



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

November 10, 2003

Community Reinvestment Act Performance Evaluation

**Associated Bank, National Association
Charter Number: 23695**

**200 North Adams Street
Green Bay, Wisconsin 54301**

**Office of the Comptroller of the Currency
Midsize Bank Supervision
440 South LaSalle Street, Suite 2700
Chicago, Illinois 60605**

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, 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 **Associated Bank, National Association** (Associated) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Associated Bank, National Association 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 major factors that support this rating include:

- Lending levels reflected excellent responsiveness by Associated to the credit needs in its full scope Assessment Areas (AAs). Associated’s market share percentile ranking for each loan product exceeded its percentile ranking for deposit market share.
- The geographic distribution of loans reflected good penetration throughout the bank’s AAs.
- The borrower distribution of loans reflected good penetration throughout Associated’s AAs.
- Associated has an good level of qualified investments considering the needs and opportunities available and its size and financial capability.
- Associated provides an adequate level of community development services. Associated’s delivery systems are reasonably accessible to geographies and individuals of different income levels.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The 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 with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental 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.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited 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, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. 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 Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Associated Bank, N.A. (Associated) is a nationally chartered, intrastate bank headquartered in Green Bay, Wisconsin. Associated operates 147 offices throughout the state of Wisconsin including the following larger communities: Green Bay, Milwaukee, Madison, Wausau, Eau Claire, Sheboygan, Racine, and Kenosha.

All of Associated's offices are full-service facilities that offer traditional deposit and loan products. Branches and automated teller machines (ATMs) are located throughout the assessment area (AA), including low- and moderate-income geographies. Deposit-taking ATMs are located at the main office and some of the branch offices.

Associated is a wholly owned subsidiary of Associated Banc-Corp (ABC). Until 2000, ABC was an eleven bank holding company headquartered in Green Bay, Wisconsin. At that time, ABC began consolidating all of its community bank charters into the existing Green Bay charter, Associated. As of November 10, 2003, Associated is the largest entity in ABC and there are fourteen other affiliates. These affiliates include three other bank charters, a full service mortgage company, a nationally chartered trust company, two insurance companies, a real estate appraisal company, a consumer finance company, an investment brokerage company, and two non-profit corporations for charitable contributions. The other bank charters include a nationally chartered bank and a state chartered bank in Illinois, as well as a nationally chartered bank in Minnesota. As of June 30, 2003 ABC's consolidated assets totaled approximately \$15.3 billion. Only the mortgage company had an impact on Associated's CRA performance and data from this entity was used in this evaluation.

As of September 30, 2003, Associated had total assets of approximately \$10.1 billion, total loans of \$6.9 billion, total deposits of \$6.1 billion, and Tier One Capital of \$726 million. Associated offers traditional commercial and retail banking services with a loan portfolio representing 69 percent of its total assets as of September 30, 2003. The majority of the loan portfolio was real estate secured. Approximately 25 percent of the portfolio was commercial real estate loans, 34 percent was 1-4 family residential loans, nine percent was construction and land development, and four percent was multifamily residential loans. The remainder of the portfolio was mainly commercial lending (19 percent) and consumer loans (6 percent). Associated was not active in agricultural lending, with less than one percent of its loan portfolio comprised of agricultural loans. Therefore Associated's performance in agricultural lending was not considered as part of this evaluation.

Associated has three subsidiaries. These subsidiaries include an offshore holding company and two subsidiaries involved in investing in real estate investment trusts, a full service insurance agency, and a subsidiary that holds its investment portfolio. These subsidiaries did not have an impact on Associated's capacity to meet community credit needs.

There were no legal, financial, or other factors impeding Associated's ability to help meet the credit needs in its AAs. Associated's previous CRA rating, as of March 8, 1999, was an Outstanding rating using Large Bank CRA evaluation procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period of home mortgage loans and loans to small businesses and farms was January 1, 1999, to December 31, 2002. The evaluation period for community development (CD) loans, the Investment Test and the Service Test, was March 8, 1999, to November 10, 2003.

For the Lending Test, Associated's origination and purchase of home mortgage loans, small loans to businesses, and CD loans were evaluated. Small loans to farms and multifamily loans were not evaluated because the low volume of these loans would not yield any meaningful analysis. For the Investment Test, current balances of qualified investments made in prior periods and qualified investments made in the current period were evaluated. For the Service Test, the geographic distribution of branches, Associated's record of opening and closing branches, and retail and CD services were evaluated.

Market share data for home mortgage loans and small loans to businesses were based on 2001 aggregate data, which were the most current data available at the time Associated's CRA performance was evaluated.

Data Integrity

We verified a sample of Home Mortgage Disclosure Act (HMDA) reported loans and small loans to businesses to determine the accuracy of data presented by Associated. We reviewed the sample of HMDA-reportable transactions to ensure the purpose, action taken, location, race, gender, applicant income, and loan size were accurately included on Associated's Loan Application Registers for 1999, 2000, 2001 and 2002. This data was determined to be accurate.

We reviewed the sample of small loans to businesses to ensure the loan type, original amount, location, and gross revenue were accurately reported. After management made revisions to the 1999, 2000, 2001 and 2002 data, we found the data to be substantially accurate. As a result, we were able to rely on Associated's data to make an appropriate and accurate assessment of Associated's performance under the Community Reinvestment Act.

We reviewed information on bank-identified community development loans, qualified investments, and community development services to verify that the activities met the regulatory definitions. Associated's list of community

development activities included loans, investments, and services that did not meet the definition. We used corrected lists for our analyses.

Selection of Areas for Full-Scope Review

Associated has twelve assessment areas (AAs), all in the state of Wisconsin. They include all of the Wisconsin MAs, except the Duluth MA, and most of the counties that are not in a MA. The majority of Associated's deposits, loans and branches were located in the Non-MA AA, Milwaukee MA and Green Bay MA. We selected these three AAs for a full-scope review. The remaining nine AAs received a limited-scope review. See Appendix A for more information.

Ratings

Associated's overall rating was based primarily on those areas that received full-scope reviews. We placed the most weight on Associated's performance in the Non-MA AA because the largest percentage of loans and deposits were in this AA. We also placed more weight on home mortgage loans than on small loans to businesses because mortgage loans were a significantly greater percentage of Associated's total loans. The Lending Test was weighted more heavily than the Investment Test and Service Test.

Other

We conducted three community contact interviews in the full scope areas during our examination. We contacted a community development housing organization in a Non-MA AA. The contact indicated that one of the primary credit needs for the area was lending for affordable housing, both rental and owner-occupied. We also contacted a community development organization located in the Green Bay MA. This contact indicated that small business lending was a credit need in this area. We contacted a community development organization in the Milwaukee MA that specializes in credit counseling and affordable housing seminars. This contact indicated that affordable housing is a significant credit need within the community.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Associated's performance under the lending test is rated High Satisfactory. Based on full-scope reviews, Associated's lending performance in the Non-MA AA is rated Outstanding, in the Green Bay MA is rated Low Satisfactory, and in the Milwaukee MA is rated High Satisfactory.

Lending Activity

Refer to Table 1 in appendix C for the facts and data used to evaluate Associated's lending activity.

Lending levels reflected excellent responsiveness by Associated to the credit needs in its full scope AAs.

To determine the relative levels of lending volume in each AA, we compared Associated's deposit market rank and market share to its market rank and market share for each loan product. To put the rankings in perspective, we also determined Associated's percentile rankings in the loan and deposit markets.

Small loans to farms and multifamily loans were not primary business lines of Associated and were not considered in any section of this CRA performance evaluation.

Green Bay MA

Lending levels reflected excellent responsiveness by Associated to the credit needs in the Green Bay MA.

During this evaluation period, Associated extended 7,113 home mortgage loans, 2,429 small loans to businesses, and 7 small loans to farms totaling approximately \$1 billion in the Green Bay MA. Approximately 75 percent were home mortgage loans and 25 percent were small loans to businesses. Among home mortgage loans, 75 percent were for refinance, 18 percent for home purchase, and 7 percent for home improvement. In view of these statistics, we gave the most weight in our analysis to home mortgage refinance loans.

Associated's lending market share is equivalent to the bank's deposit market share. Based on June 30, 2002 FDIC deposit statistics, Associated ranked first of 22 banks with branches in the Green Bay MA with a market share of 33.5 percent. Based on 2001 aggregate HMDA data for the Green Bay MA, Associated, combined with its mortgage affiliate Associated Mortgage Inc., ranked first out of 235 lenders making home mortgage loans in the MA with a market share of 11.3 percent. According to 2001 aggregate small business loan data, Associated ranked second out of 64 lenders making small loans to businesses in the Green Bay MA with a market share of 10 percent.

Milwaukee MA

Lending levels reflected excellent responsiveness by Associated to the credit needs in the Milwaukee MA.

During this evaluation period, Associated extended 8,957 home mortgage loans, 1,947 small loans to businesses, and 11 small loans to farms totaling approximately \$1.2 billion in the Milwaukee MA. Approximately 82 percent were home mortgage loans and 18 percent were small loans to businesses. Among home mortgage loans, 72 percent were for refinance, 14 percent for home purchase, and 14 percent for home improvement. In view of these statistics, we gave the most weight in our analysis to home mortgage refinance loans.

Associated's market share percentile ranking for each home mortgage loan product - home purchase loans, home improvement loans, home refinance loans - exceeded its percentile ranking for deposit market share. The market share percentile ranking for small loans to businesses was slightly below the deposit market share percentile.

Based on June 30, 2002 FDIC deposit statistics, Associated ranked fourth of 59 banks with branches in the Milwaukee MA with a market share of 4.9 percent. This places Associated in the 93rd percentile for deposit market share in the Milwaukee MA. Based on 2001 aggregate HMDA data for the AA, Associated, combined with its mortgage affiliate AMI, ranked third out of 450 lenders making home mortgage loans in the Milwaukee MA with a market share of 3.7 percent. This places Associated at the 99th percentile for all home mortgage lending, the 95th percentile for home purchase loans, the 99th percentile for home improvement loans, and the 99th percentile for home refinance loans. According to 2001 aggregate small business loan data, Associated ranked twelfth out of 124 lenders making small loans to businesses in the Milwaukee MA with a market share of 2.6 percent. This places Associated at the 90th percentile for small loans to businesses in the AA.

Non-MA AA

Lending levels reflected excellent responsiveness by Associated to the credit needs in the Non-MA AA.

During this evaluation period, Associated extended 20,802 home mortgage loans, 6355 small loans to businesses, and 1,852 small loans to farms totaling approximately \$2.4 billion in the Non MA AA. Approximately 72 percent were home mortgage loans, 22 percent were small loans to businesses and 6 percent were small loans to farms. Among home mortgage loans, 70 percent were for refinance, 17 percent for home purchase, and 13 percent for home improvement. In view of these statistics, we gave the most weight in our analysis to home mortgage refinance loans.

Associated's market share percentile ranking for each home mortgage loan product - home purchase loans, home improvement loans, home refinance loans - exceeded its percentile ranking for deposit market share. The market share percentile ranking for small loans to businesses was slightly below the deposit market share percentile.

Based on June 30, 2002 FDIC deposit statistics, Associated ranked second of 216 banks with branches in the Non MA AA with a market share of 7.8 percent. This places Associated in the 99th percentile for deposit market share in the Non MA AA. Based on 2001 aggregate HMDA data for the AA, Associated, combined with its mortgage affiliate AMI, ranked first out of 542 lenders making home mortgage loans in the Non MA AA with a market share of 14.4 percent. This places Associated at the 99th percentile for all home mortgage lending, at the 99th percentile for home purchase loans, the 99th percentile for home improvement loans, and the 99th percentile for home refinance loans. According to 2001 aggregate small business loan data, Associated ranked third out of 131 lenders making small business loans in the Non MA AA with a market share of 6.6 percent. This places Associated at the 98th percentile for small loans to businesses in the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflected good penetration throughout the Associated's AAs. This analysis was based on Associated's lending performance in the full scope AAs. Because of the volume of loans generated in the Non-MA AA, more weight was placed on the performance in this AA than in the Green Bay MA and the Milwaukee MA. The volume of small loans to farms was insignificant and therefore an analysis of their distribution would not be meaningful.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of Associated's home mortgage loan originations and purchases.

Associated's geographic distribution of home mortgage loans in the Non-MA AA was excellent. Associated's geographic distribution of home mortgage loans in the Green Bay MA and the Milwaukee MA was adequate.

Green Bay MA

Associated's geographic distribution of home purchase loans was adequate. The percentage of Associated's loans in low-income geographies was somewhat below the percentage of owner-occupied units. The opportunity to make home purchase loans in the low-income geographies was limited. There were only 240 owner-occupied units in the two low-income geographies. In addition, 31 percent of the households in low-income geographies were below the poverty level. The percentage of Associated's loans in moderate-income geographies was somewhat below the percentage of owner-occupied units. The opportunity to make home purchase loans in the moderate-income geographies was somewhat limited as there were only ten moderate-income tracts in the AA. Sixteen percent of the households in moderate-income tracts were below the poverty level. Associated made no home purchase loans in low-income geographies in 2002 and therefore had a market share of zero. Associated's market share for moderate-income geographies was somewhat below Associated's overall market share for home purchase loans.

Associated's geographic distribution of home improvement loans was good. Associated's percentage of loans in low-income geographies exceeded the percentage of owner-occupied units. Associated's percentage of loans in moderate-income geographies was somewhat below the percentage of owner-occupied units. Associated's market share for low-income geographies significantly exceeded its overall market share. Associated's market share for moderate-income geographies was somewhat below its overall market share.

Associated's geographic distribution of home refinance loans was poor. The percentage of Associated's loans in both low-income and moderate-income geographies was below the percentage of owner-occupied units in low- and moderate-income geographies. The opportunity to make home refinance loans in the low-income and moderate-income geographies was limited by the same conditions that limit home purchase loans. Associated's market share for both low-

and moderate-income geographies exceeded its overall market share for home refinance loans

Milwaukee MA

Associated's geographic distribution of home purchase loans was adequate. The percentage of Associated's loans in low-income geographies was somewhat below the percentage of owner-occupied units in low-income geographies. The opportunity to make home purchase loans in the low-income geographies was limited. Only 22 percent of the housing units in the low-income geographies were owner-occupied and 42 percent of the households in low-income geographies were below the poverty level. Competition for these loans was strong with 114 lenders originating loans in this market. Associated's total loan volume in these geographies placed them 20th of the 114 lenders.

The percentage of Associated's loans in moderate-income geographies was below the percentage of owner-occupied units. The opportunity to make home purchase loans in the moderate-income geographies was somewhat limited. Only 39 percent of the housing units in the moderate-income geographies were owner-occupied. In addition, 17 percent of the households in moderate-income geographies were below the poverty level. Competition for these loans was strong with 165 lenders originating loans in this market. Associated's total loan volume in these geographies placed it 24th of the 165 lenders.

Associated's market share for low-income geographies exceeded its overall market share for home purchase loans. Associated's market share for moderate-income geographies was below its overall market share for home purchase loans.

Associated's geographic distribution of home improvement loans was adequate. Associated's percentage of loans in both low-income and moderate-income geographies was somewhat below the percentage of owner-occupied units. Associated's market share for low-income geographies was below its overall market share. Associated's market share for moderate-income geographies was somewhat below its overall market share.

Associated's geographic distribution of home refinance loans was poor. The percentage of Associated's loans in low-income geographies was significantly below the percentage of owner-occupied units in low-income geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units. The same conditions that made lending opportunities limited for home purchase loans also applied to refinance loans. Associated's total volume of refinance loans in low-income geographies placed it 12th of 144 lenders and in

moderate-income geographies placed it 6th of 200 lenders. Associated's market share for low-income geographies was somewhat below its overall market share for home refinance loans. Associated's market share for moderate-income geographies was near to its overall market share for refinance loans.

Non-MA AA

Associated's geographic distribution of home purchase loans was excellent. The percentage of Associated's loans in both low-income and moderate-income geographies exceeded the percentage of owner-occupied units in low-income and moderate-income geographies. Associated's market share for both low-income and moderate-income geographies exceeded its overall market share for home purchase loans.

Associated's geographic distribution of home improvement loans was excellent. Associated's percentage of loans in both low-income and moderate-income geographies exceeded the percentage of owner-occupied units. Associated's market share for both low-income and moderate-income geographies exceeded its overall market share.

Associated's geographic distribution of home refinance loans was excellent. The percentage of Associated's loans in both low-income and moderate-income geographies exceeded the percentage of owner-occupied units in low-income and moderate-income geographies. Associated's market share for low-income geographies was somewhat below its overall market share for home refinance loans. Associated's market share for moderate-income geographies exceeded its overall market share for refinance loans.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of Associated's origination/purchase of small loans to businesses.

Associated's distribution of small loans to businesses in the Non-MA AA and the Green Bay MA was excellent. Associated's distribution of small loans to businesses in the Milwaukee MA was adequate.

Green Bay MA

Associated's geographic distribution of small loans to businesses in the Green Bay MA was excellent. The percentage of small loans to businesses in low-income geographies exceeded the percentage of small businesses within those geographies. The percentage of small loans to

businesses made in moderate-income geographies was near to the percentage of small businesses in those geographies. Associated's market share in low-income geographies was somewhat below its overall market share. Associated's market share in moderate-income geographies exceeded its overall market share.

Milwaukee MA

Associated's geographic distribution of small loans to businesses in the Milwaukee MA was adequate. The percentage of small loans to businesses in low-income geographies was somewhat below the percentage of small businesses within those geographies. The percentage of small loans to businesses made in moderate-income geographies was below the percentage of small businesses in those geographies. Associated's market share in low-income geographies exceeded its overall market share. Associated's market share in moderate-income geographies was somewhat below its overall market share.

Non-MA AA

Associated's geographic distribution of small loans to businesses in the Non-MA AA was excellent. The percentage of small loans to businesses in low-income geographies exceeded the percentage of small businesses within those geographies. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of small businesses within those geographies. Associated's market share in both low-income and moderate-income geographies exceeded its overall market share.

Lending Gap Analysis

Reports and maps detailing Associated's lending activity in the full scope AAs over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in any of Associated's full scope AAs.

Inside/Outside Ratio

A majority (94 percent) of home mortgage loans and small loans to businesses and farms that were originated and purchased by Associated over the evaluation period were within its AAs. Ninety-nine percent of Associated's home mortgage loans and 95 percent of small loans to businesses and farms were within its AAs. The inside/outside ratio analysis was performed at the bank level and included all bank originations and purchases. This performance was positively factored into the overall analysis of Associated's geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans reflected good penetration throughout Associated's AAs. This analysis was based on Associated's lending performance in the full scope AAs. Because of the higher volume of loans generated in the Non-MA AA, more weight was placed on the performance in this AA than in the Green Bay MA and the Milwaukee MA. The volume of small loans to farms was insignificant and therefore an analysis of their distribution would not be meaningful.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of Associated's home mortgage loan originations and purchases.

Associated's borrower distribution of home mortgage loans in the Milwaukee MA and Non-MA AA was good. Associated's borrower distribution of home mortgage loans in the Green Bay MA was adequate. Because home refinance loans comprised more than 65 percent of the total mortgage lending, more weight was placed on this performance.

Green Bay MA

Associated's distribution of home purchase, home improvement and refinance loans to borrowers of different income levels was adequate. The percentage of these loans to low-income borrowers was below the percentage of low-income households in the AA. However, the nine percent poverty level in the AA limited Associated's opportunity to make these types of loans. The percentage of these loans to moderate-income borrowers exceeded the percentage of moderate-income households. Associated's market share for home purchase and refinance loans to low-income borrowers exceeded the overall market share. Associated's market share of home improvement loans to low-income borrowers was somewhat below its overall market share of home improvement loans. Associated's market share of home purchase, home improvement, and refinance loans made to moderate-income borrowers was near to its overall market share for these products.

Milwaukee MA

Associated's distribution of home purchase, home improvement and refinance loans to borrowers of different income levels was good. The percentage of these loans to low-income borrowers was below the percentage of low-income households in the AA. However, the ten percent poverty level in the AA limited Associated's opportunity to make these types of loans. The percentage of these loans to moderate-income borrowers exceeded the percentage of moderate-income households. Associated's market share for home purchase and home improvement loans to low-income borrowers was somewhat below the overall market share. Associated's market share of refinance loans to low-income borrowers was below its overall market share of refinance loans. Associated's market share of home purchase and refinance loans made to moderate-income borrowers was near to its overall market share for these products. Associated's market share of home improvement loans made to moderate-income borrowers was somewhat below its overall market share for home improvement loans.

Non-MA AA

Associated's distribution of home purchase and home improvement loans to borrowers of different income levels was adequate. The percentage of these loans to low-income borrowers was below the percentage of low-income households in the AA. However, the eleven percent poverty level limited Associated's opportunity to make these types of loans. The percentage of home purchase and home improvement loans to moderate-income borrowers was near to the percentage of moderate-income households. Associated's market share for home purchase loans to low-income borrowers exceeded the overall market share. Associated's market share of home improvement loans to low-income borrowers was somewhat below its overall market share of home improvement loans. Associated's market share of home purchase and home improvement loans to moderate-income borrowers was near to its overall market share. Associated's market share for refinance loans made to moderate-income borrowers exceeded its overall market share for refinance loans.

Associated's distribution of refinance loans to borrowers of different incomes was good. The percentage of refinance loans to low-income borrowers was below the percentage of these borrowers. The percentage of refinance loans to moderate-income borrowers was near to the percentage of these borrowers. Associated's market share of refinance loans made to low- and moderate-income borrowers significantly exceeded its overall market share.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of Associated's origination/purchase of small loans to businesses.

Associated's distribution of small loans to businesses of different revenue sizes in the Green Bay MA was adequate. The distribution of small loans to businesses of different revenue sizes in the Milwaukee MA was poor. The distribution of small loans to businesses of different sizes in the Non-MA AA was good.

Green Bay MA

The borrower distribution of small loans to businesses was adequate. The percent of Associated's small loans to businesses with revenues of \$1 million or less was somewhat below the percent of businesses that are defined as such. Associated's market share for small loans to businesses exceeded its overall market share.

Milwaukee MA

The borrower distribution of small loans to businesses was poor. The percent of Associated's small loans to businesses with revenues of \$1 million or less was below the percent of businesses that are defined as such. Associated's market share for small loans to businesses was near to its overall market share.

Non-MA AA

The borrower distribution of small loans to businesses was good. The percent of Associated's small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses that are defined as such. Associated's market share for small loans to businesses significantly exceeded its overall market share.

Community Development Lending

Refer to Table 1 in appendix C for the facts and data used to evaluate Associated's level of community development lending.

CD lending had a neutral impact on the Lending test conclusions for the full scope areas. The level of CD lending in the Green Bay MA, Milwaukee MA and Non MA AA had a neutral impact on the respective Lending test conclusions for those areas. Associated made no qualified CD loans in these full scope AAs during the evaluation period.

Associated made three CD loans totaling \$6.1 million in the limited scope Madison MA.

Product Innovation and Flexibility

Associated used two loan programs to augment its lending initiatives to provide financing to individuals and small businesses – the Small Business Administration (SBA) and the USDA Rural Housing programs. Because of the significant volume of loans, these programs had a positive impact on the evaluation of Associated’s lending performance.

Small Business Administration Loans (SBA) – These government guaranteed loan programs offer flexible underwriting to small businesses.

Lending volumes in the full scope assessment areas during the evaluation period were as follows:

- Green Bay MA \$6,647,000
- Milwaukee MA \$3,885,000
- Non-MA AA \$7,841,000

USDA Rural Housing – This government guaranteed loan program provides low- and moderate-income families with access to affordable housing in rural areas.

Lending volumes in the full scope assessment areas during the evaluation period were as follows:

- Green Bay MA \$ 0
- Milwaukee MA \$1,076,000
- Non-MA AA \$28,258,000

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Associated’s performance under the lending test in the Appleton MA, Eau Claire MA, LaCrosse MA, and Madison MA, was not inconsistent with its overall High Satisfactory performance under the lending test. In the Janesville-Beloit MA, Kenosha MA, Racine MA, Sheboygan MA and Wausau MA, performance was weaker than Associated’s overall performance. In these MAs, the geographic distribution performance was below Associated’s overall performance. Refer to Tables 1 through 11 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Associated's performance under the investment test is rated High Satisfactory. Based on full-scope reviews, Associated's performance is adequate in the Green Bay MA and the Non-MA AA. Associated's performance is excellent in the Milwaukee MA. The performance in the limited scope areas was significantly stronger than the full scope areas, and had a positive impact on the overall rating.

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

Green Bay MA

Associated exhibited an adequate level of responsiveness to credit and community development needs in the Green Bay MA. While the investments were routine and non-complex, they were responsive to the identified needs of the community.

Associated provided qualified investments within this AA through the purchase of securities, cash contributions and grants. Qualifying investments totaled approximately \$1.5 million. Specific investments included:

- \$1.1 million in qualified mortgage backed securities. Over the evaluation period, Associated invested in several mortgage-backed securities where the underlying mortgages were made to low- and moderate-income individuals in its AA.

Prior period investments (\$361 thousand) are the current amount remaining on Associated's records from investments made prior to this evaluation period. Additionally, donations and grants were provided to organizations with a community development focus. Associated contributed to 6 different community development organizations totaling \$73 thousand during the evaluation period.

Milwaukee MA

Associated exhibited an excellent level of responsiveness to credit and community development needs in the Milwaukee MA. While the investments were routine and non-complex, they were responsive to the identified needs of the community.

Associated provided qualified investments within this AA through the purchase of securities, cash contributions and grants. Qualifying investments totaled approximately \$6.1 million. Specific investments included:

- \$6 million in qualified mortgage-backed securities. Over the evaluation period, Associated invested in several mortgage-backed securities where the underlying mortgages were made to low- and moderate-income individuals in its AA.

Prior period investments (\$105 thousand) are the current amount remaining on Associated's records from investments made prior to this evaluation period. Additionally, donations and grants were provided to organizations with a community development focus. Associated contributed to 3 different community development organizations totaling \$32 thousand during the evaluation period.

Non-MA AA

Associated exhibited an adequate level of responsiveness to credit and community development needs in the Non-MAAA. While the investments were routine and non-complex, they were responsive to the identified needs of the community.

Associated provided qualified investments within this AA through the purchase of securities, cash contributions and grants. Qualifying investments totaled approximately \$1 million. Specific investments included:

- \$1 million in qualified mortgage-backed securities. Over the evaluation period, Associated invested in several mortgage-backed securities where the underlying mortgages were made to low- and moderate-income individuals in its AA.

No prior period investments were identified for this AA. Donations and grants were provided to organizations with a community development focus. Associated contributed a total of \$24 thousand to eight community development organizations during the evaluation period.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, Associated's performance under the investment test in the limited scope MAs is generally inconsistent with its overall Low Satisfactory performance under the investment test. The Sheboygan MA had weaker performance than the full-scope areas. All of the other limited scope MAs had performance that was significantly stronger than the performance in the full-scope AAs. The performance in these areas had a positive impact on the overall rating.

Refer to Table 14 in section of Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Associated's performance under the Service Test is rated Low Satisfactory. Based on full-scope reviews, Associated's performance in the Green Bay MA, Milwaukee MA and the Non-MA AA is adequate.

Retail Banking Services

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

Green Bay MA

Associated's distribution of delivery systems is reasonably accessible to geographies and individuals of different income levels in the AA. Ten of Associated's office locations were in the Green Bay MA. One of these branches was located in a low-income geography. The percentage of branches in low-income geographies significantly exceeded the percentage of the population within these geographies. Associated did not have any branch locations in moderate-income geographies. However, there is a significant percentage of the population within moderate-income geographies.

All of Associated's branches were full service facilities, offering traditional deposit and loan products and having relatively similar hours of operation. The hours of Associated's office locations did not negatively impact low- or moderate-income individuals. All office lobbies, except the Green Bay Main office, were open at 8:30 am or earlier Monday through Saturday, and closed at 5:30 pm Monday through Friday, and 12:00pm on Saturday. The Green Bay Main office did not have Saturday hours. This branch is located in a low-income geography in downtown Green Bay that has relatively few people in the area on the weekends.

Alternative Delivery Systems

Associated offers various types of alternative delivery systems, which include automated teller machines (ATMs), telephone banking, and computer banking. Associated did not monitor the usage of these alternative delivery systems by low- and moderate-income individuals; therefore, we did not place significant weight on these delivery systems when drawing our CRA performance conclusions.

Distribution of Associated's ATMs in the Green Bay MA is adequate. Associated operated twenty-nine ATMs within the Green Bay MA. None were in low-income geographies, eight (28 percent) were in moderate-income geographies, nineteen (70 percent) were in middle-income geographies, and two (7 percent) were in upper-income geographies. Sixteen ATMs were full service and thirteen only dispensed cash.

Milwaukee MA

Associated's distribution of delivery systems is reasonably accessible to geographies and individuals of different income levels in the AA. Forty-two of Associated's office locations were in the Milwaukee AA. One of these branches was located in a low-income geography. The percentage of branches in low-income geographies was significantly below the percentage of the population within these geographies. Associated had five branch locations in moderate-income geographies. The percentage of branches in moderate-income geographies was slightly less than the percentage of the population within these geographies.

All of Associated's branches are full service facilities offering traditional deposit and loan products and having relatively similar hours of operation. The hours of Associated's office locations did not negatively impact low- or moderate-income individuals. All office lobbies, except the Kilbourn Avenue and Lannon offices, were open at 9:00 am Monday through Saturday, and close at 5:00 pm or later Monday through Friday, and 12:00 pm or later on Saturday. The Kilbourn Avenue and Lannon offices do not have Saturday hours. These branches are located in middle-income geographies.

Alternative Delivery Systems

Associated offers various types of alternative delivery systems, which include automated teller machines (ATMs), telephone banking, and computer banking. Associated did not monitor the usage of these alternative delivery systems by low- and moderate-income individuals; therefore, we did not place significant weight on these delivery systems when drawing our CRA performance conclusions.

Distribution of Associated's ATMs in the Milwaukee MA is adequate. Associated operated thirty-eight ATMs within the Milwaukee MA. None were in low-income geographies, seven (28 percent) were in moderate-income geographies, twenty (70 percent) were in middle-income geographies, and eleven (7 percent) were in upper-income geographies. Nineteen ATMs were full service and nineteen only dispensed cash.

Non-MA AA

Associated's distribution of delivery systems is accessible to geographies and individuals of different income levels in the AA. Sixty-eight of Associated's office locations were in the Non-MA AA. None of these branches was located in a low-income geography. However, there was not a significant population living in low-income geographies. Associated had six branch locations in moderate-income geographies. The percentage of branches in moderate-income geographies exceeded the percentage of the population within these geographies.

All of Associated's branches were full service facilities offering traditional deposit and loan products and having relatively similar hours of operation. The hours of Associated's office locations did not negatively impact low- or moderate-income individuals. Most office lobbies were open at 9:00 am or earlier Monday through Saturday, and closed at 4:00 pm or later Monday through Friday, and 12:00 pm or later on Saturday.

Alternative Delivery Systems

Associated offers various types of alternative delivery systems, which include automated teller machines (ATMs), telephone banking, and computer banking. Associated did not monitor the usage of these alternative delivery systems by low- and moderate-income individuals; therefore, we did not place significant weight on these delivery systems when drawing our CRA performance conclusions.

Community Development Services

Associated's record of providing community development services is adequate in the Green Bay MA, the Milwaukee MA, and the Non-MA AA.

Green Bay MA

Associated's performance in providing community development services in the assessment area is adequate. Officers and employees of Associated served on the boards of directors or as officers of community development service organizations. While the community development services provided were non-complex, they were responsive to the needs of the community.

Some of these services included:

- Two employees of Associated served in an organization that provides low- and moderate-income families with downpayment assistance for home mortgage loans and mortgage loan counseling. One employee was the Treasurer of the organization and the other was on the Board of Directors.
- An employee served on the board of directors of a local affordable housing planning commission. This employee provided mortgage lending expertise to the commission.
- A bank officer served on the board of a homeless shelter and outreach program. The officer provided financial expertise to the board.

Milwaukee MA

Associated provides a good level of CD services in the Milwaukee MA. While the community development services provided were non-complex, they were responsive to the needs of the community. Examples of these services included:

- Affordable Housing Program of the Federal Home Loan Bank - Associated has established itself as a facilitator of Affordable Housing Program (AHP) subsidies through the Federal Home Loan Bank (FHLB). Under this program, funds are provided to community organizations and other entities that develop affordable housing projects through the support of FHLB members. Associated played a critical role in the success of securing these subsidies through the provision of technical assistance, completing the extensive application and monitoring the project. In February 2002, Associated prepared and submitted an application for a grant on behalf of an organization totaling \$163 thousand.
- A bank officer participated in a non-profit organization that builds single-family and multifamily housing for low- and moderate-income persons. The officer provided budgeting and financial planning management expertise to the organization.
- A bank officer reviewed grant applications and served on the homebuyer counseling committee for a four-county governmental organization. The purpose of the organization is to provide homebuyer programs for low- and moderate-income persons in the MA.

- A bank officer served on the Finance Committee of a local organization that provided job placement programs for low- and moderate-income women in Waukesha County.
- Associated provided employees to speak at homebuyer seminars to low- and moderate-income persons through USAA Rural Development of Wisconsin. This organization also provides guaranteed affordable housing programs for low- and moderate-income persons.
- A bank officer participated in the local Small Business Corp of Retired Executives (SCORE) program that provides counseling to small business owners in the community.
- A bank officer served on the loan committee of an organization that provides business education, technical assistance, and capital for low- and moderate-income entrepreneurs.

Non-MA AA

Associated provides a good level of CD services in the Non-MA AA. While the community development services provided were non-complex, they were responsive to the needs of the community. Examples of these services included:

- Affordable Housing Program of the Federal Home Loan Bank - The bank has established itself as a facilitator of Affordable Housing Program (AHP) subsidies through the Federal Home Loan Bank (FHLB). Under this program, funds are provided to community organizations and other entities that develop affordable housing projects through the support of FHLB members. Associated played a critical role in the success of securing these subsidies through the provision of technical assistance, completing the extensive application and monitoring the project. Since January 2001, Associated has prepared and submitted applications for grants on behalf of 6 organizations totaling \$945 thousand.
- Associated's employees served on 10 different economic development commissions throughout the AA. These commissions provided revolving loan funds for small businesses in the area. The bank officers served as board members and loan committee members for these various commissions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Associated's performance under the service test in the Appleton MA, Eau Claire MA, Madison MA, Sheboygan MA, and Wausau MA is not inconsistent with its overall Low Satisfactory performance under the service test. However, performance in the Janesville-Beloit MA, the Kenosha MA, the LaCrosse MA, and the Racine MA are weaker than the Low Satisfactory performance. Associated has not identified any qualified CD services in these MAs. Refer to Table 15 of appendix C for the facts and data that support these conclusions.

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 and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/1999 to 12/31/2002 Investment and Service Tests and CD Loans: 03/08/1999 to 11/10/2003	
Financial Institution	Products Reviewed	
Associated Bank, National Association (Associated) Green Bay, Wisconsin	Home mortgage loans, Small loans to businesses, CD loans, CD Investments, CD Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Associated Mortgage (AMI)	Bank Subsidiary	Home mortgage purchase and refinance loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Green Bay MA #3080	Full- Scope	
Milwaukee MA #5080	Full- Scope	
Non-MA (52 counties)	Full- Scope	
Appleton MA #0460	Limited- Scope	
Eau Claire MA #2290	Limited- Scope	
Janesville-Beloit MA#3620	Limited-Scope	
Kenosha MA #3800	Limited- Scope	
LaCrosse MA #3870	Limited- Scope	
Madison MA #4720	Limited- Scope	
Racine MA #6600	Limited- Scope	
Sheboygan MA #7620	Limited- Scope	
Wausau MA #8940	Limited- Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Green Bay MA	B-2
Milwaukee MA	B-4
Non-MA AA.....	B-6

Full Scope Areas

Green Bay MA

Demographic Information for Full Scope Area: Green Bay MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	4.08	20.41	57.14	16.33	2.04
Population by Geography	194,594	1.55	20.21	57.43	20.36	0.44
Owner-Occupied Housing by Geography	47,423	0.51	19.35	58.20	21.94	0.00
Business by Geography	10,755	6.01	14.75	61.24	17.94	0.07
Farms by Geography	587	0.00	4.60	83.30	12.10	0.00
Family Distribution by Income Level	50,732	17.09	17.89	28.62	36.39	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,748	2.24	32.41	52.88	12.47	0.00
Median Family Income	37,121	Median Housing Value		61,209		
HUD Adjusted Median Family Income for 2002	61,900	Unemployment Rate (2002 Bureau of Labor Statistics)		5.00%		
Households Below Poverty Level	9.28%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 US Census and 2002 HUD updated MFI

The Green Bay MA AA included the entire MA and the AA met the requirements of the regulation and did not arbitrarily exclude low- or moderate-income geographies.

The bank’s AA within the Green Bay MA was comprised of 49 census tracts. Two of the census tracts in this AA were low-income geographies, 10 were moderate-income geographies, 28 were middle-income geographies, and 8 were upper-income geographies. The bank’s main office and ten branches were located in this AA.

The population of this AA was 194,594, based on 1990 census data. Two percent of the population lived in low-income geographies, 20 percent lived in moderate-income geographies, 58 percent lived in middle-income geographies, and 20 percent lived in upper-income geographies.

The updated Housing and Urban Development (HUD) 2002 medium family income for the Green Bay MA is \$61,900. A breakdown of family income levels in the AA shows 17 percent as low-income (8,624 families), 18 percent as moderate-income (9,132 families), 29 percent as middle-income (14,712 families), and 36 percent as upper-income (18,264 families). In addition, a total of 6,716 households had incomes below the poverty level. A low-income family had a maximum income of only \$30,950.

Of the 74,740 housing units in the AA, 47,423 (64 percent) were owner-occupied, 24,857 (33 percent) were rental-occupied and the remaining 2,460 (3 percent) were vacant. One percent of the owner-occupied units are located in the AA's low-income geographies, 19 percent are located in moderate-income geographies, 58 percent are located in middle-income geographies, and 22 percent are located in upper-income geographies. The median housing value within the AA based on 1990 census data was \$61,209.

A majority of the businesses in the Green Bay MA portion of the bank's AA are incorporated with 1-4 employees. Seventy eight percent of the businesses in the AA reported gross revenues of \$1 million or less. The primary industry in the AA was services (33 percent), followed by retail trade (18 percent), construction (10 percent), and finance, insurance, and real estate (8 percent). The average unemployment rate in the Green Bay MA for 2002 was 5 percent. The average rate for the state of Wisconsin for 2002 was 5.5 percent, the average rate in 2003 through September was 5.7 percent, and the most recently reported monthly rate in September was 4.9 percent.

The Green Bay MA is quite diverse in types of employment. There were approximately 5,700 employers within the MA. The major employers in the Green Bay MA included Georgia Pacific, Green Bay Public School District, Employers Health Insurance Co., Bellin Memorial Hospital and Oneida Tribe of Indians.

There are numerous (twenty-two) deposit-taking financial institutions, both local and regional, in the Green Bay MA. There are also numerous lenders, besides depository institutions, that offer a wide variety of loan products. Therefore, competition for both deposits and loans is intense.

Full Scope Areas

Milwaukee MA

Demographic Information for Full Scope Area: Milwaukee MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	392	19.13	17.35	43.11	19.64	0.77
Population by Geography	1,432,149	12.73	13.58	46.59	27.05	0.06
Owner-Occupied Housing by Geography	319,660	4.71	10.23	51.28	33.77	0.00
Business by Geography	62,799	6.89	8.51	48.01	36.29	0.29
Farms by Geography	1,619	0.80	3.64	53.55	41.94	Fv0.06
Family Distribution by Income Level	372,335	19.55	17.66	25.59	37.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	138,530	23.14	20.22	43.78	12.86	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		39,005 67,200 10.38%	Median Housing Value Unemployment Rate (2002 Bureau of Labor Statistics)		73,428 6.00%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2002 HUD updated MFI

The Milwaukee MA AA included the entire MA. It met the requirements of the regulation and did not arbitrarily exclude low- or moderate-income geographies.

The Milwaukee MA was comprised of 392 census tracts. Seventy-five of the census tracts in this AA were low-income geographies, 68 were moderate-income geographies, 169 were middle-income geographies, and 77 were upper-income geographies. The bank had 42 branches located in this AA.

The population of this AA was 1,432,149 based on 1990 census data. Thirteen percent of the population lived in low-income geographies, 13 percent lived in moderate-income geographies, 47 percent lived in middle-income geographies, and 27 percent lived in upper-income geographies.

The updated Housing and Urban Development (HUD) 2002 medium family income for the Milwaukee MA was \$67,200. A breakdown of family income levels in the AA shows 19 percent as low-income (74,467 families), 18 percent as moderate-income (67,020 families), 26 percent as middle-income (96,807 families), and 37 percent as upper-income (137,764 families). In addition, a total of 55,839 households had incomes below the poverty level. A low-income family had a maximum income of only \$33,600.

Of the 562,031 housing units in the AA, 319,660 (56 percent) were owner-occupied, 218,062 (38 percent) were rental-occupied and the remaining 24,309 (4

percent) were vacant. Five percent of the owner-occupied units were located in the AA's low-income geographies, 10 percent were located in moderate-income geographies, 51 percent were located in middle-income geographies, and 34 percent were located in upper-income geographies. The median housing value within the AA based on 1990 census data was \$73,428.

A majority of the businesses in the Milwaukee MA were incorporated with 1-4 employees. Seventy eight percent of the businesses in the AA reported gross revenues of \$1 million or less. The primary industry in the AA was services (38 percent), followed by retail trade (16 percent), and finance, insurance and real estate (9 percent). The average unemployment rate in the Milwaukee MA for 2002 was 6 percent. The average rate for the state of Wisconsin for 2002 was 5.5 percent, the average rate in 2003 through September was 5.7 percent, and the most recently reported monthly rate in September was 4.9 percent.

The Milwaukee MA employment situation is dominated by the healthcare field. Within the MA, there were approximately 1,500 firms in this field. The top employers within the MA include Aurora Health Care Metro, Inc., Northwestern Mutual Life Insurance, Medical College of Wisconsin, Inc., Seek, Inc., and Serigraph, Inc.

There are numerous (59) deposit-taking financial institutions, both local and regional, in the Milwaukee MA. There were also numerous lenders, besides depository institution, that offered a wide variety of loan products. Therefore, competition for both deposits and loans was intense.

Full Scope Areas

Non-MA AA

Demographic Information for Full Scope Area: Non-MA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	379	0.53	15.04	73.09	9.76	1.58
Population by Geography	1,227,733	0.47	7.68	78.28	13.57	0.00
Owner-Occupied Housing by Geography	338,810	0.30	8.63	77.79	13.29	0.00
Business by Geography	73,832	0.21	9.83	78.56	11.39	0.00
Farms by Geography	11,830	0.03	5.94	83.87	10.16	0.00
Family Distribution by Income Level	331,460	16.86	18.97	25.54	38.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	118,749	0.86	12.50	78.06	8.58	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		30,290 50,800 10.78%	Median Housing Value Unemployment Rate (2002 Bureau of Labor Statistics)		51,578 6.45%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2002 HUD updated MFI

The Non-MA AA consisted of all fifty-two counties in Wisconsin that are not in a MA. It met the requirements of the regulation and did not arbitrarily exclude low- or moderate-income geographies.

The bank’s Non- MA AA was comprised of 379 census tracts. Two of the census tracts in this AA were low-income geographies, 57 were moderate-income geographies, 277 were middle-income geographies, and 37 were upper-income geographies. The bank had 68 branches located in this AA.

The population of this AA was 1,227,733 based on 1990 census data. Less than one percent of the population lived in low-income geographies, 8 percent lived in moderate-income geographies, 78 percent lived in middle-income geographies, and 14 percent lived in upper-income geographies.

The updated Housing and Urban Development (HUD) 2002 medium family income for the Non-MA AA was \$50,800. A breakdown of family income levels in the AA shows 17 percent as low-income (56,348 families), 19 percent as moderate-income (62,977 families), 25 percent as middle-income (86,180 families), and 39 percent as upper-income (129,269 families). In addition, a total of 49,186 households had incomes below the poverty level. A low-income family had a maximum income of only \$25,400.

Of the 595,488 housing units in the AA, 338,810 (56 percent) were owner-occupied, 116,694 (19 percent) were rental-occupied and the remaining 139,984 (23 percent) were vacant. Less than one percent of the owner-occupied units were located in the AA's low-income geographies, 9 percent were located in moderate-income geographies, 78 percent were located in middle-income geographies, and 13 percent were located in upper-income geographies. The median housing value within the AA based on 1990 census data was \$51,578.

A majority of the businesses in the Non MA AA were small and had only 1-4 employees. Eighty-one percent of the businesses in the AA reported gross revenues of \$1 million or less. The primary industry in the AA was services (30 percent), followed by retail trade (18 percent), agriculture, forestry and fishing (14 percent), and construction (9 percent). According to the U. S. Department of Labor's Bureau of Labor Statistics, the average unemployment rate in the Non-MA AA for 2002 was 6.45 percent, ranging from a low of 4.4 percent to a high of 12.7 percent. The average rate for the state of Wisconsin for 2002 was 5.5 percent, the average rate in 2003 through September was 5.7 percent, and the most recently reported monthly rate in September was 4.9 percent.

As this AA covered a large portion of the state of Wisconsin, the economy was very diversified. Large employers were spread across a number of industries. The largest employers within the AA included Waupaca Foundry, Inc., Marten Transport, Eastbay, Inc., Wausau Hospital, Sentry Insurance, Stevens Point Public School, University of Wisconsin – Stevens Point, and Weather Shield Manufacturing, Inc.

There were numerous (216) deposit-taking financial institutions, both local and regional, in the Non MA. There were also numerous lenders, besides depository institutions, that offered a wide variety of loan products. Therefore, competition for both deposits and loans was intense.

Appendix C: Tables of Performance Data

Content of Standardized 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 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 Q&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.

Institution ID: 10000023695 ASSOCIATED BANK, N.A.

Table 1. Lending Volume

LENDING VOLUME												
Geography: WISCONSIN												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% 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:												
Green Bay MA	14.76	7,113	685,110	2,429	358,246	7	1,810	0	0	9,549	1,045,166	22.37
Milwaukee MA	16.87	8,957	927,123	1,947	297,761	11	1,614	0	0	10,915	1,226,498	26.82
Non MA WI	44.83	20,802	1,697,774	6,355	612,204	1,852	93,699	0	0	29,009	2,403,677	32.42
Limited Review:												
Appleton MA	9.34	3,746	389,180	2,263	287,530	33	1,676	0	0	6,042	678,386	7.92
Eau Claire MA	1.36	817	64,149	64	6,357	0	0	0	0	881	70,506	0.35
Janesville Beloit MA	0.81	493	40,733	29	8,517	1	44	0	0	523	49,294	0.44
Kenosha MA	0.43	236	21,108	41	1,605	0	0	0	0	277	22,713	0.57
LaCrosse MA	1.39	776	71,631	126	25,565	0	0	0	0	902	97,196	0.96
Madison MA	3.59	1,275	203,178	1,008	139,118	39	2,695	0	0	2,322	344,991	3.26
Racine MA	1.01	631	63,539	18	1,652	7	524	0	0	656	65,715	1.19
Sheboygan MA	2.43	1,030	91,334	504	63,040	37	1,729	0	0	1,571	156,103	1.56
Wausau MA	3.19	1,407	115,220	591	82,183	64	3,636	0	0	2,062	201,039	2.15

* 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 March 8, 1999 to November 10, 2003

*** Deposit Data as of December 31, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: 1000023695 ASSOCIATED BANK, N.A.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WISCONSIN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase 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:																
Green Bay MA	1,266	16.48	0.51	0.39	19.35	10.74	58.20	61.61	21.94	27.25	2.30	0.00	1.27	2.47	2.72	
Milwaukee MA	1,234	16.06	4.71	3.16	10.23	5.02	51.28	54.13	33.77	37.68	0.87	0.98	0.34	0.84	1.03	
Non MSA WI	3,589	46.72	0.30	1.09	8.63	10.00	77.79	78.57	13.29	10.34	3.64	11.76	6.62	3.64	2.25	
Limited Review:																
Appleton MA	552	7.19	0.09	0.18	4.94	4.17	84.84	81.16	10.13	14.49	1.27	0.00	1.27	1.27	1.30	
Eau Claire MA	108	1.41	0.00	0.00	10.46	8.33	74.83	67.59	14.70	24.07	0.75	0.00	1.42	0.72	0.60	
Janesville Beloit MA	101	1.31	0.21	0.00	10.65	11.88	68.94	56.44	20.20	31.68	0.62	0.00	0.66	0.69	0.43	
Kenosha MA	29	0.38	1.33	0.00	10.26	3.45	68.34	86.21	20.08	10.34	0.16	0.00	0.25	0.21	0.00	
LaCrosse MA	119	1.55	1.41	4.20	11.59	5.04	65.58	68.91	21.43	21.01	2.02	6.06	1.91	1.86	2.31	
Madison MA	243	3.16	1.26	2.06	13.73	14.40	64.70	61.73	20.31	21.81	0.46	0.00	0.72	0.40	0.55	
Racine MA	75	0.98	4.09	0.00	4.26	1.33	81.76	93.33	9.89	5.33	0.42	0.00	0.00	0.49	0.23	
Sheboygan MA	151	1.97	0.00	0.00	6.17	1.99	88.88	82.12	4.95	15.89	1.15	0.00	0.00	1.21	1.45	
Wausau MA	215	2.80	0.00	0.00	4.48	2.79	85.14	89.77	10.38	7.44	3.52	0.00	3.16	4.05	0.00	

* Based on 2001 Peer Mortgage Data: Central Region.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: WISCONSIN		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% 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						
Full Review:																					
Green Bay MA	532	9.70	0.51	0.75	19.35	14.29	58.20	62.03	21.94	22.93	15.46	40.00	10.63	15.99	17.06						
Milwaukee MA	1,197	21.82	4.71	2.76	10.23	5.93	51.28	52.21	33.77	39.10	11.33	4.43	8.07	11.78	12.68						
Non MA WI	2,749	50.11	0.30	0.58	8.63	13.50	77.79	75.66	13.29	10.26	24.01	27.27	40.61	22.46	22.08						
Limited Review:																					
Appleton MA	322	5.87	0.09	0.00	4.94	5.90	84.84	77.33	10.13	16.77	9.67	0.00	16.90	8.85	13.47						
Eau Claire MA	99	1.80	0.00	0.00	10.46	13.13	74.83	73.74	14.70	13.13	4.64	0.00	3.85	4.48	6.45						
Janesville Beloit MA	59	1.08	0.21	0.00	10.65	15.25	68.94	69.49	20.20	15.25	3.49	0.00	6.00	3.33	2.55						
Kenosha MA	35	0.64	1.33	0.00	10.26	2.86	68.34	94.29	20.08	2.86	2.56	0.00	0.00	3.45	1.12						
LaCrosse MA	65	1.18	1.41	1.54	11.59	3.08	65.58	83.08	21.43	12.31	5.87	0.00	2.70	7.02	4.24						
Madison MA	103	1.88	1.26	0.00	13.73	14.56	64.70	60.19	20.31	25.24	1.53	0.00	1.82	1.28	2.38						
Racine MA	68	1.24	4.09	1.47	4.26	2.94	81.76	88.24	9.89	7.35	4.90	3.23	4.35	5.18	3.57						
Sheboygan MA	107	1.95	0.00	0.00	6.17	3.74	88.88	85.98	4.95	10.28	8.89	0.00	5.77	9.18	9.09						
Wausau MA	150	2.73	0.00	0.00	4.48	5.33	85.14	84.67	10.38	10.00	10.80	0.00	13.04	11.62	2.04						

* Based on 2001 Peer Mortgage Data: Central Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: WISCONSIN		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% 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						
Full Review:																					
Green Bay MA	5,311	15.65	0.51	0.21	19.35	8.57	58.20	64.79	21.94	26.44	1.56	2.04	1.61	1.62	1.37						
Milwaukee MA	6,460	19.04	4.71	0.80	10.23	4.64	51.28	52.63	33.77	41.92	0.85	0.64	0.83	0.91	0.80						
Non MA WI	14,410	42.47	0.30	0.49	8.63	9.71	77.79	76.60	13.29	13.21	2.61	1.54	5.88	2.61	1.20						
Limited Review:																					
Appleton MA	2,851	8.40	0.09	0.07	4.94	3.16	84.84	76.85	10.13	19.92	1.24	0.00	1.55	1.21	1.35						
Eau Claire MA	610	1.80	0.00	0.00	10.46	10.66	74.83	65.57	14.70	23.77	0.72	0.00	1.48	0.71	0.41						
Janesville Beloit MA	332	0.98	0.21	0.90	10.65	5.42	68.94	58.73	20.20	34.94	0.37	0.00	0.15	0.49	0.17						
Kenosha MA	170	0.50	1.33	0.59	10.26	0.59	68.34	91.18	20.08	7.65	0.25	0.83	0.00	0.32	0.11						
LaCrosse MA	578	1.70	1.41	2.25	11.59	7.61	65.58	73.70	21.43	15.92	1.53	1.10	4.46	1.61	0.42						
Madison MA	911	2.69	1.26	0.00	13.73	9.99	64.70	67.40	20.31	22.61	0.13	0.00	0.16	0.13	0.15						
Racine MA	486	1.43	4.09	0.62	4.26	1.03	81.76	93.42	9.89	4.94	0.43	0.84	0.28	0.47	0.10						
Sheboygan MA	768	2.26	0.00	0.00	6.17	3.26	88.88	82.55	4.95	14.19	0.63	0.00	0.00	0.65	0.85						
Wausau MA	1,040	3.07	0.00	0.00	4.48	2.12	85.14	86.54	10.38	11.35	1.54	0.00	0.66	1.65	1.01						

* Based on 2001 Peer Mortgage Data: Central Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by 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, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Green Bay MA	4	2.13	6.31	0.00	11.91	25.00	67.91	75.00	13.87	0.00	2.86	0.00	5.00	2.27	0.00									
Milwaukee MA	66	35.11	13.81	9.09	16.02	24.24	50.60	50.00	19.57	16.67	3.81	4.48	4.76	3.36	3.85									
Non MA WI	54	28.72	0.16	0.00	5.33	3.70	79.32	83.33	15.18	12.96	9.55	0.00	0.00	9.02	11.90									
Limited Review:																								
Appleton MA	21	11.17	3.51	4.76	11.36	19.05	74.62	66.67	10.52	9.52	9.89	0.00	0.00	12.12	5.88									
Eau Claire MA	0	0.00	0.00	0.00	10.92	0.00	53.11	0.00	35.98	0.00	0.00	0.00	0.00	0.00	0.00									
Janesville Beloit MA	1	0.53	6.28	0.00	9.60	0.00	64.82	0.00	19.30	100.00	0.00	0.00	0.00	0.00	0.00									
Kenosha MA	2	1.06	10.03	0.00	6.82	0.00	70.57	100.00	12.58	0.00	2.70	0.00	0.00	5.26	0.00									
LaCrosse MA	14	7.45	23.37	21.43	30.64	57.14	40.81	14.29	5.18	7.14	7.32	0.00	13.33	0.00	50.00									
Madison MA	18	9.57	15.91	5.56	34.20	22.22	41.70	44.44	8.18	27.78	4.50	0.00	1.41	5.06	14.29									
Racine MA	2	1.06	7.16	50.00	6.80	0.00	69.20	50.00	16.16	0.00	1.96	14.29	0.00	0.00	0.00									
Sheboygan MA	4	2.13	0.00	0.00	15.96	25.00	83.63	75.00	0.42	0.00	9.09	0.00	0.00	10.00	0.00									
Wausau MA	2	1.06	0.00	0.00	10.56	0.00	84.25	100.00	5.19	0.00	11.76	0.00	0.00	14.29	0.00									

* Based on 2001 Peer Mortgage Data: Central Region.

** 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, 1999 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:															
Green Bay MA	2,429	15.80	6.01	9.28	14.75	12.91	61.24	52.60	17.94	25.21	10.86	9.04	11.53	10.53	13.73
Milwaukee MA	1,947	12.66	6.89	4.37	8.51	3.70	48.01	54.21	36.29	37.72	2.27	2.41	1.39	2.35	2.53
Non MA WI	6,355	41.33	0.21	0.41	9.83	8.72	78.56	86.00	11.39	4.88	6.57	13.25	7.08	7.61	2.41
Limited Review:															
Appleton MSA	2,263	14.72	2.52	2.65	8.85	8.84	71.45	75.25	17.18	13.26	8.42	14.62	7.73	9.00	7.75
Eau Claire MSA	64	0.42	0.00	0.00	16.00	20.31	63.11	31.25	20.69	48.44	1.62	0.00	1.13	0.33	6.10
Janesville Beloit MSA	29	0.19	5.47	3.45	8.98	0.00	60.92	48.28	24.63	48.28	0.22	1.04	0.00	0.20	0.27
Kenosha MSA	41	0.27	8.59	0.00	11.35	0.00	60.36	14.63	19.70	85.37	1.44	0.00	0.00	0.19	6.99
LaCrosse MSA	126	0.82	16.75	20.63	18.87	17.46	50.45	51.59	13.89	10.32	2.25	3.32	2.81	2.20	1.20
Madison MSA	1,008	6.56	4.67	4.07	19.90	43.75	57.85	35.32	17.58	16.87	2.80	3.37	3.69	2.35	3.25
Racine MSA	18	0.12	10.80	0.00	4.74	0.00	77.29	100.00	7.04	0.00	0.30	0.00	0.00	0.39	0.00
Sheboygan MSA	504	3.28	0.00	0.00	8.71	8.13	85.45	81.35	5.84	10.52	5.16	0.00	7.86	5.18	4.36
Wausau MSA	591	3.84	0.00	0.00	10.19	6.94	80.40	85.79	9.41	7.28	7.23	0.00	4.29	7.88	7.17

* Based on 2001 Peer Small Business Data: US&PR.

** 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, 1999 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:																					
Green Bay MA	7	0.34	0.00	0.00	4.60	0.00	83.30	57.14	12.10	42.86	0.00	0.00	0.00	0.00	0.00						
Milwaukee MA	11	0.54	0.80	0.00	3.64	0.00	53.55	63.64	41.94	36.36	0.00	0.00	0.00	0.00	0.00						
Non MA WI	1,852	90.30	0.03	0.00	5.94	9.45	83.87	88.17	10.16	2.38	11.40	0.00	28.50	11.50	3.31						
Limited Review:																					
Appleton MA	33	1.61	0.27	0.00	1.30	0.00	90.11	100.00	8.31	0.00	0.85	0.00	0.00	0.91	0.00						
Eau Claire MA	0	0.00	0.00	0.00	15.34	0.00	78.94	0.00	5.73	0.00	0.00	0.00	0.00	0.00	0.00						
Janesville Beloit MA	1	0.05	0.47	0.00	1.26	0.00	76.69	100.00	21.57	0.00	0.28	0.00	0.00	0.38	0.00						
Kenosha MA	0	0.00	0.42	0.00	4.62	0.00	86.13	0.00	8.82	0.00	0.00	0.00	0.00	0.00	0.00						
LaCrosse MA	0	0.00	0.00	0.00	2.27	0.00	81.11	0.00	16.62	0.00	0.00	0.00	0.00	0.00	0.00						
Madison MA	39	1.90	0.44	0.00	8.06	2.56	77.07	97.44	14.44	0.00	2.67	0.00	0.00	3.22	0.00						
Racine MA	7	0.34	0.27	0.00	0.00	0.00	95.93	100.00	3.79	0.00	0.86	0.00	0.00	0.86	0.00						
Sheboygan MA	37	1.80	0.00	0.00	0.81	0.00	97.37	100.00	1.82	0.00	10.58	0.00	0.00	10.68	0.00						
Wausau MA	64	3.12	0.00	0.00	0.00	0.00	97.55	96.88	2.45	3.13	5.04	0.00	0.00	4.89	100.00						

* Based on 2001 Peer Small Business Data: US&PR.

** 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. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WISCONSIN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Green Bay MA	1,266	16.48	17.09	8.17	17.89	24.44	28.62	30.03	36.39	37.36	2.47	2.79	1.89	1.95	3.31	
Milwaukee MA	1,234	16.06	19.55	9.14	17.66	25.43	25.59	30.78	37.21	34.65	1.00	0.61	0.82	0.98	1.25	
Non MA WI	3,589	46.72	16.86	7.01	18.97	18.18	25.54	28.91	38.63	45.90	4.13	4.27	3.59	3.46	4.77	
Limited Review:																
Appleton MA	552	7.19	15.37	6.23	18.80	18.48	30.27	31.32	35.55	43.97	1.29	1.21	0.63	1.22	1.93	
Eau Claire MA	108	1.41	18.70	0.94	18.20	34.91	25.62	19.81	37.48	44.34	0.79	0.00	0.96	0.52	1.04	
Janesville Beloit MA	101	1.31	18.23	5.21	18.48	23.96	26.55	29.17	36.74	41.67	0.69	0.00	0.62	0.52	1.25	
Kenosha MA	29	0.38	17.03	0.00	19.84	13.79	25.24	44.83	37.89	41.38	0.19	0.00	0.00	0.29	0.24	
LaCrosse MA	119	1.55	17.32	0.88	18.49	19.47	26.26	30.97	37.94	48.67	2.13	0.63	0.63	2.44	2.95	
Madison MA	243	3.16	15.78	7.56	19.71	17.23	28.32	29.83	36.20	45.38	0.51	0.43	0.47	0.35	0.72	
Racine MA	75	0.98	18.61	4.05	17.50	32.43	27.26	35.14	36.63	28.38	0.47	0.26	0.31	0.70	0.44	
Sheboygan MA	151	1.97	14.74	5.59	19.56	34.27	31.20	32.87	34.49	27.27	1.28	1.66	1.37	0.97	1.48	
Wausau MA	215	2.80	16.68	7.18	19.12	19.62	27.90	34.93	36.29	38.28	3.89	4.14	3.21	3.57	4.75	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 2.88% of loans originated and purchased by BANK.

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

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: WISCONSIN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement 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****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Green Bay MA	532	9.70	17.09	7.83	17.89	19.57	28.62	30.33	36.39	42.27	15.22	12.05	11.11	13.13	20.80									
Milwaukee MA	1,197	21.82	19.55	9.62	17.66	21.87	25.59	32.51	37.21	36.00	11.54	7.97	12.03	10.77	13.35									
Non MA WI	2,749	50.11	16.86	7.39	18.97	17.82	25.54	33.09	38.63	41.70	24.30	17.68	22.36	24.68	26.29									
Limited Review:																								
Appleton MA	322	5.87	15.37	7.28	18.80	23.73	30.27	28.16	35.55	40.82	9.66	10.00	9.21	8.25	11.34									
Eau Claire MA	99	1.80	18.70	9.28	18.20	15.46	25.62	27.84	37.48	47.42	5.00	1.43	2.01	4.29	7.79									
Janesville Beloit MA	59	1.08	18.23	6.78	18.48	25.42	26.55	40.68	36.74	27.12	3.55	1.98	4.42	3.48	3.61									
Kenosha MA	35	0.64	17.03	2.86	19.84	20.00	25.24	34.29	37.89	42.86	2.63	0.00	4.08	3.27	1.79									
LaCrosse MA	65	1.18	17.32	1.54	18.49	29.23	26.26	26.15	37.94	43.08	6.00	1.96	7.02	4.69	7.41									
Madison MA	103	1.88	15.78	7.92	19.71	19.80	28.32	25.74	36.20	46.53	1.55	0.59	1.39	1.46	2.07									
Racine MA	68	1.24	18.61	8.82	17.50	32.35	27.26	33.82	36.63	25.00	5.12	6.25	5.73	5.15	4.09									
Sheboygan MA	107	1.95	14.74	9.52	19.56	11.43	31.20	48.57	34.49	30.48	8.87	7.58	3.94	10.20	11.18									
Wausau MA	150	2.73	16.68	5.41	19.12	21.62	27.90	26.35	36.29	46.62	10.81	3.57	13.08	7.69	15.24									

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 2.06% of loans originated and purchased by Associated Bank N.A.

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

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WISCONSIN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Green Bay MA	5,311	15.65	17.09	5.80	17.89	19.12	28.62	30.72	36.39	44.36	1.75	2.84	1.58	1.50	1.88	
Milwaukee MA	6,460	19.04	19.55	7.48	17.66	21.35	25.59	34.74	37.21	36.43	1.00	0.88	1.01	1.10	0.93	
Non MA WI	14,410	42.47	16.86	5.37	18.97	16.27	25.54	30.70	38.63	47.67	2.92	4.79	3.66	3.07	2.39	
Limited Review:																
Appleton MA	2,851	8.40	15.37	4.76	18.80	17.73	30.27	31.85	35.55	45.67	1.36	2.06	1.10	1.38	1.37	
Eau Claire MA	610	1.80	18.70	5.30	18.20	15.56	25.62	28.81	37.48	50.33	0.76	1.27	0.98	0.61	0.72	
Janesville Beloit MA	332	0.98	18.23	5.76	18.48	18.79	26.55	38.48	36.74	36.97	0.41	0.60	0.51	0.47	0.23	
Kenosha MA	170	0.50	17.03	2.98	19.84	17.86	25.24	30.36	37.89	48.81	0.31	0.27	0.49	0.31	0.23	
LaCrosse MA	578	1.70	17.32	5.43	18.49	19.44	26.26	28.02	37.94	47.11	1.67	3.14	1.70	1.49	1.60	
Madison MA	911	2.69	15.78	6.63	19.71	19.78	28.32	26.40	36.20	47.19	0.15	0.20	0.18	0.11	0.16	
Racine MA	486	1.43	18.61	6.86	17.50	19.13	27.26	33.06	36.63	40.96	0.49	0.92	0.62	0.37	0.44	
Sheboygan MA	768	2.26	14.74	6.50	19.56	19.11	31.20	39.70	34.49	34.69	0.73	1.40	0.58	0.93	0.47	
Wausau MA	1,040	3.07	16.68	5.27	19.12	20.10	27.90	31.22	36.29	43.41	1.71	2.02	2.87	1.70	1.09	

* Based on 2001 Peer Mortgage Data: Central Region.

** As a percentage of loans with borrower income information available. No information was available for 3.20% of loans originated and purchased by Associated Bank N.A.

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

**** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased 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, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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:									
Green Bay MA	2,429	15.80	77.56	53.23	62.99	18.98	18.03	10.86	14.22
Milwaukee MA	1,947	12.66	77.53	34.77	62.56	19.47	17.98	2.27	2.03
Non MA WI	6,355	41.33	81.11	67.10	75.67	14.40	9.93	6.57	9.44
Limited Review:									
Appleton MA	2,263	14.72	78.82	51.52	71.14	15.20	13.65	8.42	10.46
Eau Claire MA	64	0.42	82.16	37.50	73.44	20.31	6.25	1.62	0.94
Janesville Beloit MA	29	0.19	82.18	48.28	37.93	31.03	31.03	0.22	0.37
Kenosha MA	41	0.27	79.08	17.07	87.80	7.32	4.88	1.44	0.28
LaCrosse MA	126	0.82	81.00	69.05	49.21	20.63	30.16	2.25	3.45
Madison MA	1,008	6.56	76.56	44.64	70.54	11.01	18.45	2.80	2.87
Racine MA	18	0.12	79.01	33.33	72.22	16.67	11.11	0.30	0.20
Sheboygan MA	504	3.28	80.34	46.43	70.44	16.07	13.49	5.16	7.39
Wausau MA	591	3.84	80.51	59.22	63.28	22.84	13.87	7.23	11.24

* Based on 2001 Peer Small Business Data: US&PR.

** 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. No information was available for 10.24% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WISCONSIN			Evaluation Period: JANUARY 1, 1999 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 \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Green Bay MA	7	0.34	94.04	71.43	0.00	57.14	42.86	0.00	0.00
Milwaukee MA	11	0.54	92.34	63.64	63.64	18.18	18.18	0.00	0.00
Non MA WI	1,852	90.30	96.25	81.48	84.56	13.07	2.38	11.40	12.00
Limited Review:									
Appleton MA	33	1.61	95.60	81.82	90.91	3.03	6.06	0.85	0.91
Eau Claire MA	0	0.00	97.34	0.00	0.00	0.00	0.00	0.00	0.00
Janesville Beloit MA	1	0.05	95.43	100.00	100.00	0.00	0.00	0.28	0.31
Kenosha MA	0	0.00	92.86	0.00	0.00	0.00	0.00	0.00	0.00
LaCrosse MA	0	0.00	97.98	0.00	0.00	0.00	0.00	0.00	0.00
Madison MA	39	1.90	95.43	94.87	87.18	0.00	12.82	2.67	3.04
Racine MA	7	0.34	95.39	85.71	57.14	42.86	0.00	0.86	0.94
Sheboygan MA	37	1.80	94.53	83.78	81.08	18.92	0.00	10.58	11.83
Wausau MA	64	3.12	95.91	85.94	84.38	10.94	4.69	5.04	5.28

* Based on 2001 Peer Small Business Data: US&PR.

** 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. No information was available for 17.21% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: WISCONSIN									
Evaluation Period: March 8, 1999 TO November 10, 2003									
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:									
Green Bay MA	1	361	13	833	14	1,194	10.10	0	0
Milwaukee MA	2	105	9	5,929	11	6,034	51.03	0	0
Non MA WI	0	0	17	1,036	17	1,036	8.76	0	0
Limited Review:									
Appleton MA	0	0	4	526	4	526	4.45	0	0
Eau Claire MA	0	0	2	216	2	216	1.82	0	0
Janesville Beloit MA	0	0	2	177	2	177	1.50	0	0
Kenosha MA	0	0	3	443	3	443	3.75	0	0
LaCrosse MA	0	0	1	145	1	145	1.23	0	0
Madison MA	1	114	4	1,521	5	1,636	13.84	0	0
Racine MA	0	0	1	119	1	119	1.01	0	0
Sheboygan MA	0	0	0	0	0	0	0.00	0	0
Wausau MA	0	0	6	298	6	298	2.52	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: March 8, 1999 TO November 10, 2003																	
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:																	
Green Bay MA	22.37	10	6.80	10.00	0.00	90.00	0.00	0	0	0	0	0	0	1.55	20.21	57.43	20.36
Milwaukee MA	26.83	42	28.57	2.00	12.00	48.00	38.00	0	0	0	0	0	0	12.73	13.58	46.59	27.05
Non MA WI	32.42	68	46.26	0.00	9.00	82.00	9.00	0	2	0	0	-2	0	0.47	7.68	78.28	13.57
Limited Review:																	
Appleton MA	7.92	9	6.12	0.00	11.00	78.00	11.00	1	0	0	0	+1	0	0.46	7.85	81.97	9.71
Eau Claire MA	0.35	1	0.68	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.46	70.58	17.61
Janesville Beloit MA	0.44	1	0.68	0.00	0.00	0.00	100.00	0	1	0	0	-1	0	0.73	13.84	66.64	18.79
Kenosha MA	0.56	1	0.68	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.30	14.28	64.46	16.97
La Crosse MA	0.96	3	2.04	33.00	0.00	67.00	0.00	0	0	0	0	0	0	6.38	16.21	60.78	16.63
Madison MA	3.27	5	3.40	0.00	40.00	60.00	0.00	0	0	0	0	0	0	6.86	19.92	57.96	15.26
Racine MA	1.19	2	1.36	0.00	0.00	50.00	50.00	0	0	0	0	0	0	9.02	6.05	74.46	10.12
Sheboygan MA	1.57	2	1.36	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	0.00	9.49	86.38	4.13
Wausau MA	2.14	3	2.04	0.00	33.00	67.00	0.00	0	0	0	0	0	0	0.00	6.87	83.98	9.16

