offices and 12.4% of the market’s deposits, US Bank with six offices and 12.1% of the market’s deposits, and Dairy State Bank with two offices and 11.6% of the market’s deposits. The other 19 banks have at least one office each and deposit shares ranging from 7.6% down to 0.1%. This information is according to Federal Deposit Insurance Corporation (FDIC) June 30, 2003 deposit market share data.

Texas Assessment Area

Demographic Information for Full Scope Area: Texas (Childress, Gray, and Wheeler Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0.0%	15.4%	53.8%	30.8%	0.0%
Population by Geography	35,799	0.0%	13.7%	47.5%	38.8%	0.0%
Owner-Occupied Housing by Geography	17,649	0.0%	12.4%	49.0%	38.6%	0.0%
Business by Geography	2,785	0.0%	14.4%	48.5%	37.1%	0.0%
Farms by Geography	234	0.0%	1.7%	50.4%	47.9%	0.0%
Family Distribution by Income Level	10,409	18.4%	15.1%	19.8%	46.7%	0.0%
Distribution of Low and Moderate Income Families throughout AA Geographies	3,492	0.0%	22.8%	56.1%	21.1%	0.0%
Median Family Income	= \$24,585	Median Housing Value		= \$34,167		
HUD Adjusted Median Family Income for 2002	= \$36,100	Unemployment Rate**		Childress County	= 3.8%	
Households Below Poverty Level	= 17.8%			Gray County	= 4.6%	
				Wheeler County	= 2.3%	
				Texas	= 6.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

(**) Texas Workforce Commission, March 2004.

Source: 1990 US Census and 2002 HUD updated MFI.

Childress, Gray and Wheeler are rural counties with a total population of 35,799 (based on 1990 census data). The main industries in this AA are government, trade, transportation, utilities, manufacturing, and leisure/hospitality. Major employers include Pampa Independent School District, Texas Department of Criminal Justice, Hoechst Celanese Chemical Co., and Pampa Regional Medical Center.

With 30.7% of the market deposits, FNB ranks first of 11 banks with at least one branch in this AA. The major competitors are FirstBank Southwest, which has three offices and 15.4% of the market's deposits, and First American Bank, with two offices and 11.9% of the market's deposits. The remaining eight banks have at least one office each and deposit shares ranging from 9.8% down to 2%. This information is according to Federal Deposit Insurance Corporation (FDIC) June 30, 2003 deposit market share data.

Appendix C: Content of Standard Tables

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/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the metropolitan area (MA) /assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Qs&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased 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 share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units

throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased 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 share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased 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 share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased 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. In addition, the table presents the percentage distribution of the number of loans originated and purchased 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 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased 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. In addition, the table presents the percentage distribution of the number of loans originated and purchased 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 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System 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 MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME													Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002	
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
Full Review:																
Wisconsin AA	100%	30	\$1,811	1,956	\$68,408	215	\$9,114	0	\$0	2,201	\$79,333	100%				

Table 1. Lending Volume

LENDING VOLUME													Geography: TEXAS		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002	
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
Full Review:																
Texas AA	100%	30	\$888	467	\$12,407	162	\$7,990	0	\$0	659	\$21,285	100%				

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 1, 2002 to March 17, 2004.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2 - 4. Geographic Distribution of Home Mortgage Loans

Geographic Distribution: HOME MORTGAGE			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full Review:																
Wisconsin AA	30	100%	N/A	N/A	6.3%	10.0%	88.4%	86.7%	5.3%	3.3%	N/A	N/A	N/A	N/A	N/A	

Table 2 - 4. Geographic Distribution of Home Mortgage Loans

Geographic Distribution: HOME MORTGAGE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full Review:																
Texas AA	30	100%	N/A	N/A	12.4%	10.0%	49.0%	53.3%	38.6%	36.7%	N/A	N/A	N/A	N/A	N/A	

* Home mortgage loans in our sample originated and purchased in the MA/AA as a percentage of the 30 home mortgage loans sampled.

** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% of MF Units**	% BANK Loans	% MF Units**	% BANK Loans	% MF Units**	% BANK Loans	% MF Units**	% BANK Loans						
Full Review:																
Wisconsin AA	0	100%	N/A	N/A	1.9%	0.0%	96.9%	0.0%	1.2%	0.0%	N/A	N/A	N/A	N/A	N/A	

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: TEXAS				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% of MF Units**	% BANK Loans	% MF Units**	% BANK Loans	% MF Units**	% BANK Loans	% MF Units**	% BANK Loans						
Full Review:																
Texas AA	0	100%	N/A	N/A	.8%	0.0%	34.2%	0.0%	65.0%	0.0%	N/A	N/A	N/A	N/A	N/A	

* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wisconsin AA	1,956	100%	N/A	N/A	7.8%	8.5%	87.6%	91.1%	4.6%	.4%	45.6%	N/A	64.0%	49.5%	7.4%

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Texas AA	467	100%	N/A	N/A	14.4%	21.8%	48.5%	50.1%	37.1%	28.1%	34.5%	N/A	46.8%	38.5%	33.5%

* Based on 2002 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data – Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wisconsin AA	215	100%	N/A	N/A	7.4%	4.7%	88.6%	87.9%	4.0%	7.4%	45.6%	N/A	76.9%	44.3%	53.3%

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: TEXAS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Texas AA	162	100%	N/A	N/A	1.7%	0.0%	50.4%	91.4%	47.9%	8.6%	56.8%	N/A	0.0%	65.8%	25.9%

* Based on 2002 Peer Small Business Data: US.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data – Dun and Bradstreet (2002).

Table 8 – 10. Borrower Distribution of Home Mortgage Loans

Borrower Distribution: HOME MORTGAGE			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Home Mortgage Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total*	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Wisconsin AA	30	100%	17.7%	36.7%	20.7%	13.3%	25.9%	36.7%	35.7%	13.3%	N/A	N/A	N/A	N/A	N/A

Table 8 – 10. Borrower Distribution of Home Mortgage Loans

Borrower Distribution: HOME MORTGAGE			Geography: TEXAS						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Home Mortgage Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total*	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Texas AA	30	100%	18.4%	16.7%	15.1%	6.7%	19.8%	33.3%	46.7%	43.3%	N/A	N/A	N/A	N/A	N/A

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

** Percentage of Families is based on the 1990 Census information.

*** From our sample, home mortgage loans originated and purchased in the MA/AA as a percentage of the 30 home mortgage loans sampled in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002		
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
MA/Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Wisconsin AA	1,956	100%	81.9%	46.3%	93.4%	4.3%	2.3%	45.6%	51.1%

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: TEXAS		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002		
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
MA/Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Texas AA	467	100%	75.2%	95.3%	94.0%	4.7%	1.3%	34.5%	60.8%

* Based on 2002 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Wisconsin AA	215	100%	96.4%	99.5%	89.8%	7.9%	2.3%	45.6%	46.8%

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: TEXAS		Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Texas AA	162	100%	93.6%	97.5%	88.3%	6.2%	5.5%	56.8%	67.8%

* Based on 2002 Peer Small Business Data: US.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B – 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2002 TO MARCH 17, 2004			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wisconsin AA	0	\$0	13	\$14	13	\$14	100%	0	\$0

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS				Evaluation Period: JANUARY 1, 2002 TO MARCH 17, 2004			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Texas AA	0	\$0	13	\$5	13	\$5	100%	0	\$0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WISCONSIN Evaluation Period: JANUARY 1, 2002 TO MARCH 17, 2004																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wisconsin AA	100%	4	100%	N/A	25.0%	75.0%	0.0%	0	0	N/A	N/A	N/A	N/A	N/A	6.1%	89.3%	4.6%

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: TEXAS Evaluation Period: JANUARY 1, 2002 TO MARCH 17, 2004																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Texas AA	100%	3	100%	N/A	0.0%	66.7%	33.3%	1	0	N/A	0	+1	0	N/A	13.6%	47.5%	38.9%