



Public Disclosure

October 3, 1997

Community Reinvestment Act Performance Evaluation

**National Exchange Bank and Trust
Charter Number: 13879**

**130 South Main Street
Fond du Lac, Wisconsin 54936**

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

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General Information

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

This document is an evaluation of the CRA performance of National Exchange Bank and Trust (NEBAT) prepared by Office of the Comptroller of the Currency, the institution's supervisory agency, as of October 3, 1997. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Institution's CRA Rating: This institution is rated Satisfactory Record of Meeting Community Credit Needs.

The major factors contributing to this rating are as follows:

- a high percentage of loans were extended within NEBAT's combined assessment area,
- NEBAT's distribution of loans to borrowers of different income levels is adequate,
- the loan distribution among businesses and farms of different sizes is good,
- delivery systems are easily accessible to all segments of the assessment area, and
- NEBAT's record of opening and closing branches has improved access to its delivery systems.

The following table indicates the performance level of NEBAT with respect to the lending, investment, and service tests.

Performance Levels	Name of Financial Institution Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High satisfactory	X		X
Low satisfactory		X	
Needs to improve			
Substantial noncompliance			

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

Description of Institution and Assessment Areas

National Exchange Bank and Trust (NEBAT) is wholly owned by National Exchange Bank Corporation, a \$600MM, two-bank holding company. The bank has its main office in Fond du Lac, Wisconsin and serves primarily Fond du Lac, Washington, Sheboygan, and Calumet counties. NEBAT currently has eleven branches and six Automated Teller Machines (ATM).

NEBAT had total assets of \$478 million and a Return on Average Assets (ROAA) of 1.66%, as of June 30, 1997. NEBAT's focus is both commercial and mortgage lending. Loans comprise \$359 million (75%) of the bank's assets. NEBAT's loan portfolio is broken down as follows: \$151 million (42%) in commercial loans, \$143 million (40%) in mortgage loans, \$50 million in individual and other loans (14%), \$7 million (2%) in construction loans, and \$8 million (2%) in agriculture loans.

NEBAT has four different assessment areas, including parts of Fond du Lac, Washington, Sheboygan, and Calumet counties. These four counties border one another. Please refer to Appendix A for a more detailed description of the census tracts making up these assessment areas. NEBAT defined its assessment areas to include all branches and ATMs, and also based on where historical loan activity has been the greatest, where competitors are located, and based on the location of major highways. All excluded census tracts except two are middle- or upper-income tracts. The two moderate-income tracts excluded are located in

the city of Sheboygan, where several of NEBAT's competitors are located.

The majority of NEBAT's loans are generated in the Fond du Lac assessment area. During the evaluation period (January 1, 1996 through June 30, 1997), the majority of loans were extended within the Fond du Lac assessment area (68%) with a lower percentage extended in the Sheboygan (28%), Washington (3%), and Calumet (1%) assessment areas.

Washington county is located in the Milwaukee-Waukesha Metropolitan Statistical Area (MSA), Sheboygan county is located in the Sheboygan MSA, Calumet county is located in the Appleton-Oshkosh MSA, and Fond du Lac county is located in a non-MSA area. The population of the combined assessment area is 184,781, according to 1990 US Census Data. The breakdown of census tracts by income level for NEBAT's assessment areas can be summarized in the following table:

Table 1 Number and Percentage of Census Tracts by Income Category by Assessment Area										
Tract Type	Fond du Lac		Washington		Sheboygan		Calumet		Totals	
	#	%	#	%	#	%	#	%	#	%
Low-income	0	0%	0	0%	0	0%	0	0%	0	0%
Moderate-income	1	6%	0	0%	0	0%	0	0%	1	2%
Middle-income	11	61%	11	100%	10	100%	2	100%	34	83%
Upper-income	6	33%	0	0%	0	0%	0	0%	6	15%
Total Tracts	18	100%	11	100%	10	100%	2	100%	41	100%

Source: 1990 Census Data, US Bureau of the Census

The majority of census tracts in the combined assessment area are middle-income tracts. Income levels for the geographies are based on 1990 US Census Median Family Income. These figures are \$30,390 for non-MSA areas (Fond du Lac county), \$39,005 for the Milwaukee-Waukesha MSA, \$36,707 for the Sheboygan MSA, and \$37,202 for the Appleton-Oshkosh MSA.

The breakdown of families in the combined assessment area is as follows:

Tract Type	Fond du Lac		Washington		Sheboygan		Calumet		Totals	
	#	%	#	%	#	%	#	%	#	%
Low-income	2,288	12%	1,848	12%	1,480	12%	333	14%	5,949	12%
Moderate-income	3,089	16%	3,003	19%	2,328	19%	472	21%	8,892	18%
Middle-income	5,143	26%	5,097	33%	3,862	32%	789	35%	14,891	30%
Upper-income	8,986	46%	5,715	36%	4,561	37%	678	30%	19,940	40%
Totals	19,506	100%	15,663	100%	12,231	100%	2,272	100%	49,672	100%

Source: 1990 Census Data, US Bureau of the Census

The percentage breakdown of families by income category is fairly consistent for all four assessment areas. The income levels of individuals are based on information from the Department of Housing and Urban Development (HUD) and are updated annually. The 1997 HUD Adjusted Median Family Income is \$39,600 for non-MSA areas in the state of Wisconsin, \$50,700 for the Milwaukee-Waukesha MSA, \$48,500 for the Sheboygan MSA, and \$47,600 for the Appleton-Oshkosh MSA.

Based on 1990 US Census Data, there are 69,149 housing units in NEBAT's combined assessment area. Of this total, 69% are owner-occupied units, 25% are rental-occupied units, and 5% are vacant units. The median housing value of the combined assessment area is \$65,930 and median housing age is 37 years.

Major industries within NEBAT's combined assessment area include manufacturing, retail trade, and services. The largest employers in the area are Mercury Marine, Giddings and Lewis, The West Bend Company, Serigraph, Regal Ware, Kohler Company, and Tecumseh Products. Unemployment is very low in the area (2%) and below the national average. Business demographic data indicates that there are 5,556 businesses and 244 farms located in NEBAT's combined assessment area. The majority of these businesses (93%) are small businesses employing less than 50 people and have gross sales under \$1 million (74%).

There are no impediments that would hinder NEBAT's ability to help meet the credit needs of the community. Competition with other local financial institutions is strong, particularly in commercial lending. Local credit unions have become increasingly more competitive. Qualified investment opportunities in the area are limited, based on a review of CRA

performance evaluations from other local financial institutions and discussions with bank management.

A community contact was made during our on-site evaluation with a member of a government office specializing in community development. The community contact was complimentary of the bank's involvement with various lending programs in the community. The community contact mentioned that creditworthy borrowers don't have problems obtaining financing from local banks, but that there is a need for low-interest rate, low down payment real estate loans in the community.

Conclusions with Respect to Performance Tests

Lending Test

Performance Criteria:

Lending Activity - NEBAT's loan-to-deposit ratio averaged 86.88% between December 31, 1995 and June 30, 1997. This is the fifth highest average loan-to-deposit ratio of all banks in NEBAT's combined assessment area. These banks range in asset size from \$15 million to \$478 million. NEBAT is the largest bank in its combined assessment area. It should be noted that in 1996 and 1997 NEBAT sold \$5.6 million and \$3.5 million, respectively, in real estate mortgage loans to the secondary market, which decreased its loan-to-deposit ratio. Table 3 shows the number and dollar amount of Home Mortgage Disclosure Act (HMDA) loans originated in 1996 by product type and assessment area (AA). Table 4 shows the same activity for the period of January 1, 1997 to June 30, 1997.

Table 3
Distribution of HMDA Loans by Product Type - 1996

	Fond du Lac	Washington	Sheboygan	Calumet	Total
Home Purchase - # Loans Made	321	16	84	5	426
Home Purchase - \$ Loans Made	\$26,022	\$1,388	\$6,726	\$485	\$34,621
Home Improvement - # Loans Made	71	3	56	2	132
Home Improvement - \$ Loans Made	\$2,655	\$72	\$1,841	\$37	\$4,605
Refinance - # Loans Made	188	6	112	3	309
Refinance - \$ Loans Made	\$10,104	\$398	\$5,989	\$134	\$16,625
Multi-Family - # Loans Made	2	1	5	0	8
Multi-Family - \$ Loans Made	\$215	\$300	\$365	\$0	\$880
Total # Loans Made by AA	582	26	257	10	875
Total \$ Loans Made by AA	\$38,896	\$2,158	\$14,921	\$656	\$56,631

*Note: Loans purchased by the institution are also considered as originations for the lending test.

Source: 1996 HMDA-LAR

Table 4
Distribution of HMDA Loans by Product Type - Jan. 1, 1997 - June 30, 1997

	Fond du Lac	Washington	Sheboygan	Calumet	Total
Home Purchase - # Loans Made	135	7	30	1	173
Home Purchase - \$ Loans Made	\$9,849	\$775	\$2,699	\$62	\$13,385
Home Improvement - # Loans Made	27	1	21	0	49
Home Improvement - \$ Loans Made	\$1,287	\$4	\$685	\$0	\$1,976
Refinance - # Loans Made	86	4	39	0	129
Refinance - \$ Loans Made	\$5,712	\$132	2,209	\$0	\$8,053
Multi-Family - # Loans Made	1	0	2	0	3
Multi-Family - \$ Loans Made	\$78	\$0	\$106	\$0	\$184
Total # Loans Made by AA	249	12	92	1	354
Total \$ Loans Made by AA	\$16,926	\$911	\$5,699	\$62	\$23,598

*Note: Loans purchased by the institution are also considered as originations for the lending test.

Source: 1996 HMDA-LAR

Assessment Area Concentration - A high percentage of loans were originated within the bank's combined assessment area during the evaluation period. Of the total loans originated by NEBAT, 85% of the number of loans and 79% of the dollar amount of loans were extended within the bank's combined assessment area.

Geographic Distribution - NEBAT's geographic distribution of loans shows very good penetration throughout its combined assessment area. At least one mortgage, small business, small farm, or other small business loan (line of credit) was made to each of the census tracts in NEBAT's combined assessment area for both 1996 and the first six months of 1997. Because there is only one moderate-income census tract and no low-income census tracts, an analysis of the geographic distribution would not be meaningful. Suffice it to say that NEBAT made three HMDA-reportable loans and 180 small business/small farm loans within the moderate-income tract during the evaluation period.

Borrower Characteristics - NEBAT's distribution of home mortgage, small business, small farm, and other small business loans (lines of credit) based on borrower characteristics is good. This is based on the distribution of loans to low-, moderate-, middle-, and upper-income individuals in the assessment area and the distribution of loans to small businesses and farms of different sizes.

Home Mortgage Loans:

The level of mortgage loans extended to low- and moderate-income individuals in NEBAT's combined assessment area is adequate in relation to the percentage of low- and moderate-income families residing in NEBAT's combined assessment area. The following tables reflect lending to borrowers of different incomes by assessment area by both number and dollar amount for the evaluation period:

Table 5
Distribution of Number of HMDA Loans Within Combined Assessment Area by Borrower Characteristic

Borrower Type	Fond du Lac		Washington		Sheboygan		Calumet		Totals					
	% families in AA	#	%	% families in AA	#	%	% families in AA	#	%	% families in AA	#	%		
Low	12%	31	4%	12%	6	16%	12%	21	6%	14%	1	9%	59	5%
Moderate	16%	125	15%	19%	4	11%	19%	77	22%	21%	1	9%	207	17%
Middle	26%	185	22%	33%	13	34%	32%	130	37%	35%	2	18%	330	27%
Upper	46%	326	39%	36%	10	26%	37%	85	24%	30%	5	46%	426	35%
N/A*	N/A	164	20%	N/A	5	13%	N/A	36	11%	N/A	2	18%	207	16%
Totals	100%	831	100%	100%	38	100%	100%	349	100%	100%	11	100%	1229	100%

Source: 1996 & 1997 HMDA-L AR

* N/A indicates that income information was not available for these borrowers.

Table 6
Distribution of Dollar Amount of HMDA Loans Within Combined Assessment Area by Borrower Characteristic (in \$000's)

Borrower Type	Fond du Lac		Washington		Sheboygan		Calumet		Totals					
	% families in AA	\$	%	% families in AA	\$	%	% families in AA	\$	%	% families in AA	\$	%		
Low	12%	845	2%	12%	155	5%	12%	442	2%	14%	62	9%	1504	2%
Moderate	16%	5401	10%	19%	240	8%	19%	3097	15%	21%	62	9%	8800	11%
Middle	26%	11743	21%	33%	744	24%	32%	7877	38%	35%	122	17%	20486	25%
Upper	46%	27846	49%	36%	1262	41%	37%	7401	36%	30%	327	45%	36836	46%
N/A*	N/A	10087	18%	N/A	668	22%	N/A	1803	9%	N/A	145	20%	12703	16%
Totals	100%	55922	100%	100%	3069	100%	100%	20620	100%	100%	718	100%	80329	100%

Source: 1996 & 1997 HMDA-L AR

* N/A indicates that income information was not available for these borrowers.

NEBAT's percentage distribution of loans by borrower income is comparable to that of other lenders in its assessment area. The following table shows both the number and dollar amount of loans originated by NEBAT's local competitors in 1996:

Borrower Type	# loans in Combined AA	% of Total	\$ Loans in Combined AA	% of Total
Low-income	59	5%	2,585	3%
Moderate-income	203	18%	11,337	13%
Middle-income	448	40%	31,040	37%
Upper-income	383	35%	37,876	44%
N/A	17	2%	2,550	3%
Totals	1,110	100%	85,388	100%

Source: 1996 HMDA data

* N/A indicates that income information was not available for these borrowers.

Small Business and Small Farm Lending:

NEBAT is a small business and small farm lending leader in its combined assessment area. Based on an analysis of small business and small farms loans outstanding as of June 30, 1997 for all banks in NEBAT's combined assessment area, NEBAT had the highest number and dollar amounts of both small loans to businesses (loans under \$1 million) and small loans to farms (loans under \$500,000). NEBAT is the largest bank in the area with total assets of \$478 million; the next closest competitor has \$281 million in assets. Small business loans represent 76% of the bank's commercial loan portfolio; small farm loans represent 100% of the bank's farm loans. The distribution of NEBAT's small business, small farm, and other small business loans (lines of credit) based on borrower characteristics in the bank's combined assessment area is good. Business demographic information indicates that 73% of businesses and 94% of farms in NEBAT's combined assessment area have revenues of less than \$1 million. Table 8 shows that the majority of these loans were extended to businesses and farms with revenues less than \$1 million.

Type of Loan	Number	% of Total	\$ Amount (000's)	% of Total
Small Business Loans	1,015	80%	62,856	70%
Small Farm Loans	235	98%	7,325	93%
Other Small Business Loans	262	76%	22,260	55%
Total	1,512	82%	92,441	67%

Source: 1996 & 1997 Small Business/Small Farm Data Collection Register

Table 9 summarizes NEBAT’s small business and small farm lending by original loan amount in its combined assessment area. The table indicates that the majority of loans are extended with original amounts less than \$1,000,000 during the evaluation period. The majority of small business, small farm, and other small business loans were in amounts less than \$100,000. Since smaller businesses and farms typically borrow smaller amounts, this indicates that NEBAT is meeting the credit needs of very small businesses and farms by extending loans with small dollar amounts.

Table 9 Small Business, Small Farm, and Other Small Business Loans by Loan Amount at Origination				
Origination Amount	Count	%of Total	\$ Amount (000's)	%of Total
Less than \$100,000	1,512	82%	41,222	30%
Between \$100,000 and \$250,000	222	12%	34,842	25%
Greater than \$250,000	114	6%	62,588	45%
Total	1,848	100%	138,652	100%

Source: 1996 & 1997 Small Business/Small Farm Data Collection Register

Community Development Lending - Community development loans are those, except for multifamily dwellings, that do not meet the definition of home mortgage, small business, or small farm loans, but do meet the community development definition as stated in the CRA regulation (12 CFR 25.12(h)). Community development loans’ primary purpose must fall into one of the following three categories: affordable housing for low- or moderate-income individuals, community services targeted toward low- or moderate-income individuals, or activities that promote economic development by financing small businesses or small farms. Since NEBAT’s business focus is home mortgage and business lending, all loans that were extended that fall within this definition have already been considered in other parts of the lending test.

Flexible Lending - NEBAT demonstrates flexibility in helping to meet special credit needs of the community by offering several government-funded or -guaranteed loan products and other programs to benefit its assessment area. These loan numbers and dollar amounts of loans originated under these programs have already been accounted for in the lending test. The following are some examples of programs NEBAT has been involved with since our October 5, 1995 CRA examination:

Small Business Administration (SBA) Loans- NEBAT is a certified SBA lender, which substantially reduces the time needed to process and approve SBA loan applications.

Petroleum Environmental Clean-up Fund Act (PECFA)- This program provides interim financing for petroleum contamination removal. After the project is successfully completed, loans are repaid from the State of Wisconsin funds.

Farmers Home Administration (FmHA)- This program offers 90% guaranteed agricultural loans that aid farmers by providing interest rate subsidies.

Wisconsin Housing & Economic Development Authority (WHEDA) Credit Relief Outreach Program (CROP) - This program provides loans to farmers for current year operating expenses. These loans are 90% guaranteed by the state of Wisconsin and are limited to \$20,000 per loan per year.

WHEDA Home Program - This is a first-time home buyer program that provides below-market fixed interest rates and requires a lower down payment than conventional mortgages.

Veterans Administration (VA) Loans- Under this program, Veterans can obtain residential mortgage loans without a down payment requirement.

WHEDA Linked Deposit Loan Program - This program offers a reduced interest rate to new and existing businesses owned and controlled by women or minority group members. Loan proceeds must be used to either purchase or improve land or buildings or purchase business equipment or machinery.

WHEDA Tourism Loan Program - This program is intended to assist in the development and expansion of tourism-related businesses. Eligible businesses may obtain loans for upgrading, renovating, or expanding the business.

Main Street Sheboygan Falls Program - This program offers subsidized loans for buildings in downtown Sheboygan Falls to refurbish and restore older buildings.

St. Agnes Loan Program - This program provides lower interest rate financing for patients of St. Agnes Hospital who do not have sufficient insurance, or are unable to pay their hospital bills within a certain time frame. All loans are 100% guaranteed by the hospital.

NEBAT also helped meet the credit needs of its community by offering lower

interest rate loans to victims of the Oakfield tornado, which occurred on July 18, 1996. In addition, NEBAT originates student loans under various programs.

Investment Test

NEBAT has a limited level of qualified investments and grants. To be considered a qualified investment, it must have as its primary purpose community development. A review of CRA performance evaluations from other local financial institutions did not reveal any additional types of investments that NEBAT could be participating in. Investment opportunities are limited within NEBAT's combined assessment area; however, NEBAT made the following qualified grants in 1996 and 1997:

- \$18,000 in donations to United Way chapters in the combined assessment area. United Way contributes to local charities, several of which specifically provide services for low-income individuals.
- A \$2,030 donation to Bethany House, which houses homeless families temporarily and helps them relocate.

Service Test

Retail Banking Services:

Delivery systems are readily accessible to all segments of NEBAT's combined assessment area, including low- and moderate-income individuals. NEBAT's branching system consists of a main office and eleven full-service branches. The distribution of branches within the combined assessment area is as follows: one branch (NEBAT's main office) in the moderate-income census tract, nine branches in middle-income census tracts, and two branches in upper-income census tracts. As previously mentioned, there are no low-income census tracts in NEBAT's combined assessment area. ATMs are located in moderate-income (one), middle-income (two), and upper-income (three) census tracts.

NEBAT's record of opening and closing offices is good. NEBAT has opened six branches since its last CRA examination in 1995, all located in middle-income census tracts. This has improved the accessibility of its delivery systems for low- and moderate-income individuals, as over 30% of families in these communities are low- to moderate-income families. NEBAT has not closed any offices.

Banking hours are convenient for customers. Office hours vary by location. The majority of offices have Saturday hours; those that do not are open until 7 or 8 P.M. on Friday. The

main office has drive-up hours beginning at 7:30 A.M. Monday through Friday, and 8 A.M. on Saturdays. NEBAT offers numerous loan and deposit products at all locations. NEBAT offers a variety of alternative delivery systems to customers, including ATM cards and banking by mail. NEBAT also offers 24-hour banking by phone, which allows customers to obtain balance information and also make transfers between accounts.

Community Development Services:

Periodically, NEBAT provides community development services to the local community by educating potential borrowers on how to obtain home loans. Below are some examples of community development services provided by NEBAT:

NEBAT participated in home shows in Fond du Lac, Washington, and Sheboygan counties in 1996 and 1997. Lenders were available at these shows to explain NEBAT's loan products and educate potential customers on how to obtain loans.

Lenders recently participated in a "Tour of Homes" show sponsored by Coldwell Banker in September 1997. Homes featured in this show had list prices under \$100,000 and were geared toward people with lower incomes. NEBAT lenders answered questions about how individuals could obtain loans for these homes.

NEBAT offers three different low-cost deposit accounts. The Simply Checking account does not have a minimum balance requirement after a \$50 opening deposit. Fees are \$3 per month and \$.50 per withdrawal after 15 withdrawals. The Step-up program is for young adults ages 13 to 25. There are no service charges if a \$100 minimum balance is maintained in either a checking account, savings account, or a Certificate of Deposit. If this minimum balance is not maintained, there is a \$3 monthly fee. The first ten withdrawals are free, with a \$.25 charge for each withdrawal after ten. NEBAT recently began offering the Direct Deposit Too Account. Deposits to this account may only be through electronic direct deposits. There is no minimum balance requirement and the first three withdrawals per month are free. After the first three withdrawals, \$1 per withdrawal is charged.

Fair Lending Review

No violations of the substantive provisions of the anti-discriminatory laws and regulations were identified. NEBAT has implemented effective policies and procedures in this area to ensure compliance with these regulations.

Metropolitan Statistical Areas

Conclusions with Respect to Performance Tests in Milwaukee-Waukesha MSA:

NEBAT's performance under the lending, investment, and service tests in the Milwaukee-Waukesha MSA is consistent with the bank's overall rating.

Conclusions with Respect to Performance Tests in Appleton-Oshkosh MSA:

NEBAT's performance under the lending, investment, and service tests in the Appleton-Oshkosh MSA is consistent with the bank's overall rating.

Conclusions with Respect to Performance Tests in Sheboygan MSA:

NEBAT's performance under the lending, investment, and service tests in the Sheboygan MSA is consistent with the bank's overall rating. It should be noted that although there are no bank branches located within this MSA, other branches are very near (within five miles) to the census tracts included in this assessment area. NEBAT's products and services are easily accessible to borrowers in this area.

Nonmetropolitan Statewide Areas

Conclusions with Respect to Performance Tests in Wisconsin Nonmetropolitan Statewide Area:

NEBAT's performance under the lending, investment, and service tests in the Fond du Lac (non-MSA) assessment area is consistent with the bank's overall rating.

Appendix A: Scope of Examination

The following table reflects the scope of the examination. Lending products reviewed, NEBAT's assessment areas, and the time period covered are listed.

Scope of Examination			
Time Period Reviewed	January 1, 1996 through June 30, 1997		
Financial institution	Products reviewed		
NEBAT, Fond du Lac, WI	Mortgage Loans reported on NEBAT's HMDA-LAR, Small business, Small farm, and Other Small Business loans.		
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Other Information
Fond du Lac County (non-MSA area), less the following census tracts: 415-418. There are 21 census tracts in Fond du Lac County.	On-Site	Main Office	See "Description of Assessment Area"
Washington County (Milwaukee-Waukesha MSA) less the following census tracts: 4301, 4401.01, 4401.02, 4402, 4601.01, 4601.02, 4701, and 4702. There are 18 census tracts in Washington County.	On-Site	None	See "Description of Assessment Area"
Calumet County (Appleton-Oshkosh MSA), census tracts 204 and 206. There are 9 census tracts in Calumet County.	On-Site	None	See "Description of Assessment Area"
Sheboygan County (Sheboygan MSA), less the following census tracts: 1-11 and 107-108. There are 24 census tracts in Sheboygan county.	On-Site	None	See "Description of Assessment Area"

Appendix B: Definitions

Low-income means an individual whose income that is less than 50% of the area median income, or a median family income (MFI) that is less than 50%, in the case of a geography.

Moderate-income means an individual whose income that is at least 50% and less than 80% of the area median income, or an MFI that is at least 50% and less than 80%, in the case of a geography.

Middle-income means an individual whose income that is at least 80% and less than 120% of the area median income, or an MFI that is at least 80% and less than 120%, in the case of a geography.

Upper-income means an individual whose income that is 120% or more of the area median income, or an MFI that is 120% or more, in the case of a geography.

Geography means a census tract or block numbering area.

Metropolitan Statistical Area (MSA) means a federally-designated geographical unit consisting of an urbanized area with a central city of at least 50,000 residents and a regional population of 100,000.