

## **PUBLIC DISCLOSURE**

December 7, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Frandsen Bank & Trust  
116 Central Street West  
Lonsdale, Minnesota 55046  
RSSD 751656

**Federal Reserve Bank of Minneapolis  
90 Hennepin Avenue, P.O. Box 291  
Minneapolis, Minnesota 55480-0291**

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

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*Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this public evaluation.*

The following abbreviations may be used throughout this performance evaluation:

Air Force Base	AFB
American Community Survey	ACS
Automated teller machine	ATM
Combined Statistical Area	CSA
Community Reinvestment Act	CRA
Dun & Bradstreet	D&B
Federal Agricultural Mortgage Corporation	Farmer Mac
Federal Deposit Insurance Corporation	FDIC
Federal Financial Institutions Examination Council	FFIEC
Federal Housing Administration	FHA
Federal Home Loan Bank	FHLB
Federal Home Loan Mortgage Corporation	Freddie Mac
Federal National Mortgage Association	Fannie Mae
U.S. Department of Agriculture Farm Service Agency	FSA
Home Mortgage Disclosure Act	HMDA
U.S. Department of Housing and Urban Development	HUD
Low-Income Housing Tax Credit	LIHTC
Minnesota Housing Finance Agency	MHFA
Metropolitan Statistical Area	MSA
New Markets Tax Credit	NMTC
Office of Management and Budget	OMB
U.S. Department of Agriculture Rural Development	RD
Report of Condition	ROC
U.S. Small Business Administration	SBA
University of North Dakota	UND
Department of Veterans Affairs	VA

## INSTITUTION RATING

**INSTITUTION’S CRA RATING:** Frandsen Bank & Trust’s rating is Satisfactory.

Examiners evaluated the bank’s CRA performance using the Large Bank CRA Examination Procedures. The following table shows the CRA performance of Frandsen Bank & Trust, Lonsdale, Minnesota, with respect to the Lending, Investment, and Service Tests.

<b>Frandsen Bank &amp; Trust Performance Tests</b>			
<i>Performance Levels</i>	<i>Lending Test*</i>	<i>Investment Test</i>	<i>Service Test</i>
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
*Note: The lending test is weighted more heavily than the investment and services tests when arriving at an overall rating.			

Major factors supporting the institution’s rating include the following:

### Lending Test

- Lending activity shows good responsiveness to credit needs throughout the bank’s assessment areas.
- Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the distribution of loans throughout the assessment areas, including low- and moderate-income census tracts, is good.
- The bank makes a relatively high level of community development loans.
- The bank originated a substantial majority of loans within its Minnesota, Wisconsin, and multistate MSA assessment areas.
- The bank uses innovative and/or flexible lending practices in serving assessment area credit needs.

### Investment Test

- The overall level of qualified investments, in the form of securities and donations, is significant.
- The bank’s qualified investments exhibit good responsive to local credit and community development needs.

### Service Test

- The bank provides a relatively high level of community development services.
- Retail banking services are accessible to the bank’s geographies and to residents, businesses, and farms throughout the assessment areas. Services do not vary in a way that inconveniences low- and moderate-income areas or individuals.
- Changes in the bank’s network of branches, drive-up facilities, and ATMs generally did not adversely affect the accessibility of the bank’s products and services.

## INSTITUTION

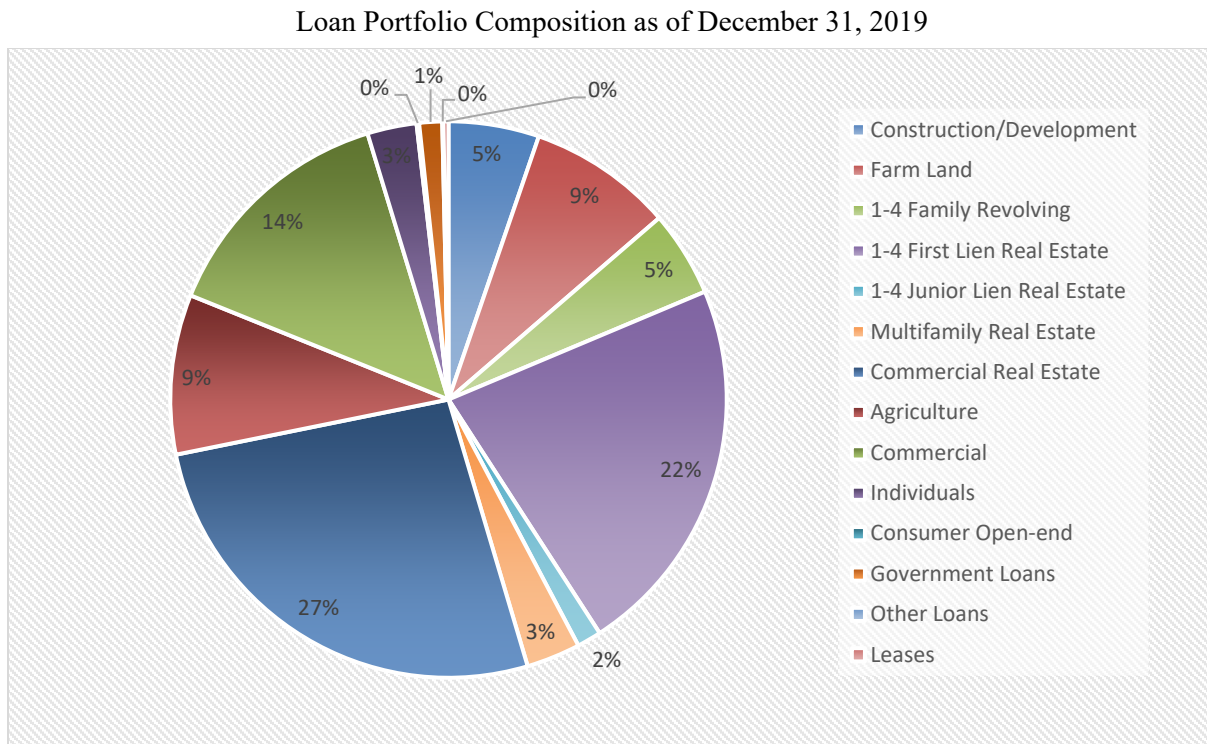
### DESCRIPTION OF INSTITUTION

*General.* Frandsen Bank & Trust is an interstate bank with headquarters in Lonsdale, Minnesota, and has assets of \$2.5 billion as of December 31, 2020. The bank has offices in Minnesota, North Dakota, and Wisconsin. The bank continues to be effective in meeting the credit and community development needs of the residents, businesses, and farms throughout its assessment areas. No financial constraints or legal impediments prevent the bank from serving the credit needs of its assessment areas. The bank’s CRA rating was Outstanding at the previous evaluation dated May 21, 2018.

*Structure.* Frandsen Financial Corporation (FFC), Arden Hills, Minnesota, wholly owns Frandsen Bank & Trust. As a bank holding company, FFC provides financial and managerial services to its subsidiary bank. FFC also owns the following entities:

- Anderson Financial Group Capital Trust I, Wayzata, Minnesota
- Tower Statutory Trust I, Cloquet, Minnesota
- Frandsen Capital I, Forest Lake, Minnesota

*Loan Portfolio.* According to the December 31, 2019, ROC, the bank’s \$1.2 billion loan portfolio consists of 49.0% commercial, 28.6% residential real estate, 17.7% agriculture, 3.0% consumer and 1.7% of other loans.<sup>1</sup> Since the previous evaluation, the bank’s total assets were stable and gross loans increased by 4.1%. The following chart illustrates the loan portfolio composition in detail, based on December 31, 2019, ROC data.



<sup>1</sup> Because the percentages are rounded to the nearest tenth, some data in this performance evaluation may not total 100.0%.

*Credit Products.* To meet the credit needs of the residents, businesses, and farms in its assessment areas, the bank offers a wide variety of residential real estate, commercial, and agricultural loan products. Loan products consist of closed-end and open-end loans as well as loans with fixed and variable rate features. In addition to these traditional loan products, the bank offers flexible loan programs in conjunction with other entities, which include several programs for affordable housing. For small business and small farm lending, the bank offers SBA and FSA loans. For a list of product offerings and program information, refer to the Innovative and Flexible Lending Practices section of this report.

*Offices.* The bank operates a network of branches, drive-up facilities, and ATMs in Minnesota, North Dakota, and Wisconsin. As of December 31, 2019, the bank operated 34 offices in Minnesota, one branch office in North Dakota, and one branch office in Wisconsin. During the evaluation period, the bank made some minor changes to its branch and ATM network. Specifically, the bank closed one branch in North Dakota and sold a branch in Minnesota. Refer to the Retail Banking Services discussion in the Service Test section for more details on the bank’s retail delivery systems.

*Assessment Areas.* During the evaluation period, the bank had 13 assessment areas. As shown in the following table, the bank has one assessment area in a multistate MSA, 11 assessment areas in Minnesota, and one in Wisconsin. Additional details on assessment areas, branches, and ATMs are in the applicable assessment area sections of this evaluation.

<b>Assessment Area Information</b>		
<i>Assessment Area Name</i>	<i>Offices</i>	<i>Geographical Description</i>
<b>Multistate ND-MN MSA</b>		
Grand Forks MSA	Grand Forks (2), * East Grand Forks	Grand Forks County (North Dakota), most of Polk County (Minnesota), and one tract in Walsh County (North Dakota)
<b>State of Minnesota</b>		
Duluth MSA	Cloquet, Duluth, Ely, Tower, Virginia	Carlton County and St. Louis County ** (Minnesota) and a portion of Douglas County (Wisconsin)
Mankato–New Ulm CSA	Mankato (3), New Ulm (2)	Blue Earth and Nicollet counties; all but one tract in Brown County
Minneapolis–St. Paul MSA	Apple Valley, Braham, Forest Lake, Hastings, *** Jordan, Lakeville, Montgomery, Waterville	Anoka, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Ramsey, Scott, and Washington counties; one tract in Waseca County
St. Cloud MSA	Foley	Benton County
Ada	Ada	Norman County
Baxter–Crosslake–Nisswa	Baxter, Crosslake, Nisswa	Crow Wing County and part of Cass County
Bird Island–Fairfax–Hector	Bird Island, Fairfax, Hector	Renville County and one tract in Sibley County
Clinton	Clinton	Big Stone County
Lonsdale	Lonsdale, Dundas	Part of Rice County
Pine City	Pine City	Kanabec and Pine counties
Oslo–Warren	Oslo, Warren	Part of Marshall County
<b>State of Wisconsin</b>		
Luck	Luck	Burnett and Polk counties
*The bank closed one of its Grand Forks branches (University Village) in 2018. **The Duluth assessment area excludes St. Louis County tract 9901, which is an unpopulated water tract in Lake Superior. ***The bank sold its Hastings branch in 2018.		

## SCOPE OF EVALUATION

Examiners selected five of the bank's assessment areas for full-scope reviews. To select full-scope reviews, examiners reviewed factors such as loan volume, deposit market share, branch size and location, length of time since the last full-scope review, and community development activity. For interstate banks, examiners must conduct a full-scope review of at least one assessment area from each state and at least one assessment area from each multistate MSA. A full-scope review requires examiners to evaluate the bank's quantitative and qualitative performance using the following criteria: lending activity, lending to borrowers of different income levels and to businesses and farms of different sizes, geographic distribution of loans throughout the assessment area, community development lending, flexible and/or innovative lending practices, qualified investments, retail services, and community development services. The other assessment areas receive limited-scope reviews in which examiners analyze quantitative data about the bank's lending, investments, and services.

The assessment areas selected for full-scope reviews represent 52.4% of the bank's lending activity by number of loans and 56.6% by dollar amount of loans, according to loan data from January 1, 2018, to December 31, 2019. Examiners conducted full-scope reviews of the following assessment areas:

- Grand Forks, North Dakota-Minnesota multistate MSA assessment area
- Mankato–New Ulm, Minnesota CSA assessment area
- Minneapolis–St. Paul, Minnesota MSA assessment area
- Clinton, Minnesota, non-metropolitan assessment area
- Luck, Wisconsin, non-metropolitan assessment area

In determining the overall CRA rating, examiners placed the greatest weight on the bank's activities in its Minnesota assessment areas because a majority of the bank's lending occurs in these assessment areas. During the evaluation period, the bank extended 86.1% of its HMDA, small business, and small farm loans, by number, in the Minnesota assessment areas.<sup>2</sup> The comparative percentages for the multistate MSA and Wisconsin assessment areas were 10.4% and 3.5%, respectively. For Minnesota, examiners placed the greatest weight in the Minneapolis–St. Paul MSA followed by the Mankato–New Ulm MSA due to loan volume. A lower weight was given for the Clinton assessment area based on the lower loan volume. For the remaining assessment areas, examiners placed more weight on the Grand Forks multistate MSA and less weight on Wisconsin based on the bank's limited presence and loan volume in the Wisconsin market.

Because of the bank's size and its branches in MSAs, HMDA requires the bank to report home purchase, refinance, home improvement, multifamily, and other purpose closed/exempt loans. The bank must also report small business, small farm, and community development loans. To understand the bank's CRA performance, examiners evaluated the bank's reported 2018 and 2019 HMDA, small business, and small farm loans. Examiners compared the bank's HMDA, small business, and small farm lending performance to that of aggregate lenders that purchased or originated loans in the assessment areas in 2018 or 2019. Examiners analyzed the lending performance in each assessment area by focusing on the predominant loan types (HMDA, small business, and/or small farm loans) for each assessment area. Examiners also evaluated the bank's 2018 and 2019 community development loans, qualified investments, and services. The information presented here pertains throughout the evaluation unless specifically noted otherwise.

As part of this evaluation, examiners had discussions with bank management and community contacts regarding local economic conditions, demographic characteristics, the performance of local financial institutions, and opportunities to participate in community development activities. Further, bank

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<sup>2</sup>Based on the total number of loans extended inside the bank's assessment areas during the two-year evaluation period.



management provided information regarding the bank's lending activities, credit demand, and competition. Examiners considered these factors and the size and financial condition of the bank when evaluating its performance. The contacts did not identify any unmet credit needs in the bank's assessment areas.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. For HMDA loans, examiners relied on demographic information, primarily from the 2010 U.S. Census or 2019 FFIEC adjusted census data, to understand the income levels and geographic locations of the families and housing units in the assessment areas.<sup>3</sup> For small business and small farm loans, examiners used D&B data for the applicable year. D&B collects and publishes this self-reported data concerning the revenues and locations of local businesses and farms. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Instead, examiners reviewed the demographic data to provide a context for the bank's performance, along with the information obtained from bank management and community contacts.

The full-scope assessment area sections of this performance evaluation describe each assessment areas' unique performance context. As noted earlier, most assessment areas are in Minnesota. The bank also has one multistate assessment area and one assessment area in Wisconsin. Some of the areas are rural, and others are metropolitan areas. The economic characteristics vary in the assessment areas, which affect loan demand as well as community development opportunities. Most assessment areas had stable economies or some growth; however, some sectors of local economies experienced downturns. Overall, the bank faced strong competition among financial institutions in most of the full-scope assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA rating is satisfactory based on the ratings for the Lending, Investment, and Service Tests. Overall, the bank did a good job of serving the credit and community development needs of its assessment areas in Minnesota, Wisconsin, and the multistate MSA.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity
- Lending to borrowers of different income levels and to businesses and farms of different sizes
- Geographic distribution of loans
- Lending inside the bank's assessment areas
- Community development lending
- Use of innovative and/or flexible lending practices.

To evaluate the bank's performance, examiners placed more weight on the criteria of borrower distribution and geographic distribution than on lending activity and lending inside the bank's assessment areas. Examiners generally assigned more weight to lending to borrowers of different income levels and to businesses and farms of different sizes than to the geographic distribution of loans unless there were low- and/or moderate-income census tracts in the assessment area. Finally, the bank's community development lending and use of innovative and/or flexible lending practices contributed to the Lending Test rating.

Examiners evaluated the bank's qualified investments and its retail and community development services under the Investment and Service Tests, respectively.

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<sup>3</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2018 OMB revised MSA delineations.

## LENDING TEST

The bank's Lending Test rating is high satisfactory. This is based on high satisfactory Lending Test ratings for Minnesota, Wisconsin, and the multistate MSA. Overall, the bank's lending to low- and moderate-income borrowers and to small businesses and small farms is excellent. The geographic distribution and dispersion of loans is good. Overall, the bank makes a relatively high level of community development loans, and it uses innovative and/or flexible lending practices. The bank made a relatively high level of community development loans in Wisconsin and the multistate MSA and was a leader in community development lending in Minnesota. The bank's lending activity shows good responsiveness to credit needs throughout its assessment areas. Finally, the bank made a substantial majority of its loans inside its assessment areas.

The bank is an interstate bank, which includes operations in one multistate MSA, among other areas. The regulation requires a separate analysis for each state in which the bank operates. This analysis must include at least one assessment area from each state. However, examiners evaluate the overall lending activity and the concentration of lending inside the assessment areas at the institution level; both criteria are discussed below. For a detailed discussion of other Lending Test criteria, see the individual assessment area sections of this evaluation. For the limited-scope assessment areas, please see Appendix D for tables displaying the borrower and geographic distributions, as well as demographic and aggregate lender information.

### Lending Activity

The bank's lending activity demonstrates good responsiveness to the credit needs of the assessment areas. The Summary of Lending Activity table shows the bank's HMDA and CRA lending activity from January 1, 2018, to December 31, 2019. The table shows the product volume by number and dollar amount.

<b>Summary of Lending Activity</b>				
<i>Loan Type</i>	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>
Home Improvement	89	4.3	4,947	1.3
Home Purchase	1,184	57.7	219,038	59.1
Multifamily Housing	28	1.4	25,060	6.8
Refinancing	656	32.0	115,154	31.1
Loan Purpose Not Applicable	1	0.0	60	0.0
Other Purpose Closed-End	95	4.6	6,267	1.7
<b>Total HMDA Related</b>	<b>2,053</b>	<b>33.5</b>	<b>370,526</b>	<b>41.9</b>
<b>Total Small Business Related</b>	<b>2,369</b>	<b>38.6</b>	<b>308,048</b>	<b>34.9</b>
<b>Total Small Farm Related</b>	<b>1,713</b>	<b>27.9</b>	<b>204,898</b>	<b>23.2</b>
<b>Total Loans</b>	<b>6,135</b>	<b>100.0</b>	<b>883,472</b>	<b>100.0</b>

Overall, the bank's primary business lines are small business and HMDA lending; however, loan volume varies depending on the assessment area. Some markets are rural and small farm lending is a predominant loan type but not HMDA. The bank is an active HMDA and small business lender in metropolitan areas. Overall, the bank's lending activities show good responsiveness to local credit needs in the Minnesota, Wisconsin, and Grand Forks multistate MSA assessment areas. For detailed information regarding the bank's lending activity, see the individual assessment area sections.

### Assessment Area Concentration

The bank extended a substantial majority of its loans inside its assessment areas. The table below shows the bank's concentrations of lending inside and outside the assessment areas from January 1, 2018, to December 31, 2019.

Lending Inside and Outside the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	79	88.8	4,501	91.0	10	11.2	446	9.0
Home Purchase - Conventional	944	82.9	176,446	82.7	195	17.1	36,823	17.3
Home Purchase - FHA	39	86.7	4,914	85.2	6	13.3	855	14.8
Loan Purpose Not Available	1	100.0	60	100.0	0	0.0	0	0.0
Multifamily Housing	21	75.0	18,069	72.1	7	25.0	6,991	27.9
Other Purpose Closed-End	87	91.6	5,493	87.6	8	8.4	774	12.4
Refinancing	586	89.3	102,234	88.8	70	10.7	12,920	11.2
<b>Total HMDA Related</b>	<b>1,757</b>	<b>85.6</b>	<b>311,717</b>	<b>84.1</b>	<b>296</b>	<b>14.4</b>	<b>58,809</b>	<b>15.9</b>
<b>Total Small Business Related</b>	<b>2,172</b>	<b>91.7</b>	<b>283,895</b>	<b>92.2</b>	<b>197</b>	<b>8.3</b>	<b>24,153</b>	<b>7.8</b>
<b>Total Small Farm Related</b>	<b>1,534</b>	<b>89.6</b>	<b>184,013</b>	<b>89.8</b>	<b>179</b>	<b>10.4</b>	<b>20,885</b>	<b>10.2</b>
<b>Total Loans</b>	<b>5,463</b>	<b>89.0</b>	<b>779,625</b>	<b>88.2</b>	<b>672</b>	<b>11.0</b>	<b>103,847</b>	<b>11.8</b>

The bank extended 89.0% of all loans by number and 88.2% by dollar amount within its assessment areas. The bank's performance is generally consistent for HMDA, small business, and small farm loans. The HMDA lending varies based on product type and volume with the lowest percentage in the multifamily housing category. For the loans outside of the assessment areas, most is concentrated between non-contiguous assessment areas or in nearby counties.

### Borrower and Geographic Distributions

Overall, the bank's distribution of loans among low- and moderate-income borrowers and businesses and farms of different sizes is excellent. This is based on excellent distributions in Minnesota, Wisconsin, and the multistate MSA. As noted above, the Minnesota ratings received more weight in determining the overall rating. The bank actively originates HMDA to low- and moderate-income borrowers. It also actively lends to farms and businesses of different sizes in its assessment areas.

Geographically, the bank's performance in low- and moderate-income census tracts is good. The geographic distribution and dispersion of loans in Minnesota and the multistate MSA was good and was excellent in Wisconsin. The bank's lending patterns do not reveal any unexplained gaps in any of the assessment areas.

## Innovative and Flexible Lending Practices

The bank uses a range of innovative and/or flexible lending programs. The variety of programs helps meet the credit needs of low- and moderate-income residents, small businesses, and small farms. The bank is most active in housing programs for low- and moderate-income homebuyers. The following list highlights several the programs the bank participated in during the evaluation period:

- *Minnesota Housing Finance Agency Fix-up Loan Program.* The MHFA offers a program to make livability or energy efficiency improvements to homes. Loan terms, rates, and fees are affordable for low- and moderate-income borrowers.
- *Minnesota Housing Finance Agency Start Up/Step Up Program.* This program allows homeowners to buy a different home or refinance a current home with down payment and closing cost loans, affordable rates, and fees. Income limits apply.
- *Home Possible:* This Freddie Mac program has flexible loan terms and offers low down payment loans for low- to moderate-income homebuyers or buyers in high-cost or underserved communities. The program has some income limitations.
- *HomeStart Program:* This program, sponsored through the FHLB of Des Moines, assists first-time homebuyers earning up to 80.0% of their area's median family income to purchase a home. These grants may be used for down payment and closing cost assistance for eligible homeowners.
- *HomeReady.* This Fannie Mae program offers flexibility in underwriting for qualified borrowers who meet specific income criteria or properties that meet geographic location criteria. It also has a low down-payment requirement.
- *Arrowhead Economic Opportunity Agency, Inc. (AEOA).* The AEOA promotes homeownership by offering assistance programs that provide down payment and closing cost loans to income-eligible, qualified borrowers.
- *U.S. Department of Agriculture Rural Development.* RD offers programs geared for purchasing or refinancing homes in rural areas. Loan terms are flexible for lower-income borrowers.
- *One Roof Community.* This loan program offers down payment assistance to help homebuyers avoid private mortgage insurance. It has income and owner-occupancy limitations. This program is offered in the city of Duluth, Minnesota, and surrounding communities.
- *Small Business Administration:* SBA loans have flexible underwriting criteria for small businesses and are often extended to businesses that cannot qualify for conventional financing. The bank originates SBA 7(a) and 504 loans.
- *Iron Range Resources and Rehabilitation Board (IRRRB).* The IRRRB loan program is focused on helping start-up and existing businesses retain and grow jobs, expand, and diversify the economy in northeastern Minnesota.
- *Farm Service Agency and Farmer Mac:* FSA loans have flexible underwriting criteria and are often extended to farmers who cannot qualify for conventional financing. Farmer Mac provides flexible lending programs for rural farms and residents.
- *Veterans Affairs Home Loans:* VA home loans help eligible borrowers purchase a home at competitive rates, often without a down payment or mortgage insurance. Cash-out refinance loans allow eligible borrowers to cash out home equity to take care of paying off debt, education financing, or home improvements.
- *Federal Housing Administration Loans:* FHA loans are designed for low- and moderate-income borrowers. These loans typically require a lower down payment and credit score than conventional loans.

During the evaluation period, the bank made 216 loans for \$37.6 million under innovative and flexible home loan programs.<sup>4</sup> These loans are included in the overall volume of loans evaluated under the Lending Test. For state-specific programs, see the state and assessment area sections for more details.

### Community Development Lending

The bank makes a relatively high level of community development loans. The bank originated 50 community development loans totaling \$47.0 million during the evaluation period that benefit its assessment areas. By number of loans, the bank extended 30.0%, 28.0%, and 16.0% of its community development loans in the Minneapolis–St. Paul, Bird Island–Fairfax–Hector, and Duluth assessment areas, respectively.<sup>5</sup> By dollar amount of loans, the bank’s community development lending was highest in the Minneapolis–St. Paul assessment area (36.7%), closely followed by Bird Island–Fairfax–Hector at 29.1%.

<b>Community Development Loans by Assessment Area</b>		
<i>Assessment Area</i>	<b>#</b>	<b>\$</b>
Grand Forks MSA	2	2,399,999
Mankato–New Ulm CSA	1	2,560,500
Minneapolis–St. Paul MSA	15	17,243,950
Duluth MSA	8	5,861,185
St. Cloud MSA	0	0
Ada, MN	0	0
Baxter–Crosslake–Nisswa, MN	0	0
Bird Island–Fairfax–Hector, MN	14	13,691,675
Clinton, MN	0	0
Lonsdale, MN	3	2,626,500
Oslo–Warren, MN	0	0
Pine City, MN	0	0
Luck, WI	7	2,621,695
<b>Total</b>	<b>50</b>	<b>47,005,504</b>

The bank did not make any community development loans in six assessment areas; a few factors contribute to this performance. Community development opportunities are not readily available in some of the rural areas. In both rural and urban markets, the bank may have a smaller presence and/or compete with regional and large financial institutions, which can limit the bank’s ability to secure community development loans.

Because the bank was responsive in meeting the credit and community development needs of its assessment areas, examiners also considered nine community development loans totaling \$12.1 million that benefited areas outside of the bank’s assessment areas. These loans were all in Minnesota with some near the bank’s assessment areas.

### INVESTMENT TEST

The Investment Test rating is high satisfactory because the overall level of qualified investments in the form of securities and donations is significant. The Investment Test ratings for Minnesota, Wisconsin, and the multistate MSA are all high satisfactory. During the evaluation period, qualified investments in the

<sup>4</sup> This total does not include FSA, SBA, or Farmer Mac loans.

<sup>5</sup> These percentages do not factor in community development loans made outside the assessment areas.

form of securities and donations benefiting the bank's assessment areas or larger regional areas including the assessment areas totaled \$18.6 million.

*Investment Securities.* The table below shows the list of qualified investment securities (bonds, mortgage-backed securities, and investment funds) by assessment area or regional and statewide area. The bank made 22 new investments during the evaluation period and continued to hold 31 prior-period investments. Overall, the level of investments shows good responsive to the credit needs and community development needs of the assessment areas. The majority of the bank's investments helped revitalize and stabilize moderate-income and underserved or distressed areas. The bank also made a number of investments that supported affordable housing throughout its assessment areas and in larger regional or statewide areas. Examiners assigned a higher amount of weight to new investments made during the evaluation period as well as to bonds that helped support low- and moderate-income students and neighborhoods.

<b>Qualified Investment Securities by Assessment Area or Regional/Statewide Area</b>		
<i>Area</i>	<i>Securities</i>	
	<i>#</i>	<i>\$</i>
Grand Forks MSA	1	215,000
Mankato–New Ulm CSA	1	174,000
Minneapolis–St. Paul MSA	8	4,571,870
Duluth MSA	4	1,673,468
St. Cloud MSA	1	386,000
Ada, MN	2	240,000
Baxter–Crosslake–Nisswa, MN	2	483,781
Bird Island–Fairfax–Hector, MN	7	1,515,302
Clinton, MN	4	545,912
Lonsdale, MN	1	202,000
Oslo–Warren, MN	3	667,031
Pine City	2	443,152
Luck, WI	3	519,000
Regional/Statewide – MN	5	3,551,447
Regional/Statewide – ND	1	150,000
Multiple States MN-WI	2	517,477
<b>Total</b>	<b>47</b>	<b>15,855,441</b>

In addition to the investments noted above, the bank made a \$2.5 million investment in an economic development loan pool that had a nationwide focus, including some of the bank's assessment areas. The bank also continued to hold a prior period nationwide economic development investment for approximately \$70,000. Since the bank was responsive to the community development needs of its assessment areas, examiners also considered qualified investments in the form of securities that benefited areas outside of the bank's assessment areas. These investments totaled \$1.2 million and helped revitalize or stabilize moderate-income neighborhoods.

*Donations.* The bank made a significant level of qualified investments in the form of donations that directly benefited the bank's assessment areas or larger statewide/regional areas that include the bank's assessment areas. These donations totaled \$275,130, as shown in the table below.

<b>Qualified Investment Donations Benefiting Assessment Areas</b>		
<i>Purpose</i>	#	\$
Affordable Housing	10	5,795
Community Services	235	206,023
Economic Development	27	20,642
Revitalize or Stabilize Low- and Moderate-Income Areas	56	24,727
Revitalize or Stabilize Distressed or Underserved Areas	76	17,943
<b>Total</b>	<b>404</b>	<b>275,130</b>

Donations primarily focus on community services to low- and moderate-income individuals, but also address other initiatives such as job creation and economic growth. The charitable contributions show good responsiveness to community development needs. Additional details are presented in the analysis of each state and full-scope assessment area.

**SERVICE TEST**

The bank’s Service Test rating is high satisfactory based on a high satisfactory rating for Minnesota and low satisfactory ratings for Wisconsin and the multi-state MSA. Given the significantly higher percentage of the bank’s activities in Minnesota, that state received more weight in determining the overall Service Test rating. The bank’s delivery systems are accessible to low- and moderate-income individuals and geographies in the bank’s assessment areas. Branch closures have not adversely affected the accessibility of the bank’s delivery systems. Services do not vary in a way that inconveniences low- or moderate-income areas or individuals throughout the assessment areas. The bank provides a relatively high level of community development services.

**Retail Banking Services**

Delivery systems generally are accessible throughout its assessment areas, and services do not vary in a way that inconveniences low- or moderate-income areas or individuals. The bank provides retail services through its network of branches, drive-up facilities, and ATMs. Hours of operation are reasonable and do not vary widely by branch. During the evaluation period, the bank sold one branch and closed another branch; both locations had ATMs. The bank also removed three ATMs from branch offices and closed two standalone ATMs. One branch closure was in a low-income tract and two ATM closures occurred in moderate-income tracts. The closures generally did not adversely affect residents or low- and moderate-income geographies given the location of other branches and ATMs in those areas.

Of the bank’s 36 branches, 22.2% are in moderate-income tracts, 72.2% are in middle-income tracts, and 5.6% are in upper-income census tracts. For ATMs, 24.0% are in moderate-income tracts, 64.0% are in middle-income tracts, and 12.0% are in upper-income tracts. Tables illustrating the branches and ATMs by tract location can be found in the state sections and in the full-scope assessment area sections. Refer to the Assessment Area Information table on page 3 of the report, the Retail Banking Services in the State of Minnesota section, or the relevant individual assessment area sections for additional information on branching structure changes.

Additional delivery services include online and mobile banking, 24-hour telephone banking, night and remote deposit capture, as well as other retail services so that customers can conduct banking activities outside of normal business hours. The bank offers standardized products and services throughout all the assessment areas with the exception of some state-specific loan programs.

### Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its assessment areas. This conclusion primarily reflects the bank’s performance in Minnesota and the bank’s services in the full-scope Minneapolis–St. Paul MSA and Mankato–New Ulm CSA assessment areas. The conclusion also recognizes the significant level of services in the Duluth MSA. As shown in the table, the bank provided 150 community development services during the evaluation. A small percentage of services had a regional focus that included the bank’s assessment areas. Most bank officers and employees serve as board members or serve on finance committees and other important roles. Many services are split between providing economic development or helping revitalize and stabilize local areas. Other services support organizations that help low- and moderate-income individuals.

<b>Community Development Services Benefiting Assessment Areas</b>	
<i>Purpose</i>	<b>#</b>
Affordable Housing	11
Community Services	38
Economic Development	51
Revitalize or Stabilize	37
Revitalize or Stabilize Distressed or Underserved Areas	13
<b>Total</b>	<b>150</b>

The state and full-scope assessment area sections include more details about the bank’s Service Test performance.

### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act, Regulation C – Home Mortgage Disclosure Act, and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.



## MULTISTATE METROPOLITAN AREA FULL-SCOPE REVIEW

***CRA RATING FOR Grand Forks, North Dakota–Minnesota Multistate MSA:<sup>6</sup> Satisfactory***

***The Lending Test is rated: High Satisfactory***

***The Investment Test is rated: High Satisfactory***

***The Service Test is rated: Low Satisfactory***

Major factors supporting the rating include the following:

- The bank's lending activity in the Grand Forks MSA assessment area shows good responsiveness to credit needs.
- The lending to farms and businesses of different sizes and to low- and moderate-income borrowers is excellent.
- The geographic distribution of loans throughout the assessment area is good.
- The bank made a relatively high level of community development loans.
- The bank uses flexible loan programs.
- The bank has a significant level of qualified investments by number and dollar amount, exhibiting good responsiveness to credit and community development needs.
- Bank retail services are reasonably accessible to farms, businesses, and residents throughout the assessment area, and the bank provides an adequate level of community development services.

### SCOPE OF EVALUATION

The scope of the CRA evaluation for the Grand Forks MSA is consistent with the scope for the overall institution, which is described earlier in the Institution section. The Grand Forks MSA is the bank's only multistate assessment area, and examiners conducted a full-scope review. For interstate institutions, a minimum of one assessment area from each multistate MSA must be reviewed using the full-scope examination procedures. To complete the full-scope review, examiners used the following criteria: lending activity, lending to borrowers of different income levels and businesses/farms of different sizes, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GRAND FORKS MSA

*Bank information.* The bank currently operates two full-service branches with drive-up facilities in the Grand Forks MSA assessment area; one is located in Grand Forks, North Dakota, and the other is located in East Grand Forks, Minnesota. The bank closed its University Village branch and ATM in 2018, also located in Grand Forks. The two branches represent 5.6% of the bank's offices, as of June 30, 2019. Both the Grand Forks and East Grand Forks branches have extended hours and ATMs. The bank currently operates one stand-alone ATM in the assessment area; it closed two others during the evaluation period. See the Service Test section for this assessment area for more details on the bank's retail services.

According to the June 30, 2019, FDIC Deposit Market Share Report, the bank ranks fifth among 20 financial institutions operating in the Grand Forks MSA, with a 7.2% deposit market share and \$200.5 million in deposits. The deposits in this assessment area account for 13.8% of the bank's overall deposits. The bank competes with several local community banks as well as regional banks, large national banks, and credit unions.

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<sup>6</sup>This rating reflects performance within the multi-state metropolitan area. The statewide evaluation of Minnesota does not reflect performance in the parts of the state contained within the multi-state metropolitan area.

*Assessment Area Information.* The bank assessment area includes Grand Forks County in North Dakota and all but one tract of Polk County in Minnesota; together, the two counties compose the Grand Forks MSA. Additionally, the assessment area includes one census tract in Walsh County, North Dakota; this middle-income tract is classified as distressed and is adjacent to the northeastern edge of Grand Forks County. The Grand Forks MSA assessment area is contiguous with the Oslo-Warren and Ada assessment areas in Minnesota. Within the assessment area, the cities of Grand Forks and East Grand Forks are located on either side of the Red River, which separates the two states. The assessment area's 28 census tracts include one low-, four moderate-, 19 middle-, and four upper-income census tracts. The bank has not changed its assessment area since the previous evaluation.

The Combined Demographics Report on the following page provides demographic information for the bank's assessment area, based on the 2019 FFIEC adjusted census data and 2019 D&B data.<sup>7</sup>

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<sup>7</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2018 OMB revised MSA delineations.

## Combined Demographics Report

Assessment Area(s): Grand Forks Multi-State MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.6	275	1.2	99	36.0	4,635	19.6
Moderate-income	4	14.3	3,815	16.2	731	19.2	4,473	19.0
Middle-income	19	67.9	14,590	61.8	1,048	7.2	4,980	21.1
Upper-income	4	14.3	4,918	20.8	100	2.0	9,510	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>28</b>	<b>100.0</b>	<b>23,598</b>	<b>100.0</b>	<b>1,978</b>	<b>8.4</b>	<b>23,598</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	#	%	#	%	
Low-income	1,308	77	0.3	5.9	1,045	79.9	186	14.2
Moderate-income	7,764	2,377	10.4	30.6	4,850	62.5	537	6.9
Middle-income	28,051	15,122	66.0	53.9	10,159	36.2	2,770	9.9
Upper-income	7,142	5,320	23.2	74.5	1,408	19.7	414	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>44,265</b>	<b>22,896</b>	<b>100.0</b>	<b>51.7</b>	<b>17,462</b>	<b>39.4</b>	<b>3,907</b>	<b>8.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	81	1.9	71	1.8	9	2.1	1	1.7
Moderate-income	494	11.3	417	10.8	72	16.6	5	8.5
Middle-income	2,723	62.3	2,461	63.5	216	49.7	46	78.0
Upper-income	1,072	24.5	927	23.9	138	31.7	7	11.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>4,370</b>	<b>100.0</b>	<b>3,876</b>	<b>100.0</b>	<b>435</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.7</b>		<b>10.0</b>		<b>1.4</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	8	1.4	8	1.5	0	0.0	0	0.0
Middle-income	490	87.5	471	87.9	19	79.2	0	0.0
Upper-income	61	10.9	56	10.4	5	20.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>560</b>	<b>100.0</b>	<b>536</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>95.7</b>		<b>4.3</b>		<b>0.0</b>

2019 FFIEC Census Data and 2019 D&B Information

*Income.* For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Grand Forks MSA, for the year of loan origination.<sup>8</sup> The following table shows the estimated median family income for each year and the ranges for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels  
Grand Forks ND-MN, MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2018</b>	<b>\$78,100</b>	0	- \$39,049	\$39,050	- \$62,479	\$62,480	- \$93,719	\$93,720	- & above
<b>2019</b>	<b>\$78,500</b>	0	- \$39,249	\$39,250	- \$62,799	\$62,800	- \$94,199	\$94,200	- & above

For purposes of classifying census tracts by income level, this evaluation relies on FFIEC’s adjusted census data median family income for the Grand Forks MSA, which was \$70,827 for 2018 and 2019.<sup>9</sup>

*Population.* According to 2019 FFIEC adjusted census data, the total population of the assessment area is 98,625. The largest age group of the assessment area population, 47.5%, is 25 to 64 years of age. The remaining age groups are as follows: 21.2% of residents are 17 years and younger, 18.7% are 18 to 24 years of age, and 12.6% are 65 years and older.

*Housing Information.* According to 2019 FFIEC adjusted census data, this assessment area has 44,265 housing units: 51.7% are owner-occupied, 39.5% are rental units, and 8.8% are vacant. The median age of the housing stock across the assessment area is 46 years, which is older than the median housing age of 40 years for both North Dakota and Minnesota. The median housing value is \$153,945, and the affordability ratio is 33.2, which is below the ratio for North Dakota at 37.2 and consistent with the ratio for Minnesota at 33.0. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that overall housing is somewhat less affordable in the assessment area than in other areas of North Dakota.

The housing market is active, and demand generally exceeds supply, according to bank management. New construction of single-family homes was significantly higher in 2018 (254) than in 2019 (140), based on the number of building permits from the Department of Housing and Urban Development (HUD) census data. While prices are increasing over time, bank management stated that the change is modest and noted that housing is more expensive in Grand Forks than East Grand Forks. In 2019, the average sales price was \$240,000 in Grand Forks and \$218,000 in East Grand Forks, according to bank management. While affordably priced homes are available, a significant portion of the smaller, older housing stock was destroyed in the 1997 Red River flood. According to a community contact, the older homes are more affordable for low- and moderate-income borrowers and have a wide price range – around \$55,000 to \$190,000 in 2019 for East Grand Forks.

Both management and contacts discussed the construction of several multifamily rental properties in Grand Forks. As a result of the new construction, one contact explained that owners of the older units could not raise rents as quickly, if at all, which over time makes rents more affordable. Vacancy rates for housing that was available for sale and available for rent were near zero in 2018 but increased to 1.5% and 4.5% in 2019, respectively, according to HUD census data.

<sup>8</sup> As mentioned, the assessment area includes one census tract in Walsh County, which is not part of the MSA. Therefore, for borrowers in Walsh County, the evaluation uses the FFIEC’s estimated median family income for nonmetropolitan areas of North Dakota, which was \$82,900 in 2018 and \$80,200 in 2019.

<sup>9</sup> For the Walsh County census tract, the evaluation uses the FFIEC adjusted census data median family income for nonmetropolitan North Dakota, which was \$74,708 for 2018 and 2019.

*General Economic and Business Characteristics.* The local economy is stable and relatively strong. Both contacts and management said that the economy's diversity insulates it from significant swings. Agriculture is the primary industry in the area and the main products are soybeans, sugar beets, wheat, and potatoes, as well as some corn. Nearly 40% of the national sugar beet crop is produced in the area, according to a contact. Although agricultural prices were down in 2018, yields were average. In 2019, yields were poor due to weather and crops were left in the field, according to contacts and bank management. Government programs helped offset losses. While most farms in the area are independently owned, they continue to grow, according to bank management and a contact. Young farmers have a difficult time purchasing a farm of their own; as a result, families expand existing operations to include the next generation.

Major employers include UND, the Grand Forks AFB, a sugar refining company, an ethanol production facility, a wind turbine blade manufacturer, healthcare providers, local government, and the public-school system. The Grand Forks region is also home to a public and private partnership in the field of unmanned aircraft systems (AUS). The AUS business and aviation park is located near the Grand Forks AFB, and it was the first site to receive regulatory approval to host commercial beyond visual line of sight (BVLOS) flights.

Manufacturing is significant in the area and spans several industries, including wind energy, utilities, aviation, construction, food, and automotive. One contact noted that several businesses in the area had expanded operations and several added new employees. Wages in the area have been increasing due to strong demand for employees, according to a contact. However, a contact noted that the retail industry has struggled as some larger department stores recently closed.

Both contacts and management explained it is common for residents in the area to commute to work, and people will commute up to 50 to 60 miles each way. Most commuters in the area drive from smaller towns in rural areas to Grand Forks. Unemployment in the rural areas is often higher because of their lack of larger industries, according to bank management.

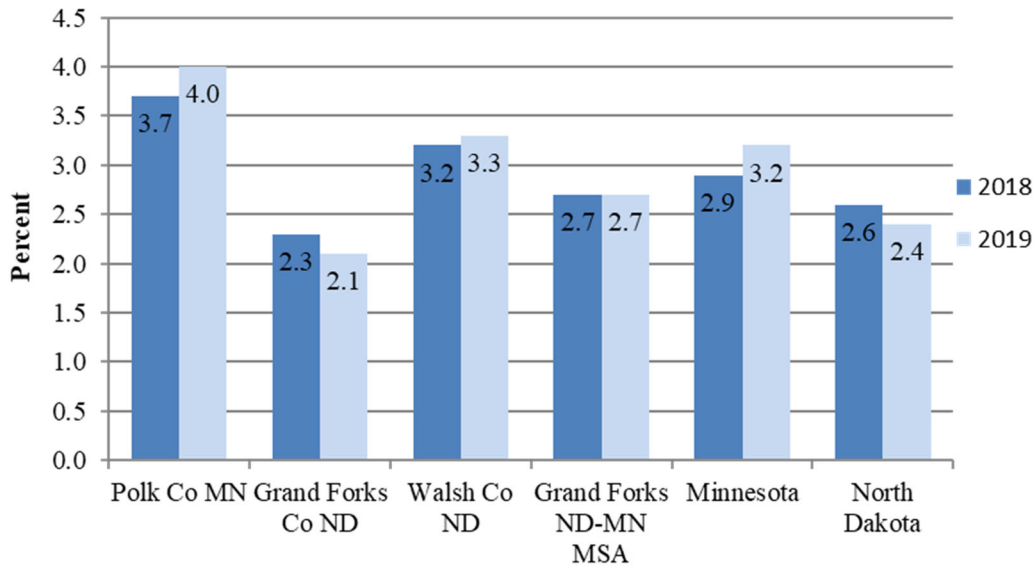
The area has a competitive banking market. Several banks operate in the assessment area, along with credit unions and other lenders. Community contacts did not identify any unmet credit needs in the assessment area.

The Unemployment Rates chart provides the annual average unemployment rate for each county in the Grand Forks MSA and for the states as a whole.<sup>10</sup> As shown, the unemployment rate was consistent in the Grand Forks MSA during the evaluation period, while it increased in Polk and Walsh counties, and decreased in Grand Forks County. For the state of Minnesota, the unemployment rate increased while the rate for North Dakota decreased.

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<sup>10</sup>As mentioned, the assessment area includes one census tract in Walsh County, which is not part of the Grand Forks MSA.

### Unemployment Rates - Grand Forks ND-MN MSA



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND FORKS MSA

The overall CRA rating for the Grand Forks MSA is satisfactory, based on the bank’s performance under the Lending, Investment, and Service Tests.

The Lending Test rating is high satisfactory. Lending activity shows good responsiveness to assessment area credit needs. Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes. The geographic distribution of loans reflects good dispersion throughout the assessment area. The bank made a relatively high level of community development loans and uses flexible loan programs to help meet credit needs. Examiners assigned equal weight to HMDA,<sup>11</sup> small business, and small farm loans, based on both loan volume and dollar amount of loans.

The Investment Test rating is high satisfactory. The bank made a significant level of qualified investments that demonstrate good responsiveness to credit and community development needs.

The Service Test rating is low satisfactory. The bank’s delivery systems are reasonably accessible to the geographies in the assessment area and to low- and moderate-income individuals. The bank’s changes to branches and ATMs generally did not adversely affect the availability of its delivery systems. The bank provides an adequate level of community development services.

### LENDING TEST

The Lending Test rating is high satisfactory for the Grand Forks MSA.

<sup>11</sup> For HMDA loans, examiners did not evaluate the following categories of loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.

## **Lending Activity**

The bank's lending levels reflect good responsiveness to assessment area credit needs. In 2018, the bank ranked seventh of 133 lenders reporting HMDA data, with a 3.5% market share. In 2019, the bank ranked sixth of 148 lenders reporting HMDA data, with a 4.1% market share. For small business and small farm lending, the bank ranked fourth out of 52 lenders who reported CRA data in 2018 and fourth out of 53 lenders in 2019. For small business loans, the bank had a 5.8% market share in 2018 and 5.0% in 2019. For small farm loans, these figures were 12.7% for 2018 and 13.8% for 2019. During the evaluation period, lending activity in the Grand Forks MSA assessment area represents 10.4% by number and 10.2% by dollar amount of the bank's total lending.

## **Distribution by Borrower Income Level and by Size of Businesses and Farms**

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent.

*Residential Real Estate.* The bank's HMDA lending to low- and moderate-income borrowers is excellent. The bank did an excellent job of extending home purchase, refinancing, and home improvement loans to low- and moderate-income borrowers. Examiners did not evaluate the bank's multifamily loans because of limited lending in this product type. The following table shows the bank's HMDA loan data by income level and product type for 2018 and 2019.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Grand Forks Multi-State MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018			2019								
		Count		Dollar			Bank	Agg	Dollar	Count		Dollar						
		#	%	\$ (000s)	\$ %	%				#	%	%	\$ (000s)	\$ %	\$ %	#	%	%
HOME PURCHASE	Low	6	6.7%	\$678	4.1%	19.6%	0	0.0%	8.0%	\$0	0.0%	4.4%	6	12.2%	8.3%	\$678	7.2%	4.7%
	Moderate	24	26.7%	\$3,609	22.1%	19.0%	12	29.3%	23.9%	\$1,742	24.9%	19.1%	12	24.5%	24.0%	\$1,867	20.0%	19.3%
	Middle	25	27.8%	\$4,176	25.5%	21.1%	10	24.4%	22.7%	\$1,476	21.1%	22.9%	15	30.6%	25.0%	\$2,700	28.9%	25.0%
	Upper	30	33.3%	\$6,583	40.3%	40.3%	18	43.9%	32.3%	\$3,504	50.1%	40.9%	12	24.5%	30.7%	\$3,079	32.9%	40.0%
	Unknown	5	5.6%	\$1,303	8.0%	0.0%	1	2.4%	13.0%	\$270	3.9%	12.6%	4	8.2%	11.9%	\$1,033	11.0%	11.1%
	<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>\$16,349</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,357</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	7	8.6%	\$633	5.4%	19.6%	4	12.5%	9.0%	\$456	10.9%	5.0%	3	6.1%	4.8%	\$177	2.4%	2.4%
	Moderate	22	27.2%	\$2,693	23.1%	19.0%	13	40.6%	19.4%	\$1,523	36.4%	15.2%	9	18.4%	15.0%	\$1,170	15.7%	9.7%
	Middle	29	35.8%	\$4,731	40.7%	21.1%	7	21.9%	25.7%	\$1,238	29.6%	24.2%	22	44.9%	21.8%	\$3,493	46.9%	18.6%
	Upper	20	24.7%	\$3,041	26.1%	40.3%	8	25.0%	34.2%	\$967	23.1%	41.8%	12	24.5%	38.5%	\$2,074	27.8%	47.2%
	Unknown	3	3.7%	\$535	4.6%	0.0%	0	0.0%	11.7%	\$0	0.0%	13.7%	3	6.1%	20.0%	\$535	7.2%	22.1%
	<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>\$11,633</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,184</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,449</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	8.3%	\$150	20.2%	19.6%	1	16.7%	6.7%	\$150	45.9%	6.1%	0	0.0%	4.0%	\$0	0.0%	1.9%
	Moderate	6	50.0%	\$386	52.0%	19.0%	3	50.0%	21.7%	\$110	33.6%	19.6%	3	50.0%	18.3%	\$276	66.5%	15.4%
	Middle	1	8.3%	\$30	4.0%	21.1%	1	16.7%	20.6%	\$30	9.2%	19.9%	0	0.0%	30.2%	\$0	0.0%	21.4%
	Upper	4	33.3%	\$176	23.7%	40.3%	1	16.7%	43.9%	\$37	11.3%	46.6%	3	50.0%	43.7%	\$139	33.5%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.2%	\$0	0.0%	7.8%	0	0.0%	4.0%	\$0	0.0%	12.6%
	<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>\$742</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$327</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$415</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	0.7%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	7.5%	\$0	0.0%	2.1%
	Unknown	2	100.0%	\$322	100.0%	0.0%	1	100.0%	100.0%	\$264	100.0%	100.0%	1	100.0%	87.5%	\$58	100.0%	96.8%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$322</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	4.7%	\$0	0.0%	2.2%	0	0.0%	1.1%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	12.9%	\$0	0.0%	10.5%	0	0.0%	12.1%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	28.2%	\$0	0.0%	24.6%	0	0.0%	20.9%	\$0	0.0%	12.9%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	52.9%	\$0	0.0%	58.8%	0	0.0%	59.3%	\$0	0.0%	73.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	4.0%	0	0.0%	6.6%	\$0	0.0%	3.3%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Grand Forks Multi-State MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018			2019								
		Count		Dollar			Bank	Agg	Dollar	Count		Dollar						
		#	%	\$ (000s)	\$ %	%				#	%	%	\$ (000s)	\$ %	\$ %	#	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	6.7%	\$26	5.8%	19.6%	0	0.0%	7.9%	\$0	0.0%	4.0%	1	12.5%	7.6%	\$26	10.3%	4.7%
	Moderate	4	26.7%	\$114	25.3%	19.0%	2	28.6%	15.8%	\$61	30.7%	10.8%	2	25.0%	13.6%	\$53	21.0%	8.8%
	Middle	2	13.3%	\$48	10.6%	21.1%	2	28.6%	21.1%	\$48	24.1%	17.6%	0	0.0%	22.7%	\$0	0.0%	18.4%
	Upper	8	53.3%	\$263	58.3%	40.3%	3	42.9%	47.4%	\$90	45.2%	60.0%	5	62.5%	53.0%	\$173	68.7%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.9%	\$0	0.0%	7.5%	0	0.0%	3.0%	\$0	0.0%	4.6%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$451</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$199</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$252</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	3.2%	\$0	0.0%	2.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	3.2%	\$0	0.0%	5.1%	0	0.0%	5.0%	\$0	0.0%	2.1%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	3.2%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$60	100.0%	0.0%	0	0.0%	90.3%	\$0	0.0%	92.9%	1	100.0%	95.0%	\$60	100.0%	97.9%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	15	7.5%	\$1,487	5.0%	19.6%	5	5.7%	7.9%	\$606	5.1%	4.1%	10	8.8%	6.6%	\$881	5.0%	3.5%
	Moderate	56	27.9%	\$6,802	23.0%	19.0%	30	34.5%	21.4%	\$3,436	28.7%	16.1%	26	22.8%	19.6%	\$3,366	19.1%	14.1%
	Middle	57	28.4%	\$8,985	30.4%	21.1%	20	23.0%	22.9%	\$2,792	23.3%	20.6%	37	32.5%	23.5%	\$6,193	35.2%	20.5%
	Upper	62	30.8%	\$10,063	34.0%	40.3%	30	34.5%	33.9%	\$4,598	38.4%	37.3%	32	28.1%	34.8%	\$5,465	31.1%	39.8%
	Unknown	11	5.5%	\$2,220	7.5%	0.0%	2	2.3%	14.1%	\$534	4.5%	21.9%	9	7.9%	15.6%	\$1,686	9.6%	22.1%
	<b>Total</b>	<b>191</b>	<b>100.0%</b>	<b>\$29,557</b>	<b>100.0%</b>	<b>100.0%</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,966</b>	<b>100.0%</b>	<b>100.0%</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,591</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data



Overall, the bank's HMDA lending exceeds or is consistent with aggregate lenders' performance, except for loans to low-income borrowers in 2018. While the bank's lending to low-income borrowers in both 2018 and 2019 is below demographics, lending to moderate-income borrowers exceeds demographics for both years. According to 2018 and 2019 FFIEC adjusted census data, 19.6% of the families in the assessment area are low income and 19.0% are moderate income.

The bank's level of lending to low- and moderate-income borrowers reflects the general availability of affordable housing in the assessment area, according to bank management and community contacts. In addition, given the bank's small market share of HMDA loans in the assessment area, the bank's performance is notable. The bank competes with many institutions for HMDA loans, including local banks as well as regional and national lenders, several of which are much larger than the bank.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2019 FFIEC estimated family income of \$78,500 for the Grand Forks MSA, an individual with the highest income in the low-income bracket (\$39,249) could afford a \$117,747 home. Using the same assumption for borrowers with the highest income in the moderate-income brackets (\$62,799) a borrower could afford a \$188,397 home. According to 2019 FFIEC adjusted census data, the median housing value in the assessment area is \$153,945. This data suggests that homeownership would not be affordable for many low-income borrowers.

The bank makes use of flexible lending programs to meet the credit needs of low- and moderate-income mortgage borrowers. Programs include down payment and closing cost assistance that helps low- and moderate-income borrowers afford homeownership. In this assessment area, the bank actively uses Fannie Mae's HomeReady mortgage programs and the VA's lending programs. The use of these programs demonstrates a willingness to meet the credit needs of low- and moderate-income borrowers. For more information on these lending programs, refer to the Institution section of this evaluation.

*Small Business.* The distribution of small business loans among businesses of different sizes is good. The following tables show the bank's small business loans by revenue and loan size for the evaluation period.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Grand Forks Multi-State MSA

Product Type	Bank Lending & Demographic Data Comparison 2018, 2019						Bank & Aggregate Lending Comparison											
	Bank				Total Businesses	2018					2019							
	Count		Dollar			Count		Dollar			Count		Dollar					
	#	%	\$ (000s)	\$ %	%	Bank #	Bank %	Agg %	Bank \$ 000s	Bank \$ %	Agg \$ %	Bank #	Bank %	Agg %	Bank \$ 000s	Bank \$ %	Agg \$ %	
Small Business Revenue	\$1 Million or Less	120	62.8%	\$9,428	41.5%	88.7%	64	62.7%	44.9%	\$5,396	40.9%	33.2%	56	62.9%	46.4%	\$4,032	42.4%	31.4%
	Over \$1 Million	69	36.1%	\$13,097	57.7%	10.0%	37	36.3%					32	36.0%				
	Total Rev. available	189	98.9%	\$22,525	99.2%	98.7%	101	99.0%					88	98.9%				
	Rev. Not Known	2	1.0%	\$169	0.7%	1.4%	1	1.0%					1	1.1%				
	Total	191	100.0%	\$22,694	100.0%	100.0%	102	100.0%					89	100.0%				
Small Business Loan Size	\$100,000 or Less	133	69.6%	\$4,973	21.9%		69	67.6%	83.2%	\$2,714	20.6%	22.3%	64	71.9%	82.6%	\$2,259	23.7%	21.3%
	\$100,001 - \$250,000	38	19.9%	\$7,108	31.3%		20	19.6%	8.8%	\$3,660	27.8%	20.2%	18	20.2%	8.8%	\$3,448	36.2%	19.8%
	\$250,001 - \$1 Million	20	10.5%	\$10,613	46.8%		13	12.7%	7.9%	\$6,808	51.6%	57.5%	7	7.9%	8.6%	\$3,805	40.0%	58.9%
	Total	191	100.0%	\$22,694	100.0%		102	100.0%	100.0%	\$13,182	100.0%	100.0%	89	100.0%	100.0%	\$9,512	100.0%	100.0%
Small Business Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	94	78.3%	\$3,017	32.0%													
	\$100,001 - \$250,000	17	14.2%	\$2,941	31.2%													
	\$250,001 - \$1 Million	9	7.5%	\$3,470	36.8%													
	Total	120	100.0%	\$9,428	100.0%													
Small Farm Revenue	\$1 Million or Less	146	82.5%	\$20,966	77.8%	95.7%	68	81.0%	56.1%	\$9,286	70.0%	58.8%	78	83.9%	57.2%	\$11,680	85.5%	61.6%
	Over \$1 Million	25	14.1%	\$5,493	20.4%	4.3%	13	15.5%					12	12.9%				
	Total Rev. available	171	96.6%	\$26,459	98.2%	100.0%	81	96.5%					90	96.8%				
	Not Known	6	3.4%	\$480	1.8%	0.0%	3	3.6%					3	3.2%				
	Total	177	100.0%	\$26,939	100.0%	100.0%	84	100.0%					93	100.0%				
Small Farm Loan Size	\$100,000 or Less	96	54.2%	\$5,230	19.4%		42	50.0%	58.1%	\$2,170	16.3%	14.7%	54	58.1%	61.9%	\$3,060	22.4%	17.6%
	\$100,001 - \$250,000	42	23.7%	\$7,257	26.9%		23	27.4%	22.1%	\$4,087	30.8%	29.6%	19	20.4%	20.4%	\$3,170	23.2%	28.6%
	\$250,001 - \$500,000	39	22.0%	\$14,452	53.6%		19	22.6%	19.8%	\$7,016	52.9%	55.7%	20	21.5%	17.6%	\$7,436	54.4%	53.8%
	Total	177	100.0%	\$26,939	100.0%		84	100.0%	100.0%	\$13,273	100.0%	100.0%	93	100.0%	100.0%	\$13,666	100.0%	100.0%
Small Farm Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	84	57.5%	\$4,409	21.0%													
	\$100,001 - \$250,000	30	20.5%	\$5,057	24.1%													
	\$250,001 - \$500,000	32	21.9%	\$11,500	54.9%													
	Total	146	100.0%	\$20,966	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2019 FFIEC Census Data and 2019 D&B Information

Overall, the bank’s small business lending performance exceeds aggregate lending levels for both 2018 and 2019, although it is below demographics. According to D&B data in 2018 and 2019, 88.7% of businesses in the assessment area have gross annual revenues of \$1 million or less. The bank’s performance is notable given the competition in the assessment area. Despite being one of the leading lenders in the assessment area, two nationally chartered bank and credit card lenders rank ahead of the bank in small business lending (with a combined 43.9% market share).

In addition, the bank makes loans of varying sizes. More than two-thirds of the bank’s small business loans are in amounts of \$100,000 or less in both 2018 and 2019. This indicates a willingness to meet the credit needs of all businesses, especially small businesses, since they tend to request loans in smaller amounts. The bank also makes use of flexible loan programs in this assessment area, which help meet the credit needs of small businesses. In this assessment area, the bank uses SBA 504 and 7(a) loan programs.

*Small Farm.* The distribution of small farm loans among farms of different sizes is excellent. The bank originated a substantial majority of its small farm loans to small farms in 2018 and 2019. As shown in the table, 95.7% of farms in the assessment area had revenues of \$1 million or less.<sup>12</sup> Although the bank’s lending is below demographics, its lending significantly exceeds aggregate lenders for both years.

<sup>12</sup> According to bank management, demographics may overestimate the actual number of small farms in the area; they noted that revenue may not reliably reflect the size of a particular entity’s operations.

The bank exceeded aggregate lender performance despite the many competitors for agricultural loans. The two aggregate lenders that ranked above the bank (one large regional bank and an agricultural equipment lender) capture 65.4% of the market. In addition, a specialized agricultural lender operates in the area and is not included in the aggregate lender data. Given the bank's share of the market (13.8%), its performance is noteworthy.

The bank makes loans of varying sizes. A significant percentage of the bank's small farm loans are for amounts of \$100,000 or less (50.0% in 2018 and 58.1% in 2019). The opportunity to originate small farm loans in amounts of \$100,000 or less continues to decrease; bank management noted that farming operations in the area continue to grow and, as a result, increasingly request larger loan amounts. Originating these loans demonstrates the bank's commitment to serving the credit needs of farms of all sizes in the area.

Finally, the bank uses Farmer Mac and FSA loans in this assessment area, which provide flexibility to lend to small farms that may not otherwise qualify for financing, again meeting the needs of the small farms.

### **Geographic Distribution**

Overall, the geographic distribution and dispersion of the bank's HMDA, small business, and small farm loans in the Grand Forks assessment area is good and does not reveal any unexplained gaps in lending. The assessment area includes one low- and four moderate-income census tracts; most of the census tracts in the assessment area are middle-income.

When evaluating all loan types, the bank made loans throughout this assessment area except for one moderate-income tract in 2018 and 2019. This census tract is in Crookston, Minnesota, which is approximately 30 minutes from Grand Forks, and several financial institutions have offices there.

*Residential Real Estate.* The geographic distribution of the bank's HMDA loans is good. At the loan product level, examiners did not evaluate the bank's multifamily loans because of limited lending for this product type. The following table shows the bank's HMDA data and aggregate lending data by census tract income level and product type for 2018 and 2019.

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Grand Forks Multi-State MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018					2019							
		Count		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	4	4.4%	\$709	4.3%	10.4%	2	4.9%	8.6%	\$389	5.6%	7.0%	2	4.1%	10.6%	\$320	3.4%	8.3%
	Middle	58	64.4%	\$9,405	57.5%	66.0%	27	65.9%	61.1%	\$3,997	57.2%	55.2%	31	63.3%	60.9%	\$5,408	57.8%	55.8%
	Upper	28	31.1%	\$6,235	38.1%	23.2%	12	29.3%	30.0%	\$2,606	37.3%	37.4%	16	32.7%	28.5%	\$3,629	38.8%	35.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>\$16,349</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,357</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	4	4.9%	\$782	6.7%	10.4%	3	9.4%	7.2%	\$616	14.7%	5.3%	1	2.0%	6.1%	\$166	2.2%	4.7%
	Middle	51	63.0%	\$6,744	58.0%	66.0%	20	62.5%	61.7%	\$2,462	58.8%	58.1%	31	63.3%	61.5%	\$4,282	57.5%	55.5%
	Upper	26	32.1%	\$4,107	35.3%	23.2%	9	28.1%	30.6%	\$1,106	26.4%	36.2%	17	34.7%	32.0%	\$3,001	40.3%	39.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>\$11,633</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,184</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,449</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.4%
	Moderate	1	8.3%	\$10	1.3%	10.4%	1	16.7%	11.7%	\$10	3.1%	10.7%	0	0.0%	7.9%	\$0	0.0%	6.4%
	Middle	4	33.3%	\$260	35.0%	66.0%	2	33.3%	60.6%	\$185	56.6%	57.1%	2	33.3%	61.9%	\$75	18.1%	50.9%
	Upper	7	58.3%	\$472	63.6%	23.2%	3	50.0%	27.8%	\$132	40.4%	32.2%	4	66.7%	29.4%	\$340	81.9%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>\$742</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$327</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$415</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	7.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$58	18.0%	29.7%	0	0.0%	15.0%	\$0	0.0%	34.8%	1	100.0%	15.0%	\$58	100.0%	15.6%
	Middle	1	50.0%	\$264	82.0%	53.2%	1	100.0%	75.0%	\$264	100.0%	56.2%	0	0.0%	85.0%	\$0	0.0%	84.4%
	Upper	0	0.0%	\$0	0.0%	9.7%	0	0.0%	10.0%	\$0	0.0%	8.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$322</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58</b>	<b>100.0%</b>	<b>100.0%</b>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	9.4%	\$0	0.0%	10.4%	0	0.0%	7.7%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	56.5%	\$0	0.0%	55.7%	0	0.0%	61.5%	\$0	0.0%	60.1%
	Upper	0	0.0%	\$0	0.0%	23.2%	0	0.0%	34.1%	\$0	0.0%	33.9%	0	0.0%	30.8%	\$0	0.0%	34.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Grand Forks Multi-State MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018					2019							
		Count		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	2.6%	\$0	0.0%	6.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	6.7%	\$40	8.9%	10.4%	1	14.3%	3.9%	\$40	20.1%	1.7%	0	0.0%	13.6%	\$0	0.0%	9.1%
	Middle	10	66.7%	\$307	68.1%	66.0%	5	71.4%	55.3%	\$134	67.3%	46.1%	5	62.5%	60.6%	\$173	68.7%	66.2%
	Upper	4	26.7%	\$104	23.1%	23.2%	1	14.3%	38.2%	\$25	12.6%	45.4%	3	37.5%	25.8%	\$79	31.3%	24.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$451</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$199</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$252</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	16.1%	\$0	0.0%	26.9%	0	0.0%	15.0%	\$0	0.0%	20.3%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	74.2%	\$0	0.0%	62.0%	0	0.0%	45.0%	\$0	0.0%	35.3%
	Upper	1	100.0%	\$60	100.0%	23.2%	0	0.0%	9.7%	\$0	0.0%	11.1%	1	100.0%	40.0%	\$60	100.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Moderate	11	5.5%	\$1,599	5.4%	10.4%	7	8.0%	8.5%	\$1,055	8.8%	9.6%	4	3.5%	9.0%	\$544	3.1%	7.7%
	Middle	124	61.7%	\$16,980	57.4%	66.0%	55	63.2%	61.3%	\$7,042	58.9%	56.0%	69	60.5%	61.4%	\$9,938	56.5%	58.0%
	Upper	66	32.8%	\$10,978	37.1%	23.2%	25	28.7%	29.8%	\$3,869	32.3%	34.0%	41	36.0%	29.4%	\$7,109	40.4%	34.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>201</b>	<b>100.0%</b>	<b>\$29,557</b>	<b>100.0%</b>	<b>100.0%</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,966</b>	<b>100.0%</b>	<b>100.0%</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,591</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

The bank did not make any HMDA loans in the low-income tract in either 2018 or 2019, which is reasonable given that only 1.2% of families and 0.3% of the owner-occupied units in the assessment area are located here, according to 2019 FFIEC adjusted census data. The same data shows that most housing units are rental units (79.9%) or vacant (14.2%) in the low-income tract. Similarly, aggregate lenders report only 0.4% of loans in the low-income tract for 2018 and 0.2% for 2019. UND is in the low-income tract, and most of the housing is rental units for students.

The bank made HMDA loans in all but two moderate-income tracts during the evaluation period. For 2019, the bank’s HMDA lending in moderate-income tracts is below aggregate lenders and below demographics. In 2018, the bank’s level of lending compares more favorably to aggregate lenders but is also below demographics. The bank’s record of lending in the moderate-income tracts is reasonable. According to 2019 FFIEC adjusted census data, 16.2% of families resided in moderate-income tracts and 10.4% of owner-occupied units are in these tracts. Of the housing units in the moderate-income tracts, 30.6% are owner-occupied. These factors limit the bank’s opportunity to make HMDA loans in moderate-income tracts.

The assessment area includes four moderate-income census tracts. The bank’s lending in the moderate-income tracts generally reflects their demographic characteristics. The moderate-income census tracts in Grand Forks include industrial and commercial areas with few housing units. These tracts include the shopping mall and the Grand Forks AFB. There is limited opportunity to lend near the AFB because the base provides housing for staff. The moderate-income census tract in Crookston, Minnesota, is located 25 miles east of Grand Forks. The estimated 2019 population of Crookston according to the U.S. Census is 7,764, and at least three banks and a credit union have offices in Crookston. Bank management stated that given both the distance and the competition, the bank’s opportunity to lend in Crookston is limited.

*Small Business.* The geographic distribution of small business loans is good. The following table shows the bank’s 2018 and 2019 small business and small farm loans by income level of census tract. The table also includes aggregate lending data for comparison.

**Geographic Distribution of Small Business & Small Farm Loans**

Assessment Area: Grand Forks Multi-State MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Count		Bank Dollar		Total Businesses	2018			2019			2019					
		#	%	\$ (000s)	\$ %		%	Count		Dollar		%	Count		Dollar			
						Bank		Agg	Bank	Agg	Bank		Agg	Bank	Agg			
						#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
SMALL BUSINESSES	Low	3	1.6%	\$550	2.4%	1.9%	2	2.0%	1.2%	\$450	3.4%	0.9%	1	1.1%	1.1%	\$100	1.1%	0.5%
	Moderate	21	11.0%	\$3,762	16.6%	11.3%	11	10.8%	12.6%	\$2,314	17.6%	14.3%	10	11.2%	13.2%	\$1,448	15.2%	13.7%
	Middle	119	62.3%	\$11,608	51.2%	62.3%	64	62.7%	57.4%	\$6,197	47.0%	47.7%	55	61.8%	53.2%	\$5,411	56.9%	44.5%
	Upper	48	25.1%	\$6,774	29.8%	24.5%	25	24.5%	27.8%	\$4,221	32.0%	36.6%	23	25.8%	30.5%	\$2,553	26.8%	40.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.4%	0	0.0%	2.1%	\$0	0.0%	0.4%
	<b>Total</b>	<b>191</b>	<b>100.0%</b>	<b>\$22,694</b>	<b>100.0%</b>	<b>100.0%</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,182</b>	<b>100.0%</b>	<b>100.0%</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,512</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM	<b>Total Farms</b>																	
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	0.6%	\$25	0.1%	1.4%	0	0.0%	2.0%	\$0	0.0%	1.1%	1	1.1%	2.4%	\$25	0.2%	2.1%
	Middle	145	81.9%	\$24,153	89.7%	87.5%	71	84.5%	80.8%	\$11,879	89.5%	84.1%	74	79.6%	81.6%	\$12,274	89.8%	82.8%
	Upper	31	17.5%	\$2,761	10.2%	10.9%	13	15.5%	16.9%	\$1,394	10.5%	14.7%	18	19.4%	15.4%	\$1,367	10.0%	15.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.0%
<b>Total</b>	<b>177</b>	<b>100.0%</b>	<b>\$26,939</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,666</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases

2019 FFIEC Census Data and 2019 D&B Information

In both 2018 and 2019, the bank's record of small business lending is consistent with demographics and aggregate lender performance in the low- and moderate-income census tracts. D&B data for 2018 and 2019 indicate 1.9% of total businesses are in the low-income census tract while 11.3% of small businesses are in the moderate-income census tract.

During the evaluation period, the bank originated small business loans in all census tracts in the assessment area except for one moderate-income tract that contains Crookston, Minnesota and one middle-income census tract in downtown Grand Forks. As noted, the bank's opportunity to lend in Crookston is limited due to its distance from the bank's branches and the number of financial institutions with offices in Crookston. In addition, bank management stated that there is significant competition in the assessment area for small business loans.

Overall, the bank's geographic distribution and dispersion of small business loans is good given loan demand, the competitive lending environment, office locations, and assessment area characteristics.

*Small Farm.* The geographic distribution of small farm loans is adequate. In 2018, the bank did not originate small farm loans in the low- and moderate-income tracts. Comparably, aggregate lenders did not originate small farm loans in the low-income tract and originated only 2.0% of small farm loans in the moderate-income tracts. The bank's performance is generally consistent with 2018 and 2019 D&B demographic data showing that virtually no farms are in the low-income tract (0.2%) and few are located in the moderate-income tracts (1.4%).

Similarly, in 2019, the bank did not originate small farm loans in the low-income tract but did originate 2.0% of its small farm loans in the moderate-income tracts. The bank's performance in 2019 is comparable to aggregate lender performance and to demographics.

The bank's performance reflects the assessment area characteristics. The low-income tract is in downtown Grand Forks and includes the UND campus. Two of the four moderate-income tracts are also in downtown Grand Forks, where few, if any, farms are located. The third moderate-income census tract consists of the Grand Forks AFB, and the fourth moderate-income census tract is comprised of the city of Crookston, which as mentioned has its own financial institutions that are more conveniently located for residents. The bank's opportunity to make small farm loans in the low- and moderate-income census tracts is limited. In addition, the bank did not originate loans in most of the middle-income census tracts in downtown Grand Forks, which is reasonable given the lack of opportunities to originate small farm loans in those areas.

### **Community Development Loans**

The bank made a relatively high level of community development loans in the Grand Forks MSA assessment area. During the evaluation period, the bank made two community development loans totaling \$2.4 million. Both loans were part of an SBA 504 project with an economic development purpose. The loans funded a business that expanded its operations and created jobs in the assessment area. The bank competes for community development loans with several other financial institutions, including large national and regional banks that operate in the area. The bank's community development lending reflects good responsiveness to community needs.

### **INVESTMENT TEST**

The bank's investment test rating for the Grand Forks MSA is high satisfactory. The bank made a significant level of qualified investments in the Grand Forks MSA assessment area, showing good responsiveness to area needs. The bank makes occasional use of innovative investments to support community development initiatives.

form of securities is adequate. The bank continues to hold one prior-period bond in the amount of \$215,000, which benefits a regional area that includes the assessment area. The bank also holds a prior-period \$150,000 state housing agency bond that supports affordable housing in the state of North Dakota. The bank did not purchase any new securities in the Grand Forks MSA assessment area during the evaluation period. The bank faces strong competition for qualified investments, and investment opportunities are limited according to bank management.

*Donations.* The bank’s level of qualified investments in the form of donations is excellent, totaling \$57,839, during the evaluation period. As shown in the Qualified Investment Donations table, the bank’s donations primarily support community services to low- and moderate-income individuals. Organizations that provide health care, early childhood education, food, and shelter for low- and moderate-income individuals were among the recipients of the bank’s largest donations.

<b>Qualified Investment Donations Grand Forks MSA Assessment Area</b>		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Affordable Housing	1	725
Community Services	44	53,614
Economic Development	3	3,000
Revitalize or Stabilize	2	500
<b>Total</b>	<b>50</b>	<b>57,839</b>

**SERVICE TEST**

The Service Test rating is low satisfactory for the Grand Forks MSA. Delivery systems are reasonably accessible to residents, businesses, and farms throughout the assessment area. Services and hours do not vary in a way that inconveniences certain individuals or areas. The bank closed a branch with an ATM and two stand-alone ATMs during the evaluation period. The bank provides an adequate level of community development services.

**Retail Services**

The bank’s delivery systems are reasonably accessible in the assessment area, and services do not vary in a way that inconvenience low- and moderate-income areas or individuals. The bank’s record of opening and closing branches generally did not adversely affect the accessibility of its delivery systems to low- and moderate-income geographies or individuals. During the evaluation period, the bank operated two branches in Grand Forks and one branch in East Grand Forks. The bank closed its limited service, University Village branch in 2018. The remaining two branches operate drive-up facilities and cash-dispensing only ATMs. The bank also currently operates one stand-alone ATM in the assessment area; it closed two other ATMs during the evaluation period; none are deposit-taking.

The Grand Forks Main branch is in a middle-income tract; however, the adjacent moderate-income tract is across the street. The Grand Forks Main branch is approximately two miles from the low-income tract, and the East Grand Forks branch is approximately three miles away. The Grand Forks University Village branch (now closed) was in the low-income tract.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank provides reasonable service hours and reasonable means for customers to complete many types of banking activities outside of normal service hours. The following table shows the geographic distribution of the bank’s branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS  
Assessment Area: Grand Forks Multi-State MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	1	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	1	1	3.6%	2.8%	1.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	1	4	14.3%	17.9%	11.3%
DTO	0		0	0				SA	0		0		0	0	0		0	1				
Middle	2	100.0%	0	0	2	2	2	Total	3	100.0%	0	0.0%	0	0	3	100.0%	0	0	19	67.9%	62.6%	62.3%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	1	4	14.3%	16.7%	24.5%
DTO	0		0	0				SA	0		0		0	0	0		0	1				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	2	100.0%	0	1	2	2	2	Total	3	100.0%	0	0.0%	0	0	3	100.0%	0	3	28	100.0%	100.0%	100.0%
DTO	0		0	0				SA	1		0		0	0	1		0	2				

2019 FFIEC Census Data, 2019 D&B Inf 2010 ACS Data  
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
 DTO - Drive thru only is a subset of total branches  
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides an adequate level of community development services in the Grand Forks MSA assessment area. Five bank employees provided community development services for four organizations during the evaluation period. A bank employee served on the board of an affordable housing organization. Other community development services included participating on the board of directors of an organization that provides care to low- and moderate-income individuals and providing financial education to low- and moderate-income children.



## MINNESOTA

### ***CRA RATING FOR Minnesota: Satisfactory***

***The Lending Test is rated: High Satisfactory***

***The Investment Test is rated: High Satisfactory***

***The Service Test is rated: High Satisfactory***

Major factors supporting the rating include the following:

- The bank's lending activity in the Minnesota assessment areas shows good responsiveness to local credit needs.
- The lending to farms and businesses of different sizes and to low- and moderate-income borrowers is excellent.
- Overall, the geographic distribution of loans throughout the assessment areas is good.
- The bank makes a relatively high level of community development loans.
- The bank uses flexible loan programs in its Minnesota assessment areas.
- By number and dollar amount, the bank has a significant level of qualified investments, which exhibit good responsiveness to credit and community development needs.
- Bank retail services are accessible to businesses, farms, and residents throughout the assessment areas. The bank also provides a relatively high level of community development services in its Minnesota assessment areas.

### **SCOPE OF EVALUATION**

The scope of the CRA evaluation for Minnesota is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Mankato–New Ulm CSA, the Minneapolis–St. Paul MSA, and the Clinton assessment areas. Examiners weighted the Minneapolis–St. Paul MSA slightly more than the Mankato–New Ulm CSA based on loan volume. The Clinton assessment area received less weight based on loan volume.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Duluth MSA, St. Cloud MSA, Ada, Baxter–Crosslake–Nisswa, Bird Island–Fairfax–Hector, Lonsdale, Oslo–Warren, and Pine City assessment areas in Minnesota. Examiners evaluated whether the bank's performance in the limited scope assessment areas was consistent with its performance in the full-scope assessment areas. The limited-scope MSA assessment areas are compared against metropolitan full-scope assessment areas. Similarly, nonmetropolitan limited-scope assessment areas are compared to nonmetropolitan full-scope assessment area.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MINNESOTA**

*Assessment Area Information.* During the evaluation period, the bank had 11 assessment areas in Minnesota. There have been no changes to the Minnesota assessment areas since the previous evaluation.

According to the June 30, 2019, FDIC Market Share Report, the bank ranks 16th among the 339 FDIC-insured institutions in Minnesota, with 0.5% of the state's deposits. Two large national banks have 32.2% and 29.7% of deposit market share in Minnesota. The bank has \$1.2 billion in deposits in its Minnesota

assessment areas, which represent 82.3% of the bank's total deposits. The bank operates in a competitive environment and many assessment areas have several large national and regional banks.

Based on 2019 FFIEC adjusted census data, the Minnesota assessment areas include 887 census tracts: 62 low-, 192 moderate-, 419 middle-, 207 upper-, and 7 unknown-income census tracts.<sup>13</sup> The unknown tracts are in the Minneapolis-St. Paul MSA assessment area. These tracts include the Minneapolis-St. Paul International airport, Fort Snelling, an interstate tunnel corridor, a university, correctional facilities, and state parkland. As of 2019, nine census tracts in nonmetropolitan areas are classified as underserved and six are classified as distressed. In 2018, six census tracts in nonmetropolitan areas were classified as underserved, six as distressed, and three as distressed and underserved.

Some of the Minnesota assessment areas include American Indian reservations. The Shakopee Mdewakanton Sioux Community is in Scott County. A small portion of the Prairie Island Community's trust land is in Dakota County. The Fond du Lac Band and a small portion of the Bois Forte reservations are in the Duluth MSA. The Baxter-Crosslake-Nisswa and Pine City assessment areas include small portions of Mille Lacs Band of Ojibwe trust land.

*Population.* According to 2019 FFIEC adjusted census data, the total population of the assessment areas in Minnesota is 3,600,873, which represents 66.4% of the state's population (5,419,171). The data also shows that 78.2% of families reside in middle- and upper-income census tracts and that 10.8% of households are below the poverty level.

*General Economic and Housing Characteristics.* Bank management and community contacts stated the economic conditions in the Minnesota assessment areas were generally stable and there was some economic growth. The state's not seasonally adjusted unemployment rate was 2.9% in 2018 and 3.2% in 2019. The national unemployment rate was low in 2019, at 3.5%. Commercial expansion occurred at a greater rate in urban metropolitan areas compared to rural nonmetropolitan areas. Agriculture is a prominent industry in Minnesota. Farms produce mostly crops; not many dairy operators are in the bank's assessment areas. Weather and low commodity prices hindered agricultural producers during the evaluation period.

The housing market in Minnesota varies by region. In some areas, the housing market was active and housing stock sold quickly. Construction costs increased in 2019, which slowed development of new homes. Apartment complexes in some communities offer voucher programs to assist low- and moderate-income renters.

According to 2019 FFIEC census data, 64.1% of housing in the Minnesota assessment areas was owner-occupied, 28.7% was rental, and 7.2% was vacant. The median housing value was \$202,679 for Minnesota assessment areas; the lowest was \$83,200 in Norman County and the highest median housing value was \$247,600 in Scott County. The median age of housing stock in Minnesota assessment areas was 46; it was the lowest in Scott County at 21 and the highest at 58 in Renville and Sibley counties.

Numerous financial institutions are in Minnesota. Many large national and regional banks as well as community bank and credit unions operate in the state. Competition for deposits, loans, and community development activities is strong in various regions and assessment areas.

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<sup>13</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2018 OMB-revised MSA delineations.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

Examiners based the bank's Minnesota evaluation on full-scope reviews of the Mankato–New Ulm CSA, the Minneapolis–St. Paul MSA, and the Clinton assessment areas and limited-scope reviews of the remaining Minnesota assessment areas. A detailed discussion of the bank's performance in the full-scope assessment areas and a shorter discussion of the limited-review assessment areas follow this section. For the limited-scope assessment areas, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Minnesota is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests.

The Lending Test rating is high satisfactory. The bank's lending activity reflects good responsiveness to credit needs throughout the Minnesota assessment areas. Overall, the bank's distribution of HMDA, small business and small farm loans by income and revenue size of borrowers is excellent. The geographic distribution of loans is good. The bank made a relatively high level of community development loans and uses flexible loan programs in many assessment areas.

The Investment Test rating is high satisfactory. The bank made a significant level of qualified investments by number and dollar amount, which shows good responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. Delivery systems are accessible to all portions of the Minnesota assessment areas as well as low- and moderate-income individuals. The bank's changes to branches and ATMs generally did not adversely affect the availability of its delivery systems. The bank provides a relatively high level of community development services. Bank employees supported organizations that are dedicated to community development initiatives.

### LENDING TEST

The Lending Test rating is high satisfactory for Minnesota.

#### Lending Activity

The bank's lending activity reflects good responsiveness to credit needs in its Minnesota assessment areas. The table below shows the bank's lending in its Minnesota assessment areas by product type for the two-year evaluation period.

<b>Statewide Summary of Lending Activity Assessment Areas Located in MN 2018 and 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
HMDA Home Purchase	865	18.4%	\$161,313	23.7%
HMDA Refinance	471	10.0%	\$86,396	12.7%
HMDA Home Improvement	66	1.4%	\$3,724	0.5%
HMDA Multi-Family	18	0.4%	\$17,547	2.6%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	69	1.5%	\$4,876	0.7%
HMDA Loan Purpose NA	0	0.0%	\$0	0.0%
<b>Total HMDA</b>	<b>1,489</b>	<b>31.7%</b>	<b>\$273,856</b>	<b>40.2%</b>
<b>Total Small Business</b>	<b>1,889</b>	<b>40.2%</b>	<b>\$252,782</b>	<b>37.1%</b>
<b>Total Farm</b>	<b>1,323</b>	<b>28.1%</b>	<b>\$155,293</b>	<b>22.8%</b>
<b>TOTAL LOANS</b>	<b>4,701</b>	<b>100.0%</b>	<b>\$681,931</b>	<b>100.0%</b>

Originations and Purchases

The Minnesota assessment areas account for 86.1% by number and 87.5% by amount of the bank’s lending activity during the evaluation period. In all but one assessment area, the bank was among the top 10 lenders for HMDA, small business, and small farm loans. The bank also makes use of flexible loan programs, particularly for home mortgage loans to low- and moderate-income borrowers. Refer to the Innovative and Flexible Lending Practices describes previously in the Institution section for specific program information.

### **Borrower and Geographic Distributions**

Overall, the bank’s distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to low- and moderate-income borrowers and to small businesses and small farms throughout the assessment areas. In addition, the geographic distribution and dispersion of loans is good and does not reveal any unexplained gaps or patterns.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Mankato–New Ulm CSA, the Minneapolis–St. Paul MSA, and the Clinton assessment areas. The tables in Appendix D show the borrower and geographic distributions of the bank’s loans, demographic characteristics, and aggregate lending data for the limited-scope assessment areas.

### Community Development Loans

The bank makes a relatively high level of community development loans in the Minnesota assessment areas. As shown in the table at right, the bank originated or renewed 41 community development loans totaling approximately \$42.0 million. Community development loans were not made in all assessment areas. Heavy concentrations occurred in two assessment areas. By number and dollar amount, respectively, the concentrations were: 36.6% and 41.1% in the Minneapolis–St. Paul MSA assessment area, and 34.1% and 32.6% in the Bird Island-Fairfax-Hector assessment area.

<b>Minnesota Community Development Loans</b>		
<i>Purpose</i>	<b>#</b>	<b>\$</b>
Affordable Housing	4	801,600
Community Service	9	2,091,934
Economic Development	11	16,029,650
Revitalize or Stabilize	6	10,455,450
Revitalize or Stabilize Distressed or Underserved areas	11	12,605,175
<b>Total</b>	<b>41</b>	<b>41,983,809</b>

Most community development loan dollars (54.9%) supported a variety of revitalization and stabilization efforts. Several loans supported economic development efforts and provided funding for community services in the assessment areas. The level of community development lending is responsive to the needs of the assessment areas.

Because the bank’s community development lending activities were responsive in its Minnesota assessment areas, examiners can also consider any qualified community development loans benefitting geographies outside the bank’s assessment areas. The bank originated nine loans totaling \$12.1 million that were outside the Minnesota assessment areas. These loans promoted economic development initiatives and revitalized and stabilized low- and moderate-income, distressed, or underserved areas. Some of these loans occurred in counties adjacent to the bank’s assessment area or between two Minnesota assessment areas. The table above does not include these loans.

### INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Minnesota. The bank has a significant level of qualified investments in the form of securities and donations that show good responsiveness to credit and community development needs.

During the evaluation period, the bank held 40 qualified investments totaling approximately \$14.5 million that directly benefit its Minnesota assessment areas, or broader regional or statewide areas that include the assessment areas. These investments include \$5.4 million in new investments and \$9.0 million in prior-period investments. The new investments support affordable housing initiatives, community services for low- and moderate-income people, and revitalization/stabilization efforts in low- and moderate-income areas.

Because the bank’s investments activities address community development needs in its Minnesota assessment areas, examiners also considered the bank’s qualified investments that are outside of its Minnesota assessment areas. The bank purchased three qualified investments totaling \$1.2 million that benefited areas outside of the bank’s Minnesota assessment areas. These investments support revitalization and stabilization efforts.

*Donations.* The bank made a significant level of donations during the evaluation period. The bank made \$204,376 in donations that directly benefit its assessment areas and \$5,716 that benefit regional areas of Minnesota that include the bank’s assessment areas. The following table shows the distribution of donations by assessment area and at the regional/statewide level.

<b>Minnesota Qualified Investment Donations</b>		
<i>Assessment Area</i>	<b>Bank</b>	
	<b>#</b>	<b>\$</b>
Duluth MSA	59	67,279
Mankato–New Ulm CSA	29	42,895
Minneapolis–St. Paul MSA	83	40,815
St. Cloud MSA	11	6,146
Ada	15	5,156
Baxter–Crosslake–Nisswa	22	11,360
Bird Island–Fairfax–Hector	41	9,382
Clinton	16	5,618
Lonsdale	11	7,150
Pine City	12	4,450
Oslo–Warren	23	4,125
Regional/Statewide Minnesota	18	5,716
<b>Total</b>	<b>340</b>	<b>210,092</b>

By number, the bank made most donations in the Minneapolis–St. Paul assessment area. By dollar amount, the bank made most donations in the Duluth MSA assessment area, followed by the Mankato–New Ulm CSA and the Minneapolis–St. Paul assessment areas. Overall, most of the donations were made to organizations that provide community services to low- and moderate-income individuals. The bank supported food shelves, health and social services and education facilities that target low- and moderate-income individuals. Many donations also went to revitalization and stabilization efforts that help retain businesses and residents located in communities with low- and moderate income, distressed, and underserved census tracts.

### **SERVICE TEST**

The Service Test rating is high satisfactory for Minnesota. Delivery systems are accessible to all portions of the Minnesota assessment areas. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences certain people or areas. Finally, the bank provides a relatively high level of community development services in the Minnesota assessment areas.

### **Retail Banking Services**

The bank’s delivery systems are accessible to residents, businesses, and farms throughout the Minnesota assessment areas. The bank closed some branches and ATMs during the evaluation period and currently operates 33 offices, 29 drive-up facilities, and 21 ATMs in the state. The following tables show the bank’s distribution of branches, drive-up facilities, and ATMs as of 2019.

Geographic Distribution of Branches & ATMS																						
Assessment Area: Assessment Group(s): MN 2019																						
Tract Category	Branches							ATMs								Demographics						
	Total Branches		Drive thrus	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs		Cash only ATMs				Census Tracts		House holds	Total Businesses					
	#	%				Open	Closed	#	%	#	%	Open	Closed	#	%			Open	Closed	#	%	
Low	0	0.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	62	7.0%	5.3%	4.8%	
DTO	0		0	0					0	0	0	0	0	0	0	0	0					
Moderate	8	24.2%	1	0	7	2	4	Total	6	28.6%	0	0.0%	0	0	6	28.6%	0	1	192	21.6%	20.1%	17.3%
DTO	0		0	0				SA	2		0		0	0	2		0	0				
Middle	23	69.7%	0	1	20	10	12	Total	12	57.1%	0	0.0%	0	0	12	57.1%	0	3	419	47.2%	48.1%	48.3%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Upper	2	6.1%	0	0	2	1	2	Total	3	14.3%	0	0.0%	0	0	3	14.3%	0	0	207	23.3%	26.2%	29.4%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	7	0.8%	0.3%	0.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	33	100.0%	1	1	29	13	18	Total	21	100.0%	0	0.0%	0	0	21	100.0%	0	4	887	100.0%	100.0%	100.0%
DTO	0		0	0				SA	4		0		0	0	4		0	0				

2019 FFIEC Census Data, 2019 D&B Int 2010 ACS Data  
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
 DTO - Drive thru only is a subset of total branches  
 SA = Stand Alone ATM is a subset of total ATMs

As shown in the table, the bank has 24.2% of its branches and 28.6% of its ATMs in moderate-income census tracts. These percentages compare well to demographics, given that 21.6% of all census tracts are moderate-income tracts. No branches or ATMs are in low-income census tracts. This is reasonable because the low-income tracts are in Hennepin and Ramsey counties where the bank has no branch offices. However, some retail services are available through online, mobile, and telephone banking. According to the June 30, 2019, FDIC Deposit Market Share report, there are 82 financial institutions with 366 offices located in these two counties.

The bank made changes to its branches and ATMs since the previous examination. The bank sold one branch (and ATM) in the city of Hastings that was in a middle-income tract. The bank also removed an ATM in Lakeville and one in Cloquet, both were in middle-income tracts. Finally, the bank removed an ATM in Forest Lake that was in a moderate-income tract. The branch and ATM closures did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals or geographies.

The bank offers the same products and services at each of its Minnesota locations. Many branches with drive-up facilities have Saturday and extended hours. Hours of operation at each branch are reasonable and do not vary in a way that inconveniences individual or areas. Additional delivery services include online and mobile banking, 24-hour telephone banking, night, and remote deposit capture as well as other retail services so that customers can conduct banking activities outside of normal business hours.

### Community Development Services

The bank provides a relatively high level of community development services in the Minnesota assessment areas. This rating primarily reflects the bank’s performance in the full-scope assessment areas but also recognizes the level of services in the other Minnesota assessment areas. The bank engaged in community development services in all its Minnesota assessment areas. Most of the services (32.4%) were in the Minneapolis–St. Paul MSA. The table below shows the distribution of community development services by type of activity and assessment area.

<b>Minnesota Community Development Services</b>					
<i>Assessment Area</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Revitalize and Stabilize</i>	<i>Total</i>
Duluth MSA	0	8	4	4	16
Mankato–New Ulm CSA	5	6	6	0	17
Minneapolis–St. Paul MSA	2	8	6	29	45
St. Cloud MSA	0	0	4	0	4
Ada	0	0	2	6	8
Baxter–Crosslake–Nisswa	0	0	2	0	2
Bird Island–Fairfax–Hector	0	0	5	6	11
Clinton	0	0	0	1	1
Lonsdale	0	4	2	0	6
Pine City	0	2	10	2	14
Oslo–Warren	2	0	0	0	2
Regional/Statewide Minnesota	0	3	8	2	13
<b>Totals</b>	<b>9</b>	<b>31</b>	<b>49</b>	<b>50</b>	<b>139</b>

Numerous employees provided their financial expertise and time to organizations that helped revitalize and stabilize low- and moderate-income, distressed, and underserved areas of Minnesota as well as organizations that support economic development initiatives. Employees also provided their talents to organizations that provide educational, health, and social services geared towards low- and moderate-income individuals. The majority provide leadership roles by serving as board members and some provide financial education to low- and moderate-income children. The services are responsive to the needs of the assessment areas. Based on 2019 FFIEC adjusted census data, 24.0% and 16.1% of households in the Minnesota assessment areas are low- and moderate-income levels, respectively; 10.7% are below poverty levels.



## MINNESOTA METROPOLITAN AREA FULL-SCOPE REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MINNESOTA-WISCONSIN MSA

*Bank Information.* The bank operated seven full-service branches and closed one branch and two ATMs during the evaluation period in the Minneapolis–St. Paul-Bloomington MN-WI MSA (Minneapolis-St. Paul MSA) assessment area. All offices have drive-up facilities; all except two, have cash-dispensing-only ATMs. The bank also operates one cash dispensing-only ATM at a retail service station. By number, the bank has 16.7% of branch offices in this assessment area. See the Retail Services Test section for more details.

According to the June 30, 2019, FDIC Deposit Market Share Report, the bank ranked 29th among 121 FDIC-insured institutions operating in the following counties in the Minneapolis-St. Paul MSA: Anoka, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Ramsey, Scott, Waseca, and Washington, with a 0.2% deposit market share and \$285.7 million in deposits. The deposits in this assessment area represent 19.7% of the bank's overall deposits.

*Assessment Area Information.* The Minneapolis–St. Paul MSA assessment area is in the east central portion of Minnesota. It includes Anoka, Chisago, Dakota, Isanti, Hennepin, Le Sueur, Ramsey, Scott, and Washington counties. The bank also includes one census tract in Waseca County that is not part of the Minneapolis–St. Paul MSA. The assessment area is contiguous with the Pine City, Lonsdale, Mankato–New Ulm, MN assessment areas and the Luck, WI assessment area. The assessment area includes the twin cities of Minneapolis and St. Paul along with several suburbs that are urban in nature, while Le Sueur County is more rural. The Shakopee Mdewakanton Sioux Community is in Scott County near the communities of Shakopee and Prior Lake. A tiny portion of the Prairie Island Indian Community's trust land is in Dakota County.

The bank has not changed its assessment area since the previous evaluation; however, the income classifications of some tracts changed based on 2019 adjusted census data. In 2018, the assessment area had 710 census tracts that included 56 low-income, 170 moderate-income, 305 middle-income, 172 upper-income and 7 unknown-income census tracts. Now the 710 census tracts include 54 low-income, 164 moderate-income, 301 middle-income, 184 upper-income, and 7 unknown-income census tracts. The seven unknown census tracts cover areas that include the Minneapolis–St. Paul International Airport, Fort Snelling, an Interstate tunnel corridor, a university, state park land, and correctional facilities.

The following Combined Demographics Report provides demographic information for this assessment area, based on 2019 FFIEC adjusted census data and 2019 D& B data.<sup>14</sup>

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<sup>14</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2019 OMB revised MSA delineations.

## Combined Demographics Report

Assessment Area(s): Minneapolis-St. Paul, MN MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	54	7.6	34,445	4.7	12,147	35.3	149,829	20.3
Moderate-income	164	23.1	138,620	18.8	18,781	13.5	125,852	17.1
Middle-income	301	42.4	324,174	44	15,144	4.7	160,906	21.8
Upper-income	184	25.9	239,863	32.5	6,579	2.7	300,950	40.8
Unknown-income	7	1	435	0.1	125	28.7	0	0
<b>Total Assessment Area</b>	<b>710</b>	<b>100.0</b>	<b>737,537</b>	<b>100.0</b>	<b>52,776</b>	<b>7.2</b>	<b>737,537</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	72,803	18,617	2.3	25.6	48,394	66.5	5,792	8
Moderate-income	261,601	132,177	16.6	50.5	114,334	43.7	15,090	5.8
Middle-income	536,720	369,762	46.5	68.9	141,584	26.4	25,374	4.7
Upper-income	346,174	274,953	34.5	79.4	58,236	16.8	12,985	3.8
Unknown-income	4,250	478	0.1	11.2	3,290	77.4	482	11.3
<b>Total Assessment Area</b>	<b>1,221,548</b>	<b>795,987</b>	<b>100.0</b>	<b>65.2</b>	<b>365,838</b>	<b>29.9</b>	<b>59,723</b>	<b>4.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7,934	5	6,856	4.8	1,005	7	73	5.4
Moderate-income	28,369	17.8	25,102	17.5	3,050	21.3	217	16
Middle-income	70,873	44.4	63,660	44.3	6,662	46.5	551	40.6
Upper-income	51,846	32.5	47,762	33.2	3,576	24.9	508	37.4
Unknown-income	431	0.3	374	0.3	49	0.3	8	0.6
<b>Total Assessment Area</b>	<b>159,453</b>	<b>100.0</b>	<b>143,754</b>	<b>100.0</b>	<b>14,342</b>	<b>100.0</b>	<b>1,357</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.2</b>		<b>9.0</b>		<b>.9</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	16	0.8	16	0.8	0	0	0	0
Moderate-income	241	11.4	230	11.2	9	20	2	28.6
Middle-income	1,192	56.4	1,167	56.6	21	46.7	4	57.1
Upper-income	660	31.2	644	31.2	15	33.3	1	14.3
Unknown-income	5	0.2	5	0.2	0	0	0	0
<b>Total Assessment Area</b>	<b>2,114</b>	<b>100.0</b>	<b>2,062</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.5</b>		<b>2.1</b>		<b>.3</b>	

2019 FFIEC Census Data and 2019 D&B Information

*Income.* For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the Minneapolis–St. Paul MSA, for the year of loan origination.<sup>15</sup> The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Minneapolis-St.Paul-Bloomington, MN-WI MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2018</b>	<b>\$93,600</b>	0 - \$46,799	\$46,800 - \$74,879	\$74,880 - \$112,319	\$112,320 - & above
<b>2019</b>	<b>\$93,000</b>	0 - \$46,499	\$46,500 - \$74,399	\$74,400 - \$111,599	\$111,600 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family income for the Minneapolis–St. Paul MSA, which was \$85,636 for 2018 and \$84,589 for 2019.<sup>16</sup>

*Population.* According to 2019 FFIEC census data, the population of the assessment area is 2,979,856. The county with the highest percentage (40.2%) of the assessment area population is Hennepin County, followed by Ramsey County (17.7%) and Dakota County (13.7%). By age, the population is as follows: 23.9% are age 17 years and younger, 8.9% are 18 to 24 years, 55.2% are 25 to 64 years, and 12.0% are 65 and over.

*Housing Information.* Based on 2019 adjusted census data, this assessment area has 1,221,548 housing units: 65.2% are owner-occupied, 30.0% are rental units, and 4.9% are vacant. The median age of housing stock is 45 years, which is slightly higher than the statewide median of 40 years. The median housing value is \$215,968 and the affordability ratio is 31.4%, which is similar to the state ratio of 33.0%. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

According to bank management, the housing market in the assessment area was active during the evaluation period. Bank management stated that demand was strong for any housing under \$400,000 but anything over that price point took longer to sell. Affordable single-family housing exists at the \$200,000 level in certain southern communities in the assessment area. At the \$150,000 level, the affordable housing is more likely to be a multifamily housing unit (e.g. condo, town home). In the northern region, 2018 was a stronger year than 2019. The price points for housing during the evaluation period was \$350,000 and under. Affordable housing exists in the northern region for \$200,000. The lower interest-rate environment helped low- and moderate-income borrowers. According to a community contact, the housing market was good in 2019 but construction slowed because material prices increased substantially.

*General Economic and Business Information.* According to community contacts and bank management, economic conditions were stable overall during the evaluation period, but the conditions differ somewhat based on the regional area.

In the northern region, specifically Chisago and Isanti counties, manufacturing and transportation are the two main industries. The area has retained businesses, but attracting new business was challenging due to the lack of industrial building stock.

<sup>15</sup> The assessment area includes one census tract in Waseca County, which is not part of the MSA. The evaluation uses the FFIEC’s estimated median family income for nonmetropolitan areas of Minnesota, which was \$69,500 in 2018 and \$68,800 in 2019 for the borrowers in this County.

<sup>16</sup> For the Waseca County census tract, the evaluation uses the FFIEC adjusted census data median family income for nonmetropolitan Minnesota, which was \$63,182 for 2018 and \$63,045 in 2019.

Anoka County is known for its focus on three industries: medical, data centers, and technology, as noted by a community contact. Anoka County has a competitive advantage by having a sizeable workforce for the medical device industry.

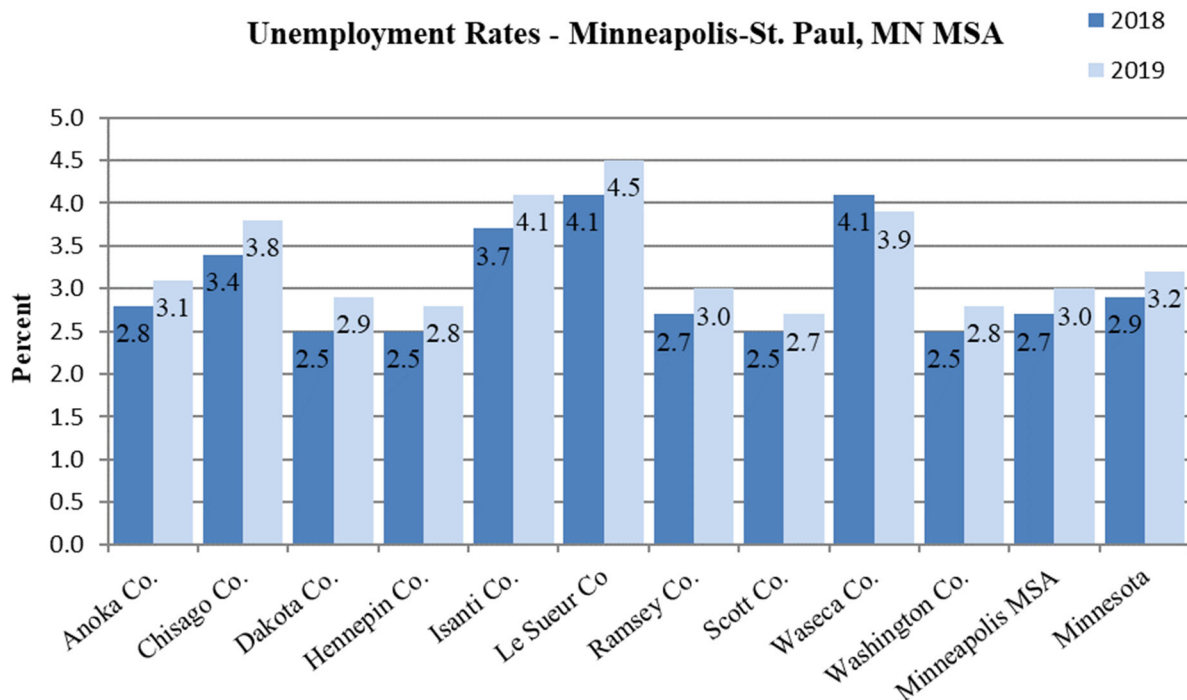
According to a community contact, Washington County experienced economic expansion, but most of it occurred in the southern region where several large manufacturers are located. Some of the manufacturers expanded facilities leading to job creation. Some economic growth occurred in the northern part of the Washington County because it had development-ready sites for expansion.

Hennepin and Ramsey counties are centrally located in this market and are the most urban communities in the assessment area. These counties offer a mix of office, industrial, and retail services. These two counties are the most active economically and experienced growth in the housing market and commercial development.

Dakota, Scott, and Le Sueur counties offer a mix of industries. Business expansion was stalled somewhat in Dakota and Scott counties based on a lack of workforce or available land sites.

Le Sueur County is primarily agricultural; however, there are a few large manufacturing companies. The primary crops in Le Sueur County are corn, soybeans, peas, and sweet corn. The agricultural economy struggled in 2018 due to dry moisture conditions and low commodity prices. Weather conditions improved for 2019 but low commodity prices continued to persist. Limited capital and low margins are barriers for young people who want to enter the farming market.

The unemployment rate for the Minneapolis–St. Paul MSA was consistent with the rate for Minnesota for both years. The following table provides the annual average unemployment rate for each county in the assessment area, the Minneapolis–St. Paul MSA, and the state of Minnesota.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS–ST. PAUL MSA

The bank's Lending Test performance in the Minneapolis–St. Paul MSA assessment area is excellent. Lending activity shows good responsiveness to assessment area credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The overall geographic distribution of loans is good. The bank is a leader in making community development loans. To help meet credit needs in the assessment area, the bank extensively used flexible loan programs for low- and moderate-income HMDA borrowers and small businesses. The bank also made limited use of a flexible small farm loan program. Examiners assigned the most weight to HMDA and small business loans based on the total number and dollar volume of loans during the evaluation period, followed by small farm lending.

The Investment Test performance in this assessment area is excellent. The bank made an excellent level of qualified investments that show excellent responsiveness to credit and community development needs.

Under the Service Test, delivery systems are accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. The bank is a leader in providing community development services.

### LENDING TEST

The bank's Lending Test performance in the Minneapolis–St. Paul MSA assessment area is excellent.

#### Lending Activity

Overall, the bank's lending activity reflects good responsiveness to assessment area credit needs. The bank's market share for HMDA and small business loans is similar in 2018 and 2019. For HMDA loans, the bank ranked 85th among 655 reporting HMDA loans in 2018 and 86th among 686 lenders in 2019. The bank's HMDA lending market share was 0.2% for both years. The bank ranked 23rd among 152 lenders reporting CRA small business and small farm loans in 2018. In 2019, the bank ranked 21st among 167 lenders reporting CRA small business and small farm loans. The bank's market share for small business loans averaged 0.4% over both years. Market share for small farm loans averaged 12.2% over both years.

During the evaluation period, lending activity in this assessment area represented 18.8% by number and 25.9% by dollar amount of the bank's total lending. Within the Minnesota assessment areas, the lending activity in the Minneapolis–St. Paul MSA assessment area was 21.8% by number and 29.6% by dollar amount.

#### Distribution by Borrower Income Level and by Size of Businesses and Farms

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.

*Residential Real Estate.* The bank's HMDA lending to low- and moderate-income borrowers is good. At the product level, examiners evaluated home purchase and refinance loans based on loan volume. The following table shows the bank's HMDA loan data by income level and product type for 2018 and 2019. The tables also include aggregate lending data for each year and demographics for families at various income levels.

**Borrower Distribution of HMDA Loans - Table 1 of 2**

Assessment Area: Minneapolis-St. Paul, MN MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	22	9.4%	\$2,503	4.7%	20.3%	8	7.0%	9.5%	\$887	3.4%	5.6%	14	11.9%	8.5%	\$1,616	6.0%	4.9%
	Moderate	57	24.5%	\$10,300	19.4%	17.1%	27	23.5%	23.5%	\$4,501	17.0%	18.3%	30	25.4%	24.7%	\$5,799	21.7%	19.1%
	Middle	57	24.5%	\$13,321	25.0%	21.8%	34	29.6%	21.4%	\$7,668	29.0%	21.1%	23	19.5%	22.0%	\$5,653	21.1%	21.1%
	Upper	84	36.1%	\$24,632	46.3%	40.8%	39	33.9%	26.3%	\$11,981	45.3%	36.5%	45	38.1%	28.4%	\$12,651	47.3%	39.0%
	Unknown	13	5.6%	\$2,440	4.6%	0.0%	7	6.1%	19.3%	\$1,412	5.3%	18.6%	6	5.1%	16.4%	\$1,028	3.8%	15.9%
	<b>Total</b>	<b>233</b>	<b>100.0%</b>	<b>\$53,196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,449</b>	<b>100.0%</b>	<b>100.0%</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,747</b>	<b>100.0%</b>	<b>100.0%</b>
HOME REFINANCE	Low	16	10.8%	\$1,456	4.4%	20.3%	8	15.1%	10.8%	\$686	7.1%	6.7%	8	8.4%	6.8%	\$770	3.3%	3.8%
	Moderate	31	20.9%	\$4,736	14.3%	17.1%	17	32.1%	21.9%	\$2,051	21.2%	17.1%	14	14.7%	18.5%	\$2,685	11.5%	13.2%
	Middle	28	18.9%	\$6,669	20.1%	21.8%	8	15.1%	23.0%	\$1,881	19.4%	20.9%	20	21.1%	22.2%	\$4,788	20.4%	19.2%
	Upper	60	40.5%	\$17,441	52.7%	40.8%	16	30.2%	32.5%	\$4,336	44.8%	42.7%	44	46.3%	36.9%	\$13,105	55.9%	47.0%
	Unknown	13	8.8%	\$2,811	8.5%	0.0%	4	7.5%	11.8%	\$724	7.5%	12.5%	9	9.5%	15.6%	\$2,087	8.9%	16.8%
	<b>Total</b>	<b>148</b>	<b>100.0%</b>	<b>\$33,113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,678</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,435</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	6.7%	\$50	5.0%	20.3%	1	10.0%	5.7%	\$50	8.1%	4.3%	0	0.0%	5.1%	\$0	0.0%	3.7%
	Moderate	3	20.0%	\$122	12.1%	17.1%	1	10.0%	15.8%	\$106	17.1%	12.2%	2	40.0%	16.5%	\$16	4.1%	12.1%
	Middle	6	40.0%	\$377	37.5%	21.8%	4	40.0%	24.9%	\$106	17.1%	20.2%	2	40.0%	24.6%	\$271	70.0%	20.0%
	Upper	3	20.0%	\$310	30.8%	40.8%	2	20.0%	47.7%	\$210	33.9%	53.3%	1	20.0%	50.0%	\$100	25.8%	57.2%
	Unknown	2	13.3%	\$147	14.6%	0.0%	2	20.0%	5.9%	\$147	23.7%	10.0%	0	0.0%	3.8%	\$0	0.0%	6.9%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$1,006</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$387</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.6%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Upper	1	14.3%	\$360	2.4%	40.8%	1	25.0%	2.6%	\$360	2.7%	0.3%	0	0.0%	0.8%	\$0	0.0%	0.1%
	Unknown	6	85.7%	\$14,385	97.6%	0.0%	3	75.0%	96.0%	\$12,954	97.3%	99.5%	3	100.0%	98.3%	\$1,431	100.0%	99.8%
	<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>\$14,745</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,314</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,431</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	6.7%	\$0	0.0%	5.0%	0	0.0%	6.1%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	18.7%	\$0	0.0%	13.0%	0	0.0%	15.9%	\$0	0.0%	11.7%
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	25.4%	\$0	0.0%	20.5%	0	0.0%	24.3%	\$0	0.0%	19.7%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	44.2%	\$0	0.0%	55.6%	0	0.0%	49.2%	\$0	0.0%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.0%	\$0	0.0%	5.9%	0	0.0%	4.5%	\$0	0.0%	4.5%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: Minneapolis-St. Paul, MN MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2018			2019								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %
OTHER PURPOSE	Low	1	5.0%	\$80	4.5%	20.3%	0	0.0%	9.6%	\$0	0.0%	7.1%	1	11.1%	7.9%	\$80	11.1%	4.9%
	Moderate	6	30.0%	\$480	26.9%	17.1%	3	27.3%	20.6%	\$294	27.7%	15.4%	3	33.3%	20.0%	\$186	25.8%	12.6%
	Middle	5	25.0%	\$446	25.0%	21.8%	2	18.2%	27.5%	\$154	14.5%	19.0%	3	33.3%	25.1%	\$292	40.6%	19.0%
	Upper	8	40.0%	\$776	43.5%	40.8%	6	54.5%	38.3%	\$614	57.8%	50.1%	2	22.2%	42.8%	\$162	22.5%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	8.4%	0	0.0%	4.2%	\$0	0.0%	5.3%
	<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>\$1,782</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,062</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$720</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	2.2%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	3.0%	\$0	0.0%	1.9%	0	0.0%	0.7%	\$0	0.0%	0.4%
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	2.7%	\$0	0.0%	1.1%	0	0.0%	1.1%	\$0	0.0%	1.3%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	1.6%	\$0	0.0%	1.8%	0	0.0%	2.3%	\$0	0.0%	3.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	90.5%	\$0	0.0%	94.2%	0	0.0%	95.5%	\$0	0.0%	94.5%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	40	9.5%	\$4,089	3.9%	20.3%	17	8.8%	9.3%	\$1,623	3.2%	5.3%	23	10.0%	7.5%	\$2,466	4.7%	4.0%
	Moderate	97	22.9%	\$15,638	15.1%	17.1%	48	24.9%	21.9%	\$6,952	13.6%	16.2%	49	21.3%	21.2%	\$8,686	16.5%	15.0%
	Middle	96	22.7%	\$20,813	20.0%	21.8%	48	24.9%	21.9%	\$9,809	19.2%	19.1%	48	20.9%	22.0%	\$11,004	20.9%	18.5%
	Upper	156	36.9%	\$43,519	41.9%	40.8%	64	33.2%	29.5%	\$17,501	34.2%	35.4%	92	40.0%	33.2%	\$26,018	49.4%	39.2%
	Unknown	34	8.0%	\$19,783	19.1%	0.0%	16	8.3%	17.4%	\$15,237	29.8%	24.0%	18	7.8%	16.1%	\$4,546	8.6%	23.2%
	<b>Total</b>	<b>423</b>	<b>100.0%</b>	<b>\$103,842</b>	<b>100.0%</b>	<b>100.0%</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$51,122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$52,720</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

The bank’s overall lending to low-income borrowers was consistent with aggregate lenders’ performance in 2018 and slightly above aggregate lenders in 2019. The bank’s and aggregate lenders’ overall lending were below demographics for both years. The bank’s overall lending to moderate-income borrowers was slightly above aggregate lenders’ performance in 2018 and consistent with aggregate lenders in 2019. The bank’s lending to moderate-income borrowers is above demographics for both years. According to FFIEC adjusted census data, 20.7 % and 20.3% of the families in the assessment area were low income and 17.3% and 17.1% were moderate income for 2018 and 2019, respectively.

The performance is good given the performance context. Using the assumption that a borrower can afford a home for approximately three times their annual income, an individual with the highest income in the low-income bracket (\$46,499) could afford a home prices at \$139,497. The calculation is based on the 2019 FFIEC median family income of \$93,000 for the Minneapolis–St. Paul MSA. According to 2019 FFIEC adjusted census data, the median housing value in the assessment area is \$215,968. The data suggest that home ownership would not be affordable for low-income borrowers. However, it might be more affordable for moderate-income borrowers starting with the highest income bracket of \$74,399 for the Minneapolis–St. Paul MSA. Using the same assumption, a moderate-income borrower may be able to afford a home priced at \$223,197. In addition, the bank only had 0.2% of the market share over both years and faces strong competition from financial institutions.

To meet credit needs for low- and moderate-income residents, the bank makes extensive use of several loan programs such as VA, FHA, Home Ready, MHFA Fix-up, FHLB Home\$start, and RD home loans. The use of these programs demonstrates the bank’s willingness to meet the credit needs of low- and moderate-income borrowers.

*Small Business.* The distribution of small business loans among businesses of different sizes is excellent. The following table shows the bank’s small business and small farm loans by revenue and loan size for the evaluation period. The table also includes aggregate lending data for each year.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Minneapolis-St. Paul, MN MSA

Product Type	Bank Lending & Demographic Data Comparison 2018, 2019						Bank & Aggregate Lending Comparison											
	Bank				Total Businesses	2018			2019									
	Count		Dollar			Count	Dollar		Count	Dollar								
	#	%	\$ (000s)	\$ %	%		Bank	Agg		\$ %	Bank	Agg	\$ %					
Small Business Revenue	\$1 Million or Less	272	58.6%	\$36,762	43.1%	90.2%	146	60.3%	53.0%	\$21,865	50.4%	30.9%	126	56.8%	53.4%	\$14,897	35.5%	31.2%
	Over \$1 Million	183	39.4%	\$47,783	56.0%	9.0%	91	37.6%					92	41.4%				
	Total Rev. available	455	98.0%	\$84,545	99.1%	99.2%	237	97.9%					218	98.2%				
	Rev. Not Known	9	1.9%	\$830	1.0%	0.9%	5	2.1%					4	1.8%				
	Total	464	100.0%	\$85,375	100.0%	100.0%	242	100.0%	100.0%				222	100.0%	100.0%			
Small Business Loan Size	\$100,000 or Less	259	55.8%	\$11,018	12.9%		136	56.2%	93.1%	\$5,861	13.5%	36.4%	123	55.4%	93.9%	\$5,157	12.3%	40.7%
	\$100,001 - \$250,000	98	21.1%	\$17,665	20.7%		50	20.7%	3.2%	\$8,982	20.7%	13.4%	48	21.6%	2.9%	\$8,683	20.7%	12.9%
	\$250,001 - \$1 Million	107	23.1%	\$56,692	66.4%		56	23.1%	3.7%	\$28,575	65.8%	50.2%	51	23.0%	3.2%	\$28,117	67.0%	46.4%
	Total	464	100.0%	\$85,375	100.0%		242	100.0%	100.0%	\$43,418	100.0%	100.0%	222	100.0%	100.0%	\$41,957	100.0%	100.0%
	Total	464	100.0%	\$85,375	100.0%		242	100.0%	100.0%	\$43,418	100.0%	100.0%	222	100.0%	100.0%	\$41,957	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	127	91.4%	\$11,369	90.6%	97.5%	57	93.4%	52.4%	\$4,940	95.8%	65.0%	70	89.7%	58.4%	\$6,429	86.9%	67.4%
	Over \$1 Million	6	4.3%	\$1,004	8.0%	2.1%	3	4.9%					3	3.8%				
	Total Rev. available	133	95.7%	\$12,373	98.6%	99.6%	60	98.3%					73	93.5%				
	Not Known	6	4.3%	\$181	1.4%	0.3%	1	1.6%					5	6.4%				
	Total	139	100.0%	\$12,554	100.0%	100.0%	61	100.0%	100.0%				78	100.0%	100.0%			
Small Farm Loan Size	\$100,000 or Less	101	72.7%	\$4,025	32.1%		45	73.8%	89.5%	\$1,715	33.2%	41.4%	56	71.8%	89.3%	\$2,310	31.2%	40.3%
	\$100,001 - \$250,000	28	20.1%	\$5,113	40.7%		12	19.7%	6.9%	\$2,216	43.0%	28.6%	16	20.5%	7.1%	\$2,897	39.2%	28.0%
	\$250,001 - \$500,000	10	7.2%	\$3,416	27.2%		4	6.6%	3.6%	\$1,228	23.8%	30.1%	6	7.7%	3.6%	\$2,188	29.6%	31.7%
	Total	139	100.0%	\$12,554	100.0%		61	100.0%	100.0%	\$5,159	100.0%	100.0%	78	100.0%	100.0%	\$7,395	100.0%	100.0%
	Total	139	100.0%	\$12,554	100.0%		61	100.0%	100.0%	\$5,159	100.0%	100.0%	78	100.0%	100.0%	\$7,395	100.0%	100.0%
Small Farm Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	91	71.7%	\$3,531	31.1%													
	\$100,001 - \$250,000	27	21.3%	\$4,922	43.3%													
	\$250,001 - \$500,000	9	7.1%	\$2,916	25.6%													
	Total	127	100.0%	\$11,369	100.0%													

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

The bank's lending to small businesses exceeded aggregate lenders' activity in 2018 and slightly exceeded aggregate lenders in 2019. According to 2018 and 2019 D&B data, 89.7% and 90.2% of businesses in the assessment area had gross annual revenues of \$1 million or less, respectively. For both years, the bank and aggregate lenders were below demographic data. The bank was below aggregate lenders when extending loans for amounts of \$100,000 or less but exceeded aggregate lenders in higher loan size categories, as shown in the table.

The bank competes with many large financial institutions and credit unions, as well as a large credit card company ranked second in market share for the assessment area. Bank management noted that it is common for small entities to use a credit card or a loan product secured by personal assets to address smaller dollar capital needs or operating expenses. During 2018 and 2019, the bank averaged 65.8% of its small business loans to small entities for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of smaller businesses that tend to request small-dollar loans. The bank made extensive use of SBA loan products, which demonstrates responsiveness to small business credit needs.

*Small Farm.* The distribution of small farm loans among businesses of different sizes is excellent. For both years, the bank's lending to small farms greatly exceeds aggregate lenders. According to D&B data, 97.6% and 97.5% of farms had gross annual revenues of \$1 million or less in 2018 and 2019, respectively. The bank's lending in 2018 and 2019 is slightly below demographics. The bank's lending was below aggregate lenders' performance for loans in amounts of \$100,000 or less. The bank's lending exceeded aggregate lenders' activity for loan amounts ranging from \$100,001 to \$1 million. Over 2018 and 2019, the bank averaged 71.7% of its small farm loans for amounts of \$100,000 or less. This indicates a willingness to meet credit needs of smaller farms that tend to request small-dollar loans. The



bank competes with three national financial institutions, which had a higher market share than the bank in 2018 and two had a higher market share in 2019. During the evaluation period, the bank used a flexible loan program through Farmer Mac to help a borrower obtain financing.

**Geographic Distribution**

Overall, the geographic distribution of the bank’s HMDA, small business and small farm loans is good. In 2018, the assessment area had 56 low-income and 170 moderate-income census tracts. In 2019, there were 54 low-income and 164 moderate-income census tracts in the assessment area. In both years, the assessment area had seven unknown-income tracts. Middle-income tracts are the highest by number and represent 43.0% and 42.4% of tracts, respectively, in 2018 and 2019. While the bank did not lend in numerous census tracts in the assessment area, including some low- and moderate-income tracts, the geographic distribution is reasonable given the location of the bank’s offices and the strong competition throughout the assessment area. The bank’s geographic distribution of loans does not reveal any unexplained gaps in lending.

*Residential Real Estate.* The geographic distribution of residential real estate loans is good. At the product level, examiners focused on home purchase and refinance transactions based on loan volume. The following table shows the bank’s HMDA data and aggregate lending data by census tract and product type for both years.

**Geographic Distribution of HMDA Loans - Table 1 of 2**

Assessment Area: Minneapolis-St. Paul, MN MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Owner Occupied Units %	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	5	2.1%	\$846	1.6%	2.3%	2	1.7%	3.7%	\$344	1.3%	2.5%	3	2.5%	3.4%	\$502	1.9%	2.3%
	Moderate	73	31.3%	\$11,834	22.2%	16.6%	40	34.8%	19.3%	\$6,497	24.6%	14.8%	33	28.0%	18.4%	\$5,337	20.0%	13.9%
	Middle	95	40.8%	\$23,100	43.4%	46.5%	41	35.7%	47.3%	\$10,638	40.2%	44.8%	54	45.8%	45.9%	\$12,462	46.6%	42.6%
	Upper	60	25.8%	\$17,416	32.7%	34.5%	32	27.8%	29.6%	\$8,970	33.9%	37.8%	28	23.7%	32.2%	\$8,446	31.6%	41.1%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<b>Total</b>	<b>233</b>	<b>100.0%</b>	<b>\$53,196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,449</b>	<b>100.0%</b>	<b>100.0%</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,747</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	2.5%	\$0	0.0%	1.8%	0	0.0%	1.8%	\$0	0.0%	1.2%
	Moderate	40	27.0%	\$6,084	18.4%	16.6%	17	32.1%	17.3%	\$2,136	22.1%	12.9%	23	24.2%	13.8%	\$3,948	16.8%	9.9%
	Middle	58	39.2%	\$11,558	34.9%	46.5%	22	41.5%	47.9%	\$3,529	36.5%	43.9%	36	37.9%	46.1%	\$8,029	34.3%	41.5%
	Upper	50	33.8%	\$15,471	46.7%	34.5%	14	26.4%	32.2%	\$4,013	41.5%	41.4%	36	37.9%	38.3%	\$11,458	48.9%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>148</b>	<b>100.0%</b>	<b>\$33,113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,678</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,435</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	2.1%	\$0	0.0%	2.2%	0	0.0%	1.8%	\$0	0.0%	2.0%
	Moderate	4	26.7%	\$310	30.8%	16.6%	4	40.0%	13.5%	\$310	50.1%	11.6%	0	0.0%	13.2%	\$0	0.0%	11.0%
	Middle	10	66.7%	\$665	66.1%	46.5%	5	50.0%	46.2%	\$278	44.9%	41.9%	5	100.0%	43.9%	\$387	100.0%	38.2%
	Upper	1	6.7%	\$31	3.1%	34.5%	1	10.0%	38.1%	\$31	5.0%	44.0%	0	0.0%	41.0%	\$0	0.0%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.3%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$1,006</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$387</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	12.4%	0	0.0%	17.9%	\$0	0.0%	14.0%	0	0.0%	13.9%	\$0	0.0%	8.5%
	Moderate	3	42.9%	\$13,409	90.9%	31.0%	2	50.0%	34.6%	\$12,709	95.5%	28.5%	1	33.3%	37.4%	\$700	48.9%	28.2%
	Middle	4	57.1%	\$1,336	9.1%	39.6%	2	50.0%	31.8%	\$605	4.5%	42.0%	2	66.7%	33.3%	\$731	51.1%	37.7%
	Upper	0	0.0%	\$0	0.0%	15.6%	0	0.0%	14.7%	\$0	0.0%	15.1%	0	0.0%	14.6%	\$0	0.0%	25.2%
	<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>\$14,745</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,314</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,431</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.7%	\$0	0.0%	1.3%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	12.6%	\$0	0.0%	9.0%	0	0.0%	10.7%	\$0	0.0%	7.6%
	Middle	0	0.0%	\$0	0.0%	46.5%	0	0.0%	43.9%	\$0	0.0%	40.3%	0	0.0%	44.0%	\$0	0.0%	37.6%
	Upper	0	0.0%	\$0	0.0%	34.5%	0	0.0%	41.7%	\$0	0.0%	49.3%	0	0.0%	43.9%	\$0	0.0%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Minneapolis-St. Paul, MN MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	3.1%	\$0	0.0%	2.3%	0	0.0%	2.2%	\$0	0.0%	1.5%
	Moderate	10	50.0%	\$731	41.0%	16.6%	5	45.5%	18.2%	\$365	34.4%	12.5%	5	55.6%	15.5%	\$366	50.8%	11.6%
	Middle	7	35.0%	\$472	26.5%	46.5%	4	36.4%	47.0%	\$272	25.6%	40.1%	3	33.3%	45.5%	\$200	27.8%	36.4%
	Upper	3	15.0%	\$579	32.5%	34.5%	2	18.2%	31.7%	\$425	40.0%	45.2%	1	11.1%	36.7%	\$154	21.4%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>\$1,782</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,062</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$720</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	5.5%	\$0	0.0%	4.9%	0	0.0%	3.2%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	26.1%	\$0	0.0%	22.5%	0	0.0%	25.1%	\$0	0.0%	19.5%
	Middle	0	0.0%	\$0	0.0%	46.5%	0	0.0%	49.9%	\$0	0.0%	48.6%	0	0.0%	47.4%	\$0	0.0%	43.8%
	Upper	0	0.0%	\$0	0.0%	34.5%	0	0.0%	18.5%	\$0	0.0%	24.0%	0	0.0%	24.2%	\$0	0.0%	34.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	1.2%	\$846	0.8%	2.3%	2	1.0%	3.3%	\$344	0.7%	3.2%	3	1.3%	2.7%	\$502	1.0%	2.4%
	Moderate	130	30.7%	\$32,368	31.2%	16.6%	68	35.2%	18.4%	\$22,017	43.1%	15.4%	62	27.0%	16.2%	\$10,351	19.6%	13.5%
	Middle	174	41.1%	\$37,131	35.8%	46.5%	74	38.3%	47.2%	\$15,322	30.0%	44.3%	100	43.5%	45.8%	\$21,809	41.4%	41.6%
	Upper	114	27.0%	\$33,497	32.3%	34.5%	49	25.4%	31.0%	\$13,439	26.3%	37.0%	65	28.3%	35.3%	\$20,058	38.0%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	<b>Total</b>	<b>423</b>	<b>100.0%</b>	<b>\$103,842</b>	<b>100.0%</b>	<b>100.0%</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$51,122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$52,720</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Overall, for both years, the bank’s HMDA lending in low-income tracts was generally consistent with aggregate lenders’ activity as well as the percentage of owner-occupied units in these tracts. The bank’s lending was slightly below the percentage of families in these tracts. According to 2019 FFIEC adjusted census data, only 2.3% of housing stock is owner-occupied and 4.7% of families reside the low-income tracts; 2018 data is similar. In addition, according to the same data, 66.5% of housing stock located in low-income tracts are rentals, which may limit lending opportunities. Overall, for both years, the bank’s HMDA lending in moderate-income tracts exceeded aggregate lending and demographics. According to 2019 FFIEC adjusted census data, 16.6% of housing stock is owner-occupied and 18.8% of families reside in moderate-income tracts; 2018 data is similar.

While the bank did not extend HMDA loans in numerous tracts, including many low- and moderate-income tracts during the evaluation period, many of these tracts are located in Anoka, Hennepin, and Ramsey counties where the bank does not have offices. Four of the bank’s seven offices in this assessment area are in moderate-income tracts, which helps explain the higher dispersion of HMDA loans in those tracts versus the low-income tracts. Finally, the bank operates in a highly competitive environment and in an expansive assessment area.

*Small Business.* The geographic distribution of small business loans is good. The following table shows the bank’s geographic distribution of small business and small farm loans as well as aggregate lending data.

**Geographic Distribution of Small Business & Small Farm Loans**  
Assessment Area: Minneapolis-St. Paul, MN MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Count		Bank		Total	Count		Dollar		Agg	Count		Dollar		Agg		
#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %		
SMALL BUSINESSES	Low	13	2.8%	\$7,680	9.0%	5.0%	7	2.9%	4.5%	\$3,338	7.7%	4.7%	6	2.7%	4.4%	\$4,342	10.3%	4.7%
	Moderate	141	30.4%	\$21,700	25.4%	17.8%	74	30.6%	17.1%	\$11,865	27.3%	19.5%	67	30.2%	16.6%	\$9,835	23.4%	18.5%
	Middle	201	43.3%	\$37,499	43.9%	44.4%	106	43.8%	45.2%	\$19,152	44.1%	47.5%	95	42.8%	43.3%	\$18,347	43.7%	44.8%
	Upper	109	23.5%	\$18,496	21.7%	32.5%	55	22.7%	32.4%	\$9,063	20.9%	27.6%	54	24.3%	34.9%	\$9,433	22.5%	31.3%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.5%	0	0.0%	0.7%	\$0	0.0%	0.5%
	<b>Total</b>	<b>464</b>	<b>100.0%</b>	<b>\$85,375</b>	<b>100.0%</b>	<b>100.0%</b>	<b>242</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$43,418</b>	<b>100.0%</b>	<b>100.0%</b>	<b>222</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$41,957</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Total Farms</b>													
	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.9%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	0.5%
	Moderate	53	38.1%	\$5,236	41.7%	11.4%	24	39.3%	12.9%	\$2,248	43.6%	17.0%	29	37.2%	15.6%	\$2,988	40.4%	18.2%
	Middle	75	54.0%	\$5,316	42.3%	56.4%	33	54.1%	57.6%	\$2,101	40.7%	52.4%	42	53.8%	54.3%	\$3,215	43.5%	51.5%
	Upper	11	7.9%	\$2,002	15.9%	31.2%	4	6.6%	27.9%	\$810	15.7%	29.3%	7	9.0%	27.6%	\$1,192	16.1%	29.3%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	1.2%	\$0	0.0%	0.5%
<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$12,554</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>78</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,395</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

The bank was consistent with aggregate lenders with its small business lending in low-income tracts for both years, and consistent with demographics. For both years, the bank exceeded aggregate lenders and demographics with its small business lending in moderate-income tracts. According to D&B data, 4.8% of small businesses were located in low-income tracts for both years. In 2018, 17.9% of small businesses were in moderate-income tracts. In 2019, 17.5% of small businesses were in moderate-income tracts. As mentioned above, over half of the bank’s seven offices in this assessment area are in moderate-income tracts, which helps explain the higher dispersion of small business loans in those tracts versus low-income tracts. The bank did not extend small business loans in numerous tracts, including many low- and moderate-income tracts during the evaluation period; many of these tracts are in Anoka, Hennepin, and Ramsey counties where the bank does not have offices. As previously noted, the bank operates in a highly competitive environment and in an expansive assessment area.

*Small Farm.* The geographic distribution of small farms loans is excellent. The bank was mostly consistent with aggregate lenders and demographics with its small farm lending in low-income tracts for both years. For both years, the bank exceeded aggregate lenders and demographics with its small farm lending in moderate-income tracts. According to D&B data, 0.8% of small farms were in low-income tracts and 11.4% were in moderate-income tracts for both years. It is reasonable that the bank did not make any small farm loans in low-income tracts in 2018 or 2019, given the demographics and urban nature of those tracts. The bank did not extend small farm loans in numerous tracts, including some moderate-income tracts, during the evaluation period. This is also reasonable because many moderate-income tracts are located in the urban areas of Anoka, Hennepin, and Ramsey counties. Small farm lending occurs primarily in the counties located in the northern and southern portions of the assessment area, which are more rural. Most small farms (87.6%) are in middle- and upper-income tracts. In addition, as mentioned, the bank operates in a highly competitive environment and in an expansive assessment area.

### Community Development Lending

The bank is a leader in making community development loans in the Minneapolis–St. Paul MSA assessment area. As shown in the table at the right, the bank originated or renewed 15 community development loans totaling \$17.2 million. The majority of loans helped revitalize and stabilize low- and moderate-income areas by creating and retaining jobs and also supported economic development initiatives. The other loans help provide affordable housing opportunities and social services to low- and moderate-income residents.

<b>Community Development Loans Minneapolis–St. Paul MSA</b>		
<i>Purpose</i>	#	\$
Affordable Housing	3	659,100
Community Services	2	100,000
Economic Development	4	6,029,400
Revitalize and Stabilize	6	10,455,450
<b>Total</b>	<b>15</b>	<b>17,243,950</b>

### INVESTMENT TEST

The bank made an excellent level of qualified investments in the Minneapolis–St. Paul MSA assessment area that exhibits excellent responsiveness. The bank’s level of qualified investments in the form of securities is excellent. The bank purchased six new securities totaling \$2,934,444, which demonstrates excellent responsiveness to the credit needs of the assessment area. Three investments helped revitalize and stabilize areas by making capital improvements to public service facilities as well as other areas designated in local improvement plans, and three others helped fund schools needing facility improvements. During the evaluation period, the bank also had prior period investments totaling \$1.6 million that supported affordable housing. In December 2018, \$881,851, of those investments matured.

As shown in the table at right, the bank’s level of qualified investments in the form of donations is significant. The donations support organizations that provide community services to low- and moderate-income residents, as well as revitalize or stabilize moderate-income areas. Some examples include the provision of financial aid, health, and social services. Several other donations went to schools and fire departments and other emergency services that help retain, as well as attract, residents.

<b>Qualified Investment Donations Minneapolis–St. Paul MSA Assessment Area</b>		
<i>Purpose</i>	#	\$
Community Service	56	26,373
Revitalize / Stabilize	27	14,442
<b>Total</b>	<b>83</b>	<b>40,815</b>

### SERVICE TEST

The bank’s delivery systems are accessible to residents, businesses, and farms throughout the assessment area. Services and hours do not vary in a way that inconveniences particular individuals or areas. The bank is a leader in providing community development services.

### Retail Services

Delivery systems are accessible in the bank’s assessment area. The bank’s services and hours do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates seven full-service branches and sold one in the assessment area during the evaluation period. The seven offices are in the communities of Apple Valley, Braham, Forest Lake, Jordan, Lakeville, Montgomery, and Waterville. All offices have drive-up facilities; most offices have extended and weekend hours. Three offices have cash-dispensing-only ATMs. The bank also operates one cash-dispensing-only ATM at a retail store. Four offices are located in moderate-income tracts and three are located in middle-income tracts.

In June 2018, the bank sold its office located in Hastings (which had a cash-dispensing only ATM); the office was in a moderate-income tract in the assessment area. In addition, the bank removed two cash-dispensing only ATMs: one at the Forest Lake office in March 2019 and one at the Lakeville office in June 2019. The closure of the office in Hastings did not adversely affect the accessibility of banking services; the bank sold the office to another financial institution. In 2019, the tract where the Hastings office was located became a middle-income tract, with two moderate-income tracts nearby.

Additional delivery services include online and mobile banking, 24-hour telephone banking, night deposit, and remote deposit capture, as well as other retail services so customers can conduct banking activities outside of normal business hours. The following table shows the geographic distribution of branches and ATMs in this assessment area.

**Geographic Distribution of Branches & ATMs**  
Assessment Area: Minneapolis-St. Paul, MN MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATM				Cash only ATM				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	54	7.6%	5.8%	5.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	4	57.1%	0	0	4	2	3	Total	3	75.0%	0	0.0%	0	0	3	75.0%	0	1	164	23.1%	21.2%	17.8%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Middle	3	42.9%	0	1	3	3	3	Total	1	25.0%	0	0.0%	0	0	1	25.0%	0	2	301	42.4%	44.0%	44.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	184	25.9%	28.7%	32.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	7	1.0%	0.3%	0.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	7	100.0%	0	1	7	5	6	Total	4	100.0%	0	0.0%	0	0	4	100.0%	0	3	710	100.0%	100.0%	100.0%
DTO	0		0	0				SA	1		0		0	0	1		0	0				

2019 FFIEC Census Data, 2019 D&B Info, a 2010 ACS Data  
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
DTO - Drive thru only is a subset of total branches  
SA = Stand Alone ATM is a subset of total ATMs

### Community Development Services

The bank is a leader in providing community development services in the assessment area. The table to the right shows the service activity and purpose category for both years. During the evaluation period, 17 employees engaged in community development services on behalf of the bank. Most of the employees lent their expertise to organizations to help revitalize and stabilize moderate-income areas. Many of these services support organizations that promote businesses to help retain them as well as attract new residents to the area. Other service activities involved fundraising, reviewing scholarships, and teaching financial literacy.

<b>Community Development Services Minneapolis–St. Paul MSA Assessment Area</b>	
<i>Purpose</i>	<b>#</b>
Affordable Housing	2
Community Service	8
Economic Development	6
Revitalize / Stabilize	29
<b>Total</b>	<b>45</b>

## MINNESOTA METROPOLITAN AREA FULL-SCOPE REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MANKATO–NEW ULM, MINNESOTA CSA

*Bank Information.* The bank operates six branch offices in the Mankato–New Ulm, MN CSA assessment area, two full-service and four limited-service offices. Five of the offices have drive-up facilities. The bank also operates four cash-dispensing-only ATMs. By number, the bank has 16.7% of branch offices in this assessment area. See the Retail Services Test section for more details.

According to the June 30, 2019, FDIC Deposit Market Share Report, the bank ranked fifth among 28 FDIC-insured institutions operating in Blue Earth, Brown, and Nicollet counties, with a 6.1% deposit market share and \$194.5 million in deposits. The deposits in this assessment area represent 13.4% of the bank's overall deposits.

*Assessment Area Information.* The New Ulm–Mankato CSA assessment area is in south central Minnesota. It consists of Blue Earth and Nicollet counties and all but one tract of Brown County. Blue Earth and Nicollet counties form the Mankato, MN Metropolitan Statistical Area, and Brown County forms the New Ulm, MN Micropolitan Statistical Area. Together, they form the Mankato–New Ulm, MN CSA. The bank has not changed this assessment area since the previous evaluation, nor were there any changes with census tract income classifications based on 2019 FFIEC adjusted census data.

The following Combined Demographics Report provides demographic information for this assessment area, based on 2019 FFIEC adjusted census data and 2019 D& B data.<sup>17</sup>

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<sup>17</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2019 OMB-revised MSA delineations.

### Combined Demographics Report

Assessment Area(s): Mankato-New Ulm, MN CSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	5,404	18.8	
Moderate-income	4	13.3	1,749	6.1	262	15	5,112	17.8	
Middle-income	24	80	24,722	86	1,823	7.4	6,817	23.7	
Upper-income	2	6.7	2,272	7.9	84	3.7	11,410	39.7	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0</b>	<b>28,743</b>	<b>100.0</b>	<b>2,169</b>	<b>7.5</b>	<b>28,743</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	5,715	1,933	5.9	33.8	3,288	57.5	494	8.6	
Middle-income	41,162	27,859	85.6	67.7	10,802	26.2	2,501	6.1	
Upper-income	3,153	2,735	8.4	86.7	224	7.1	194	6.2	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>50,030</b>	<b>32,527</b>	<b>100.0</b>	<b>65.0</b>	<b>14,314</b>	<b>28.6</b>	<b>3,189</b>	<b>6.4</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	868	14.6	737	14	126	22.4	5	6.1	
Middle-income	4,693	79.2	4,208	79.7	415	73.8	70	85.4	
Upper-income	366	6.2	338	6.4	21	3.7	7	8.5	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>5,927</b>	<b>100.0</b>	<b>5,283</b>	<b>100.0</b>	<b>562</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>89.1</b>		<b>9.5</b>		<b>1.4</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	10	1.2	10	1.2	0	0	0	0	
Middle-income	741	90.1	728	90.1	13	92.9	0	0	
Upper-income	71	8.6	70	8.7	1	7.1	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>822</b>	<b>100.0</b>	<b>808</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.7</b>		<b>.0</b>	

2019 FFIEC Census Data and 2019 D&B Information

*Income.* For purposes of classifying borrower income for residents residing in Blue Earth and Nicollet counties, this evaluation uses the FFIEC’s estimated median family income for the Mankato, MN MSA, for the year of loan origination. For residents residing in Brown County, this evaluation uses the FFIEC’s estimated median family income for the nonmetropolitan areas of Minnesota for the year of loan

origination. The following tables show the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels  
Mankato, MN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2018</b>	<b>\$75,000</b>	0 - \$37,499	\$37,500 - \$59,999	\$60,000 - \$89,999	\$90,000 - & above
<b>2019</b>	<b>\$78,500</b>	0 - \$39,249	\$39,250 - \$62,799	\$62,800 - \$94,199	\$94,200 - & above

**Borrower Income Levels  
Statewide Non-Metropolitan-- Minnesota**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2018</b>	<b>\$69,500</b>	0 - \$34,749	\$34,750 - \$55,599	\$55,600 - \$83,399	\$83,400 - & above
<b>2019</b>	<b>\$68,800</b>	0 - \$34,399	\$34,400 - \$55,039	\$55,040 - \$82,559	\$82,560 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family income. For the Mankato, MN MSA, this figure was \$71,814 for both years. For the nonmetropolitan areas of Minnesota, this figure was \$63,182 for 2018 and \$63,045 for 2019.

*Population.* According to 2019 FFIEC census data, the population of the assessment area is 120,436. The majority of population (54.1%) resides in Blue Earth County followed by Nicollet County (27.5%) and Brown (21.1%) County. By age, the population is as follows: 20.6% are 17 years and younger, 17.8% are 18 to 24 years, 47.7% are 25 to 64 years, and 14.0% are 65 and over.

*Housing Information.* Based on 2019 adjusted census data, this assessment area has 50,030 housing units: 65.0% are owner-occupied, 28.6% are rental units, and 6.4% are vacant. The median age of the housing stock is 49 years, which is somewhat higher than the statewide median of 40 years. The median housing value is \$159,435 and the affordability ratios is 33.3, which is similar to the state ratio of 33.0. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

According to bank management, affordable housing exists in the assessment area but differs somewhat by region. In the Mankato region, housing prices increased substantially compared to New Ulm. In both regions, the older housing stock sells quickly; this stock is affordable for low- and moderate-income borrowers. Special loan programs geared towards low- to moderate-income borrowers also help with achieving home ownership. However, the older homes do not have the amenities that homebuyers prefer, and the buying power has dropped for quality homes compared to several years ago. In the New Ulm community, there is less land available for development compared to Mankato that experienced more apartment developments. Some apartment complexes have voucher programs to assist low- to moderate-income renters with rent, and some units have lower rents based on income limits.

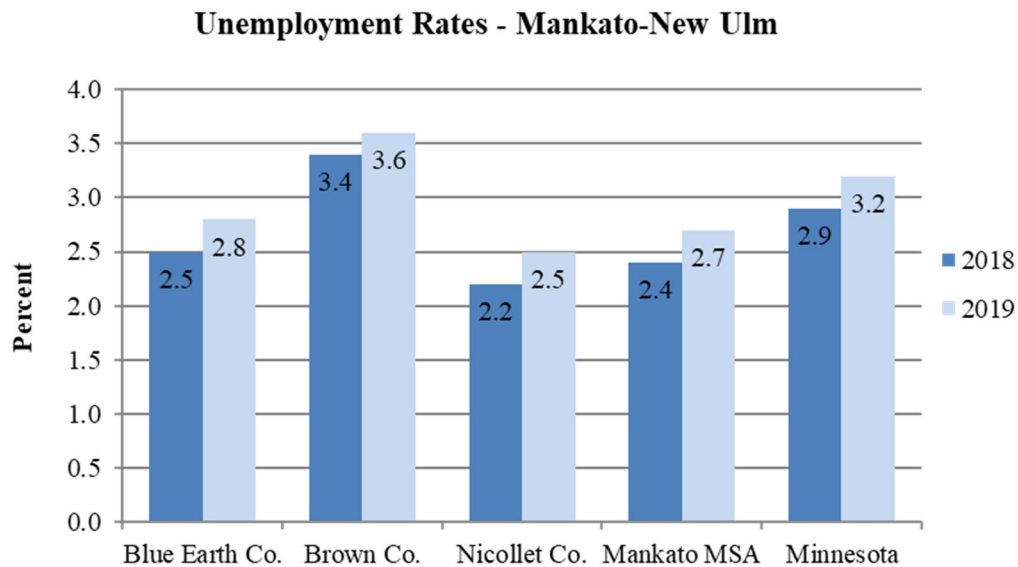
*General Economic and Business Information.* Bank management and community contacts indicated the overall economy is stable and noted some differences in the region based on community size. The cities of Mankato and New Ulm have large employers that include a good mix of manufacturing, medical facilities, and school facilities. In the New Ulm community, the economy was stable but not as strong as



the Mankato area. New Ulm has a mix of large and small businesses. Major employers include 3M Corporation, New Ulm Medical Center, and Kraft Foods, along with the school district and several other manufacturing, trucking, and service-related employers. Prior to and during the evaluation period, the downtown area lost big-box retail stores; however, expansions occurred with other industries. In the Mankato region, the economy was strong with new construction projects that included apartment complexes. Two large national retail stores brought in new jobs; however, other national retail outlets have either left or continue to struggle in the Mankato region. Some of the expansion brought in new employees, but small businesses still struggle with finding employees.

The agricultural economy includes crops (corn and soybeans), livestock operations, and some dairy farms. According to bank management, the soil conditions have been good for the agricultural sector. Depressed prices have affected farmers, but high yields have offset big losses. Livestock operations fared stronger than farming.

According to bank management, the unemployment rate was low overall in various regions of the assessment area, especially Mankato. Unemployment rates in the assessment area’s counties as well as the state of Minnesota are shown in the following chart.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MANKATO-NEW ULM CSA**

The bank’s Lending Test performance in the Mankato–New Ulm CSA assessment area is good. Lending activity shows excellent responsiveness to assessment area credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is adequate. The bank made a relatively high level of community development loans. The bank made use of flexible loan programs for low- and moderate-income borrowers, and limited use of small business- and small farm-related flexible loan programs in the assessment area to help meet credit needs. Examiners assigned the most weight to small business and

HMDA loans<sup>18</sup>, followed by small farm lending, based on the total number and dollar volume of loans during the evaluation period.

The Investment Test performance in this assessment area is good. The bank made a significant level of qualified investments that show good responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Bank officers and employees provide a relatively high level of community development services.

## **LENDING TEST**

The bank's Lending Test performance in the Mankato–New Ulm CSA assessment area is good.

### **Lending Activity**

Overall, the bank's lending activity reflects excellent responsiveness to assessment area credit needs. For HMDA loans, the bank ranked 11th among 183 reporting HMDA loans in 2018 and eighth among 209 lenders in 2019. The bank's market share of HMDA lending was 2.6% in 2018 and 3.5% in 2019. The bank ranked second among 60 lenders reporting small business loans and small farm loans in 2018; market share was 9.1% for small business and 21.5% for small farms. In 2019, the bank ranked fifth of 58 lenders reporting small business and small farm loans, with a market share of 7.4% for small business and 22.5% for small farm loans.

During the evaluation period, lending activity in this assessment area represented 11.9% by number and 12.7% by dollar amount of the bank's total lending. Within the Minnesota assessment areas, the lending activity in the Mankato–New Ulm CSA assessment area was 13.9% by number and 14.5% by dollar amount.

### **Distribution by Borrower Income Level and by Size of Businesses and Farms**

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses and farms of different sizes.

*Residential Real Estate.* The bank's HMDA lending to low- and moderate-income borrowers is good. At the product level, examiners evaluated home purchase and refinance loans based on loan volume. The following table shows the banks' HMDA loan data by income level and product type for 2018 and 2019. The table also includes aggregate lending data for each year and demographics for families at various income levels.

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<sup>18</sup> Examiners did not evaluate the following categories of HMDA loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.

**Borrower Distribution of HMDA Loans - Table 1 of 2**

Assessment Area: Mankato-New Ulm, MN CSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019				Families by Family Income %	2018					2019						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	7	5.4%	\$457	2.0%	18.8%	4	7.1%	10.5%	\$245	2.7%	6.7%	3	4.1%	11.0%	\$212	1.6%	6.8%
	Moderate	32	24.8%	\$4,380	19.5%	17.8%	14	25.0%	24.8%	\$1,698	18.9%	19.3%	18	24.7%	25.7%	\$2,682	19.8%	20.6%
	Middle	26	20.2%	\$4,220	18.8%	23.7%	12	21.4%	23.1%	\$2,002	22.3%	23.1%	14	19.2%	23.0%	\$2,218	16.4%	22.9%
	Upper	48	37.2%	\$11,617	51.7%	39.7%	18	32.1%	26.7%	\$4,178	46.6%	37.0%	30	41.1%	25.6%	\$7,439	55.0%	35.6%
	Unknown	16	12.4%	\$1,807	8.0%	0.0%	8	14.3%	14.9%	\$839	9.4%	13.9%	8	11.0%	14.7%	\$968	7.2%	14.0%
	<b>Total</b>	<b>129</b>	<b>100.0%</b>	<b>\$22,481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,962</b>	<b>100.0%</b>	<b>100.0%</b>	<b>73</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,519</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	4	6.2%	\$431	4.1%	18.8%	2	13.3%	9.8%	\$263	16.0%	6.0%	2	4.0%	6.4%	\$168	1.9%	3.6%
	Moderate	10	15.4%	\$976	9.4%	17.8%	4	26.7%	21.5%	\$329	20.1%	16.7%	6	12.0%	19.0%	\$647	7.4%	13.3%
	Middle	15	23.1%	\$1,975	19.0%	23.7%	5	33.3%	22.0%	\$366	22.3%	22.2%	10	20.0%	25.0%	\$1,609	18.4%	22.6%
	Upper	31	47.7%	\$6,600	63.5%	39.7%	4	26.7%	32.7%	\$682	41.6%	41.2%	27	54.0%	34.7%	\$5,918	67.7%	43.4%
	Unknown	5	7.7%	\$404	3.9%	0.0%	0	0.0%	14.1%	\$0	0.0%	13.8%	5	10.0%	14.9%	\$404	4.6%	17.1%
	<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>\$10,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,640</b>	<b>100.0%</b>	<b>100.0%</b>	<b>50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,746</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	7.1%	\$8	1.2%	18.8%	1	14.3%	6.1%	\$8	1.8%	2.2%	0	0.0%	4.6%	\$0	0.0%	3.1%
	Moderate	2	14.3%	\$63	9.3%	17.8%	0	0.0%	13.1%	\$0	0.0%	8.9%	2	28.6%	14.7%	\$63	27.6%	12.7%
	Middle	1	7.1%	\$40	5.9%	23.7%	0	0.0%	22.2%	\$0	0.0%	20.9%	1	14.3%	24.8%	\$40	17.5%	21.1%
	Upper	10	71.4%	\$563	83.5%	39.7%	6	85.7%	42.4%	\$438	98.2%	50.3%	4	57.1%	45.0%	\$125	54.8%	41.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.2%	\$0	0.0%	17.7%	0	0.0%	11.0%	\$0	0.0%	21.5%
	<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>\$674</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$228</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	18.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	1.8%	\$0	0.0%	0.1%	0	0.0%	1.6%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	12.7%	\$0	0.0%	7.0%	0	0.0%	6.6%	\$0	0.0%	0.9%
	Unknown	2	100.0%	\$810	100.0%	0.0%	1	100.0%	85.5%	\$625	100.0%	92.9%	1	100.0%	91.8%	\$185	100.0%	99.0%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$810</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$625</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$185</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	18.8%	0	0.0%	1.4%	\$0	0.0%	1.5%	0	0.0%	7.5%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	16.4%	\$0	0.0%	9.9%	0	0.0%	11.9%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	26.0%	\$0	0.0%	19.3%	0	0.0%	26.9%	\$0	0.0%	24.6%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	53.4%	\$0	0.0%	65.4%	0	0.0%	50.7%	\$0	0.0%	63.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	3.9%	0	0.0%	3.0%	\$0	0.0%	1.5%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: Mankato-New Ulm, MN CSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank		Families by Family Income		Count	Dollar		Count		Dollar		Count		Dollar			
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	10.0%	\$17	2.6%	18.8%	1	14.3%	6.4%	\$17	4.7%	3.7%	0	0.0%	13.2%	\$0	0.0%	6.3%
	Moderate	3	30.0%	\$274	42.2%	17.8%	2	28.6%	12.8%	\$120	33.0%	8.8%	1	33.3%	18.9%	\$154	54.0%	22.6%
	Middle	2	20.0%	\$160	24.7%	23.7%	1	14.3%	29.8%	\$100	27.5%	34.5%	1	33.3%	30.2%	\$60	21.1%	29.8%
	Upper	3	30.0%	\$156	24.0%	39.7%	2	28.6%	42.6%	\$85	23.4%	47.8%	1	33.3%	35.8%	\$71	24.9%	41.2%
	Unknown	1	10.0%	\$42	6.5%	0.0%	1	14.3%	8.5%	\$42	11.5%	5.2%	0	0.0%	1.9%	\$0	0.0%	0.2%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$649</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$364</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$285</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	18.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	1.6%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	1.6%	\$0	0.0%	2.3%	0	0.0%	2.1%	\$0	0.0%	1.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.8%	\$0	0.0%	96.0%	0	0.0%	97.9%	\$0	0.0%	98.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	13	5.9%	\$913	2.6%	18.8%	8	9.3%	9.6%	\$533	4.4%	5.6%	5	3.7%	8.6%	\$380	1.7%	4.4%
	Moderate	47	21.4%	\$5,693	16.3%	17.8%	20	23.3%	22.4%	\$2,147	17.8%	16.1%	27	20.1%	21.8%	\$3,546	15.4%	14.4%
	Middle	44	20.0%	\$6,395	18.3%	23.7%	18	20.9%	22.1%	\$2,468	20.5%	20.0%	26	19.4%	23.4%	\$3,927	17.1%	18.8%
	Upper	92	41.8%	\$18,936	54.1%	39.7%	30	34.9%	28.8%	\$5,383	44.7%	34.6%	62	46.3%	29.7%	\$13,553	59.0%	32.5%
	Unknown	24	10.9%	\$3,063	8.8%	0.0%	10	11.6%	17.1%	\$1,506	12.5%	23.7%	14	10.4%	16.5%	\$1,557	6.8%	29.8%
	<i>Total</i>	<i>220</i>	<i>100.0%</i>	<i>\$35,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,037</i>	<i>100.0%</i>	<i>100.0%</i>	<i>134</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,963</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

In 2018, the bank’s overall lending to low-income borrowers was comparable to aggregate lenders’ performance but below demographics. The bank’s overall lending to moderate-income borrowers was also comparable to aggregate lenders’ performance and slightly above demographics. In 2019, the bank’s overall lending to low-income borrowers was below aggregate lenders’ performance and demographics. The bank’s overall lending to moderate-income borrowers was comparable with aggregate lenders’ performance and slightly above demographics. According to FFIEC adjusted census data, 18.8% of the families in the assessment area were low income and 17.8% were moderate income for both years.

The overall lending performance is good, even though affordability concerns exist in the assessment area. Using the assumption that a borrower can afford a home for approximately three times their annual income, an individual with the highest income in the low-income bracket (\$39,249) could afford a home priced at \$117,747. The calculation is based on the 2019 FFIEC estimated median family income of \$78,500 for the Mankato MSA. According to 2019 FFIEC adjusted census data, the median housing values in the assessment area is \$159,435. The data suggest that homeownership may not be affordable for low-income borrowers. Using the same assumption, homeownership might be more affordable for a moderate-income borrower. A moderate-income borrower with the highest income in that bracket (\$62,799) may be able to afford a home priced at \$188,397. Also, according to management, the bank faces strong competition from national and regional banks, credit unions, and local community banks. The bank averaged a 3.1% market share over both years while large national banks held a 7.2% to 10.0% market share.

To meet credit needs for low- and moderate-income residents, the bank used several loan programs, such as VA, Home Ready, MHFA Fix-up, and FHLB Home\$tart loans. The use of these programs demonstrates the bank’s willingness to meet the credit needs of low- and moderate-income borrowers.

*Small Business.* The distribution of small business loans among businesses of different sizes is good. The following table shows the bank’s small business and small farm loans by revenue and loan size for the evaluation period. The table also includes aggregate lending data for each year.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Mankato-New Ulm, MN CSA

Product Type	Bank Lending & Demographic Data Comparison 2018, 2019						Bank & Aggregate Lending Comparison												
	2018, 2019					Total Businesses %	2018						2019						
	Bank		Dollar				Count			Dollar			Count			Dollar			
	#	%	\$ (000s)	\$ %	%		Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	152	51.9%	\$10,067	20.9%	89.1%	83	51.2%	49.5%	\$6,019	20.4%	27.8%	69	52.7%	51.9%	\$4,048	21.8%	24.0%
		Over \$1 Million	128	43.7%	\$37,363	77.6%	9.5%	72	44.4%					56	42.7%				
		Total Rev. available	280	95.6%	\$47,430	98.5%	98.6%	155	95.6%					125	95.4%				
		Rev. Not Known	13	4.4%	\$719	1.5%	1.4%	7	4.3%					6	4.6%				
		Total	293	100.0%	\$48,149	100.0%	100.0%	162	100.0%					131	100.0%				
	Loan Size	\$100,000 or Less	177	60.4%	\$7,381	15.3%		96	59.3%	89.9%	\$3,973	13.4%	26.8%	81	61.8%	88.5%	\$3,408	18.3%	25.1%
		\$100,001 - \$250,000	59	20.1%	\$9,731	20.2%		29	17.9%	4.0%	\$4,842	16.4%	11.8%	30	22.9%	4.5%	\$4,889	26.3%	11.7%
		\$250,001 - \$1 Million	57	19.5%	\$31,037	64.5%		37	22.8%	6.1%	\$20,752	70.2%	61.4%	20	15.3%	7.0%	\$10,285	55.3%	63.2%
		Total	293	100.0%	\$48,149	100.0%		162	100.0%	100.0%	\$29,567	100.0%	100.0%	131	100.0%	100.0%	\$18,582	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	126	82.9%	\$4,456	44.3%													
Small Farm	Revenue	\$1 Million or Less	128	92.1%	\$14,331	90.0%	Total Farms 98.3%	63	91.3%	39.3%	\$7,471	89.1%	55.4%	65	92.9%	38.6%	\$6,860	91.0%	51.8%
		Over \$1 Million	10	7.2%	\$1,455	9.1%	1.7%	6	8.7%					4	5.7%				
		Total Rev. available	138	99.3%	\$15,786	99.1%	100.0%	69	100.0%					69	98.6%				
		Not Known	1	0.7%	\$140	0.9%	0.0%	0	0.0%					1	1.4%				
		Total	139	100.0%	\$15,926	100.0%	100.0%	69	100.0%					70	100.0%				
	Loan Size	\$100,000 or Less	84	60.4%	\$3,783	23.8%		38	55.1%	76.0%	\$1,712	20.4%	25.6%	46	65.7%	81.4%	\$2,071	27.5%	32.4%
		\$100,001 - \$250,000	38	27.3%	\$6,068	38.1%		22	31.9%	16.8%	\$3,484	41.6%	37.3%	16	22.9%	13.8%	\$2,584	34.3%	38.4%
		\$250,001 - \$500,000	17	12.2%	\$6,075	38.1%		9	13.0%	7.2%	\$3,189	38.0%	37.1%	8	11.4%	4.8%	\$2,886	38.3%	29.2%
		Total	139	100.0%	\$15,926	100.0%		69	100.0%	100.0%	\$8,385	100.0%	100.0%	70	100.0%	100.0%	\$7,541	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	82	64.1%	\$3,714	25.9%													

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

For both years, the bank’s lending to small businesses was consistent with aggregate lenders by number of loans. According to 2018 and 2019 D&B data, 89.1% of businesses in the assessment area had gross annual revenues of \$1 million or less. For both years, the bank and aggregate lenders were below demographic data. The bank’s lending was below aggregate for loans for amounts of \$100,000 or less but exceeded aggregate lenders for amounts ranging from \$100,001 to \$1 million. The bank competes against many large financial institutions and a major credit card company. Some smaller entities may use credit cards to fund smaller dollar working capital needs or operating expenses. The bank averaged an 8.2% market share over both years. During the evaluation period, the bank used a flexible loan program through the SBA to help a borrower obtain financing.

*Small Farm.* The distribution of small farm loans among farms of different sizes is excellent. For both years, the bank’s lending to small farms greatly exceeded aggregate lenders and was slightly below demographics. According to D&B data, 98.2% and 98.3% of farms had gross annual revenues of \$1 million or less in 2018 and 2019, respectively. The bank’s lending was below aggregate lenders for loans of \$100,000 or less. It exceeded aggregate lenders for loans ranging from \$100,001 to \$1 million. While the bank averaged 22.0% of market share over both years, it faces competition from other financial institutions—mostly from a lender who specializes in agricultural financing. During the evaluation period, the bank used a flexible loan program through Farmer Mac to help a borrower obtain financing.

**Geographic Distribution**

Overall, the geographic distribution of the bank’s HMDA, small business, and small farm loans is adequate and does not reveal any unexplained gaps in lending. There are four moderate-income tracts and

no low-income tracts in this assessment area. The majority (80.0%) of tracts are classified as middle-income. The bank did not originate small farm loans in the moderate-income tracts; however, given the performance context, this is reasonable.

*Residential Real Estate.* The geographic distribution of residential real estate loans is adequate. At the product level, examiners focused on home purchase and refinance loans based on loan volume. The following table shows the bank’s HMDA data and aggregate lending data by census tract and product type for both years.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Mankato-New Ulm, MN CSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank		Dollar		Owner Occupied Units %	Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %		Bank #	%	Agg %	\$ (000s)	\$ %	Agg %	Bank #	%	Agg %	\$ (000s)	\$ %	Agg %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	1.6%	\$487	2.2%	5.9%	0	0.0%	10.1%	\$0	0.0%	7.7%	2	2.7%	9.3%	\$487	3.6%	7.5%
	Middle	107	82.9%	\$18,741	83.4%	85.6%	49	87.5%	82.5%	\$7,915	88.3%	85.2%	58	79.5%	84.6%	\$10,826	80.1%	86.7%
	Upper	20	15.5%	\$3,253	14.5%	8.4%	7	12.5%	7.5%	\$1,047	11.7%	7.1%	13	17.8%	6.1%	\$2,206	16.3%	5.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>129</b>	<b>100.0%</b>	<b>\$22,481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,962</b>	<b>100.0%</b>	<b>100.0%</b>	<b>73</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,519</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	4.6%	\$279	2.7%	5.9%	1	6.7%	9.3%	\$75	4.6%	7.7%	2	4.0%	5.4%	\$204	2.3%	4.4%
	Middle	55	84.6%	\$9,003	86.7%	85.6%	13	86.7%	82.8%	\$1,553	94.7%	83.2%	42	84.0%	85.1%	\$7,450	85.2%	85.9%
	Upper	7	10.8%	\$1,104	10.6%	8.4%	1	6.7%	7.9%	\$12	0.7%	9.1%	6	12.0%	9.5%	\$1,092	12.5%	9.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>\$10,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,640</b>	<b>100.0%</b>	<b>100.0%</b>	<b>50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,746</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	9.1%	\$0	0.0%	9.2%	0	0.0%	10.1%	\$0	0.0%	5.0%
	Middle	10	71.4%	\$474	70.3%	85.6%	5	71.4%	79.8%	\$318	71.3%	79.4%	5	71.4%	78.0%	\$156	68.4%	77.1%
	Upper	4	28.6%	\$200	29.7%	8.4%	2	28.6%	11.1%	\$128	28.7%	11.4%	2	28.6%	11.9%	\$72	31.6%	17.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>\$674</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$228</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$185	22.8%	25.5%	0	0.0%	18.2%	\$0	0.0%	11.2%	1	100.0%	24.6%	\$185	100.0%	5.3%
	Middle	1	50.0%	\$625	77.2%	73.4%	1	100.0%	81.8%	\$625	100.0%	88.8%	0	0.0%	75.4%	\$0	0.0%	94.7%
	Upper	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$810</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$625</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$185</b>	<b>100.0%</b>	<b>100.0%</b>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	5.5%	\$0	0.0%	7.5%	0	0.0%	4.5%	\$0	0.0%	1.9%
	Middle	0	0.0%	\$0	0.0%	85.6%	0	0.0%	76.7%	\$0	0.0%	77.6%	0	0.0%	92.5%	\$0	0.0%	97.5%
	Upper	0	0.0%	\$0	0.0%	8.4%	0	0.0%	17.8%	\$0	0.0%	14.9%	0	0.0%	3.0%	\$0	0.0%	0.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Mankato-New Ulm, MN CSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Owner Occupied Units %	Count		Bank		Dollar			Count		Dollar				
		#	%		\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.7%	\$0	0.0%	3.4%
	Middle	9	90.0%	\$632	97.4%	85.6%	6	85.7%	89.4%	\$347	95.3%	93.5%	3	100.0%	86.8%	\$285	100.0%	93.1%
	Upper	1	10.0%	\$17	2.6%	8.4%	1	14.3%	10.6%	\$17	4.7%	6.5%	0	0.0%	7.5%	\$0	0.0%	3.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$649</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$364</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$285</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	7.9%	\$0	0.0%	7.1%	0	0.0%	25.5%	\$0	0.0%	20.5%
	Middle	0	0.0%	\$0	0.0%	85.6%	0	0.0%	87.3%	\$0	0.0%	88.2%	0	0.0%	74.5%	\$0	0.0%	79.5%
	Upper	0	0.0%	\$0	0.0%	8.4%	0	0.0%	4.8%	\$0	0.0%	4.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	6	2.7%	\$951	2.7%	5.9%	1	1.2%	9.7%	\$75	0.6%	8.1%	5	3.7%	8.1%	\$876	3.8%	6.0%
	Middle	182	82.7%	\$29,475	84.2%	85.6%	74	86.0%	82.5%	\$10,758	89.4%	85.1%	108	80.6%	84.5%	\$18,717	81.5%	87.8%
	Upper	32	14.5%	\$4,574	13.1%	8.4%	11	12.8%	7.8%	\$1,204	10.0%	6.8%	21	15.7%	7.4%	\$3,370	14.7%	6.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>220</i>	<i>100.0%</i>	<i>\$35,000</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,037</i>	<i>100.0%</i>	<i>100.0%</i>	<i>134</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,963</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

While the bank made HMDA loans in some moderate-income tracts, it was below aggregate lenders and demographics. In 2018, the bank did not extend HMDA loans in three of the four moderate-income tracts (1706.00, 1707.00, and 1711.01). In 2019, the bank extended HMDA loans in all but one moderate-income tract (1707.00). Tract 1707.00, located in Mankato, consists of a commercial area and some housing. Residents in this tract have access to numerous financial institutions. The moderate-income tracts also include Minnesota State University and an older downtown area with businesses and housing. The older housing stock in this area may need more repairs than lower-income residents can afford. Bank management stated there are affordable homes, but they may not be in acceptable shape for homebuyers. According to 2019 FFIEC adjusted census data, 6.1% of families reside in moderate-income tracts; the majority (86.0%) reside in middle-income tracts. In the moderate-income tracts, only 5.9% of housing stock is owner-occupied and 8.6% is vacant; the majority (57.5%) is rental housing, which helps explain the lower level of lending opportunities in these tracts by the bank and aggregate lenders.

*Small Business.* The geographic distribution of small business loans is adequate. The following table shows the geographic distribution of the bank's small business and small farm loans, as well as aggregate lending data.

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: Mankato-New Ulm, MN CSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar				
#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %		
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	25	8.5%	\$3,092	6.4%	14.6%	15	9.3%	16.8%	\$1,288	4.4%	22.2%	10	7.6%	18.7%	\$1,804	9.7%	24.4%
	Middle	254	86.7%	\$43,600	90.6%	79.2%	139	85.8%	76.5%	\$27,560	93.2%	74.1%	115	87.8%	74.4%	\$16,040	86.3%	72.4%
	Upper	14	4.8%	\$1,457	3.0%	6.2%	8	4.9%	5.2%	\$719	2.4%	2.8%	6	4.6%	5.3%	\$738	4.0%	2.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	1.6%	\$0	0.0%	0.8%
	<b>Total</b>	<b>293</b>	<b>100.0%</b>	<b>\$48,149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,567</b>	<b>100.0%</b>	<b>100.0%</b>	<b>131</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,582</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM						<b>Total Farms</b>												
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	138	99.3%	\$15,906	99.9%	90.1%	69	100.0%	94.4%	\$8,385	100.0%	97.1%	69	98.6%	92.6%	\$7,521	99.7%	94.6%
	Upper	1	0.7%	\$20	0.1%	8.6%	0	0.0%	5.3%	\$0	0.0%	2.9%	1	1.4%	6.4%	\$20	0.3%	5.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.2%	
	<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$15,926</b>	<b>100.0%</b>	<b>100.0%</b>	<b>69</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,385</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,541</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

For both years, the bank’s small business lending is below aggregate lenders and demographics when lending in moderate-income tracts. According to D&B data, 14.6% of small businesses are in moderate-income tracts for both years. The bank did not extend small business loans in moderate-income tract 1711.01 during the evaluation period. This is reasonable given Minnesota State University is located in this tract, in addition to the strong competition in the area.

*Small Farm.* The geographic distribution of small farms loans is adequate. The bank and aggregate lenders did not lend in the moderate-income tracts during the evaluation period. This is reasonable because the moderate-income tracts mostly comprise the city of Mankato, which includes some residential areas, businesses, several school districts, and colleges. According to D&B data, only 1.2% of small farm entities are in moderate-income tracts. The vast majority of bank and aggregate small farm lending is in middle-income tracts where small farms are located. The bank also did not make small farm loans in the upper-income tracts and some of the middle-income tracts. The bank’s lack of lending in those tracts is reasonable given the lack of farms and competition in those tracts.

**Community Development Loans**

The bank made a relatively high-level community development loan in the Mankato–New Ulm CSA assessment area. During the evaluation period, the bank originated one SBA 504 loan with an economic development purpose for \$2.6 million. The financing enabled a business to demolish an existing building and construct a new one, as well as create jobs in the assessment area. According to bank management and community contacts, there are several financial institutions in the assessment area and competition is strong for community development loans. This loan demonstrates good responsiveness to community needs.

**INVESTMENT TEST**

Overall, the bank made a significant level of qualified investments, including donations, in the Mankato–New Ulm CSA assessment area. The level of qualified investments in the form of securities is adequate. The bank made a new MBS investment in the amount of \$174,000 that supports affordable housing initiatives. According to bank management, investment opportunities are limited and the bank faces competition from other financial institutions.



The bank made a significant level of qualified investments in the form of donations, as shown in the table at the right. Most donations provide community services that support low- and moderate-income residents. The organizations receiving the donations provide financial literacy, health, and social services for low- and moderate-income individuals. The level of donations shows good responsiveness.

<b>Qualified Investment Donations Mankato–New Ulm CSA Assessment Area</b>		
<i>Purpose</i>	<b>#</b>	<b>\$</b>
Affordable Housing	1	250
Community Service	27	42,095
Revitalize / Stabilize	1	550
<b>Total</b>	<b>29</b>	<b>42,895</b>

**SERVICE TEST**

The bank’s delivery systems are readily accessible to residents, businesses, and farms throughout the assessment area. Services do not vary in a way that inconveniences individuals or areas. The bank provides a relatively high level of community development services.

**Retail Services**

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different income levels. Bank services do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates six branch offices in the Mankato–New Ulm CSA (two full-service and four limited-service offices). The two full-service offices are in North Mankato and New Ulm and do not have ATMs. There are two limited-service offices in North Mankato, one in Mankato and one in New Ulm. Drive-up facilities are available at five of the six offices. The drive-up facilities offer extended weeknight hours, and some have Saturday hours. The bank has cash-dispensing-only ATMs at three of the limited-service offices and a grocery store. Three limited-service offices and one full-service office are within a mile of moderate-income census tracts. One cash-dispensing-only ATM is in a moderate-income tract.

Additional delivery services include online and mobile banking, 24-hour telephone banking, night and remote deposit capture as well as other retail services so customers can conduct banking activities outside of normal business hours. The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS  
Assessment Area: Mankato-New Ulm, MN CSA

Tract Category	Branches							ATMs								Demographics								
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs			Cash only ATMs			Census Tracts	House holds	Total Businesses						
	#	%						#	%	#	%	Open	Closed	Open	Closed				Open	Closed	#	%	%	
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0						
Moderate	0	0.0%	0	0	0	0	0	Total	1	25.0%	0	0.0%	0	0	1	25.0%	0	0	4	13.3%	11.1%	14.6%		
DTO	0		0	0				SA	1		0		0	0	0		0	0						
Middle	6	100.0%	0	0	5	3	4	Total	3	75.0%	0	0.0%	0	0	3	75.0%	0	0	24	80.0%	82.5%	79.2%		
DTO	0		0	0				SA	0		0		0	0	0		0	0						
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	6.7%	6.3%	6.2%		
DTO	0		0	0				SA	0		0		0	0	0		0	0						
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%		
DTO	0		0	0				SA	0		0		0	0	0		0	0						
Total	6	100.0%	0	0	5	3	4	Total	4	100.0%	0	0.0%	0	0	4	100.0%	0	0	30	100.0%	100.0%	100.0%		
DTO	0		0	0				SA	1		0		0	0	0		0	0						

2019 FFIEC Census Data, 2019 D&B Info 2010 ACS Data  
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
DTO - Drive thru only is a subset of total branches  
SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. Eight employees serve on seven organizations, some serving as board or committee members. Others provided financial education to low- or moderate-income children or provided bookkeeping services to affordable housing organizations. These nonprofit organizations provide affordable housing, financial literacy, health and social services to low- and moderate-income residents, as well as providing resources for economic growth and development. The table to the right shows the services by community development purpose and number for the evaluation period.

Community Development Services Mankato–New Ulm CSA Assessment Area	
Purpose	#
Affordable Housing	5
Community Service	6
Economic Development	6
<b>Total</b>	<b>17</b>

## MINNESOTA NONMETROPOLITAN AREA FULL-SCOPE REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLINTON, MINNESOTA

*Bank Information.* The bank operates one full-service branch office in the Clinton assessment area. It has a drive-up facility and a cash-dispensing-only ATM. By number, the bank has 2.8% of its offices in this assessment area. See the Retail Services Test section for more details.

According to the June 30, 2019, FDIC Deposit Market Share Report, the bank ranked second among five FDIC-insured institutions operating in the Clinton assessment area, with a 23.3% deposit market share and \$43.6 million in deposits. The deposits in this assessment area represent 3.0% of the bank's overall deposits.

*Assessment Area Information.* The assessment area consists of Big Stone County in western Minnesota along the South Dakota border. The bank has not changed the assessment area since the previous evaluation. The assessment area is comprised of three underserved middle-income census tracts. The income classifications for these census tracts have not changed.

The following Combined Demographics Report provides demographic information for this assessment area, based on 2019 FFIEC adjusted census data and 2019 D& B data.<sup>19</sup>

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<sup>19</sup> The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2018 OMB revised MSA delineations.

### Combined Demographics Report

Assessment Area(s): Clinton, MN

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	308	20.3	
Moderate-income	0	0	0	0	0	0	285	18.8	
Middle-income	3	100	1,517	100	169	11.1	378	24.9	
Upper-income	0	0	0	0	0	0	546	36	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>3</b>	<b>100.0</b>	<b>1,517</b>	<b>100.0</b>	<b>169</b>	<b>11.1</b>	<b>1,517</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	0	0	0	0	0	0	0	0	
Middle-income	3,109	100	1,803	58	479	15.4	827	26.6	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>3,109</b>	<b>100.0</b>	<b>1,803</b>	<b>58.0</b>	<b>479</b>	<b>15.4</b>	<b>827</b>	<b>26.6</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	0	0	0	0	0	0	0	0	
Middle-income	271	100	240	100	16	100	15	100	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>271</b>	<b>100.0</b>	<b>240</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>88.6</b>			<b>5.9</b>	<b>5.5</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	0	0	0	0	0	0	0	0	
Middle-income	105	100	103	100	2	100	0	0	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>105</b>	<b>100.0</b>	<b>103</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.1</b>			<b>1.9</b>	<b>.0</b>	

2019 FFIEC Census Data and 2019 D&B Information

*Income.* For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the nonmetropolitan areas of Minnesota for the year of loan origination. The table below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels  
Statewide Non-Metropolitan-- Minnesota**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2018</b>	<b>\$69,500</b>	0 - \$34,749	\$34,750 - \$55,599	\$55,600 - \$83,399	\$83,400 - & above
<b>2019</b>	<b>\$68,800</b>	0 - \$34,399	\$34,400 - \$55,039	\$55,040 - \$82,559	\$82,560 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family income for the nonmetropolitan areas of Minnesota, which was \$63,182 for 2018 and \$63,045 for 2019.

*Population.* According to 2019 FFIEC adjusted census data, the population of the assessment area is 5,134. By age, the population is as follows: 21.0% are 17 years and younger, 6.1% are 18 to 24 years, 47.3% are 25 to 64 years, and 25.6% are 65 and older. The most populated towns in the assessment area are Ortonville (the county seat), Graceville, and Clinton.

*Housing Information.* Based on 2019 adjusted census data, this assessment area has 3,109 housing units; 58.0% are owner-occupied, 15.4% are rental units, and 26.6% are vacant. The median age of the housing stock is 61 years, which is higher than the state median of 40 years. The median housing value is \$94,874 and the affordability ratio is 50.3%, which is higher than the state ratio of 33.0%. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

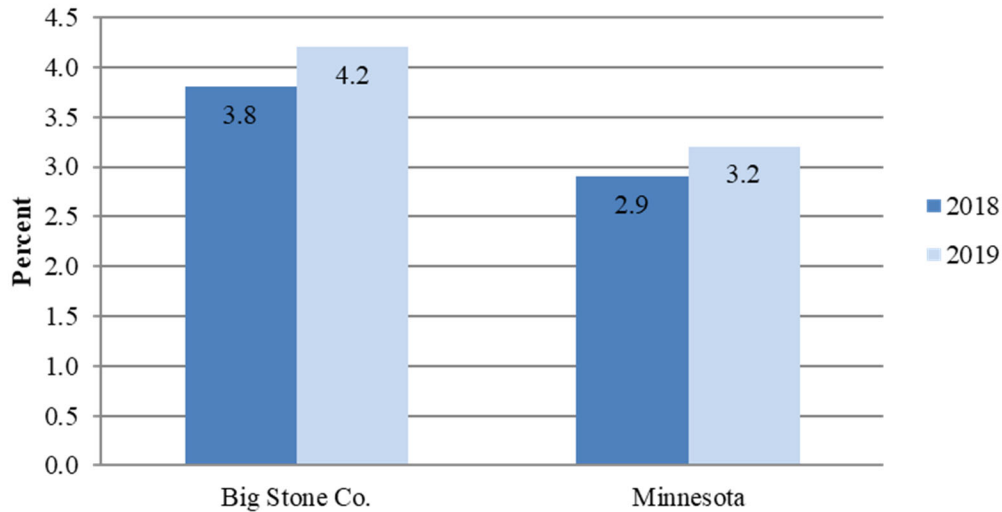
According to bank management, home sales prices cover a wide range and meet the needs of residents at various income levels. Higher-priced homes are located along the lake in Clinton.

*General Economic and Business Information.* According to a community contact, the overall economy is fairly unstable. The area is mostly dependent on agriculture and agriculture-related industries, yet there has been a decline in all sectors of these industries. During the evaluation period, farm operators were at a status quo; generally, farmers did not expand or replace equipment. The primary crops are corn and soybeans, with a little wheat. There are some livestock operations for beef and hogs, but they are not major industries. According to bank management, farmers had a fairly good year in 2018 and 2019; however, crops were in poor condition and yields were lower than normal, so farmers relied on crop insurance. A community contact indicated that the majority of farmers in the area rely on off-farm jobs because they typically provide healthcare benefits. The average age of farmers continues to increase because young people move out of the area to further their education and do not always return.

Big Stone County is rural and has limited commercial industry. In Clinton, there are some small businesses, including a convenience store, grocery store, and lumber yard. Some communities, such as Graceville and Ortonville, have county government, healthcare, and local school districts for employment, but there is no other major commercial industry. Several residents commute outside of Big Stone County to Morris, Minnesota, or Millbank, South Dakota, that have more employment opportunities.

As shown in the Unemployment Rates chart below, the unemployment rate was slightly higher in Big Stone County than the state level but considered low overall.

### Unemployment Rates - Clinton, MN



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CLINTON, MINNESOTA

The bank’s Lending Test performance in the Clinton assessment area is good. Lending levels show excellent responsiveness to assessment area credit needs. Overall, the distribution of loans reflects excellent dispersion among businesses and farms of different sizes. The geographic distribution and dispersion of loans throughout the assessment area is adequate. The bank did not make any community development loans during the evaluation period and made limited use of flexible loan programs to help meet credit needs of consumers and small farms. Examiners assigned the most weight to small farms loans, followed by small business loans for distribution by revenue size given lending volume. Minimal weight was given for geographic distribution of small business and small farm lending given the composition of the assessment area, which only include three middle-income tracts. Examiners did not review HMDA loans because it is not a material product line for this assessment area.

Overall, the Investment Test performance in the Clinton assessment area is significant. The bank made and held a significant level of qualified investments and donations, which shows good responsiveness to credit and community development needs.

Finally, under the Service Test, the bank’s delivery systems are accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provides an adequate level of community development services in the assessment area.

### LENDING TEST

The bank’s Lending Test performance in the Clinton assessment area is good.

#### Lending Activity

The bank’s lending activity reflects excellent responsiveness to assessment area credit needs. For CRA reporters, the bank ranked first among 20 lenders reporting small business and small farm loan data in 2018, with a 42.7% market share for small business loans and a 64.2% market share for small farm loans. In 2019, the bank ranked first among 26 lenders reporting CRA small business and small farm loan data, with a 41.0% market share for small business loans and a 64.3% market share for small farm loans.

During the evaluation period, lending activity in this assessment area represented 7.7% by number and 5.4% by dollar amount of the bank’s total lending. Within the bank’s Minnesota assessment areas, the lending activity in the Clinton assessment area was 9.0% by number and 6.2% by dollar amount.

**Distribution by Size of Businesses and Farms**

The bank’s distribution of loans reflects excellent dispersion among businesses and farms of different sizes.

*Small Business.* The distribution of small business loans among businesses of different sizes and loan size is excellent. The following table shows the small business and small farm loan data by revenue and loan size for 2018 and 2019, respectively, as well as aggregate lending data.

**Small Business & Small Farm Lending By Revenue & Loan Size**

Assessment Area: MN Clinton

Product Type	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison													
	Bank				Total Businesses	2018			2019										
	Count		Dollar			Bank	Agg	Dollar	Count		Dollar								
	#	%	\$ (000s)	\$ %	%				#	%	%	\$ 000s	\$ %	\$ %					
Small Business	Revenue	\$1 Million or Less	96	82.1%	\$2,750	56.5%	88.6%	39	73.6%	68.5%	\$875	34.8%	31.8%	57	89.1%	69.9%	\$1,875	79.8%	51.0%
		Over \$1 Million	12	10.3%	\$1,946	40.0%	5.9%	8	15.1%					4	6.3%				
		Total Rev. available	108	92.4%	\$4,696	96.5%	94.5%	47	88.7%					61	95.4%				
		Rev. Not Known	9	7.7%	\$172	3.5%	5.5%	6	11.3%					3	4.7%				
		Total	117	100.0%	\$4,868	100.0%	100.0%	53	100.0%					64	100.0%				
	Loan Size	\$100,000 or Less	109	93.2%	\$2,721	55.9%		50	94.3%	87.9%	\$1,196	47.5%	31.6%	59	92.2%	91.7%	\$1,525	64.9%	48.4%
		\$100,001 - \$250,000	6	5.1%	\$1,026	21.1%		1	1.9%	6.5%	\$200	7.9%	18.6%	5	7.8%	5.8%	\$826	35.1%	21.4%
		\$250,001 - \$1 Million	2	1.7%	\$1,121	23.0%		2	3.8%	5.6%	\$1,121	44.5%	49.8%	0	0.0%	2.6%	\$0	0.0%	30.2%
		Total	117	100.0%	\$4,868	100.0%		53	100.0%	100.0%	\$2,517	100.0%	100.0%	64	100.0%	100.0%	\$2,351	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	93	96.9%	\$2,277	82.8%													
Small Farm	Revenue	\$1 Million or Less	230	81.0%	\$24,790	71.7%	98.1%	114	77.6%	70.7%	\$12,028	66.8%	69.5%	116	84.7%	78.9%	\$12,762	77.1%	78.3%
		Over \$1 Million	48	16.9%	\$9,535	27.6%	1.9%	29	19.7%					19	13.9%				
		Total Rev. available	278	97.9%	\$34,325	99.3%	100.0%	143	97.3%					135	98.6%				
		Not Known	6	2.1%	\$234	0.7%	0.0%	4	2.7%					2	1.5%				
		Total	284	100.0%	\$34,559	100.0%	100.0%	147	100.0%					137	100.0%				
	Loan Size	\$100,000 or Less	185	65.1%	\$7,657	22.2%		96	65.3%	68.6%	\$3,999	22.2%	22.6%	89	65.0%	65.7%	\$3,658	22.1%	23.5%
		\$100,001 - \$250,000	49	17.3%	\$8,347	24.2%		26	17.7%	16.6%	\$4,571	25.4%	27.1%	23	16.8%	21.1%	\$3,776	22.8%	33.4%
		\$250,001 - \$500,000	50	17.6%	\$18,555	53.7%		25	17.0%	14.8%	\$9,441	52.4%	50.3%	25	18.2%	13.1%	\$9,114	55.1%	43.1%
		Total	284	100.0%	\$34,559	100.0%		147	100.0%	100.0%	\$18,011	100.0%	100.0%	137	100.0%	100.0%	\$16,548	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	159	69.1%	\$6,324	25.5%													
Loan Size & Rev \$1 Mill or Less	\$100,001 - \$250,000	37	16.1%	\$6,197	25.0%														
	\$250,001 - \$500,000	34	14.8%	\$12,269	49.5%														
	Total	230	100.0%	\$24,790	100.0%														

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

For both years, the bank’s small business lending exceeded aggregate lenders and was consistent with demographics. According to 2018 D&B data, 88.5% of businesses in the assessment area have gross annual revenues of \$1 million or less. This figure is consistent with 2019 D&B data. In 2018, the bank made six loans where it did not report the gross annual revenues. Bank management confirmed those borrowers had gross annual revenues of \$1 million or less, which, if reflected in the data, would show the bank’s lending to small business entities as 84.9% by number.

The bank extended a majority of its small business loans for amounts of \$100,000 or less in 2018 and 2019 (94.3% and 92.2%, respectively). This was slightly above aggregate lenders in 2018 (87.9%) and consistent with aggregate lenders in 2019 (91.7%). The bank’s performance indicates a willingness to

meet the credit needs of small businesses in its assessment area as they typically request smaller loan amounts.

*Small Farm.* The distribution of small farm loans among farms of different sizes is excellent. For both years, the bank's small farm lending was above aggregate lenders, by number of loans, but below demographics. According to 2018 D&B data, 98.2% of farms in the assessment area have gross annual revenues of \$1 million or less. This figure is consistent with 2019 D&B data. According to bank management, many small hobby farms in the area report their operations as small farm entities that do not actively seek credit; those farms may be reflected in the D&B data. Bank management also faces strong competition from agricultural dealers that offer financing for equipment, feed, and chemicals; however, the bank is the top small farm reporter for both years.

Over both years, the bank averaged 65.2% of its small farm loans for amounts of \$100,000 or less. This is slightly below aggregate lenders in 2018 (68.6%) but consistent with aggregate lenders in 2019 (65.7%). The bank's performance indicates a willingness to meet the credit needs of small farms in its assessment area as they typically request smaller loan amounts. During the evaluation period, the bank used a flexible loan program to help a borrower obtain financing.

### **Geographic Distribution**

The geographic distribution and dispersion of the bank's small business and small farms loans in the Clinton assessment area is adequate and does not reveal any unexplained gaps in lending. As noted previously, the assessment area consists of three underserved middle-income tracts.

The bank originated loans in all census tracts during the evaluation period; however, most of the lending occurred in tracts 9501 and 9502, which are the largest tracts by size and when combined, largest by population. The bank's office, which is centrally located in Big Stone County, is located in tract 9501 and is in close proximity to the border of tract 9502. The bank's office is approximately 11 miles from the town of Ortonville, located in tract 9503; Ortonville has offices of other financial institutions.

### **Community Development Lending**

The bank did not make any community development loans in this assessment area during the evaluation period. This is reasonable given the assessment area is very rural. According to bank management, community development opportunities were very limited during the evaluation period.

### **INVESTMENT TEST**

Overall, the bank made a significant level of qualified investments that demonstrated good responsiveness to the community needs of the assessment area. The bank continues to hold four prior-period investments totaling \$545,912. However, \$69,977 matured within one month of the evaluation period and two others totaling \$335,935 matured in June 2019, bringing the outstanding amount to \$140,000. These investments helped revitalize and stabilize the area by retaining senior housing for low-income residents and providing essential infrastructure. One investment addressed broadband needs, which has a significant impact on a rural area. These investments help attract new residents and businesses to the area and retain those already in the area.



The bank also made a significant level of qualified investments in the form of donations, as shown in the table to the right. Most of the donations met important community needs for the operation of facilities that provide health care, education, public safety, and public services. These donations help revitalize and stabilize the underserved geographies, including attracting and retaining residents and businesses.

<b>Qualified Investment Donations Clinton Assessment Area</b>		
<i>Purpose</i>	<b>#</b>	<b>\$</b>
Economic Development	1	490
Revitalize & Stabilize Distressed and/or Underserved Tracts	15	5,128
<b>Total</b>	<b>16</b>	<b>\$5,618</b>

**SERVICE TEST**

The bank’s delivery systems are accessible to businesses and farms throughout the assessment area. Services do not vary in a way that inconveniences particular individuals or areas. The bank provides an adequate level of community development services.

**Retail Services**

Delivery systems in the assessment area are accessible to the bank’s geographies and to individuals of different income levels. Bank services do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates one full-service office with a drive-up facility and a cash-dispensing-only ATM. The office is located in Clinton, which is relatively centrally located in the assessment area. The office and drive-up facility do not offer extended or weekend hours, but the ATM is available 24/7.

Additional delivery services include online and mobile banking, 24-hour telephone banking, night and remote deposit capture, as well as other retail services that allow customers to conduct banking activities outside of normal business hours.

**Community Development Services**

The bank provides an adequate level of community development services in this assessment area. A banker provided financial expertise as a board treasurer to an organization that fundraises and distributes donations to several organizations that serve low- and moderate-income residents.

## MINNESOTA METROPOLITAN AREAS LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DULUTH, MINNESOTA-WISCONSIN MSA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Duluth MSA assessment area. They determined that the bank’s lending, investment, and service performance in this assessment area is generally consistent with the performance in the full-scope metropolitan assessment areas. Examiners did not evaluate the bank’s small farm lending because it is not a major business line for this assessment area.

This assessment area consists of a portion of the Duluth, MN-WI MSA, which is in northeastern Minnesota and northwestern Wisconsin. The assessment area includes Carlton County, all but one census tract of St. Louis County, and a portion of Douglas County.<sup>20</sup> The Duluth MSA consists of Carlton, Lake, and St. Louis counties in Minnesota and Douglas County in Wisconsin.<sup>21</sup> The income classifications of the tracts in the assessment area are noted in the table below. According to 2019 FFIEC adjusted census data, the population of the assessment area is 263,299.<sup>22</sup> The assessment area includes the Fond du Lac Reservation and small portions of the Bois Forte Indian Reservation. The assessment area is adjacent to and north of the bank’s Pine City assessment area.

The bank operates five full-service branches in the assessment area, one each in Cloquet, Duluth, Ely, Tower, and Virginia, all of which are in Minnesota. Four of the branches (Cloquet, Ely, Tower, and Virginia) have drive-up facilities and the Ely branch has a cash-dispensing-only ATM. Since the previous evaluation, the bank relocated its Duluth branch and closed a cash-dispensing-only ATM at its Cloquet branch.<sup>23</sup> The Cloquet branch offers Saturday hours. The Duluth, Ely, and Virginia branches are in moderate-income tracts, and the Cloquet and Tower branches are in middle-income tracts.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Duluth Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	8	9.8	4.7	20.2
Moderate Income	17	20.7	14.8	17.2
Middle Income	41	50.0	54.4	22.9
Upper Income	16	19.5	26.0	39.7
<b>Total</b>	<b>82</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<sup>20</sup> The bank’s assessment area no longer includes unknown-income tract 9901.00 in St. Louis County, as at the previous evaluation; this tract consists entirely of water and covers a small portion of Lake Superior.

<sup>21</sup> Lake County became part of the Duluth, MN-WI MSA based on the September 2018 OMB revised MSA delineations.

<sup>22</sup> The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data; it also reflects changes from the 2018 OMB revised MSA delineations.

<sup>23</sup> The bank acquired the Duluth, Minnesota, banking operation of Alerus Financial, National Association, in April 2019 and moved its branch to this new location. The new location is in the same census tract as the previous location.

The following table shows the bank's lending activity in the assessment area during the evaluation period.<sup>24</sup>

<b>Lending Activity in the Duluth Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	201	189	390
Small Business	233	227	460
Small Farm	11	7	18
<b>Total</b>	<b>445</b>	<b>423</b>	<b>868</b>

By number, the Duluth MSA assessment area accounts for 15.9% of the bank's overall lending during the evaluation period and 18.5% of the bank's lending activity in the Minnesota assessment areas. For HMDA loans, the bank ranked eighth of 284 financial institutions reporting HMDA loans in the assessment area for 2018 and eighth of 328 in 2019. The bank's HMDA lending accounted for an average of 2.6% of the loans reported in the assessment area. For small business loans, the bank ranked sixth among 67 institutions reporting small business loans in the assessment area in 2018 and sixth of 69 in 2019. The bank's small business lending accounted for an average of 6.3% of the loans reported in the assessment area.

The bank's community development loans in the assessment area are noteworthy. Specifically, the bank originated eight loans for nearly \$5.9 million, which helped to promote economic development as well as support organizations that provide services to low- and moderate-income individuals.

The bank's qualified investments in the form of securities in the assessment area are noteworthy. Specifically, the bank made new investments totaling approximately \$949,000 and holds approximately \$354,000 in a prior-period bond. In addition, one bond matured during the evaluation period. The new investments helped to revitalize and/or stabilize moderate-income areas and promoted affordable housing.

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. CLOUD, MINNESOTA MSA**

Examiners conducted a limited-scope review of the bank's CRA performance in the St. Cloud MSA assessment area. They determined the bank's lending performance is generally consistent with the performance in the full-scope nonmetropolitan assessment areas. The bank's investment and service performance are below the performance in the full-scope metropolitan assessment areas, based on a lower level of qualified investments and community development services. However, this performance does not change the conclusion for the metropolitan portions of the state. Examiners did not include the bank's HMDA and small business lending in the analysis because they are not major business lines for this assessment area.

This assessment area consists of Benton County, which is part of the St. Cloud, MN MSA. Benton and Stearns counties compose the entire St. Cloud, MN MSA. The assessment area includes one moderate-income and eight middle-income census tracts, as noted in the table below. According to 2019 FFIEC adjusted census data, the population of the assessment area is 39,221.

The bank operates one full-service branch and a stand-alone drive-up/walk-up facility in Foley, Minnesota. The drive-up/walk-up facility has a cash-dispensing-only ATM and offers Saturday and extended weekday hours. The branch and drive-up/walk-up facility are in the same middle-income tract.

<sup>24</sup> For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – St. Cloud Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	22.3
Moderate Income	1	11.1	13.0	19.5
Middle Income	8	88.9	87.0	21.9
Upper Income	0	0.0	0.0	36.3
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the St. Cloud Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	20	14	34
Small Business	21	16	37
Small Farm	27	30	57
<b>Total</b>	<b>68</b>	<b>60</b>	<b>128</b>

By number, the St. Cloud MSA assessment area accounts for 2.3% of the bank’s overall lending during the evaluation period and 2.7% of the bank’s lending activity in the Minnesota assessment areas. For small farm loans, the bank ranked first among 11 institutions reporting small farm loans in the assessment area in 2018 and first of 10 in 2019. The bank’s small farm lending accounted for an average of 29.4% of the loans reported in the assessment area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF MINNESOTA**

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section of the report shows the bank’s community development lending and qualified investments in the form of securities for each assessment area. The Minnesota state section of the reports shows qualified investments in the form of donations, and community development services, for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the state rating, are shown in the table below.

<b>Performance in the Limited-Scope Review Minnesota MSA Assessment Areas</b>			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Duluth, MN Partial MSA	Consistent	Consistent	Consistent
St. Cloud, MN Partial MSA	Consistent	Below	Below

## MINNESOTA NONMETROPOLITAN AREAS LIMITED REVIEW

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ADA, MINNESOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Ada assessment area. They determined the bank’s lending and investment performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. The bank’s service performance exceeds the performance of the full-scope nonmetropolitan assessment area because of the level of community development services. However, this performance does not change the conclusion for the nonmetropolitan portion of the state. Examiners did not include the bank’s HMDA loans in the analysis because it is not a major business line for this assessment area.

This assessment area consists of Norman County, which is in northwestern Minnesota. The assessment area includes three middle-income census tracts, which are designated as underserved. According to 2019 FFIEC adjusted census data, the population of the assessment area is 6,692. The bank operates one full-service branch, with a drive-up and cash-dispensing-only ATM, in Ada, Minnesota.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Ada Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	0	0.0	0.0	18.5
Moderate Income	0	0.0	0.0	18.1
Middle Income	3	100.0	100.0	25.0
Upper Income	0	0.0	0.0	38.4
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the Ada Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	16	16	32
Small Business	24	26	50
Small Farm	57	56	113
<b>Total</b>	<b>97</b>	<b>98</b>	<b>195</b>

By number, the Ada assessment area accounts for 3.6% of the bank’s overall lending during the evaluation period and 4.1% of the bank’s lending activity in the Minnesota assessment areas. In 2018, the bank ranked first among 33 institutions reporting small business and small farm loans in the assessment area. The bank also ranked first among 26 reporters in 2019. The bank extended an average of 21.9% of small business and 48.3% of small farm loans reported in the assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BAXTER–CROSSLAKE–NISSWA, MINNESOTA, ASSESSMENT AREA**

Examiners conducted a limited-scope review of the bank’s CRA performance in the Baxter–Crosslake–Nisswa assessment area. They determined the bank’s lending and investment performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. The bank’s service performance generally exceeds the full-scope nonmetropolitan assessment area due to the accessibility of the bank’s retail services to a nearby moderate-income geography. However, this performance does not change the conclusion for the nonmetropolitan portion of the state. Examiners did not include the bank’s small farm loans in the analysis because it is not a major business line for this assessment area.

This assessment area consists of Crow Wing County and portions of Cass County in north-central Minnesota. The bank has not changed this assessment area since the previous evaluation, but the income classification of one census tract changed from moderate to middle income. The assessment now includes two moderate-income, seventeen middle-income, and one upper-income tracts, as shown in the table below. According to 2019 FFIEC adjusted census data, the population of the assessment area is 78,064. The bank’s assessment area includes a small portion of Mille Lacs Band of Ojibwe trust land.

The bank operates three full-service branches in the assessment area, in Baxter, Crosslake, and Nisswa, Minnesota. The Baxter and Crosslake branches have cash-dispensing-only ATMs. All three have drive-up facilities, where the bank offers Saturday and extended Friday hours. All three branches are in middle-income census tracts.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Baxter–Crosslake–Nisswa Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	20.5
Moderate Income	2	10.0	9.0	19.8
Middle Income	17	85.0	83.2	23.2
Upper Income	1	5.0	7.8	36.5
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the Baxter–Crosslake–Nisswa Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	53	100	153
Small Business	34	37	71
Small Farm	2	0	2
<b>Total</b>	<b>89</b>	<b>137</b>	<b>226</b>

By number, the Baxter–Crosslake–Nisswa assessment area accounts for 4.1% of the bank’s overall lending during the evaluation period and 4.8% of the bank’s lending activity in the Minnesota assessment areas. For HMDA loans, the bank ranked 14th among 235 financial institutions reporting HMDA loans in the assessment area in 2018, and 10th of 242 in 2019. The bank’s HMDA lending accounted for an

average of 2.3% of the loans reported in the assessment area. For small business loans, the bank ranked ninth among 47 institutions reporting small business loans in the assessment area in 2018 and 10th of 47 in 2019. The bank’s small business lending accounted for an average of 2.4% of the loans reported in the assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BIRD ISLAND–FAIRFAX–HECTOR, MINNESOTA, ASSESSMENT AREA**

Examiners conducted a limited-scope review of the bank’s CRA performance in the Bird Island–Fairfax–Hector assessment area. They determined the bank’s lending and service performance in this assessment area exceeds the performance in the full-scope nonmetropolitan assessment area, primarily because of the level of community development loans and services. However, this performance does not change the conclusion for the nonmetropolitan portion of the state. The bank’s investment performance is consistent with the performance in the full-scope nonmetropolitan assessment area. Examiners did not evaluate the bank’s HMDA lending because it was not a major business line for this assessment area.

The assessment area is in south-central Minnesota and consists of Renville County and one census tract in western Sibley County. The bank has not changed this assessment area since the previous evaluation but the income classification of one census tract changed from moderate to middle income. The assessment area now includes seven middle-income tracts, as shown in the table below. The six middle-income tracts in Renville County are all designated as distressed. According to 2019 FFIEC adjusted census data, the population of the assessment area is 18,863. The assessment area is contiguous with the bank’s Mankato–New Ulm assessment area.

The bank operates three full-service branches in the assessment area (all are in middle-income tracts). The branches are in Bird Island, Fairfax, and Hector, Minnesota. Each office has drive-up facilities, and the Fairfax branch operates a cash-dispensing-only ATM. The bank also operates one cash-dispensing-only ATM at a convenience store.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Bird Island–Fairfax–Hector Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	17.8
Moderate Income	0	0.0	0.0	17.7
Middle Income	7	100.0	100.0	24.5
Upper Income	0	0.0	0.0	40.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the Bird Island–Fairfax–Hector Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	7	16	23
Small Business	73	52	125
Small Farm	150	172	322
<b>Total</b>	<b>230</b>	<b>240</b>	<b>470</b>

By number, the Bird Island–Fairfax–Hector assessment area accounts for 8.6% of the bank’s overall lending during the evaluation period and 10.0% of the bank’s lending activity in the Minnesota assessment areas. In 2018, the bank ranked first among 30 financial institutions reporting small business and small farm loans in the assessment area. The bank ranked first among 25 aggregate lenders for small business and small farm lending in 2019. It extended an average of 21.7% of small business and 41.8% of small farm loans reported in the assessment area.

The bank’s community development loans in the assessment area are noteworthy. Specifically, the bank originated 14 loans for nearly \$13.7 million, most of which revitalize and/or stabilize distressed census tracts in the assessment area. Of special note, the bank originated two community development loans through the SBA 504 program that promote economic development in the assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LONSDALE, MINNESOTA, ASSESSMENT AREA**

Examiners conducted a limited-scope review of the bank’s CRA performance in the Lonsdale assessment area. They determined the bank’s lending and service performance in this assessment area exceeds the performance in the full-scope nonmetropolitan assessment area because of the level of community development loans and community development services. However, this performance does not change the conclusion for the nonmetropolitan portion of the state. The bank’s investment performance is consistent with the performance in the full-scope nonmetropolitan assessment area.

This assessment area consists of a portion of Rice County in southeastern Minnesota and includes four middle-income and four upper-income census tracts. The Lonsdale assessment area does not include the tracts that largely comprise the city of Faribault and the southeastern section of Rice County. According to 2019 FFIEC adjusted census data, the population of the assessment area is 36,837. The assessment area borders the Minneapolis-St. Paul MSA assessment area.

The bank operates its main office in Lonsdale, Minnesota, and one full-service branch in Dundas, Minnesota, in the assessment area, both with drive-up facilities, cash-dispensing-only ATMs, and Saturday hours. The branch also offers extended weekday hours. The bank operates one cash-dispensing-only ATM at a grocery store in Lonsdale. Both offices are in upper-income tracts.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Lonsdale Assessment Area</b>				
<b><i>Income Category</i></b>	<b><i>Tract Distribution</i></b>		<b><i>Percentage of Families by Tract</i></b>	<b><i>Percentage of Families by Income Level</i></b>
	<b><i>#</i></b>	<b><i>%</i></b>		
Low Income	0	0.0	0.0	12.4
Moderate Income	0	0.0	0.0	13.0
Middle Income	4	50.0	43.7	22.0
Upper Income	4	50.0	56.3	52.5
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.



<b>Lending Activity in the Lonsdale Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	48	46	94
Small Business	65	67	132
Small Farm	60	41	101
<b>Total</b>	<b>173</b>	<b>154</b>	<b>327</b>

By number, the Lonsdale assessment area accounts for 6.0% of the bank’s overall lending during the evaluation period and 7.0% of the bank’s lending activity in the Minnesota assessment areas. For HMDA loans, the bank ranked fifth among 157 financial institutions reporting HMDA loans in the assessment area in 2018, and sixth of 164 in 2019. The bank’s HMDA lending accounted for an average of 3.7% of the loans reported in the assessment area. In 2018, the bank ranked first among 43 aggregate lenders reporting small business and small farm loans in the assessment area. The bank ranked first among 40 aggregate lenders for small business and small farm lending in 2019. It extended an average of 11.9% of small business and 49.8% of small farm loans reported in the assessment area.

The bank’s community development loans in the assessment area are noteworthy. Specifically, the bank originated three loans for approximately \$2.6 million. Of special note, the largest two community development loans were SBA 504 loans, which promote economic development in the assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE OSLO–WARREN, MINNESOTA, ASSESSMENT AREA**

Examiners conducted a limited-scope review of the bank’s CRA performance in the Oslo–Warren assessment area. They determined the bank’s lending, investment, and service performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. Examiners did not include the bank’s HMDA and small business loans in the analysis because they are not major business lines for this assessment area.

This assessment area consists of portions of Marshall County in northwestern Minnesota. The assessment area includes three middle-income census tracts, which are designated as distressed and underserved. According to 2019 FFIEC adjusted census data, the population of the assessment area is 7,250. The assessment area is contiguous with the bank’s Grand Forks MSA assessment area. The bank operates two full-service branches in the assessment area, one in Oslo and one in Warren. The Warren branch has a drive-up facility and a cash-dispensing-only ATM.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Oslo–Warren Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	15.6
Moderate Income	0	0.0	0.0	16.5
Middle Income	3	100.0	100.0	26.7
Upper Income	0	0.0	0.0	41.2
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the Oslo–Warren Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	5	19	24
Small Business	15	17	32
Small Farm	42	50	92
<b>Total</b>	<b>62</b>	<b>86</b>	<b>148</b>

By number, the Oslo–Warren assessment area accounts for 2.7% of the bank’s overall lending during the evaluation period and 3.1% of the bank’s lending activity in the Minnesota assessment areas. For small farm loans, the bank ranked third among 10 institutions reporting small farm loans in the assessment area in 2018 and second of 11 in 2019. The bank’s small farm lending accounted for an average of 17.5% of the loans reported in the assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE PINE CITY, MINNESOTA, ASSESSMENT AREA**

Examiners conducted a limited-scope review of the bank’s CRA performance in the Pine City assessment area. They determined the bank’s lending performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. The bank’s investment and service performance exceed the performance in the full-scope nonmetropolitan assessment area, given the level of new securities, as well as the accessibility of retail services to moderate-income areas and the level of community development services. However, this performance does not change the conclusion for the nonmetropolitan portion of the state.

This assessment area consists of Pine and Kanabec counties in east-central Minnesota. The assessment area includes four moderate-income and eight middle-income tracts, as noted in the table below. According to 2019 FFIEC adjusted census data, the population of the assessment area is 45,221. The assessment area includes small parcels of Mille Lacs Band of Ojibwe trust land. The assessment area is contiguous with the Duluth MSA, Minneapolis-St. Paul MSA, and Luck, WI, assessment areas.

The bank operates one full-service branch in the assessment area, with a drive-up and a cash-dispensing-only ATM. The drive-up has Saturday hours. The branch is in a moderate-income census tract.

The following table provides information regarding the demographic characteristics of the assessment area based on 2019 FFIEC adjusted census data.

<b>Assessment Area Demographics – Pine City Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	23.3
Moderate Income	4	33.3	34.2	22.2
Middle Income	8	66.7	65.8	22.9
Upper Income	0	0.0	0.0	31.6
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

<b>Lending Activity in the Pine City Assessment Area</b>			
<i>Loan Type</i>	<i>2018</i>	<i>2019</i>	<i>Total</i>
HMDA	35	40	75
Small Business	64	44	108
Small Farm	31	25	56
<b>Total</b>	<b>130</b>	<b>109</b>	<b>239</b>

By number, the Pine City assessment area accounts for 4.4% of the bank’s overall lending during the evaluation period and 5.1% of the bank’s lending activity in the Minnesota assessment areas. For HMDA loans, the bank ranked 10th among 176 financial institutions reporting HMDA loans in the assessment area in 2018, and 10th of 200 in 2019. The bank’s HMDA lending accounted for an average of 2.3% of the loans reported in the assessment area. In 2018, the bank ranked first among 43 aggregate lenders reporting small business and small farm loans in the assessment area. The bank ranked third among 37 aggregate lenders for small business and small farm lending in 2019. It extended an average of 10.7% of small business and 23.0% of small farm loans reported in the assessment area.

The bank’s qualified investments in the form of securities in the assessment area are noteworthy. Specifically, the bank made new investments totaling \$443,153, which help to revitalize and/or stabilize a moderate-income geography and promote affordable housing in the assessment area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF MINNESOTA**

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank’s community development lending and qualified investments for each assessment area. The Minnesota state section of the report also shows qualified investments in the form of donations and community development services for each assessment area. Conclusions regarding performance of the limited scope assessment areas, which did not affect the overall state rating, are shown in the table below.

<b>Performance in the Limited-Scope Review Nonmetropolitan Minnesota Assessment Areas</b>			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Ada	Consistent	Consistent	Exceeds
Baxter–Crosslake–Nisswa	Consistent	Consistent	Exceeds
Bird Island–Fairfax–Hector	Exceeds	Consistent	Exceeds
Lonsdale	Exceeds	Consistent	Exceeds
Oslo–Warren	Consistent	Consistent	Consistent
Pine City	Consistent	Exceeds	Exceeds

## WISCONSIN NONMETROPOLITAN AREA FULL-SCOPE REVIEW

**CRA RATING FOR Wisconsin: Satisfactory**

***The Lending Test is rated: High Satisfactory***

***The Investment Test is rated: High Satisfactory***

***The Service Test is rated: Low Satisfactory***

Major factors supporting the rating include the following:

- The bank's lending activity in the Luck assessment area shows good responsiveness to credit needs.
- The lending to businesses of different sizes and to low- and moderate-income borrowers is excellent.
- The geographic distribution of loans throughout the assessment area is excellent.
- The bank is a leader in making community development loans.
- The bank uses flexible loan programs.
- The bank has a significant level of qualified investments by number and dollar amount, which exhibits good responsiveness to credit and community development needs.
- Bank retail services are accessible to farms, businesses, and residents throughout the assessment area, and the bank provides an adequate level of community development services.

### SCOPE OF EVALUATION

The scope of the CRA evaluation for the state of Wisconsin is consistent with the scope for the overall institution described earlier in the Institution section. Examiners conducted a full-scope review of the Luck assessment area, which is the bank's only assessment area in Wisconsin.<sup>25</sup> Since there is only one assessment area, examiners discuss the statewide and Luck assessment area performance concurrently. To complete the full-scope review, examiners used the following criteria: lending activity, lending to borrowers of different income levels and businesses of different sizes, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN LUCK, WISCONSIN

*Bank information.* The bank currently operates one full-service branch with an ATM in Luck, Wisconsin. This is the only branch in Wisconsin. This branch represents 2.8% of the bank's offices, as of June 30, 2019.

According to the June 30, 2019, FDIC Deposit Market Share Report, the bank ranks fifth among 12 financial institutions operating in the Luck assessment area, with a 6.1% deposit market share and \$55.9 million in deposits. The deposits in this assessment area account for 3.9% of the bank's overall deposits. The bank's competition in the area includes competition from large regional and national banks as well as several community banks and credit unions.

*Assessment Area Information.* The Luck assessment area consists of Burnett and Polk counties in west-central Wisconsin and is unchanged since the previous evaluation. The assessment area borders the state

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<sup>25</sup> The bank's Duluth assessment area includes a portion of Douglas County, which is in Wisconsin; the county is part of the Duluth, MN-WI MSA.

of Minnesota, including the Minneapolis-St. Paul MSA and Pine City assessment areas. The income classifications of some census tracts have changed, based on 2019 FFIEC adjusted census data. The assessment area now consists of two moderate-income and 14 middle-income tracts. However, the earlier figures based on 2018 FFIEC adjusted census data were three moderate-income and 13 middle-income tracts. The Luck assessment area does not include any low- or upper-income tracts or tracts classified as distressed or underserved. The Luck branch is in a middle-income tract.

The assessment area includes areas of tribal land and reservation communities. These areas include, for example, Danbury and Balsam, Wisconsin. This land belongs to the St. Croix Chippewa Indians of Wisconsin, which has 1,054 enrolled members.

The Combined Demographics Report on the following page provides demographic information for the Luck assessment area based on the 2019 FFIEC adjusted census data and 2019 D&B data.

## Combined Demographics Report

Restricted-FR

Assessment Area(s): Luck, WI

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	3,425	20.1	
Moderate-income	2	12.5	1,455	8.6	268	18.4	3,445	20.3	
Middle-income	14	87.5	15,548	91.4	1,131	7.3	3,916	23	
Upper-income	0	0	0	0	0	0	6,217	36.6	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>16</b>	<b>100.0</b>	<b>17,003</b>	<b>100.0</b>	<b>1,399</b>	<b>8.2</b>	<b>17,003</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	3,267	1,810	9.2	55.4	703	21.5	754	23.1	
Middle-income	36,300	17,931	90.8	49.4	4,862	13.4	13,507	37.2	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>39,567</b>	<b>19,741</b>	<b>100.0</b>	<b>49.9</b>	<b>5,565</b>	<b>14.1</b>	<b>14,261</b>	<b>36.0</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	0
Moderate-income	317	11	283	10.9	25	12.4	9	11.5	
Middle-income	2,556	89	2,310	89.1	177	87.6	69	88.5	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>2,873</b>	<b>100.0</b>	<b>2,593</b>	<b>100.0</b>	<b>202</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>7.0</b>		<b>2.7</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	0
Moderate-income	21	6	21	6	0	0	0	0	
Middle-income	331	94	327	94	4	100	0	0	
Upper-income	0	0	0	0	0	0	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>352</b>	<b>100.0</b>	<b>348</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.9</b>		<b>1.1</b>		<b>.0</b>	

2019 FFIEC Census Data and 2019 D&B Information

*Income.* For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the nonmetropolitan areas of Wisconsin, for the year of loan origination. The following table shows the estimated median family income for each year and the ranges for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels  
Statewide Non-Metropolitan-- Wisconsin**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2018</b>	<b>\$67,800</b>	0 - \$33,899	\$33,900 - \$54,239	\$54,240 - \$81,359	\$81,360 - & above
<b>2019</b>	<b>\$65,900</b>	0 - \$32,949	\$32,950 - \$52,719	\$52,720 - \$79,079	\$79,080 - & above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for the Luck assessment area, which is \$58,038 for 2018 and \$58,038 for 2019.

*Population.* According to 2019 FFIEC adjusted census data, the total population of the assessment area is 58,906. The majority by age is 25 to 64 years (52.3%), followed by 17 years and younger (21.3%), 65 years and older (19.8%), and 18 to 24 years (6.5%). The population of both counties has remained relatively stable over many years, based on U.S. Census data. The population of Luck is 1,051 based on estimated 2019 U.S. Census data.

*Housing Information.* According to 2019 FFIEC adjusted census data, the assessment area has 39,567 housing units: 49.9% are owner-occupied, 14.1% are rental units, and 36.0% are vacant. The assessment area is bordered by the St. Croix River and includes several lakes; the area has seasonal residents who occupy vacation homes and cabins. The median age of the housing stock in the assessment area is 43 years, which is consistent with the statewide median age. The median housing value is \$153,444 and the affordability ratio is 31.0, compared to 32.2 for the state of Wisconsin. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly less affordable in the Luck assessment area.

Home prices have slowly but steadily increased in recent years, according to bank management and a community contact. Lake home prices are significantly higher than those in the smaller towns, such as Luck, and range from \$200,000 to \$300,000. Many seasonal homes are being remodeled to make them habitable year-round, according to bank management and a community contact. Many retirees choose to stay in the area. One community contact noted that housing is a significant need; affordable housing is needed for the local workforce, as are smaller homes and rental housing for retirees.

*General Economic and Business Characteristics.* Bank management described local economic conditions as stable. Community contacts noted that businesses are generally growing, with few significant layoffs in the area. Unemployment fluctuates seasonally; summer tourism and the return of vacation homeowners benefit the area. One contact estimated that the population more than doubles during the spring and summer. Employers have a difficult time finding both skilled and unskilled labor during the summer, particularly as the population in the area ages, according to community contacts.

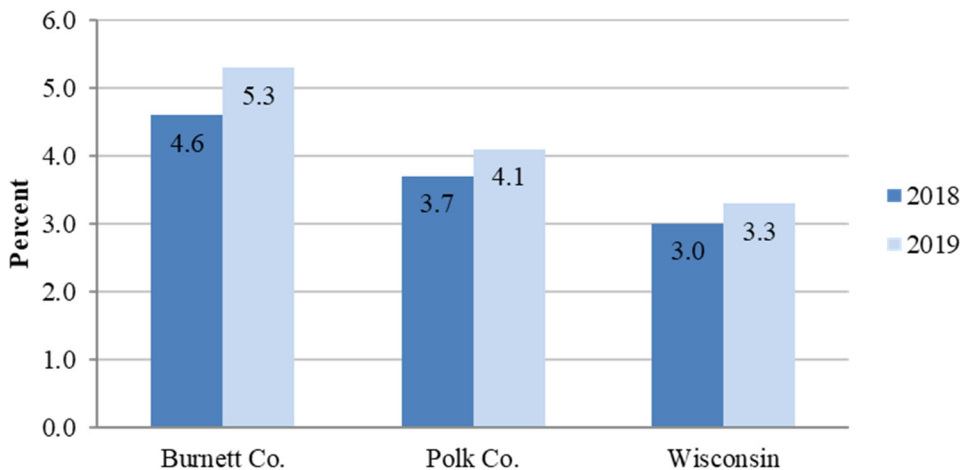
Major industries in the assessment area include health care and social services, manufacturing, tourism, and retail, according to bank management and community contacts. The St. Croix Chippewa own and operate casinos in Danbury and Turtle Lake, Wisconsin. The tribe employs about 2,000 people full-time. Other major employers include building material manufacturers and machining companies that produce goods for automotive, aerospace, and industrial applications. Other manufacturers are located in several industrial parks in both Polk and Burnett counties. The health-care industry, local government, and the public schools are also major employers.

Community contacts stated that most residents commute to work. Some residents travel to metropolitan areas such as the Twin Cities of Minneapolis/St. Paul or to the Twin Ports of Duluth/Superior while others travel to neighboring counties or cities. The challenge for residents is to find affordable, decent housing, solid employment, and a good school system within a reasonable distance, according to one community contact. Wages in the area are generally low and employees who support the service and summer tourism industries earn lower wages on average. One contact said that manufacturing positions generally earn lower wages in the assessment area than in other parts of the state.

The area has a competitive banking market. Several banks operate in the assessment area, along with credit unions and other lenders. Community contacts did not identify any unmet credit needs in the assessment area.

The Unemployment Rates Chart provides the annual average unemployment rate for each county in the assessment area and for the state. As show, the unemployment rates increased during the evaluation period. The unemployment rates for both counties is higher than the rate for the state overall.

**Unemployment Rates - WI Luck**



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LUCK, WISCONSIN**

The overall CRA rating for Wisconsin is satisfactory, based on the bank’s performance under the Lending, Investment, and Service Tests.

The Lending Test rating is high satisfactory. Lending activity shows good responsiveness to assessment area credit needs. The distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes. Overall, the geographic distribution of loans also reflects excellent dispersion throughout the assessment area. The bank’s level of community development lending is excellent, and it uses flexible loan programs to help meet credit needs of consumers and small businesses. Examiners assigned greater weight to small business loans than HMDA<sup>26</sup> loans, based on the total number and dollar volume of loans during the evaluation period. Examiners did not include the bank’s small farm lending in the analysis because agricultural loans are not a major product for this assessment area.

<sup>26</sup> For HMDA loans, examiners did not evaluate the following categories of loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.



The Investment Test rating is high satisfactory. Overall, the bank made a significant level of qualified investments that shows good responsiveness to credit and community development needs.

The Service Test rating is low satisfactory. Retail services are accessible to all portions of the assessment area and do not vary in a way that inconveniences any individuals or areas. Further, the bank provides an adequate level of community development services in the assessment area.

## **LENDING TEST**

The Lending Test rating is high satisfactory.

### **Lending Activity**

The bank's lending levels reflect good responsiveness to assessment area credit needs. In 2018, the bank ranks 18th out of 208 lenders reporting HMDA data, with a 1.1% market share. For small business lending, the bank ranks seventh out of 45 lenders reporting CRA data in 2018, with a 4.6% market share. In 2019, the bank ranks 17 out of 229 lenders reporting HMDA data and had a 1.4% market share. The bank ranks sixth out of 44 lenders reporting CRA loan data in 2019, with a 5.6% market share. During the evaluation period, lending activity in the Luck assessment area represents 3.5% by number and 2.4% by dollar amount of the bank's total lending.

### **Distribution by Borrower Income Level and by Size of Businesses**

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is excellent.

*Residential Real Estate.* The bank's HMDA lending to low- and moderate-income borrowers is good. The following table shows the bank's HMDA loan data by income level and product type for 2018 and 2019. The table also includes aggregate lending data for each year. Examiners did not separately evaluate the bank's home improvement or multifamily loans because of limited lending for these products.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Luck, WI

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %		%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %
HOME PURCHASE	Low	1	3.6%	\$123	3.3%	20.1%	0	0.0%	5.8%	\$0	0.0%	3.1%	1	5.9%	5.2%	\$123	5.9%	2.7%
	Moderate	3	10.7%	\$273	7.4%	20.3%	1	9.1%	21.5%	\$114	7.1%	16.2%	2	11.8%	18.0%	\$159	7.6%	12.4%
	Middle	8	28.6%	\$939	25.4%	23.0%	4	36.4%	19.9%	\$373	23.2%	18.8%	4	23.5%	23.2%	\$566	27.0%	20.4%
	Upper	14	50.0%	\$2,247	60.8%	36.6%	5	45.5%	36.9%	\$1,057	65.9%	47.1%	9	52.9%	39.4%	\$1,190	56.9%	50.6%
	Unknown	2	7.1%	\$116	3.1%	0.0%	1	9.1%	15.9%	\$61	3.8%	14.8%	1	5.9%	14.2%	\$55	2.6%	13.9%
	<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>\$3,698</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,605</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,093</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	6	17.6%	\$391	9.3%	20.1%	3	27.3%	9.1%	\$230	19.6%	4.4%	3	13.0%	5.2%	\$161	5.3%	2.3%
	Moderate	5	14.7%	\$526	12.5%	20.3%	1	9.1%	17.2%	\$35	3.0%	13.3%	4	17.4%	13.1%	\$491	16.2%	8.2%
	Middle	7	20.6%	\$813	19.3%	23.0%	2	18.2%	24.8%	\$151	12.9%	22.8%	5	21.7%	19.8%	\$662	21.8%	15.8%
	Upper	13	38.2%	\$1,930	45.9%	36.6%	3	27.3%	39.2%	\$333	28.4%	49.9%	10	43.5%	44.3%	\$1,597	52.7%	54.7%
	Unknown	3	8.8%	\$545	13.0%	0.0%	2	18.2%	9.6%	\$425	36.2%	9.6%	1	4.3%	17.6%	\$120	4.0%	19.0%
	<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>\$4,205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,031</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	6.0%	\$0	0.0%	3.3%	0	0.0%	4.1%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	14.8%	\$0	0.0%	13.5%	0	0.0%	14.6%	\$0	0.0%	7.7%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	17.5%	\$0	0.0%	15.2%	0	0.0%	23.4%	\$0	0.0%	13.4%
	Upper	1	100.0%	\$35	100.0%	36.6%	1	100.0%	60.1%	\$35	100.0%	66.5%	0	0.0%	53.8%	\$0	0.0%	71.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	1.5%	0	0.0%	4.1%	\$0	0.0%	3.9%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$200	100.0%	0.0%	1	100.0%	100.0%	\$200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$200</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$200</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	9.2%	\$0	0.0%	4.8%	0	0.0%	6.8%	\$0	0.0%	5.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	18.4%	\$0	0.0%	17.7%	0	0.0%	14.6%	\$0	0.0%	11.4%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	28.2%	\$0	0.0%	23.6%	0	0.0%	23.8%	\$0	0.0%	18.1%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	43.2%	\$0	0.0%	53.4%	0	0.0%	51.5%	\$0	0.0%	62.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.6%	0	0.0%	3.4%	\$0	0.0%	3.1%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Luck, WI

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank		Families by Family Income		2018			2019			2018		2019				
		Count		Dollar		#	Count		Dollar		#	Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	8.9%	\$0	0.0%	4.5%	0	0.0%	8.8%	\$0	0.0%	4.9%
	Moderate	1	33.3%	\$85	51.2%	20.3%	1	33.3%	17.9%	\$85	51.2%	12.1%	0	0.0%	19.1%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	21.4%	\$0	0.0%	17.7%	0	0.0%	23.5%	\$0	0.0%	18.9%
	Upper	2	66.7%	\$81	48.8%	36.6%	2	66.7%	51.8%	\$81	48.8%	65.6%	0	0.0%	44.1%	\$0	0.0%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	3.9%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	3.4%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	3.4%	\$0	0.0%	8.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	93.1%	\$0	0.0%	89.1%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	7	10.4%	\$514	6.2%	20.1%	3	11.1%	7.0%	\$230	7.2%	3.4%	4	10.0%	5.3%	\$284	5.5%	2.6%
	Moderate	9	13.4%	\$884	10.6%	20.3%	3	11.1%	19.3%	\$234	7.4%	15.1%	6	15.0%	15.6%	\$650	12.7%	10.4%
	Middle	15	22.4%	\$1,752	21.1%	23.0%	6	22.2%	21.4%	\$524	16.5%	19.5%	9	22.5%	21.6%	\$1,228	24.0%	18.0%
	Upper	30	44.8%	\$4,293	51.7%	36.6%	11	40.7%	39.5%	\$1,506	47.4%	47.9%	19	47.5%	42.2%	\$2,787	54.4%	51.9%
	Unknown	6	9.0%	\$861	10.4%	0.0%	4	14.8%	12.8%	\$686	21.6%	14.1%	2	5.0%	15.3%	\$175	3.4%	17.1%
	<b>Total</b>	<b>67</b>	<b>100.0%</b>	<b>\$8,304</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,180</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,124</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Overall, the bank exceeds aggregate lenders in lending to low-income borrowers in both 2018 and 2019. While the bank’s record of lending to moderate-income borrowers is consistent with aggregate lending in 2019, it is below aggregate lending in 2018. The bank’s level of lending is below demographics for both low- and moderate-income borrowers in 2018 and 2019. According to 2018 FFIEC adjusted census data, 20.2% of the families in the assessment area are low income and 20.3 are moderate income. In 2019, 20.1% of the families in the assessment area are low income and 20.3% are moderate income.

For refinancing loans, the bank’s performance exceeded that of aggregate lenders to low-income borrowers in 2018 and to low- and moderate-income borrowers in 2019. Bank management stated that refinance activity declined during the evaluation period, given the rising rate environment. Most homeowners took advantage of refinancing in prior years when rates were lower.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower’s annual income, based on the 2019 FFIEC estimated family income of \$65,900 for the nonmetropolitan areas of Wisconsin, an individual with the highest income in the low-income bracket (\$32,949) could afford a \$98,847 home. Using the same assumption for borrowers with the highest income in the moderate-income brackets (\$52,719) a borrower could afford a \$158,157 home. According to 2019 FFIEC adjusted census data, the median housing value in the assessment area is \$153,444. This data suggests that homeownership would not be affordable for many low-income borrowers and some moderate-income borrowers.

The bank makes use of flexible lending programs, which help low- and moderate-income borrowers afford homeownership. In this assessment area, the bank uses the Home\$tart Program through the FHLB, which provides down payment and closing cost assistance. The bank’s participation in flexible loan programs helps meet the needs of low- and moderate-income individuals.

*Small Business.* The distribution of small business loans among businesses of different sizes is excellent. The following table shows the small business loan data by revenue and loan size for 2018 and 2019.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Luck, WI

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
	2018, 2019					2018					2019							
	Bank		Dollar		Total Businesses	Count		Dollar			Count		Dollar					
	Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
BUSINESS REVENUE	\$1million or Less	74	80.4%	\$4,424	52.5%	90.3%	33	80.5%	53.6%	\$2,224	60.2%	44.9%	41	80.4%	53.4%	\$2,200	46.6%	40.0%
	Over \$1 Million	16	17.4%	\$3,991	47.4%	7.0%	7	17.1%					9	17.6%				
	Total Rev. available	90	97.8%	\$8,415	99.9%	97.3%	40	97.6%					50	98.0%				
	Rev. Not Known	2	2.2%	\$4	0.0%	2.7%	1	2.4%					1	2.0%				
	Total	92	100.0%	\$8,419	100.0%	100.0%	41	100.0%					51	100.0%				
LOAN SIZE	\$100,000 or Less	73	79.3%	\$2,872	34.1%		33	80.5%	91.1%	\$1,287	34.8%	39.4%	40	78.4%	92.7%	\$1,585	33.5%	44.2%
	\$100,001 - \$250,000	14	15.2%	\$2,321	27.6%		6	14.6%	5.7%	\$1,004	27.2%	22.9%	8	15.7%	5.1%	\$1,317	27.9%	24.5%
	\$250,001 - \$1 Million	5	5.4%	\$3,226	38.3%		2	4.9%	3.2%	\$1,402	38.0%	37.8%	3	5.9%	2.2%	\$1,824	38.6%	31.3%
	Total	92	100.0%	\$8,419	100.0%		41	100.0%	100.0%	\$3,693	100.0%	100.0%	51	100.0%	100.0%	\$4,726	100.0%	100.0%
	Rev \$1 Mill or Less	64	86.5%	\$2,309	52.2%													
LOAN SIZE Rev \$1 Mill or Less	\$100,001 - \$250,000	9	12.2%	\$1,463	33.1%													
	\$250,001 - \$1 Million	1	1.4%	\$652	14.7%													
	Total	74	100.0%	\$4,424	100.0%													

Originations & Purchases  
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

The bank originated a large majority of its small business loans to small businesses in 2018 and 2019. The bank originated 80.5% and 80.4% of its loans to small businesses in 2018 and 2019, respectively, while aggregate lenders originated 53.6% and 53.4% of loans to small businesses in 2018 and 2019, respectively. According to D&B data, 90.5% of businesses in the assessment area have gross annual revenues of \$1 million or less in 2018, and 90.3% in 2019. While the bank's lending is below demographics, its performance greatly exceeds aggregate lenders, both in number and in dollar amount of loans each year. The bank's lending performance is excellent; it competes against many institutions, including national credit card lenders, and still performs favorably compared to aggregate lenders (the top five small business aggregate lenders have a combined 61.3% of the market share).

The bank makes loans of varying sizes. The significant majority of small business loans to businesses are for amounts of \$100,000 or less (80.5% in 2018 and 78.4% in 2019). The bank's performance is particularly notable because small businesses typically use credit cards for small-dollar loans; in the Luck assessment area five of the top 10 lenders are primarily credit card lenders.

The bank makes use of flexible loan programs in the Luck assessment area. Specifically, the bank originates SBA loans, which help meet the credit needs of small businesses in the assessment area. Overall, the bank's record of lending to small businesses is excellent.

**Geographic Distribution**

The geographic distribution of HMDA and small business loans in the Luck assessment area is excellent and does not reveal any unexplained gaps in lending. In 2018, the assessment area had three moderate-income tracts and 13 middle-income tracts. For 2019, the income classification of one tract changed, and the assessment area includes two moderate income and 14 middle income tracts. The Luck assessment area does not include any low- or upper-income tracts for either year. The bank originated loans in all moderate-income tracts and every middle-income tract except one.

*Residential Real Estate.* The geographic distribution of the bank's HMDA loans is good. Examiners did not separately evaluate the bank's home improvement or multifamily loans because of limited lending for these products.

The following table shows the bank’s HMDA data by census tract income level and product type for 2018 and 2019, as well as aggregate lending data for both years.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Luck, WI

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	7.1%	\$294	8.0%	9.2%	1	9.1%	20.9%	\$114	7.1%	18.7%	1	5.9%	7.1%	\$180	8.6%	5.7%
	Middle	26	92.9%	\$3,404	92.0%	90.8%	10	90.9%	79.0%	\$1,491	92.9%	81.2%	16	94.1%	92.9%	\$1,913	91.4%	94.3%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>\$3,698</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,605</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,093</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	5.9%	\$306	7.3%	9.2%	1	9.1%	20.0%	\$144	12.3%	19.9%	1	4.3%	5.5%	\$162	5.3%	4.9%
	Middle	32	94.1%	\$3,899	92.7%	90.8%	10	90.9%	80.0%	\$1,030	87.7%	80.1%	22	95.7%	94.5%	\$2,869	94.7%	95.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>34</b>	<b>100.0%</b>	<b>\$4,205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,031</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	10.9%	\$0	0.0%	15.8%	0	0.0%	4.1%	\$0	0.0%	5.2%
	Middle	1	100.0%	\$35	100.0%	90.8%	1	100.0%	89.1%	\$35	100.0%	84.2%	0	0.0%	95.9%	\$0	0.0%	94.8%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$200	100.0%	88.2%	1	100.0%	100.0%	\$200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$200</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$200</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	7.8%	\$0	0.0%	7.3%	0	0.0%	2.4%	\$0	0.0%	2.2%
	Middle	0	0.0%	\$0	0.0%	90.8%	0	0.0%	92.2%	\$0	0.0%	92.7%	0	0.0%	97.6%	\$0	0.0%	97.8%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Luck, WI

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg \$ %	#	%	Agg %	\$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	28.6%	\$0	0.0%	35.4%	0	0.0%	5.9%	\$0	0.0%	6.8%
	Middle	3	100.0%	\$166	100.0%	90.8%	3	100.0%	71.4%	\$166	100.0%	64.6%	0	0.0%	94.1%	\$0	0.0%	93.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	3.4%	\$0	0.0%	8.3%	0	0.0%	13.0%	\$0	0.0%	20.9%
	Middle	0	0.0%	\$0	0.0%	90.8%	0	0.0%	96.6%	\$0	0.0%	91.7%	0	0.0%	87.0%	\$0	0.0%	79.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	6.0%	\$600	7.2%	9.2%	2	7.4%	18.8%	\$258	8.1%	18.4%	2	5.0%	6.1%	\$342	6.7%	5.3%
	Middle	63	94.0%	\$7,704	92.8%	90.8%	25	92.6%	81.2%	\$2,922	91.9%	81.5%	38	95.0%	93.9%	\$4,782	93.3%	94.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>67</b>	<b>100.0%</b>	<b>\$8,304</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,180</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,124</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

In both 2018 and 2019, the bank’s HMDA lending in moderate-income tracts is below aggregate lenders and demographics but is nonetheless reasonable given the proximity of the branch to the moderate-income census tracts and the overall opportunity for the bank to make home purchase or refinance loans.

According to 2018 and 2019 FFIEC adjusted census data, 16.0% and 8.6% of the families in the assessment area reside in moderate-income tracts, respectively. The bank’s HMDA lending performance in moderate-income tracts is also below demographics but is nonetheless reasonable.

The bank made HMDA loans in all moderate-income tracts in both 2018 and 2019. Most of the bank’s lending was in the tracts closest to the branch, which are middle-income tracts. The bank’s only branch in the assessment area is in Luck (Polk County), in the south central portion of the assessment area. The moderate-income census tracts are in Burnett County, which is in the northern part of the assessment area. The bank did not originate HMDA loans in three middle-income census tracts during the evaluation period. These tracts are in the southernmost part of Polk County. According to bank management, residents in those tracts have other financial institutions nearby that are more convenient.

In addition, a significant portion of the housing units in the moderate-income tracts are rental units or vacant. According to 2018 FFIEC adjusted census data, 50.4% of the housing units are vacant and 11.4% are rental units. These figures are 23.1%, and 21.5%, respectively, for 2019 (the difference is primarily due to the change in classification of a moderate-income census tract to middle-income). As community contacts and bank management explained, the moderate-income and northern areas are rural and primarily recreational, including forests, lakes, and rivers.

*Small Business.* The geographic distribution of small business loans is excellent. The following table shows the geographic distribution of the bank’s small business loans for 2018 and 2019, as well as aggregate lending data for both years.

**Geographic Distribution of Small Business Loans**

Assessment Area: Luck, WI

Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
	Count		Bank Dollar		Total Businesses %	2018						2019					
	#	%	\$ (000s)	\$ %		Count		Dollar		Agg %	Count		Dollar		Agg %		
					Bank #	Agg %	Bank \$ 000s	Agg \$ %	Bank #		Agg %	Bank \$ 000s	Agg \$ %				
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	13	14.1%	\$748	8.9%	11.0%	7	17.1%	14.7%	\$417	11.3%	10.6%	6	11.8%	8.4%	\$331	7.0%	5.4%
Middle	79	85.9%	\$7,671	91.1%	89.0%	34	82.9%	82.5%	\$3,276	88.7%	87.9%	45	88.2%	87.9%	\$4,395	93.0%	92.6%
Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	1.6%	0	0.0%	3.7%	\$0	0.0%	2.0%
<b>Total</b>	<b>92</b>	<b>100.0%</b>	<b>\$8,419</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,693</b>	<b>100.0%</b>	<b>100.0%</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,726</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

The bank’s small business lending in moderate-income tracts exceeded aggregate lenders and was consistent with demographics for both years. According to 2018 and 2019 D&B data, 17.8% and 11.0% of small businesses were in the moderate-income tracts, respectively.<sup>27</sup>

In both 2018 and 2019, the bank originated small business loans in all but one of the moderate-income tracts. As mentioned, the moderate-income census tracts are in the northern portion of the assessment area and are primarily rural and largely recreational. Specifically, the bank did not extend any small business loans in a tract in Burnett County that is the farthest from the bank’s branch in Luck. The bank originated most of its small business loans in the moderate-income tract that is closest to the bank’s branch. In addition, most small businesses are in the southern portion of the assessment area. Like other loan products, the bank competes with many institutions for small business loans in this assessment area.

In addition, the bank did not originate small business loans in two middle-income census tracts during the evaluation period. These tracts are further away from the bank office and there are financial institutions closer to those areas. Overall, the bank’s performance is excellent.

**Community Development Loans**

The bank is a leader in making community development loans in the Luck assessment area. It originated seven community development loans totaling more than \$2.6 million, as shown in the table at right. The bank’s community development loans increased significantly since the previous evaluation.

Community Development Loans Luck Assessment Area		
Purpose	#	\$
Affordable Housing	1	200,000
Economic Development	4	2,221,695
Revitalize or Stabilize	2	200,000
<b>Total</b>	<b>7</b>	<b>2,621,695</b>

The bank’s community development lending demonstrates good responsiveness to community needs. The bank provided financing for recovery and rehabilitation after a disaster declaration due to storm damage. The bank originated several economic development loans that financed business expansion and created jobs. The bank’s level of lending is particularly noteworthy given the competition in the assessment area.

<sup>27</sup> One census tract changed from moderate- to middle-income in 2019, which explains the change in D&B demographics.

## INVESTMENT TEST

The bank's Investment Test rating is high satisfactory. The level of qualified investment activity in the Luck assessment area is significant and shows good responsiveness to assessment area needs. During the evaluation period, the bank held or purchased four qualified investments totaling \$822,742, which directly benefit the assessment area or a broader statewide area. Two of the prior-period investments, which were bonds, helped revitalize or stabilize a moderate-income tract by supporting water and sewer infrastructure improvements. In addition, the bank purchased an MBS, which helped address affordable housing needs in the assessment area.

Because the bank's investment activities adequately address community development needs in its Luck assessment area, examiners also considered the bank's qualified Wisconsin investments that were outside its assessment area. The bank purchased one bond that financed street and bridge improvements in a city located in a neighboring county. The \$303,742 investment helped to revitalize and stabilize a moderate-income census tract.

In addition, the bank made qualified investments in the form of donations totaling \$6,700 to organizations that provide community services to low- and moderate-income individuals and promote economic development. The bank's largest donations included college and summer camp scholarships for low- and moderate-income students. Other charitable contributions were made to organizations that promote economic growth and vitality in Polk County.

## SERVICE TEST

The Service Test rating is low satisfactory. Delivery systems are accessible to residents and businesses throughout the assessment area. Services and hours do not vary in a way that inconveniences certain individuals or areas. The bank provides an adequate level of community development services.

### Retail Services

Delivery systems are accessible in the bank's assessment area. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank operates one full-service branch in a middle-income tract in the assessment area. The branch has a drive-up facility and offers Saturday lobby and drive-up hours. The bank also operates a cash-dispensing-only ATM at the branch. The bank did not open or close any offices or ATMs in this assessment area during the evaluation period.

The bank does not operate an office in Burnett County, which includes two moderate-income tracts as of 2019; however, the Luck branch is relatively close (approximately 11 miles) to the southern portion of the nearest moderate-income tract. The bank can reasonably serve the moderate-income areas, as shown by the loans originated in the moderate-income tracts.

Additional delivery services include online, mobile, and telephone banking as well as remote deposit capture. The bank provides reasonable service hours and the means for customers to complete many types of banking activities outside of normal service hours. The following table shows the geographic distribution of the bank's branch and ATM in this assessment area.



Geographic Distribution of Branches & ATMS  
Assessment Area: WILuck

Tract Category	Branches							ATMs								Demographics									
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts	House holds	Total Businesses					
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed				#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0.0%	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0	0	0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	12.5%	9.9%	11.0%			
DTO	0		0	0				SA	0		0		0	0	0		0	0							
Middle	1	100.0%	0	0	1	0	1	Total	1	100.0%	0	0.0%	0	0	1	100.0%	0	0	14	87.5%	90.1%	89.0%			
DTO	0		0	0				SA	0		0		0	0	0		0	0							
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%	0.0%		
DTO	0		0	0				SA	0		0		0	0	0		0	0							
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%	0.0%		
DTO	0		0	0				SA	0		0		0	0	0		0	0							
Total	1	100.0%	0	0	1	0	1	Total	1	100.0%	0	0.0%	0	0	1	100.0%	0	0	16	100.0%	100.0%	100.0%			
DTO	0		0	0				SA	0		0		0	0	0		0	0							

2019 FFIEC Census Data, 2019 D&B Ini 2010 ACS Data  
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.  
 DTO - Drive thru only is a subset of total branches  
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides an adequate level of community development services in the Luck assessment area. One bank employee served on the board of an organization promoting economic development. The bank's community development services are concentrated in Polk County, where the bank has its office.

**CRA APPENDIX A**

**Scope of Evaluation**

<b>SCOPE OF EVALUATION FOR LENDING ACTIVITY</b> <b>January 1, 2018, through December 31, 2019</b>	
<i>FINANCIAL INSTITUTION</i>	<i>PRODUCTS REVIEWED</i>
Frandsen Bank & Trust	HMDA loans Small business loans Small farm loans
<i>AFFILIATES</i>	<i>PRODUCTS REVIEWED</i>
Not applicable	Not applicable
<b>SCOPE OF EVALUATION FOR COMMUNITY DEVELOPMENT ACTIVITY</b>	
January 1, 2018, through December 31, 2019	

<b>LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION</b>			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EVALUATION</i>	<i>BRANCHES VISITED*</i>	<i>OTHER INFORMATION</i>
Grand Forks MSA, North Dakota–Minnesota	Full scope	None	None
New Ulm–Mankato CSA, Minnesota	Full scope	None	None
Minneapolis–St. Paul MSA, Minnesota	Full scope	None	None
Clinton, Minnesota	Full scope	None	None
Duluth MSA, Minnesota	Limited scope	None	None
St. Cloud MSA, Minnesota	Limited scope	None	None
Ada, Minnesota	Limited scope	None	None
Baxter–Crosslake–Nisswa, Minnesota	Limited scope	None	None
Bird Island–Fairfax–Hector, Minnesota	Limited scope	None	None
Lonsdale, Minnesota	Limited scope	None	None
Oslo–Warren, Minnesota	Limited scope	None	None
Pine City, Minnesota	Limited scope	None	None
Luck, Wisconsin	Full scope	None	None
<p>*There is a statutory requirement that the written evaluation of a multistate institution’s performance must list the individual branches examined in each state. “Branches visited” indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution’s CRA performance takes into consideration activity from all branch locations, as described in the Scope of Evaluation section of the report. Due to the COVID-19 pandemic, no branches were visited during this evaluation.</p>			

**CRA APPENDIX B**

**Summary of State Ratings**

<i>State Name</i>	<i>Lending Test Rating</i>	<i>Investment Test Rating</i>	<i>Service Test Rating</i>	<i>Overall State Rating</i>
Multistate MSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Minnesota	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Wisconsin	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

## CRA APPENDIX C

### Glossary of Common CRA Terms

**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 metropolitan statistical area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on 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:** An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) 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 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

**Consumer loan:** A loan to one or more individuals for household, family, or other personal expenditures. It 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.

**Distressed nonmetropolitan middle-income census tract:** A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

**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 nonrelatives 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-scope review:** Performance 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., responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

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

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, 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-scope review:** Performance is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

**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 metropolitan statistical area/assessment area.

**Metropolitan statistical area (MSA):** An area, defined by the Office of Management and Budget, based on the concept of a core area with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**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 multistate MSA. 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 multistate MSA, the institution will receive a rating for the multistate metropolitan area.

**Small loan to business:** A loan included in “loans to small businesses” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or classified as commercial and industrial loans.

**Small loan to farm:** 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 classified as loans to finance agricultural production and other loans to farmers.

**Underserved middle-income census tract:** A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**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 geography.

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 28.12.)

CRA APPENDIX D

Lending and Demographic Tables for Limited-Scope Reviews

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Duluth MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2018					2018					2019						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar					
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	24	9.3%	\$1,790	4.7%	20.2%	19	13.3%	9.2%	\$1,290	6.2%	4.9%	5	4.3%	8.1%	\$500	2.9%	4.2%
	Moderate	48	18.6%	\$5,125	13.4%	17.2%	29	20.3%	21.7%	\$3,205	15.4%	16.4%	19	16.5%	21.0%	\$1,920	11.0%	15.8%
	Middle	60	23.3%	\$7,842	20.4%	22.9%	32	22.4%	20.7%	\$4,264	20.4%	19.4%	28	24.3%	24.1%	\$3,578	20.4%	22.9%
	Upper	96	37.2%	\$19,882	51.8%	39.7%	54	37.8%	27.8%	\$11,050	53.0%	39.4%	42	36.5%	31.9%	\$8,832	50.4%	44.2%
	Unknown	30	11.6%	\$3,747	9.8%	0.0%	9	6.3%	20.5%	\$1,056	5.1%	20.0%	21	18.3%	14.9%	\$2,691	15.4%	12.9%
	Total	258	100.0%	\$38,386	100.0%	100.0%	143	100.0%	100.0%	\$20,865	100.0%	100.0%	115	100.0%	100.0%	\$17,521	100.0%	100.0%
REFINANCE	Low	5	5.0%	\$420	2.9%	20.2%	4	10.0%	10.0%	\$360	8.5%	5.5%	1	1.6%	5.8%	\$60	0.6%	2.7%
	Moderate	23	22.8%	\$2,376	16.3%	17.2%	11	27.5%	21.1%	\$1,009	24.0%	16.1%	12	19.7%	16.7%	\$1,367	13.2%	11.2%
	Middle	29	28.7%	\$4,061	27.9%	22.9%	12	30.0%	24.5%	\$1,589	37.7%	21.5%	17	27.9%	22.4%	\$2,472	23.9%	19.0%
	Upper	38	37.6%	\$7,146	49.1%	39.7%	10	25.0%	34.0%	\$996	23.7%	45.8%	28	45.9%	40.2%	\$6,150	59.4%	49.8%
	Unknown	6	5.9%	\$562	3.9%	0.0%	3	7.5%	10.3%	\$257	6.1%	11.1%	3	4.9%	14.9%	\$305	2.9%	17.4%
	Total	101	100.0%	\$14,565	100.0%	100.0%	40	100.0%	100.0%	\$4,211	100.0%	100.0%	61	100.0%	100.0%	\$10,354	100.0%	100.0%
HOME IMPROVEMENT	Low	1	7.7%	\$56	6.6%	20.2%	1	16.7%	7.3%	\$56	23.0%	4.8%	0	0.0%	4.3%	\$0	0.0%	2.8%
	Moderate	4	30.8%	\$216	25.3%	17.2%	1	16.7%	18.0%	\$23	9.5%	14.7%	3	42.9%	19.1%	\$193	31.6%	15.6%
	Middle	2	15.4%	\$74	8.7%	22.9%	2	33.3%	26.0%	\$74	30.5%	23.3%	0	0.0%	24.2%	\$0	0.0%	20.8%
	Upper	3	23.1%	\$318	37.2%	39.7%	1	16.7%	44.5%	\$40	16.5%	48.8%	2	28.6%	48.6%	\$278	45.5%	53.6%
	Unknown	3	23.1%	\$190	22.2%	0.0%	1	16.7%	4.2%	\$50	20.6%	8.3%	2	28.6%	3.8%	\$140	22.9%	7.2%
	Total	13	100.0%	\$854	100.0%	100.0%	6	100.0%	100.0%	\$243	100.0%	100.0%	7	100.0%	100.0%	\$611	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	1.6%	\$0	0.0%	0.2%	0	0.0%	1.4%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	15.9%	\$0	0.0%	1.2%	0	0.0%	6.8%	\$0	0.0%	1.0%
	Unknown	7	100.0%	\$1,524	100.0%	0.0%	6	100.0%	82.5%	\$1,132	100.0%	98.6%	1	100.0%	90.4%	\$392	100.0%	98.9%
	Total	7	100.0%	\$1,524	100.0%	100.0%	6	100.0%	100.0%	\$1,132	100.0%	100.0%	1	100.0%	100.0%	\$392	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	6.7%	\$0	0.0%	6.8%	0	0.0%	6.6%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	16.7%	\$0	0.0%	9.3%	0	0.0%	11.0%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	26.7%	\$0	0.0%	19.1%	0	0.0%	28.7%	\$0	0.0%	27.2%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	46.7%	\$0	0.0%	57.6%	0	0.0%	47.8%	\$0	0.0%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	7.2%	0	0.0%	5.9%	\$0	0.0%	6.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: MN Duluth MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2018					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018			2019								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	3	27.3%	\$63	5.9%	20.2%	2	33.3%	7.2%	\$55	11.4%	3.8%	1	20.0%	8.7%	\$8	1.4%	5.6%
	Moderate	1	9.1%	\$40	3.7%	17.2%	1	16.7%	19.6%	\$40	8.3%	16.1%	0	0.0%	14.0%	\$0	0.0%	11.4%
	Middle	3	27.3%	\$325	30.4%	22.9%	2	33.3%	27.5%	\$300	62.4%	26.6%	1	20.0%	27.7%	\$25	4.3%	22.9%
	Upper	4	36.4%	\$641	60.0%	39.7%	1	16.7%	42.0%	\$86	17.9%	48.5%	3	60.0%	47.1%	\$555	94.4%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	5.0%	0	0.0%	2.5%	\$0	0.0%	3.7%
	<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>\$1,069</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$588</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.7%	\$0	0.0%	0.6%	0	0.0%	0.8%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	2.2%	\$0	0.0%	2.5%	0	0.0%	1.5%	\$0	0.0%	1.7%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	2.7%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.7%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	6.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.3%	\$0	0.0%	96.9%	0	0.0%	93.2%	\$0	0.0%	88.4%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	33	8.5%	\$2,329	4.1%	20.2%	26	12.9%	9.0%	\$1,761	6.5%	4.6%	7	3.7%	6.9%	\$568	1.9%	3.1%
	Moderate	76	19.5%	\$7,757	13.8%	17.2%	42	20.9%	20.7%	\$4,277	15.9%	14.8%	34	18.0%	18.6%	\$3,480	11.8%	12.0%
	Middle	94	24.1%	\$12,302	21.8%	22.9%	48	23.9%	21.8%	\$6,227	23.1%	18.5%	46	24.3%	23.1%	\$6,075	20.6%	18.4%
	Upper	141	36.2%	\$27,987	49.6%	39.7%	66	32.8%	30.5%	\$12,172	45.2%	38.2%	75	39.7%	35.6%	\$15,815	53.7%	40.2%
	Unknown	46	11.8%	\$6,023	10.7%	0.0%	19	9.5%	18.0%	\$2,495	9.3%	23.9%	27	14.3%	15.8%	\$3,528	12.0%	26.3%
	<b>Total</b>	<b>390</b>	<b>100.0%</b>	<b>\$56,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>201</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,932</b>	<b>100.0%</b>	<b>100.0%</b>	<b>189</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,466</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

**Small Business Loans by Business Revenue & Loan Size**

Assessment Area: MN Duluth MSA

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2019, 2018	Bank & Aggregate Lending Comparison																
		Bank					2018			2019								
		Count		Dollar		Total Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %
BUSINESS REVENUE	\$1million or Less	295	64.1%	\$26,001	44.4%	89.6%	147	63.1%	54.5%	\$14,610	49.6%	42.7%	148	65.2%	54.9%	\$11,391	39.0%	41.7%
	Over \$1 Million	157	34.1%	\$31,874	54.4%	8.8%	83	35.6%					74	32.6%				
	Total Rev. available	452	98.2%	\$57,875	98.8%	98.4%	230	98.7%					222	97.8%				
	Rev. Not Known	8	1.7%	\$726	1.2%	1.6%	3	1.3%					5	2.2%				
	<b>Total</b>	<b>460</b>	<b>100.0%</b>	<b>\$58,601</b>	<b>100.0%</b>	<b>100.0%</b>	<b>233</b>	<b>100.0%</b>					<b>227</b>	<b>100.0%</b>				
LOAN SIZE	\$100,000 or Less	297	64.6%	\$11,516	19.7%		151	64.8%	94.2%	\$5,757	19.6%	45.8%	146	64.3%	94.2%	\$5,759	19.7%	47.2%
	\$100,001 - \$250,000	102	22.2%	\$16,730	28.5%		49	21.0%	2.9%	\$7,849	26.7%	14.1%	53	23.3%	3.5%	\$8,881	30.4%	17.6%
	\$250,001 - \$1 Million	61	13.3%	\$30,355	51.8%		33	14.2%	2.9%	\$15,820	53.8%	40.1%	28	12.3%	2.2%	\$14,535	49.8%	35.2%
	<b>Total</b>	<b>460</b>	<b>100.0%</b>	<b>\$58,601</b>	<b>100.0%</b>		<b>233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>227</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,175</b>	<b>100.0%</b>	<b>100.0%</b>
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	219	74.2%	\$7,832	30.1%													
	\$100,001 - \$250,000	55	18.6%	\$8,724	33.6%													
	\$250,001 - \$1 Million	21	7.1%	\$9,445	36.3%													
	<b>Total</b>	<b>295</b>	<b>100.0%</b>	<b>\$26,001</b>	<b>100.0%</b>													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2019 FFIEC Census Data and 2019 D&B Information



Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Duluth MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2018					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018			2019								
		Count		Dollar			Bank #	Agg %	Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%			\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	5	1.9%	\$640	1.7%	2.6%	2	1.4%	4.4%	\$229	1.1%	3.2%	3	2.6%	3.9%	\$411	2.3%	2.6%
	Moderate	67	26.0%	\$6,847	17.8%	13.4%	34	23.8%	15.3%	\$3,212	15.4%	9.2%	33	28.7%	15.6%	\$3,635	20.7%	10.0%
	Middle	155	60.1%	\$24,826	64.7%	57.5%	94	65.7%	53.5%	\$15,224	73.0%	51.0%	61	53.0%	54.0%	\$9,602	54.8%	51.6%
	Upper	31	12.0%	\$6,073	15.8%	26.5%	13	9.1%	26.8%	\$2,200	10.5%	36.6%	18	15.7%	26.5%	\$3,873	22.1%	35.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>258</b>	<b>100.0%</b>	<b>\$38,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,865</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,521</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	3.1%	\$0	0.0%	2.0%	0	0.0%	2.9%	\$0	0.0%	1.6%
	Moderate	13	12.9%	\$1,052	7.2%	13.4%	6	15.0%	9.3%	\$365	8.7%	5.8%	7	11.5%	9.0%	\$687	6.6%	5.7%
	Middle	61	60.4%	\$7,909	54.3%	57.5%	26	65.0%	52.1%	\$2,847	67.6%	48.3%	35	57.4%	53.7%	\$5,062	48.9%	50.1%
	Upper	27	26.7%	\$5,604	38.5%	26.5%	8	20.0%	35.6%	\$999	23.7%	43.9%	19	31.1%	34.4%	\$4,605	44.5%	42.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>101</b>	<b>100.0%</b>	<b>\$14,565</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,211</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,354</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.9%	\$0	0.0%	3.9%	0	0.0%	2.0%	\$0	0.0%	2.3%
	Moderate	2	15.4%	\$74	8.7%	13.4%	2	33.3%	8.6%	\$74	30.5%	5.3%	0	0.0%	8.4%	\$0	0.0%	6.5%
	Middle	9	69.2%	\$730	85.5%	57.5%	3	50.0%	48.2%	\$129	53.1%	45.1%	6	85.7%	53.2%	\$601	98.4%	53.6%
	Upper	2	15.4%	\$50	5.9%	26.5%	1	16.7%	40.4%	\$40	16.5%	45.7%	1	14.3%	36.4%	\$10	1.6%	37.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>\$854</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$243</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$611</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>					Low	1	16.7%	20.6%	\$369	32.6%	21.8%	0	0.0%	31.5%	\$0	0.0%	7.1%
	Moderate	1	14.3%	\$126	8.3%	28.7%	1	16.7%	39.7%	\$126	11.1%	51.5%	0	0.0%	21.9%	\$0	0.0%	10.0%
	Middle	4	57.1%	\$1,009	66.2%	35.8%	3	50.0%	25.4%	\$617	54.5%	9.8%	1	100.0%	32.9%	\$392	100.0%	40.5%
	Upper	1	14.3%	\$20	1.3%	15.6%	1	16.7%	14.3%	\$20	1.8%	16.9%	0	0.0%	13.7%	\$0	0.0%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>\$1,524</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$392</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	5.0%	\$0	0.0%	2.6%	0	0.0%	2.9%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	13.4%	0	0.0%	7.5%	\$0	0.0%	4.0%	0	0.0%	8.1%	\$0	0.0%	8.7%
	Middle	0	0.0%	\$0	0.0%	57.5%	0	0.0%	55.8%	\$0	0.0%	54.9%	0	0.0%	46.3%	\$0	0.0%	44.2%
	Upper	0	0.0%	\$0	0.0%	26.5%	0	0.0%	31.7%	\$0	0.0%	38.5%	0	0.0%	42.6%	\$0	0.0%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Geographic Distribution of HMDA Loans - Table 2 of 2**  
Assessment Area: MN Duluth MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2018					2018					2019						
		Count		Bank Dollar		Owner Occupied Units %	Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg \$ %	#	%	Agg %	\$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.2%	\$0	0.0%	1.2%	0	0.0%	1.7%	\$0	0.0%	1.6%
	Moderate	4	36.4%	\$103	9.6%	13.4%	3	50.0%	8.0%	\$95	19.8%	4.7%	1	20.0%	9.5%	\$8	1.4%	7.1%
	Middle	7	63.6%	\$966	90.4%	57.5%	3	50.0%	50.7%	\$386	80.2%	53.6%	4	80.0%	44.2%	\$580	98.6%	47.2%
	Upper	0	0.0%	\$0	0.0%	26.5%	0	0.0%	39.1%	\$0	0.0%	40.5%	0	0.0%	44.6%	\$0	0.0%	44.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>\$1,069</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$588</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	4.5%	\$0	0.0%	3.8%	0	0.0%	5.3%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	13.4%	0	0.0%	17.2%	\$0	0.0%	12.4%	0	0.0%	19.7%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	57.5%	0	0.0%	58.2%	\$0	0.0%	57.7%	0	0.0%	51.5%	\$0	0.0%	54.4%
	Upper	0	0.0%	\$0	0.0%	26.5%	0	0.0%	20.1%	\$0	0.0%	26.1%	0	0.0%	23.5%	\$0	0.0%	30.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	6	1.5%	\$1,009	1.8%	2.6%	3	1.5%	4.0%	\$598	2.2%	4.3%	3	1.6%	3.6%	\$411	1.4%	2.9%
	Moderate	87	22.3%	\$8,202	14.5%	13.4%	46	22.9%	13.1%	\$3,872	14.4%	11.3%	41	21.7%	12.8%	\$4,330	14.7%	8.5%
	Middle	236	60.5%	\$35,440	62.8%	57.5%	129	64.2%	52.6%	\$19,203	71.3%	47.2%	107	56.6%	53.2%	\$16,237	55.1%	49.6%
	Upper	61	15.6%	\$11,747	20.8%	26.5%	23	11.4%	30.2%	\$3,259	12.1%	37.2%	38	20.1%	30.3%	\$8,488	28.8%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>390</b>	<b>100.0%</b>	<b>\$56,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>201</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,932</b>	<b>100.0%</b>	<b>100.0%</b>	<b>189</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,466</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Geographic Distribution of Small Business Loans**  
Assessment Area: MN Duluth MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2019, 2018					2018					2019						
	Count		Bank Dollar		Total Businesses %	Count			Dollar			Count			Dollar		
	#	%	\$ (000s)	\$ %		#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
Low	24	5.2%	\$3,547	6.1%	10.7%	14	6.0%	9.9%	\$2,175	7.4%	12.0%	10	4.4%	8.8%	\$1,372	4.7%	10.2%
Moderate	87	18.9%	\$11,525	19.7%	20.0%	50	21.5%	19.3%	\$5,687	19.3%	19.8%	37	16.3%	19.5%	\$5,838	20.0%	19.5%
Middle	282	61.3%	\$35,261	60.2%	47.9%	137	58.8%	46.0%	\$18,040	61.3%	46.7%	145	63.9%	45.9%	\$17,221	59.0%	45.2%
Upper	67	14.6%	\$8,268	14.1%	21.4%	32	13.7%	22.8%	\$3,524	12.0%	19.9%	35	15.4%	23.7%	\$4,744	16.3%	23.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.6%	0	0.0%	2.1%	\$0	0.0%	1.8%
<b>Total</b>	<b>460</b>	<b>100.0%</b>	<b>\$58,601</b>	<b>100.0%</b>	<b>100.0%</b>	<b>233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>227</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,175</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

Small Farm Lending By Revenue & Loan Size

Assessment Area: MN St. Cloud MSA

Product Type		Bank Lending & Demographic Data Comparison 2019, 2018					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2018			2019									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %
Small Farm	Revenue	\$1 Million or Less	54	94.7%	\$3,300	77.2%	Total Farms	26	96.3%	60.6%	\$1,807	79.2%	56.1%	28	93.3%	55.0%	\$1,493	74.9%	55.6%
		Over \$1 Million	3	5.3%	\$975	22.8%		1	3.7%					2	6.7%				
		Total Rev. available	57	100.0%	\$4,275	100.0%		27	100.0%					30	100.0%				
		Not Known	0	0.0%	\$0	0.0%		0	0.0%					0	0.0%				
		Total	57	100.0%	\$4,275	100.0%	100.0%	27	100.0%					30	100.0%				
	Loan Size	\$100,000 or Less	48	84.2%	\$1,725	40.4%		22	81.5%	73.4%	\$819	35.9%	25.9%	26	86.7%	82.0%	\$906	45.5%	37.3%
		\$100,001 - \$250,000	6	10.5%	\$1,109	25.9%		3	11.1%	17.0%	\$497	21.8%	32.9%	3	10.0%	12.0%	\$612	30.7%	32.8%
		\$250,001 - \$500,000	3	5.3%	\$1,441	33.7%		2	7.4%	9.6%	\$966	42.3%	41.2%	1	3.3%	6.0%	\$475	23.8%	29.9%
		Total	57	100.0%	\$4,275	100.0%		27	100.0%	100.0%	\$2,282	100.0%	100.0%	30	100.0%	100.0%	\$1,993	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	47	87.0%	\$1,700	51.5%													
\$100,001 - \$250,000		6	11.1%	\$1,109	33.6%														
\$250,001 - \$500,000		1	1.9%	\$491	14.9%														
Total		54	100.0%	\$3,300	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of Small Farm Loans

Assessment Area: MN St. Cloud MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2018					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses	2018			2019								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%		#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
SMALL FARM	Low	0	0.0%	\$0	0.0%	Total Farms	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	57	100.0%	\$4,275	100.0%		27	100.0%	98.9%	\$2,282	100.0%	99.8%	30	100.0%	100.0%	\$1,993	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	57	100.0%	\$4,275	100.0%	100.0%	27	100.0%	100.0%	\$2,282	100.0%	100.0%	30	100.0%	100.0%	\$1,993	100.0%	100.0%

Originations & Purchases

2019 FFIEC Census Data and 2019 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MN Ada

Product Type		Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2018			2019									
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%			#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
Small Business	Revenue	\$1 Million or Less	30	60.0%	\$1,792	32.7%	86.9%	15	62.5%	62.4%	\$1,033	34.2%	33.3%	15	57.7%	50.5%	\$759	30.9%	27.8%
		Over \$1 Million	20	40.0%	\$3,685	67.3%	7.7%	9	37.5%					11	42.3%				
		Total Rev. available	50	100.0%	\$5,477	100.0%	94.6%	24	100.0%					26	100.0%				
		Rev. Not Known	0	0.0%	\$0	0.0%	5.3%	0	0.0%					0	0.0%				
		Total	50	100.0%	\$5,477	100.0%	100.0%	24	100.0%					26	100.0%				
	Loan Size	\$100,000 or Less	36	72.0%	\$1,607	29.3%		16	66.7%	90.6%	\$694	22.9%	30.8%	20	76.9%	91.9%	\$913	37.2%	37.8%
		\$100,001 - \$250,000	8	16.0%	\$1,390	25.4%		4	16.7%	4.3%	\$750	24.8%	16.4%	4	15.4%	5.4%	\$640	26.1%	20.8%
		\$250,001 - \$1 Million	6	12.0%	\$2,480	45.3%		4	16.7%	5.1%	\$1,580	52.2%	52.7%	2	7.7%	2.7%	\$900	36.7%	41.4%
		Total	50	100.0%	\$5,477	100.0%		24	100.0%	100.0%	\$3,024	100.0%	100.0%	26	100.0%	100.0%	\$2,453	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	27	90.0%	\$1,147	64.0%													
		\$100,001 - \$250,000	2	6.7%	\$365	20.4%													
		\$250,001 - \$1 Million	1	3.3%	\$280	15.6%													
		Total	30	100.0%	\$1,792	100.0%													
Small Farm	Revenue	\$1 Million or Less	86	76.1%	\$9,337	62.6%	97.8%	39	68.4%	53.0%	\$3,728	49.4%	52.5%	47	83.9%	68.4%	\$5,609	76.1%	81.0%
		Over \$1 Million	23	20.4%	\$5,147	34.5%	2.2%	17	29.8%					6	10.7%				
		Total Rev. available	109	96.5%	\$14,484	97.1%	100.0%	56	98.2%					53	94.6%				
		Not Known	4	3.5%	\$429	2.9%	0.0%	1	1.8%					3	5.4%				
		Total	113	100.0%	\$14,913	100.0%	100.0%	57	100.0%					56	100.0%				
	Loan Size	\$100,000 or Less	62	54.9%	\$2,837	19.0%		32	56.1%	66.7%	\$1,457	19.3%	19.0%	30	53.6%	63.2%	\$1,380	18.7%	18.6%
		\$100,001 - \$250,000	36	31.9%	\$6,385	42.8%		17	29.8%	22.2%	\$3,066	40.7%	38.7%	19	33.9%	27.4%	\$3,319	45.0%	46.6%
		\$250,001 - \$500,000	15	13.3%	\$5,691	38.2%		8	14.0%	11.1%	\$3,016	40.0%	42.3%	7	12.5%	9.4%	\$2,675	36.3%	34.8%
		Total	113	100.0%	\$14,913	100.0%		57	100.0%	100.0%	\$7,539	100.0%	100.0%	56	100.0%	100.0%	\$7,374	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	54	62.8%	\$2,392	25.6%													
		\$100,001 - \$250,000	25	29.1%	\$4,490	48.1%													
		\$250,001 - \$500,000	7	8.1%	\$2,455	26.3%													
		Total	86	100.0%	\$9,337	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2019 FFEC Census Data and 2019 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MN Ada

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	%	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	50	100.0%	\$5,477	100.0%	100.0%	24	100.0%	98.3%	\$3,024	100.0%	99.6%	26	100.0%	96.4%	\$2,453	100.0%	99.4%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	0.4%	0	0.0%	3.6%	\$0	0.0%	0.6%
	<b>Total</b>	<b>50</b>	<b>100.0%</b>	<b>\$5,477</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,024</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,453</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Total Farms</b>													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	113	100.0%	\$14,913	100.0%	100.0%	57	100.0%	100.0%	\$7,539	100.0%	100.0%	56	100.0%	100.0%	\$7,374	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>113</b>	<b>100.0%</b>	<b>\$14,913</b>	<b>100.0%</b>	<b>100.0%</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,539</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,374</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Baxter Crosslake Nisswa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		2018, 2019				Families by Family Income %	2018					2019						
		Bank		Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg	Agg	Bank	Agg	Agg	Bank	Agg	Agg	Bank	Agg	Agg
#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %			
HOME PURCHASE	Low	8	8.6%	\$779	3.4%	20.5%	4	10.8%	6.7%	\$369	3.7%	3.2%	4	7.1%	5.8%	\$410	3.1%	2.8%
	Moderate	18	19.4%	\$2,243	9.8%	19.8%	3	8.1%	18.8%	\$313	3.2%	13.0%	15	26.8%	16.9%	\$1,930	14.7%	10.7%
	Middle	12	12.9%	\$1,925	8.4%	23.2%	4	10.8%	18.7%	\$675	6.9%	15.4%	8	14.3%	17.2%	\$1,250	9.5%	13.9%
	Upper	51	54.8%	\$17,201	75.0%	36.5%	23	62.2%	36.5%	\$7,783	79.0%	49.8%	28	50.0%	41.9%	\$9,418	71.9%	54.5%
	Unknown	4	4.3%	\$793	3.5%	0.0%	3	8.1%	19.3%	\$709	7.2%	18.6%	1	1.8%	18.3%	\$84	0.6%	18.0%
	<b>Total</b>	<b>93</b>	<b>100.0%</b>	<b>\$22,941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,849</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,092</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	9.2%	\$0	0.0%	4.1%	0	0.0%	5.5%	\$0	0.0%	2.5%
	Moderate	11	25.0%	\$1,471	13.6%	19.8%	1	12.5%	16.2%	\$153	8.2%	9.5%	10	27.8%	13.6%	\$1,318	14.7%	8.1%
	Middle	8	18.2%	\$1,765	16.3%	23.2%	4	50.0%	20.5%	\$729	39.0%	16.1%	4	11.1%	16.2%	\$1,036	11.6%	11.7%
	Upper	24	54.5%	\$7,445	68.7%	36.5%	3	37.5%	41.9%	\$989	52.9%	57.1%	21	58.3%	47.9%	\$6,456	72.0%	61.1%
	Unknown	1	2.3%	\$154	1.4%	0.0%	0	0.0%	12.2%	\$0	0.0%	13.2%	1	2.8%	16.8%	\$154	1.7%	16.6%
	<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>\$10,835</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,964</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	10.0%	\$50	10.7%	20.5%	0	0.0%	5.1%	\$0	0.0%	3.5%	1	16.7%	8.2%	\$50	15.4%	4.1%
	Moderate	2	20.0%	\$32	6.8%	19.8%	1	25.0%	20.6%	\$11	7.6%	14.6%	1	16.7%	16.4%	\$21	6.5%	8.7%
	Middle	4	40.0%	\$298	63.5%	23.2%	2	50.0%	28.7%	\$97	66.9%	22.4%	2	33.3%	17.9%	\$201	62.0%	14.8%
	Upper	3	30.0%	\$89	19.0%	36.5%	1	25.0%	42.6%	\$37	25.5%	53.9%	2	33.3%	54.5%	\$52	16.0%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	5.6%	0	0.0%	3.0%	\$0	0.0%	7.4%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$469</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$145</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$324</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	8.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	87.5%	\$0	0.0%	91.9%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	5.9%	\$0	0.0%	4.9%	0	0.0%	1.4%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	16.2%	\$0	0.0%	9.8%	0	0.0%	4.3%	\$0	0.0%	4.2%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	20.6%	\$0	0.0%	12.5%	0	0.0%	18.8%	\$0	0.0%	17.3%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	55.9%	\$0	0.0%	71.5%	0	0.0%	69.6%	\$0	0.0%	75.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	1.3%	0	0.0%	5.8%	\$0	0.0%	2.9%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: MN Baxter Crosslake Nisswa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2018			2019								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	10.4%	\$0	0.0%	12.6%	0	0.0%	5.3%	\$0	0.0%	2.0%
	Moderate	1	16.7%	\$40	10.6%	19.8%	1	25.0%	20.8%	\$40	12.6%	11.2%	0	0.0%	19.7%	\$0	0.0%	8.4%
	Middle	2	33.3%	\$48	12.7%	23.2%	1	25.0%	15.6%	\$32	10.1%	10.5%	1	50.0%	13.2%	\$16	27.1%	4.0%
	Upper	3	50.0%	\$289	76.7%	36.5%	2	50.0%	50.6%	\$246	77.4%	64.4%	1	50.0%	56.6%	\$43	72.9%	76.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	1.3%	0	0.0%	5.3%	\$0	0.0%	9.1%
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$377</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$318</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$59</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	2.1%	\$0	0.0%	2.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	8.5%	\$0	0.0%	6.3%	0	0.0%	2.2%	\$0	0.0%	3.0%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	1.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	89.4%	\$0	0.0%	91.3%	0	0.0%	95.6%	\$0	0.0%	95.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	9	5.9%	\$829	2.4%	20.5%	4	7.5%	7.2%	\$369	3.0%	3.4%	5	5.0%	5.6%	\$460	2.1%	2.6%
	Moderate	32	20.9%	\$3,786	10.9%	19.8%	6	11.3%	17.9%	\$517	4.2%	11.4%	26	26.0%	15.2%	\$3,269	14.6%	9.2%
	Middle	26	17.0%	\$4,036	11.7%	23.2%	11	20.8%	19.3%	\$1,533	12.6%	14.8%	15	15.0%	16.6%	\$2,503	11.2%	12.5%
	Upper	81	52.9%	\$25,024	72.3%	36.5%	29	54.7%	38.2%	\$9,055	74.3%	49.4%	52	52.0%	44.7%	\$15,969	71.2%	55.7%
	Unknown	5	3.3%	\$947	2.7%	0.0%	3	5.7%	17.3%	\$709	5.8%	21.0%	2	2.0%	17.9%	\$238	1.1%	20.0%
	<i>Total</i>	<i>153</i>	<i>100.0%</i>	<i>\$34,622</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$22,439</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Small Business Loans by Business Revenue & Loan Size**

Assessment Area: MN Baxter Crosslake Nisswa

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2018, 2019						Bank & Aggregate Lending Comparison											
	Bank					Total Businesses %	2018			2019								
	Count		Dollar		Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %			Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
BUSINESS REVENUE	\$1million or Less	38	53.5%	\$4,345	44.1%	92.1%	17	50.0%	54.0%	\$1,728	36.0%	38.4%	21	56.8%	50.9%	\$2,617	51.8%	33.8%
	Over \$1 Million	33	46.5%	\$5,504	55.9%	6.4%	17	50.0%					16	43.2%				
	<i>Total Rev. available</i>	<i>71</i>	<i>100.0%</i>	<i>\$9,849</i>	<i>100.0%</i>	<i>98.5%</i>	<i>34</i>	<i>100.0%</i>					<i>37</i>	<i>100.0%</i>				
	Rev. Not Known	0	0.0%	\$0	0.0%	1.6%	0	0.0%					0	0.0%				
	<i>Total</i>	<i>71</i>	<i>100.0%</i>	<i>\$9,849</i>	<i>100.0%</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>					<i>37</i>	<i>100.0%</i>				
LOAN SIZE	\$100,000 or Less	45	63.4%	\$2,715	27.6%		24	70.6%	90.8%	\$1,480	30.8%	32.3%	21	56.8%	91.6%	\$1,235	24.5%	34.0%
	\$100,001 - \$250,000	20	28.2%	\$3,940	40.0%		7	20.6%	4.8%	\$1,297	27.0%	18.2%	13	35.1%	5.0%	\$2,643	52.3%	19.6%
	\$250,001 - \$1 Million	6	8.5%	\$3,194	32.4%		3	8.8%	4.4%	\$2,021	42.1%	49.4%	3	8.1%	3.4%	\$1,173	23.2%	46.4%
	<i>Total</i>	<i>71</i>	<i>100.0%</i>	<i>\$9,849</i>	<i>100.0%</i>		<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,798</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,051</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	27	71.1%	\$1,281	29.5%													
	\$100,001 - \$250,000	8	21.1%	\$1,645	37.9%													
	\$250,001 - \$1 Million	3	7.9%	\$1,419	32.7%													
	<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$4,345</i>	<i>100.0%</i>													

Originations & Purchases  
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Baxter Crosslake Nisswa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
		2018, 2019				Owner Occupied Units %	2018					2019							
		Bank		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	4	4.3%	\$398	1.7%	8.3%	3	8.1%	12.0%	\$297	3.0%	8.0%	1	1.8%	7.8%	\$101	0.8%	5.1%	
	Middle	83	89.2%	\$21,356	93.1%	84.9%	34	91.9%	79.3%	\$9,552	97.0%	83.2%	49	87.5%	83.7%	\$11,804	90.2%	86.4%	
	Upper	6	6.5%	\$1,187	5.2%	6.8%	0	0.0%	8.7%	\$0	0.0%	8.8%	6	10.7%	8.5%	\$1,187	9.1%	8.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>93</b>	<b>100.0%</b>	<b>\$22,941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,849</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,092</b>	<b>100.0%</b>	<b>100.0%</b>	
HOME REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	7.8%	\$0	0.0%	5.1%	0	0.0%	5.0%	\$0	0.0%	3.9%	
	Middle	40	90.9%	\$10,001	92.3%	84.9%	7	87.5%	83.7%	\$1,647	88.0%	85.9%	33	91.7%	87.0%	\$8,354	93.2%	88.4%	
	Upper	4	9.1%	\$834	7.7%	6.8%	1	12.5%	8.5%	\$224	12.0%	9.0%	3	8.3%	8.0%	\$610	6.8%	7.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>\$10,835</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,964</b>	<b>100.0%</b>	<b>100.0%</b>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	2	20.0%	\$61	13.0%	8.3%	1	25.0%	5.1%	\$11	7.6%	2.9%	1	16.7%	3.7%	\$50	15.4%	2.0%	
	Middle	8	80.0%	\$408	87.0%	84.9%	3	75.0%	89.7%	\$134	92.4%	94.8%	5	83.3%	87.3%	\$274	84.6%	94.1%	
	Upper	0	0.0%	\$0	0.0%	6.8%	0	0.0%	5.1%	\$0	0.0%	2.4%	0	0.0%	9.0%	\$0	0.0%	4.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$469</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$145</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$324</b>	<b>100.0%</b>	<b>100.0%</b>	
MULTI FAMILY		<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	12.9%	0	0.0%	16.7%	\$0	0.0%	11.4%	0	0.0%	6.3%	\$0	0.0%	0.5%	
	Middle	0	0.0%	\$0	0.0%	83.2%	0	0.0%	83.3%	\$0	0.0%	88.6%	0	0.0%	93.8%	\$0	0.0%	99.5%	
	Upper	0	0.0%	\$0	0.0%	3.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	5.9%	\$0	0.0%	5.2%	0	0.0%	5.8%	\$0	0.0%	2.8%	
	Middle	0	0.0%	\$0	0.0%	84.9%	0	0.0%	88.2%	\$0	0.0%	91.6%	0	0.0%	84.1%	\$0	0.0%	88.6%	
	Upper	0	0.0%	\$0	0.0%	6.8%	0	0.0%	5.9%	\$0	0.0%	3.2%	0	0.0%	10.1%	\$0	0.0%	8.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data



**Geographic Distribution of HMDA Loans - Table 2 of 2**  
Assessment Area: MN Baxter Crosslake Nisswa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	16.7%	\$40	10.6%	8.3%	1	25.0%	6.5%	\$40	12.6%	4.5%	0	0.0%	6.6%	\$0	0.0%	6.7%
	Middle	4	66.7%	\$183	48.5%	84.9%	2	50.0%	85.7%	\$124	39.0%	82.6%	2	100.0%	85.5%	\$59	100.0%	90.1%
	Upper	1	16.7%	\$154	40.8%	6.8%	1	25.0%	7.8%	\$154	48.4%	13.0%	0	0.0%	7.9%	\$0	0.0%	3.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$377</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$318</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$59</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	4.3%	\$0	0.0%	3.5%	0	0.0%	4.4%	\$0	0.0%	3.2%
	Middle	0	0.0%	\$0	0.0%	84.9%	0	0.0%	89.4%	\$0	0.0%	90.1%	0	0.0%	95.6%	\$0	0.0%	96.8%
	Upper	0	0.0%	\$0	0.0%	6.8%	0	0.0%	6.4%	\$0	0.0%	6.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	7	4.6%	\$499	1.4%	8.3%	5	9.4%	10.2%	\$348	2.9%	7.2%	2	2.0%	6.6%	\$151	0.7%	4.5%
	Middle	135	88.2%	\$31,948	92.3%	84.9%	46	86.8%	81.4%	\$11,457	94.0%	84.5%	89	89.0%	85.2%	\$20,491	91.3%	87.8%
	Upper	11	7.2%	\$2,175	6.3%	6.8%	2	3.8%	8.3%	\$378	3.1%	8.3%	9	9.0%	8.2%	\$1,797	8.0%	7.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>153</b>	<b>100.0%</b>	<b>\$34,622</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,183</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,439</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Geographic Distribution of Small Business Loans**  
Assessment Area: MN Baxter Crosslake Nisswa

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2018, 2019					2018					2019						
	Count	Bank		Total Businesses	Count	Dollar			Count			Dollar					
		#	%			\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	1	1.4%	\$27	0.3%	10.8%	0	0.0%	14.0%	\$0	0.0%	19.8%	1	2.7%	8.8%	\$27	0.5%	9.9%
Middle	67	94.4%	\$9,759	99.1%	82.8%	31	91.2%	75.3%	\$4,735	98.7%	72.0%	36	97.3%	79.2%	\$5,024	99.5%	77.5%
Upper	3	4.2%	\$63	0.6%	6.5%	3	8.8%	7.4%	\$63	1.3%	6.0%	0	0.0%	8.0%	\$0	0.0%	9.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	2.2%	0	0.0%	4.0%	\$0	0.0%	3.2%
	<b>Total</b>	<b>71</b>	<b>100.0%</b>	<b>\$9,849</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,798</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,051</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MN Bird Island Fairfax Hector

Product Type	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2018				2019								
	Count		Dollar			Count		Dollar		Count		Dollar						
	#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business Revenue	\$1 Million or Less	95	76.0%	\$4,833	45.9%	87.6%	58	79.5%	58.3%	\$3,391	54.5%	44.7%	37	71.2%	49.8%	\$1,442	33.5%	24.7%
	Over \$1 Million	29	23.2%	\$5,652	53.7%	8.8%	15	20.5%					14	26.9%				
	Total Rev. available	124	99.2%	\$10,485	99.6%	96.4%	73	100.0%					51	98.1%				
	Rev. Not Known	1	0.8%	\$45	0.4%	3.6%	0	0.0%					1	1.9%				
	Total	125	100.0%	\$10,530	100.0%	100.0%	73	100.0%					52	100.0%				
Small Business Loan Size	\$100,000 or Less	95	76.0%	\$3,146	29.9%		55	75.3%	85.5%	\$1,942	31.2%	28.8%	40	76.9%	92.2%	\$1,204	28.0%	33.2%
	\$100,001 - \$250,000	21	16.8%	\$3,533	33.6%		13	17.8%	8.7%	\$2,283	36.7%	26.5%	8	15.4%	4.4%	\$1,250	29.0%	20.3%
	\$250,001 - \$1 Million	9	7.2%	\$3,851	36.6%		5	6.8%	5.8%	\$2,001	32.1%	44.7%	4	7.7%	3.4%	\$1,850	43.0%	46.6%
	Total	125	100.0%	\$10,530	100.0%		73	100.0%	100.0%	\$6,226	100.0%	100.0%	52	100.0%	100.0%	\$4,304	100.0%	100.0%
Small Business Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	80	84.2%	\$2,279	47.2%													
	\$100,001 - \$250,000	13	13.7%	\$2,003	41.4%													
	\$250,001 - \$1 Million	2	2.1%	\$551	11.4%													
	Total	95	100.0%	\$4,833	100.0%													
Small Farm Revenue	\$1 Million or Less	274	85.1%	\$35,325	76.1%	98.0%	125	83.3%	62.2%	\$17,643	76.4%	67.2%	149	86.6%	64.2%	\$17,682	75.7%	68.4%
	Over \$1 Million	44	13.7%	\$10,743	23.1%	2.0%	22	14.7%					22	12.8%				
	Total Rev. available	318	98.8%	\$46,068	99.2%	100.0%	147	98.0%					171	99.4%				
	Not Known	4	1.2%	\$379	0.8%	0.0%	3	2.0%					1	0.6%				
	Total	322	100.0%	\$46,447	100.0%	100.0%	150	100.0%					172	100.0%				
Small Farm Loan Size	\$100,000 or Less	161	50.0%	\$7,302	15.7%		71	47.3%	63.3%	\$3,125	13.5%	17.4%	90	52.3%	65.2%	\$4,177	17.9%	18.2%
	\$100,001 - \$250,000	105	32.6%	\$18,412	39.6%		46	30.7%	21.9%	\$8,055	34.9%	33.5%	59	34.3%	22.5%	\$10,357	44.4%	37.5%
	\$250,001 - \$500,000	56	17.4%	\$20,733	44.6%		33	22.0%	14.8%	\$11,918	51.6%	49.2%	23	13.4%	12.3%	\$8,815	37.8%	44.3%
	Total	322	100.0%	\$46,447	100.0%		150	100.0%	100.0%	\$23,098	100.0%	100.0%	172	100.0%	100.0%	\$23,349	100.0%	100.0%
Small Farm Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	149	54.4%	\$6,755	19.1%													
	\$100,001 - \$250,000	90	32.8%	\$15,595	44.1%													
	\$250,001 - \$500,000	35	12.8%	\$12,975	36.7%													
	Total	274	100.0%	\$35,325	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFEC Census Data and 2019 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: MN Bird Island Fairfax Hector

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	4.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	125	100.0%	\$10,530	100.0%	100.0%	73	100.0%	84.8%	\$6,226	100.0%	94.9%	52	100.0%	92.9%	\$4,304	100.0%	99.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	0.7%	0	0.0%	7.1%	\$0	0.0%	0.8%
	<b>Total</b>	<b>125</b>	<b>100.0%</b>	<b>\$10,530</b>	<b>100.0%</b>	<b>100.0%</b>	<b>73</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,226</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,304</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Total Farms</b>													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	0.6%	\$378	0.8%	0.0%	2	1.3%	18.8%	\$378	1.6%	15.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	320	99.4%	\$46,069	99.2%	100.0%	148	98.7%	81.0%	\$22,720	98.4%	84.8%	172	100.0%	99.5%	\$23,349	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.0%
<b>Total</b>	<b>322</b>	<b>100.0%</b>	<b>\$46,447</b>	<b>100.0%</b>	<b>100.0%</b>	<b>150</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,098</b>	<b>100.0%</b>	<b>100.0%</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,349</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Lonsdale AA

PRODUCTTYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank		Families by Family Income		Count	Count		Dollar				Count		Dollar			
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	2.2%	\$25	0.3%	12.4%	0	0.0%	2.3%	\$0	0.0%	1.3%	1	6.3%	2.4%	\$25	0.8%	1.2%
	Moderate	10	22.2%	\$1,463	15.6%	13.0%	5	17.2%	14.0%	\$740	11.8%	9.9%	5	31.3%	13.3%	\$723	23.4%	9.6%
	Middle	11	24.4%	\$1,830	19.6%	22.0%	8	27.6%	23.7%	\$1,285	20.5%	22.1%	3	18.8%	26.8%	\$545	17.6%	24.8%
	Upper	19	42.2%	\$5,573	59.6%	52.5%	14	48.3%	42.9%	\$3,999	63.8%	50.6%	5	31.3%	42.0%	\$1,574	50.9%	47.9%
	Unknown	4	8.9%	\$466	5.0%	0.0%	2	6.9%	17.1%	\$242	3.9%	16.1%	2	12.5%	15.5%	\$224	7.2%	16.4%
	<b>Total</b>	<b>45</b>	<b>100.0%</b>	<b>\$9,357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,266</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,091</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	2.9%	\$185	2.4%	12.4%	1	9.1%	7.1%	\$185	7.6%	4.8%	0	0.0%	2.7%	\$0	0.0%	1.3%
	Moderate	5	14.3%	\$815	10.6%	13.0%	2	18.2%	11.9%	\$357	14.7%	9.0%	3	12.5%	11.6%	\$458	8.7%	8.1%
	Middle	6	17.1%	\$1,379	17.9%	22.0%	0	0.0%	23.5%	\$0	0.0%	22.4%	6	25.0%	20.5%	\$1,379	26.1%	17.7%
	Upper	22	62.9%	\$5,050	65.6%	52.5%	8	72.7%	48.3%	\$1,883	77.6%	53.8%	14	58.3%	51.4%	\$3,167	60.0%	57.9%
	Unknown	1	2.9%	\$275	3.6%	0.0%	0	0.0%	9.2%	\$0	0.0%	10.1%	1	4.2%	13.9%	\$275	5.2%	15.0%
	<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$7,704</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,279</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	12.4%	0	0.0%	2.9%	\$0	0.0%	2.9%	0	0.0%	1.2%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	12.9%	\$0	0.0%	8.1%	0	0.0%	7.0%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	21.4%	\$0	0.0%	26.6%	0	0.0%	17.4%	\$0	0.0%	13.5%
	Upper	4	100.0%	\$241	100.0%	52.5%	2	100.0%	57.1%	\$54	100.0%	49.1%	2	100.0%	72.1%	\$187	100.0%	79.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.7%	\$0	0.0%	13.3%	0	0.0%	2.3%	\$0	0.0%	2.4%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$241</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$187</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	12.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	52.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	12.4%	0	0.0%	5.0%	\$0	0.0%	5.7%	0	0.0%	3.4%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	10.0%	\$0	0.0%	2.6%	0	0.0%	13.8%	\$0	0.0%	10.5%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	25.0%	\$0	0.0%	24.5%	0	0.0%	17.2%	\$0	0.0%	12.8%
	Upper	0	0.0%	\$0	0.0%	52.5%	0	0.0%	57.5%	\$0	0.0%	63.9%	0	0.0%	55.2%	\$0	0.0%	61.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	3.3%	0	0.0%	10.3%	\$0	0.0%	14.2%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Borrower Distribution of HMDA Loans - Table 2 of 2**

Assessment Area: MN Lonsdale AA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		2018				Families by Family Income %	2018			2019								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	1	10.0%	\$37	7.7%	12.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	25.0%	3.2%	\$37	15.8%	1.3%
	Moderate	2	20.0%	\$49	10.2%	13.0%	2	33.3%	21.4%	\$49	19.8%	21.9%	0	0.0%	6.5%	\$0	0.0%	10.2%
	Middle	1	10.0%	\$117	24.3%	22.0%	0	0.0%	10.7%	\$0	0.0%	13.8%	1	25.0%	25.8%	\$117	50.0%	29.3%
	Upper	6	60.0%	\$278	57.8%	52.5%	4	66.7%	67.9%	\$198	80.2%	64.3%	2	50.0%	61.3%	\$80	34.2%	50.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	9.1%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$247</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$234</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	12.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	4.0%	\$0	0.0%	3.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	4.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	1.5%
	Upper	0	0.0%	\$0	0.0%	52.5%	0	0.0%	8.0%	\$0	0.0%	11.3%	0	0.0%	10.0%	\$0	0.0%	3.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	84.0%	\$0	0.0%	85.4%	0	0.0%	80.0%	\$0	0.0%	94.8%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	3.2%	\$247	1.4%	12.4%	1	2.1%	3.6%	\$185	2.1%	2.2%	2	4.3%	2.4%	\$62	0.7%	1.2%
	Moderate	17	18.1%	\$2,327	13.1%	13.0%	9	18.8%	13.2%	\$1,146	12.7%	9.5%	8	17.4%	12.0%	\$1,181	13.4%	8.6%
	Middle	18	19.1%	\$3,326	18.7%	22.0%	8	16.7%	22.8%	\$1,285	14.3%	21.8%	10	21.7%	23.3%	\$2,041	23.2%	20.9%
	Upper	51	54.3%	\$11,142	62.7%	52.5%	28	58.3%	45.5%	\$6,134	68.2%	51.0%	23	50.0%	48.0%	\$5,008	57.0%	51.2%
	Unknown	5	5.3%	\$741	4.2%	0.0%	2	4.2%	14.9%	\$242	2.7%	15.5%	3	6.5%	14.3%	\$499	5.7%	18.1%
	<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>\$17,783</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,791</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MN Lonsdale AA

Product Type		Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2018			2019									
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%			#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
Small Business	Revenue	\$1 Million or Less	105	79.5%	\$8,232	67.4%	93.1%	52	80.0%	55.0%	\$4,407	74.2%	46.3%	53	79.1%	61.6%	\$3,825	61.0%	47.6%
		Over \$1 Million	24	18.2%	\$3,653	29.9%	6.2%	10	15.4%					14	20.9%				
		Total Rev. available	129	97.7%	\$11,885	97.3%	99.3%	62	95.4%					67	100.0%				
		Rev. Not Known	3	2.3%	\$324	2.7%	0.7%	3	4.6%					0	0.0%				
		Total	132	100.0%	\$12,209	100.0%	100.0%	65	100.0%					67	100.0%				
	Loan Size	\$100,000 or Less	102	77.3%	\$4,673	38.3%		53	81.5%	92.2%	\$2,584	43.5%	43.8%	49	73.1%	92.6%	\$2,089	33.3%	40.0%
		\$100,001 - \$250,000	22	16.7%	\$3,820	31.3%		9	13.8%	4.3%	\$1,680	28.3%	18.1%	13	19.4%	3.8%	\$2,140	34.1%	15.2%
		\$250,001 - \$1 Million	8	6.1%	\$3,716	30.4%		3	4.6%	3.4%	\$1,678	28.2%	38.1%	5	7.5%	3.6%	\$2,038	32.5%	44.8%
		Total	132	100.0%	\$12,209	100.0%		65	100.0%	100.0%	\$5,942	100.0%	100.0%	67	100.0%	100.0%	\$6,267	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	90	85.7%	\$3,901	47.4%													
\$100,001 - \$250,000		9	8.6%	\$1,469	17.8%														
\$250,001 - \$1 Million		6	5.7%	\$2,862	34.8%														
Total		105	100.0%	\$8,232	100.0%														
Small Farm	Revenue	\$1 Million or Less	83	82.2%	\$8,125	78.2%	98.2%	52	86.7%	60.4%	\$4,590	83.7%	81.1%	31	75.6%	56.5%	\$3,535	72.1%	75.3%
		Over \$1 Million	15	14.9%	\$2,110	20.3%	1.2%	6	10.0%					9	22.0%				
		Total Rev. available	98	97.1%	\$10,235	98.5%	99.4%	58	96.7%					40	97.6%				
		Not Known	3	3.0%	\$154	1.5%	0.6%	2	3.3%					1	2.4%				
		Total	101	100.0%	\$10,389	100.0%	100.0%	60	100.0%					41	100.0%				
	Loan Size	\$100,000 or Less	66	65.3%	\$2,542	24.5%		40	66.7%	77.5%	\$1,458	26.6%	30.7%	26	63.4%	78.3%	\$1,084	22.1%	28.1%
		\$100,001 - \$250,000	26	25.7%	\$4,766	45.9%		16	26.7%	17.1%	\$2,783	50.8%	43.5%	10	24.4%	14.1%	\$1,983	40.4%	36.3%
		\$250,001 - \$500,000	9	8.9%	\$3,081	29.7%		4	6.7%	5.4%	\$1,242	22.7%	25.8%	5	12.2%	7.6%	\$1,839	37.5%	35.6%
		Total	101	100.0%	\$10,389	100.0%		60	100.0%	100.0%	\$5,483	100.0%	100.0%	41	100.0%	100.0%	\$4,906	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	55	66.3%	\$1,903	23.4%													
\$100,001 - \$250,000		20	24.1%	\$3,639	44.8%														
\$250,001 - \$500,000		8	9.6%	\$2,583	31.8%														
Total		83	100.0%	\$8,125	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Lonsdale AA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	13	28.9%	\$2,603	27.8%	41.6%	9	31.0%	34.2%	\$1,939	30.9%	31.0%	4	25.0%	33.6%	\$664	21.5%	28.8%
	Upper	32	71.1%	\$6,754	72.2%	58.4%	20	69.0%	65.8%	\$4,327	69.1%	69.0%	12	75.0%	66.4%	\$2,427	78.5%	71.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>45</b>	<b>100.0%</b>	<b>\$9,357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,266</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,091</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	6	17.1%	\$1,035	13.4%	41.6%	4	36.4%	36.7%	\$655	27.0%	30.2%	2	8.3%	33.6%	\$380	7.2%	29.8%
	Upper	29	82.9%	\$6,669	86.6%	58.4%	7	63.6%	63.3%	\$1,770	73.0%	69.8%	22	91.7%	66.4%	\$4,899	92.8%	70.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$7,704</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,279</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	25.0%	\$24	10.0%	41.6%	1	50.0%	38.6%	\$24	44.4%	41.6%	0	0.0%	36.0%	\$0	0.0%	28.1%
	Upper	3	75.0%	\$217	90.0%	58.4%	1	50.0%	61.4%	\$30	55.6%	58.4%	2	100.0%	64.0%	\$187	100.0%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$241</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$187</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	79.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	66.7%	\$0	0.0%	62.1%
	Upper	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	37.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	41.6%	0	0.0%	30.0%	\$0	0.0%	20.6%	0	0.0%	44.8%	\$0	0.0%	52.0%
	Upper	0	0.0%	\$0	0.0%	58.4%	0	0.0%	70.0%	\$0	0.0%	79.4%	0	0.0%	55.2%	\$0	0.0%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Geographic Distribution of HMDA Loans - Table 2 of 2**  
Assessment Area: MN Lonsdale AA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	20.0%	\$76	15.8%	41.6%	2	33.3%	39.3%	\$76	30.8%	26.0%	0	0.0%	29.0%	\$0	0.0%	40.9%
	Upper	8	80.0%	\$405	84.2%	58.4%	4	66.7%	60.7%	\$171	69.2%	74.0%	4	100.0%	71.0%	\$234	100.0%	59.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$247</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$234</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	41.6%	0	0.0%	36.0%	\$0	0.0%	44.0%	0	0.0%	50.0%	\$0	0.0%	48.7%
	Upper	0	0.0%	\$0	0.0%	58.4%	0	0.0%	64.0%	\$0	0.0%	56.0%	0	0.0%	50.0%	\$0	0.0%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	22	23.4%	\$3,738	21.0%	41.6%	16	33.3%	35.2%	\$2,694	30.0%	31.0%	6	13.0%	34.1%	\$1,044	11.9%	30.4%
	Upper	72	76.6%	\$14,045	79.0%	58.4%	32	66.7%	64.8%	\$6,298	70.0%	69.0%	40	87.0%	65.9%	\$7,747	88.1%	69.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>\$17,783</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,791</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

**Geographic Distribution of Small Business & Small Farm Loans**  
Assessment Area: MN Lonsdale AA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Total Businesses %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	33	25.0%	\$2,315	19.0%	40.5%	15	23.1%	39.3%	\$647	10.9%	32.7%	18	26.9%	36.7%	\$1,668	26.6%	35.9%
	Upper	99	75.0%	\$9,894	81.0%	59.5%	50	76.9%	60.7%	\$5,295	89.1%	67.3%	49	73.1%	63.3%	\$4,599	73.4%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>132</b>	<b>100.0%</b>	<b>\$12,209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,942</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,267</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Total Farms</b>																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	15	14.9%	\$1,168	11.2%	28.1%	9	15.0%	22.5%	\$698	12.7%	16.3%	6	14.6%	17.4%	\$470	9.6%	14.1%
	Upper	86	85.1%	\$9,221	88.8%	71.9%	51	85.0%	77.5%	\$4,785	87.3%	83.7%	35	85.4%	82.6%	\$4,436	90.4%	85.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<b>Total</b>	<b>101</b>	<b>100.0%</b>	<b>\$10,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,906</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information



Small Farm Lending By Revenue & Loan Size

Assessment Area: MN Oslo Warren

Product Type		Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		2018, 2019				Total Businesses %	2018					2019						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Farm	Revenue	Total Farms																
	\$1 Million or Less	85	92.4%	\$11,623	87.1%	100.0%	39	92.9%	62.0%	\$5,751	84.4%	68.9%	46	92.0%	68.9%	\$5,872	89.9%	69.9%
	Over \$1 Million	7	7.6%	\$1,727	12.9%	0.0%	3	7.1%				4	8.0%					
	Total Rev. available	92	100.0%	\$13,350	100.0%	100.0%	42	100.0%				50	100.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
Total	92	100.0%	\$13,350	100.0%	100.0%	42	100.0%				50	100.0%						
Small Farm	Loan Size																	
	\$100,000 or Less	48	52.2%	\$2,419	18.1%		22	52.4%	67.2%	\$1,240	18.2%	21.6%	26	52.0%	59.0%	\$1,179	18.0%	19.4%
	\$100,001 - \$250,000	24	26.1%	\$3,609	27.0%		9	21.4%	19.7%	\$1,416	20.8%	31.9%	15	30.0%	28.3%	\$2,193	33.6%	40.7%
	\$250,001 - \$500,000	20	21.7%	\$7,322	54.8%		11	26.2%	13.1%	\$4,162	61.0%	46.5%	9	18.0%	12.7%	\$3,160	48.4%	39.9%
Total	92	100.0%	\$13,350	100.0%		42	100.0%	100.0%	\$6,818	100.0%	100.0%	50	100.0%	100.0%	\$6,532	100.0%	100.0%	
Small Farm	Loan Size & Rev																	
	\$1 Mill or Less	46	54.1%	\$2,334	20.1%													
	\$100,001 - \$250,000	22	25.9%	\$3,279	28.2%													
	\$250,001 - \$500,000	17	20.0%	\$6,010	51.7%													
Total	85	100.0%	\$11,623	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of Small Farm Loans

Assessment Area: MN Oslo Warren

Product Type	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		2018, 2019				Total Businesses %	2018					2019						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	92	100.0%	\$13,350	100.0%	100.0%	42	100.0%	100.0%	\$6,818	100.0%	100.0%	50	100.0%	100.0%	\$6,532	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	92	100.0%	\$13,350	100.0%	100.0%	42	100.0%	100.0%	\$6,818	100.0%	100.0%	50	100.0%	100.0%	\$6,532	100.0%	100.0%

Originations & Purchases

2019 FFIEC Census Data and 2019 D&B Information

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Pine City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data				Bank & Aggregate Lending Comparison												
		2019, 2018				2018					2019							
		Bank		Families by Family Income		Count		Dollar			Count		Dollar					
		Count	Dollar		%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	8.6%	\$332	6.5%	23.3%	1	5.6%	6.8%	\$53	2.1%	4.1%	2	11.8%	7.7%	\$279	10.7%	4.6%
	Moderate	4	11.4%	\$403	7.9%	22.2%	4	22.2%	24.5%	\$403	16.3%	20.7%	0	0.0%	22.5%	\$0	0.0%	18.9%
	Middle	10	28.6%	\$1,484	29.2%	22.9%	4	22.2%	25.2%	\$569	23.1%	25.7%	6	35.3%	26.1%	\$915	35.0%	27.5%
	Upper	15	42.9%	\$2,462	48.4%	31.6%	9	50.0%	24.7%	\$1,443	58.5%	30.4%	6	35.3%	25.1%	\$1,019	39.0%	30.1%
	Unknown	3	8.6%	\$401	7.9%	0.0%	0	0.0%	18.9%	\$0	0.0%	19.1%	3	17.6%	18.6%	\$401	15.3%	18.9%
	<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$5,082</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,468</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,614</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	3	9.1%	\$216	4.6%	23.3%	1	8.3%	10.7%	\$36	3.3%	6.5%	2	9.5%	10.4%	\$180	5.0%	5.4%
	Moderate	3	9.1%	\$265	5.6%	22.2%	2	16.7%	21.9%	\$225	20.4%	18.1%	1	4.8%	18.3%	\$40	1.1%	14.9%
	Middle	11	33.3%	\$1,179	25.0%	22.9%	2	16.7%	28.6%	\$97	8.8%	28.4%	9	42.9%	22.0%	\$1,082	30.0%	19.8%
	Upper	11	33.3%	\$1,541	32.7%	31.6%	6	50.0%	29.7%	\$577	52.2%	36.7%	5	23.8%	30.6%	\$964	26.7%	37.0%
	Unknown	5	15.2%	\$1,514	32.1%	0.0%	1	8.3%	9.2%	\$170	15.4%	10.3%	4	19.0%	18.6%	\$1,344	37.2%	23.0%
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$4,715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,610</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	11.0%	\$0	0.0%	7.8%	0	0.0%	7.9%	\$0	0.0%	5.8%
	Moderate	0	0.0%	\$0	0.0%	22.2%	0	0.0%	18.3%	\$0	0.0%	15.8%	0	0.0%	15.9%	\$0	0.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	29.3%	\$0	0.0%	22.6%	0	0.0%	25.4%	\$0	0.0%	33.1%
	Upper	2	100.0%	\$102	100.0%	31.6%	2	100.0%	35.4%	\$102	100.0%	40.5%	0	0.0%	49.2%	\$0	0.0%	46.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	13.3%	0	0.0%	1.6%	\$0	0.0%	1.7%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	50.0%	\$0	0.0%	9.3%	0	0.0%	12.5%	\$0	0.0%	8.7%
	Unknown	1	100.0%	\$325	100.0%	0.0%	0	0.0%	50.0%	\$0	0.0%	90.7%	1	100.0%	87.5%	\$325	100.0%	91.3%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$325</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$325</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	20.0%	\$0	0.0%	13.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.2%	0	0.0%	15.0%	\$0	0.0%	10.4%	0	0.0%	10.7%	\$0	0.0%	5.8%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	15.0%	\$0	0.0%	18.6%	0	0.0%	28.6%	\$0	0.0%	21.0%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	50.0%	\$0	0.0%	57.2%	0	0.0%	60.7%	\$0	0.0%	73.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: MN Pine City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2018					Bank & Aggregate Lending Comparison											
		Bank		Dollar		Families by Family Income %	2018			2019			2018			2019		
		Count		Dollar			Count	Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar			
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	3	75.0%	\$115	86.5%	23.3%	2	66.7%	5.3%	\$95	84.1%	3.2%	1	100.0%	8.8%	\$20	100.0%	6.7%
	Moderate	1	25.0%	\$18	13.5%	22.2%	1	33.3%	7.9%	\$18	15.9%	7.1%	0	0.0%	14.7%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	42.1%	\$0	0.0%	37.4%	0	0.0%	32.4%	\$0	0.0%	34.7%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	34.2%	\$0	0.0%	38.9%	0	0.0%	44.1%	\$0	0.0%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.5%	\$0	0.0%	13.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	22.9%	0	0.0%	8.7%	\$0	0.0%	6.6%	0	0.0%	2.9%	\$0	0.0%	4.6%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	91.3%	\$0	0.0%	93.4%	0	0.0%	94.1%	\$0	0.0%	93.1%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	9	12.0%	\$663	6.4%	23.3%	4	11.4%	8.0%	\$184	4.9%	4.7%	5	12.5%	8.3%	\$479	7.3%	4.6%
	Moderate	8	10.7%	\$686	6.6%	22.2%	7	20.0%	22.2%	\$646	17.1%	18.8%	1	2.5%	19.9%	\$40	0.6%	16.1%
	Middle	21	28.0%	\$2,663	25.7%	22.9%	6	17.1%	26.1%	\$666	17.6%	25.5%	15	37.5%	24.3%	\$1,997	30.4%	23.4%
	Upper	28	37.3%	\$4,105	39.6%	31.6%	17	48.6%	26.5%	\$2,122	56.0%	31.5%	11	27.5%	28.4%	\$1,983	30.2%	31.7%
	Unknown	9	12.0%	\$2,240	21.6%	0.0%	1	2.9%	17.2%	\$170	4.5%	19.5%	8	20.0%	19.1%	\$2,070	31.5%	24.3%
	<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>\$10,357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,788</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,569</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: MN Pine City

Product Type	Bank Lending & Demographic Data Comparison 2019, 2018						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2018			2019										
	Count		Dollar			Count		Dollar			Count		Dollar						
	#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	76	70.4%	\$4,289	44.7%	91.7%	48	75.0%	49.4%	\$2,798	55.4%	46.0%	28	63.6%	54.4%	\$1,491	32.7%	34.8%
		Over \$1 Million	32	29.6%	\$5,316	55.3%	6.0%	16	25.0%				16	36.4%					
		Total Rev. available	108	100.0%	\$9,605	100.0%	97.7%	64	100.0%				44	100.0%					
		Rev. Not Known	0	0.0%	\$0	0.0%	2.3%	0	0.0%				0	0.0%					
		Total	108	100.0%	\$9,605	100.0%	100.0%	64	100.0%				44	100.0%					
	Loan Size	\$100,000 or Less	78	72.2%	\$2,779	28.9%		47	73.4%	91.5%	\$1,597	31.6%	40.3%	31	70.5%	93.5%	\$1,182	25.9%	46.6%
		\$100,001 - \$250,000	19	17.6%	\$3,045	31.7%		13	20.3%	6.0%	\$2,057	40.7%	26.3%	6	13.6%	4.3%	\$988	21.7%	22.8%
		\$250,001 - \$1 Million	11	10.2%	\$3,781	39.4%		4	6.3%	2.4%	\$1,395	27.6%	33.4%	7	15.9%	2.2%	\$2,386	52.4%	30.6%
		Total	108	100.0%	\$9,605	100.0%		64	100.0%	100.0%	\$5,049	100.0%	100.0%	44	100.0%	100.0%	\$4,556	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	66	86.8%	\$2,325	54.2%													
		\$100,001 - \$250,000	8	10.5%	\$1,183	27.6%													
		\$250,001 - \$1 Million	2	2.6%	\$781	18.2%													
Total		76	100.0%	\$4,289	100.0%														
Small Farm	Revenue	\$1 Million or Less	53	94.6%	\$2,139	95.2%	98.4%	31	100.0%	68.5%	\$1,208	100.0%	83.8%	22	88.0%	69.2%	\$931	89.5%	70.9%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.6%	0	0.0%				0	0.0%					
		Total Rev. available	53	94.6%	\$2,139	95.2%	100.0%	31	100.0%				22	88.0%					
		Not Known	3	5.4%	\$109	4.8%	0.0%	0	0.0%				3	12.0%					
		Total	56	100.0%	\$2,248	100.0%	100.0%	31	100.0%				25	100.0%					
	Loan Size	\$100,000 or Less	53	94.6%	\$1,666	74.1%		29	93.5%	93.5%	\$820	67.9%	70.2%	24	96.0%	93.3%	\$846	81.3%	64.6%
		\$100,001 - \$250,000	3	5.4%	\$582	25.9%		2	6.5%	5.6%	\$388	32.1%	22.5%	1	4.0%	5.0%	\$194	18.7%	21.6%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	7.3%	0	0.0%	1.7%	\$0	0.0%	13.8%
		Total	56	100.0%	\$2,248	100.0%		31	100.0%	100.0%	\$1,208	100.0%	100.0%	25	100.0%	100.0%	\$1,040	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	50	94.3%	\$1,557	72.8%													
		\$100,001 - \$250,000	3	5.7%	\$582	27.2%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
Total		53	100.0%	\$2,139	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: MN Pine City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2018					2018					2019						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	7	20.0%	\$976	19.2%	31.9%	1	5.6%	35.7%	\$154	6.2%	31.7%	6	35.3%	34.0%	\$822	31.4%	30.6%
	Middle	28	80.0%	\$4,106	80.8%	68.1%	17	94.4%	64.3%	\$2,314	93.8%	68.3%	11	64.7%	65.4%	\$1,792	68.6%	69.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.3%
	<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$5,082</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,468</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,614</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	9	27.3%	\$1,854	39.3%	31.9%	4	33.3%	30.1%	\$226	20.5%	26.3%	5	23.8%	23.8%	\$1,628	45.1%	22.0%
	Middle	24	72.7%	\$2,861	60.7%	68.1%	8	66.7%	69.9%	\$879	79.5%	73.7%	16	76.2%	75.6%	\$1,982	54.9%	77.4%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.6%
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$4,715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,610</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	24.4%	\$0	0.0%	28.1%	0	0.0%	31.7%	\$0	0.0%	29.9%
	Middle	2	100.0%	\$102	100.0%	68.1%	2	100.0%	75.6%	\$102	100.0%	71.9%	0	0.0%	68.3%	\$0	0.0%	70.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	89.9%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	87.5%	\$0	0.0%	97.2%
	Middle	1	100.0%	\$325	100.0%	10.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	12.5%	\$325	100.0%	2.8%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$325</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$325</b>	<b>100.0%</b>	<b>100.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	30.0%	\$0	0.0%	25.9%	0	0.0%	7.1%	\$0	0.0%	11.3%
	Middle	0	0.0%	\$0	0.0%	68.1%	0	0.0%	70.0%	\$0	0.0%	74.1%	0	0.0%	92.9%	\$0	0.0%	88.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: MN Pine City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2018					2018					2019						
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg \$ %	#	%	Agg %	\$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	25.0%	\$82	61.7%	31.9%	1	33.3%	18.4%	\$82	72.6%	11.3%	0	0.0%	29.4%	\$0	0.0%	25.8%
	Middle	3	75.0%	\$51	38.3%	68.1%	2	66.7%	81.6%	\$31	27.4%	88.7%	1	100.0%	70.6%	\$20	100.0%	74.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>	
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	50.0%	\$0	0.0%	41.4%	0	0.0%	26.5%	\$0	0.0%	13.7%
	Middle	0	0.0%	\$0	0.0%	68.1%	0	0.0%	50.0%	\$0	0.0%	58.6%	0	0.0%	73.5%	\$0	0.0%	86.3%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	17	22.7%	\$2,912	28.1%	31.9%	6	17.1%	33.5%	\$462	12.2%	31.3%	11	27.5%	30.0%	\$2,450	37.3%	30.0%
	Middle	58	77.3%	\$7,445	71.9%	68.1%	29	82.9%	66.5%	\$3,326	87.8%	68.7%	29	72.5%	69.5%	\$4,119	62.7%	69.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.4%
<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>\$10,357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,788</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,569</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: MN Pine City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2018					2018					2019						
		Count		Bank Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	44	40.7%	\$3,706	38.6%	42.8%	28	43.8%	40.5%	\$1,947	38.6%	48.0%	16	36.4%	38.4%	\$1,759	38.6%	48.6%
	Middle	64	59.3%	\$5,899	61.4%	57.2%	36	56.3%	57.7%	\$3,102	61.4%	50.7%	28	63.6%	59.7%	\$2,797	61.4%	50.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	1.3%	0	0.0%	2.0%	\$0	0.0%	1.2%
<b>Total</b>	<b>108</b>	<b>100.0%</b>	<b>\$9,605</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,049</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,556</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	1.8%	\$8	0.4%	27.8%	1	3.2%	27.4%	\$8	0.7%	28.9%	0	0.0%	23.3%	\$0	0.0%	29.8%
	Middle	55	98.2%	\$2,240	99.6%	72.2%	30	96.8%	72.6%	\$1,200	99.3%	71.1%	25	100.0%	76.7%	\$1,040	100.0%	70.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>\$2,248</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,040</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2019 FFIEC Census Data and 2019 D&B Information