



Public Disclosure

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Community Reinvestment Act Performance Evaluation

The Merchants National Bank of Winona
Charter Number: 14488

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Winona, Minnesota 55987

Office of the Comptroller of the Currency

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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

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

*This document is an evaluation of the CRA performance of **The Merchants National Bank of Winona** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **April 26, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

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

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

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

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall CRA Rating

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

The following table indicates the performance level of **The Merchants National Bank of Winona (MNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Merchants National Bank of Winona Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve		X	
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- < MNB’s volume of loan originations and the percentage of those originations it made within its assessment areas (AAs) reflect good responsiveness to area credit needs.
- < Within the Winona AA, MNB’s overall borrower distribution is good for both home mortgage and small business lending. For home purchase loans, for example, borrower distribution is good, especially for low-income borrowers. Low-income families comprise 15% of the families in the AA and a strong 14% of the bank’s home purchase loans were to borrowers with that income level.
- < The bank has a poor level of qualified community development investments and grants. Its qualifying grants totaled only \$32,175 for the evaluation period. There are no factors that would impede the bank from making greater levels of qualified grants and investments, in amounts more commensurate with its size.
- < MNB provides a relatively high level of community development services, considering its capacity. Bank personnel participated in 24 different CD organizations or events for those organizations during the evaluation period. Bank personnel often serve in key roles with the organizations. The bank has been particularly responsive to the needs of small businesses and farms within the area, through educational and financial counseling efforts.

Description of Institution

MNB is headquartered in Winona, Minnesota. As of December 31, 1998, it is a \$305 million institution. In addition to its main office, MNB operates two branches, one in Goodview, Minnesota, a suburb of Winona, and the other in St. Charles, Minnesota. It is a full-service bank and offers a diverse range of products.

MNB is a subsidiary of The Merchants Holding Company, a bank holding company located in Winona which had total assets of \$380 million at year-end 1998. MNB has two subsidiaries, one of which is an equipment lease financing subsidiary located in Minneapolis, Minnesota. The other does not engage in any lending or leasing activities. The subsidiaries do not have a significant impact on the bank's capacity to lend or invest in its AAs. As a result, the activities of the subsidiaries were not explicitly considered in this evaluation.

As of December 31, 1998, the bank's net loans and leases totaled \$192 million. Those loans and leases represented 65% of the bank's assets, a percentage which is comparable to that of other banks. The bank's loan portfolio was comprised of residential real estate loans (23%), commercial and commercial real estate loans (33%), agricultural and farmland loans (6%), leases (23%), loans to individuals (12%), and all other loans (3%).

There are no legal, financial, or other factors that impede the bank's ability to help meet the credit needs in its assessment areas.

The bank delineated three separate AAs. The Winona AA consists of all of Winona County and a portion of Fillmore County. It is the bank's primary AA and is located in a nonMSA area of Minnesota. The Rochester AA consists of all of Olmsted County. Olmsted County is to the west of, and contiguous to, Winona County. The bank established it as a separate AA because it is a MSA and has a different demographic profile than the nonMSA area of the state. The Wisconsin AA consists of the westernmost portions of Buffalo and Trempealeau Counties. It is to the east of, and contiguous to, Winona County. Because the AA is within a different state, it also has a different demographic profile so the bank established it as a separate AA.

Scope of Evaluation

Evaluation Period/Products Evaluated

We examined MNB using the large bank tests pursuant to the revised CRA regulation. This evaluation covers lending, investment, and service activities since the previous CRA examination (March 26, 1997) with the following exceptions and notations:

- o Our analysis of business and farm lending included 1997 and 1998 reported loan originations. We included all 1997 loans, and excluded year-to-date 1999 loans, because CRA data is reported and aggregated in whole years. In addition, 1997 CRA data was not reviewed in the previous CRA exam. This is MNB's first evaluation under the revised CRA regulation.
- o Market comparisons for business and farm lending are based on 1997 CRA data. At the time of the examination, 1998 information was available for MNB, but not for the market in aggregate.
- o Our analysis of home mortgage loans includes 1997 and 1998 originations. We chose this period to be consistent with other loan products.
- o Our assessment of home mortgage loans is primarily based on sampling. MNB is not a HMDA reporter, nor does it internally maintain information regarding geographic or borrower income distributions. The bank was able to generate a report that itemized home mortgage originations over the evaluation period by loan type and zip code. We used the report to approximate lending activity in each assessment area and select samples (approximately 30 loans of each loan type).
- o Because MNB is not a HMDA reporter, market comparisons for home mortgage lending are not available. We did, however, use information supplied by the Register of Deeds in Winona County as a proxy for MNB's home mortgage lending activity in relation to other financial institutions.
- o Geographic distribution is not a meaningful analysis in the Winona or Wisconsin assessment areas. The Winona AA consists entirely of middle- and upper-income geographies; the Wisconsin AA consists entirely of middle-income geographies.

- o In the Winona AA, we weighted business loans and home mortgage loans equally. Farm loans received lesser weight. Over the evaluation period, MNB made 1,697 loans in the Winona AA - 499 (or 29%) were business loans, 1,032 (or 61%) were home mortgage loans, 165 (or 10%) were farm loans and one was a community development loan. While home mortgage loans account for 61% of the originations in the AA, roughly half of those (530 of 1032) are refinance loans. Home purchase and home improvement loans represent 30% of the bank's originations over the evaluation period.
- o Although the refinance product comprises roughly half the bank's home mortgage originations over the evaluation period, we gave it little weight in our overall assessment of home mortgage loans. This type of lending is primarily used to decrease a borrower's cost of credit, and it is not unusual to have weaker borrower income distributions. Many settlement costs associated with a loan refinancing do not vary based on loan amount. Therefore, it generally takes longer to recoup these costs (through interest savings) on smaller dollar loans. And it is likely the low- and moderate-income sectors have a higher proportion of small dollar loans given the direct correlation between income and debt service ability.
- o We did not evaluate home mortgage loans in the Rochester or Wisconsin AAs. MNB's lending activity is limited in these areas - only 9% (23 of 267) of its home purchase loans, 8% (22 of 280) of its home improvement loans, and 8% (48 of 578) of its refinance loans are in these areas.
- o Even though the Wisconsin AA is in a different state, we presented the information with the Minnesota set of tables in the appendix. MNB does not have any branches in Wisconsin.
- o We used evaluation periods of February 1997 through December 1998 for evaluating MNB's investment activities and March 1997 through December 1998 for evaluating its service activities. We used these time frames in order to capture activities not considered in the prior CRA evaluation.

Data Integrity

- o MNB internally identified, and corrected, substantial reporting errors in its 1997 CRA data. After validating the accuracy of the bank's revised data, we used this information in our analysis of business and farm loans.

Selection of Areas for Full-Scope Review/Ratings

- o We performed a full-scope review of the Winona AA and limited-scope reviews of the Rochester and Wisconsin AAs. The Winona AA accounts for 90% of MNB's loan originations by number (and 92% by dollar) over the evaluation period. The Winona AA contains 100% of the bank's branches and automated teller machines (ATMs). MNB has a 23% deposit market share in Winona County and has a deposit market rank of 1.
- o We generally try to obtain a representative sample of both significant and less significant markets in which the bank operates when we select areas for full-scope reviews. But because MNB's activities in the Rochester and Wisconsin AA's are so limited, a more detailed analysis in these markets would not be meaningful.
- o MNB's CRA rating is primarily based on the results of the Winona AA.
- o Refer to the table in Appendix A for more information regarding the examination scope.

Fair Lending Review

We performed a fair lending review during this evaluation and did not identify violations of the substantive provisions of antidiscrimination laws and regulations. The scope of the review consisted of an assessment of whether the bank had applied the same interest rates and fees to women as to men for used car loans.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "High Satisfactory" based primarily on our full-scope review of the Winona AA.

Lending Activity

(Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity).

Lending levels reflect good responsiveness to home mortgage credit needs. MNB originated 1,273 home mortgage loans (totaling \$81 million) during the evaluation period. A substantial majority of these loans (1,125 or 88%) were in the bank's assessment areas. MNB made 1,032 home mortgage loans (totaling \$65 million) in the Winona AA. Information from the Register of Deeds indicates MNB recorded the most mortgages in Winona County in 1997, ranking 1st of 38 lenders.

Lending levels reflect good responsiveness to business credit needs. MNB originated 756 reportable business loans (totaling \$46 million) during the evaluation period. An adequate percentage of these loans (527 or 70%) were in the bank's assessment areas. MNB made 499 business loans (totaling \$26 million) in the Winona AA. MNB originated 39% of all reported 1997 business loans in the Winona AA, ranking 1st of 21 reporting lenders.

Lending levels reflect good responsiveness to farm credit needs. MNB originated 255 reportable farm loans (totaling \$6 million) during the evaluation period. A substantial majority of these loans (230 or 90%) were in the bank's assessment areas. MNB made 165 farm loans (totaling \$4 million) in the Winona AA. MNB originated 38% of all reported 1997 farm loans in the Winona AA, ranking 2nd of four reporting lenders.

MNB's lending market share ratios exceed its deposit market share ratio. MNB has a 23% deposit market share in the Winona AA, ranking 1st of 31 lenders.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

(Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.)

The overall distribution of home mortgage loans to borrowers of different income levels is good.

Bank performance involving home purchase loans to low-income borrowers and home improvement loans to moderate-income borrowers is excellent. The percentage of home purchase loans to low-income borrowers (14%) substantially approximates the percentage of low-income families in the AA (15%). The percentage of home improvement loans to moderate-income borrowers (21%) exceeds the percentage of moderate-income families in the AA (17%).

Bank performance involving home improvement loans to low-income borrowers is good. The percentage of home improvement loans to low-income borrowers (11%) is slightly less than market demographics.

Bank performance involving home purchase loans to moderate-income borrowers is adequate. The percentage of home purchase loans to moderate-income borrowers (11%) is less than market demographics.

Bank performance in the refinance product is poor. MNB made 17% of its refinance loans to low- and moderate-income borrowers. This is much less than the percentage of low- and moderate-income families in the AA (32%).

Small Business Loans

(Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.)

The distribution of loans to businesses of different sizes is good. MNB made 85% of its reported business loans to entities with gross annual revenues of \$1 million or less. Bank performance closely approximates AA demographics - 89% of businesses with known revenues have gross annual revenues of \$1 million or less. And bank performance is substantially better than other lenders who reported loans in the Winona AA. In aggregate, other lenders made only 47% of their 1997 business loans to entities with revenues of \$1 million or less.

Of all banks subject to CRA data reporting, MNB originated the most loans to small businesses (those with gross annual revenues of \$1 million or less) in the Winona AA. MNB made 226 (or 54%) of the 419 reported loans to small businesses in 1997.

The bank's willingness to make loans to small businesses is further evidenced by a good loan size distribution. MNB made 86% of its reported business loans in amounts of \$100 thousand or less, with an average loan size of \$53 thousand. Bank performance is consistent with other lenders who reported loans in the Winona AA. In aggregate, other lenders made 86% of their 1997 business loans in amounts of \$100 thousand or less, with an average loan size of \$69 thousand.

Small Farm Loans

(Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small farm loan originations.)

The distribution of loans to farms of different sizes is adequate. MNB made 142 (or 86%) of its 165 reported farm loans to entities with gross annual revenues of \$1 million or less. Bank performance is slightly less than AA demographics (100% of farms with known revenues have revenues of \$1 million or less) and the performance of other lenders (other lenders made 96% of their 1997 loans to farms with revenues of \$1 million or less). The bank's ratio is somewhat distorted because most (21) of the loans the bank originated to farms with revenues greater than \$1 million are concentrated in a few customers (3).

Of all banks subject to CRA data reporting, MNB ranked 2nd in small farm originations in the Winona AA. MNB made 69 (or 35%) of the 197 reported loans to small farms in 1997. The market leader (with 47% of small farm originations) is a much larger institution that serves a larger geographic area.

The bank's willingness to make loans to small farms is further evidenced by an excellent loan size distribution. MNB made 97% of its reported farm loans in amounts of \$100 thousand or less, with an average loan size of \$24 thousand. Bank performance is better than other lenders who reported loans in the Winona AA. In aggregate, other lenders made 90% of their 1997 farm loans in amounts of \$100 thousand or less, with an average loan size of \$50 thousand.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

(Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.)

Geographic distribution is not a meaningful analysis in the Winona AA.

Small Business Loans

(Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.)

Geographic distribution is not a meaningful analysis in the Winona AA.

Small Farm Loans

(Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations.)

Geographic distribution is not a meaningful analysis in the Winona AA.

Community Development Lending

(Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.)

MNB made one community development loan (totaling \$800 thousand) during the evaluation period. The loan funded a building addition for Winona ORC Industries, an organization that provides long term sheltered employment and community based services for disabled individuals, a majority of whom are low- and moderate-income.

Product Innovation and Flexibility

During 1997 and 1998, the bank offered a flexible home improvement loan product. The product allowed a higher loan to value ratio (100%) and a higher debt service ratio (41%). In addition, MNB did not require updated property appraisals. The bank originated 62 loans (totaling \$1.5 million) under this program. These loans are included in the loan origination numbers presented and discussed under the Lending Test.

In June 1994, MNB committed a \$2 million pool of funds for the "Venture Capital Pool Program." The program supports small business development in the Winona Area. Loans are provided to small businesses which do not meet traditional underwriting criteria - primarily startup and expanding businesses. During the evaluation period, five loans (totaling \$614 thousand) were originated under this program. These loans are included in the loan origination numbers presented and discussed under the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending test performance in the Rochester AA is stronger than the bank's overall performance based on the following:

- o Farm lending activity is excellent. MNB originated 65 farm loans (totaling \$2 million) in the Rochester AA. The bank originated 21% of all reported 1997 farm loans in this AA, ranking 2nd of four reporting lenders. MNB does not have any branch offices in this AA.
- o The borrower income distribution of farm loans is excellent. All of the bank's reported farm loans were to small farms.
- o The geographic distribution of farm loans is excellent. All of MNB's reported farm loans were in moderate-income geographies. Bank performance substantially exceeds AA demographics - 23% of farms are in moderate-income geographies. In 1997, MNB originated 58% of all reported farm loans in moderate-income geographies.
- o The borrower income distribution of business loans is excellent. Eighty-nine percent of the bank's reported business loans were to small businesses. This ratio is consistent with AA demographics (91% of the businesses with known revenues are small) and better than other reporting lenders. In aggregate, other lenders made only 57% of their 1997 business loans in this AA to small businesses.
- o The geographic distribution of business loans is excellent. Thirty-two percent of MNB's reported business loans were in moderate-income geographies. Bank performance substantially exceeds AA demographics - 15% of businesses are in moderate-income geographies.

Lending test performance in the Wisconsin AA is weaker than the bank's overall performance based on the following:

- o Lending activity is adequate in light of the fact the bank has no branch offices in the Wisconsin AA. Over the evaluation period, MNB made 76 home mortgage loans (totaling \$4 million) and 9 reportable business loans (totaling \$351 thousand). The total number and dollars of loan originations in this AA is similar to the Rochester AA. But unlike the Rochester AA, the primary product in this market is home mortgage loans and there is no readily available market information to put the bank's lending activity into perspective. MNB originated

8% of all reported 1997 business loans in this AA, ranking 5th of 18 reporting lenders.

- o We could not reach a conclusion regarding borrower income distribution for home mortgage loans. Home mortgage originations in this AA included 10 home purchase, 19 home improvement and 47 refinance loans. As previously mentioned, MNB is not a HMDA reporter and analysis of these products requires sampling. We did not sample home mortgage loans in this AA due to the limited number of originations and the nominal impact this AA has on the bank's overall performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

(Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.)

The bank's performance under the Investment Test is rated "Needs to Improve" based primarily on our full-scope review of the Winona AA.

Given the bank's size, overall capacity for making qualifying investments, and the opportunities available within the AA, the bank's level of responsiveness is considered less than satisfactory. The bank's qualifying investments for 1997 and 1998 total only \$32 thousand. Qualifying community development investments can be in the form of either grants or investment securities, and all of the bank's are through grants. The majority of the grants were made to organizations within the Winona AA. The bank also made grants to organizations that serve the southeastern region of Minnesota which would encompass both the Winona and Rochester AAs.

Opportunities exist within the AA, particularly in the area of housing. Community contacts cited a strong need for increased housing stock throughout Winona County as well as for the rehabilitation of the aging housing stock within the city of Winona. Competition for local investment opportunities is not known to be great at this time; there is only one other bank with branch offices within the AA that is evaluated under the investment test.

The organizations to which the bank provided grants serve a wide range of identified community development needs. The organizations provide community services for low- and moderate-income people, focus on affordable housing for low- and moderate-income people, and help promote economic development within the area through small businesses and small farms.

Conclusions for Area Receiving Limited-Scope Reviews

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

The bank's performance under the investment test in the Rochester MSA is consistent with the bank's Needs to Improve performance in the Winona AA. In the Wisconsin AA the bank's performance is weaker than the bank's overall performance; however, this did not change the overall investment test rating. The bank made no qualified investments or grants within the Wisconsin AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory" based primarily on our full-scope review of the Winona AA.

Retail Banking Services

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

Retail delivery systems are reasonably accessible to individuals of different income levels in the bank's Winona AA. In addition to its main facility, the bank has two branches which are both located within the Winona AA. The bank operates seven ATMs, and all these are also in the Winona AA. There are no low- or moderate-income geographies within the Winona AA so geographical distribution analysis of the branches and ATMs is not meaningful.

The bank has not opened or closed any branches since our most recent CRA evaluation.

The bank's business hours are reasonable. The bank offers extended hours through its walk-up and drive-up facilities. Those extended hours are until 7:00 p.m. on Fridays as well as Saturdays until noon.

The bank offers a wide array of products and services. It offers business and agricultural loans, including loans through Small Business Administration programs. The bank also offers a wide array of consumer and residential mortgage loan products. The residential mortgage loans include both in-house products and secondary market products. The bank's more nontraditional services are 24-hour telephone access to account information and banking via personal computers. The bank does not gather information on the income levels of the users of these nontraditional services.

Community Development Services

MNB provides a relatively high level of community development services, considering its capacity. Bank personnel participated in 24 different CD organizations, or events for those organizations, during the evaluation period. Bank personnel often serve in key roles with the organizations. In those key roles,

they have served as treasurers, members of finance committees, and have provided oversight of fund-raising efforts.

The bank's CD services are particularly responsive to the needs of small businesses and farms within the area. The bank has been a part of a number of presentations to help educate and share information with small businesses and farms. For several of the presentations, the bank played the lead role in the coordination of the event or was the sole sponsor. Examples of presentations in which the bank participated are: preparedness for Y2K for small businesses; retirement planning for small businesses; and staffing a booth at an agri-business fair at a technical college. Bank personnel also serve on committees of business and farm organizations within the community. Examples include a bank employee who serves as Chairperson of the Small and Home-Based Business Committee of the Winona Chamber of Commerce, which focusses on promoting smaller businesses within the area. Another example is an employee who is on the board of directors and is Treasurer of the Southeastern Minnesota Development Corporation, which oversees grants and SBA loans, the majority of which benefit small farms.

The one CD service that was particularly innovative was the presentation "Y2K and What It Means To Your Business." The bank coordinated the presentation and was one of seven presenters.

The bank offers a free checking account for students. It developed the account in order to help the large student population within Winona.

Conclusions for Areas Receiving Limited-Scope Reviews

(Refer to Table 13 in Appendix C for the facts and data that support these conclusions.)

Based on limited-scope reviews, the bank's performance under the service test in the Rochester MSA is consistent with the bank's overall High Satisfactory performance. In the Wisconsin AA the bank's performance is weaker than the bank's overall performance; however, it did not change the overall service test rating. The bank provided no community development services within the Wisconsin AA.

Appendix A: Scope of Evaluation

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

Time Period Reviewed	Lending Test: January 1, 1997 to December 31, 1998 Investment Test: February 1, 1997 to December 31, 1998 Service Test: March 1, 1997 to December 31, 1998	
Financial Institution	Products Reviewed	
The Merchants National Bank (MNB) Winona, Minnesota	Small Business, Small Farm, Home Mortgage, Community Development	
Affiliate(s)	Affiliate Relationship	Products Reviewed
n/a		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Winona Assessment Area	Full-Scope	Winona County and portions of Fillmore County, MN; nonmetropolitan
Rochester Assessment Area	Limited-Scope	Olmsted County, MN; MSA #6820
Wisconsin Assessment Area	Limited-Scope	Portions of Buffalo and Trempealeau Counties, Wisconsin; nonmetropolitan

Appendix B: Market Profiles for Full-Scope Areas

Winona Assessment Area

Demographic Information for Full-Scope Area: Winona Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	13	-	-	85	15	-
Population by Geography	57,562	-	-	84	16	-
Owner-Occupied Housing by Geography	15,041	-	-	82	18	-
Businesses by Geography	1,855	-	-	91	9	-
Farms by Geography	86	-	-	81	19	-
Family Distribution by Income Level	14,010	15	17	24	44	-
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,458	-	-	87	13	-
Median Family Income	= \$28,933	Median Housing Value		= \$52,685		
HUD Adjusted Median Family Income for 1998	= \$40,500	Unemployment Rate (1998)		= 2.78%		
Households Below the Poverty Level	= 13.86%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The Winona AA consists of all of Winona County and portions of Fillmore County, both in Minnesota. Of all of the loan originations we evaluated, 90% were from this AA. The only bank that originates comparable volumes of loans in the AA is Norwest; Norwest is a much larger institution that is headquartered in Rochester, Minnesota and has branches in Winona. For lending to businesses, MNB ranked first in this AA and for lending to farms, it ranked second. Because the Winona AA is not part of an MSA, MNB's current ranking for mortgage products is not readily available; however, information available through county offices showed that MNB filed the most mortgages in the county during 1997. Each of the bank's three offices and seven ATMs is in this AA. Two of the bank's offices are in the city of Winona and one is in the city of St. Charles.

The economy of the area is good. The city of Winona has a population of approximately 26 thousand. The city is home to a very diverse range of industries. Its largest employers are: Lucas Body Systems, manufacturer of industrial machinery; the state university and public school system; Community Memorial Hospital; Fastenal Company, a hardware manufacturer; and Watkins, Inc., producer of spices and extracts. The unemployment rate is low and

consistent with the state average. The city of St. Charles is 30 miles west of Winona and has a population of approximately 3,000. St. Charles is located in a more rural area and its economy is more agriculturally based.

During the examination, we contacted representatives of two organizations that serve the Winona AA. We also reviewed information from seven contacts the OCC and other bank regulatory agencies had made within the area within the past two years. The contacts were with government and nonprofit organizations, many of which focus on local housing needs. Other contacts were with organizations that focus on agriculture. The organizations cited the need for continued lending to small farm operators. They also cited the need for housing. They indicated there is a county-wide shortage of housing and efforts are underway to develop solutions for this shortage. The contacts also cited the need for home improvement and rehabilitation lending within the city of Winona, as the age of housing stock is older than the state average.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME													State: Minnesota	Evaluation Period: January 1, 1997 TO December 31, 1998
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full-Scope:														
Winona Assessment Area	100%	1,032	\$64,771	499	\$26,423	165	\$3,895	1	\$800	1,697	\$95,889	90%		
Limited-Scope:														
Rochester MSA	0%	17	\$1,672	19	\$640	65	\$1,686	0	\$0	101	\$3,998	5%		
Wisconsin Assessment Area	0%	76	\$4,123	9	\$351	0	\$0	0	\$0	85	\$4,474	5%		

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE SAMPLE					State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998					Total Home Purchase Loans				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					#	% of Total
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Overall	Low	Mod	Mid	Upp		
Full-Scope:																
Winona Assessment Area	n/a	n/a	n/a	n/a	82%	n/p	18%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	244	91%
Limited-Scope:																
Rochester MSA	n/a	n/a	15%	n/p	66%	n/p	19%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	13	5%
Wisconsin Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	10	4%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT SAMPLE					State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998					Total Home Improvement Loans				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					#	% of Total
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Overall	Low	Mod	Mid	Upp		
Full-Scope:																
Winona Assessment Area	n/a	n/a	n/a	n/a	82%	n/p	18%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	258	92%
Limited-Scope:																
Rochester MSA	n/a	n/a	15%	n/p	66%	n/p	19%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	3	1%
Wisconsin Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	19	7%

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE SAMPLE																State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans				
	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans	% Owner Occ Units	% MNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Winona Assessment Area	n/a	n/a	n/a	n/a	82%	n/p	18%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	530	92%			
Limited-Scope:																			
Rochester MSA	n/a	n/a	15%	n/p	66%	n/p	19%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	1	< 1%			
Wisconsin Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	47	8%			

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																
State: Minnesota																
Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% MNB Loans	% of Businesses	% MNB Loans	% of Businesses	% MNB Loans	% of Businesses	% MNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Winona Assessment Area	n/a	n/a	n/a	n/a	91%	78%	9%	22%	1	39%	n/a	n/a	40%	36%	499	95%
Limited-Scope:																
Rochester MSA	n/a	n/a	15%	32%	71%	63%	14%	5%	9	< 1%	n/a	< 1%	< 1%	< 1%	19	3%
Wisconsin Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	5	8%	n/a	n/a	8%	n/a	9	2%

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																
State: Minnesota																
Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% MNB Loans	% of Farms	% MNB Loans	% of Farms	% MNB Loans	% of Farms	% MNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Winona Assessment Area	n/a	n/a	n/a	n/a	81%	90%	19%	10%	2	38%	n/a	n/a	44%	19%	165	72%
Limited-Scope:																
Rochester MSA	n/a	n/a	23%	100%	67%	0%	10%	0%	2	21%	n/a	58%	0%	0%	65	28%
Wisconsin Assessment Area	n/a	n/a	n/a	n/a	100%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	0%

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HOME PURCHASE SAMPLE																	State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans					
	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Winona Assessment Area	15%	14%	17%	11%	24%	21%	44%	50%	n/a	n/a	n/a	n/a	n/a	n/a	244	91%				
Limited-Scope:																				
Rochester MSA	15%	n/p	19%	n/p	29%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	13	5%				
Wisconsin Assessment Area	16%	n/p	19%	n/p	28%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	10	4%				

(*) As a percentage of loans with borrower income information available. No information was available for 4% of loans originated by MNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT SAMPLE																State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans				
	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Winona Assessment Area	15%	11%	17%	21%	24%	39%	44%	29%	n/a	n/a	n/a	n/a	n/a	n/a	258	92%			
Limited-Scope:																			
Rochester MSA	15%	n/p	19%	n/p	29%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	3	1%			
Wisconsin Assessment Area	16%	n/p	19%	n/p	28%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	19	7%			

(*) As a percentage of loans with borrower income information available. Information was available for 100% of loans originated by MNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE SAMPLE																	State: Minnesota		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans					
	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*	% of Families	% MNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Winona Assessment Area	15%	7%	17%	10%	24%	40%	44%	43%	n/a	n/a	n/a	n/a	n/a	n/a	530	92%				
Limited-Scope:																				
Rochester MSA	15%	n/p	19%	n/p	29%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	1	< 1%				
Wisconsin Assessment Area	16%	n/p	19%	n/p	28%	n/p	37%	n/p	n/a	n/a	n/a	n/a	n/a	n/a	47	8%				

(*) As a percentage of loans with borrower income information available. Information was available for 100% of loans originated by MNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS			State: Minnesota			Evaluation Period: January 1, 1997 TO December 31, 1998					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% MNB Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Winona Assessment Area	89%	85%	47%	86%	9%	5%	39%	54%	499	95%	\$53
Limited-Scope:											
Rochester MSA	91%	89%	57%	100%	0%	0%	< 1%	< 1%	19	3%	\$34
Wisconsin Assessment Area	95%	100%	23%	89%	11%	0%	8%	27%	9	2%	\$39

(*) As a percentage of businesses with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for 2% of loans originated by MNB in the Winona AA.
 (***) The market consists of all other Small Business reporters in MNB's assessment area and is based on 1997 Aggregate Small Business Data only.
 (****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM											
State: Minnesota			Evaluation Period: January 1, 1997 TO December 31, 1998								
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% MNB Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Winona Assessment Area	100%	86%	96%	97%	2%	1%	38%	35%	165	72%	\$24
Limited-Scope:											
Rochester MSA	98%	100%	98%	98%	0%	2%	21%	21%	65	28%	\$26
Wisconsin Assessment Area	100%	n/a	90%	n/a	n/a	n/a	n/a	n/a	0	0%	n/a

(*) As a percentage of farms with known revenues.
 (**) As a percentage of loans with revenue information available. Information was available for 100% of loans originated by MNB.
 (***) The market consists of all other Small Farm reporters in MNB's assessment area and is based on 1997 Aggregate Small Farm Data only.
 (****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
			State: Minnesota			Evaluation Period: February 1, 1997 TO December 31, 1998			
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Winona Assessment Area	0	\$0	0%	11	\$27	85%	11	\$27	85%
Limited-Scope:									
Rochester MSA (regional investments that also benefit the Winona Assessment Area)	0	\$0	0%	4	\$5	15%	4	\$5	15%
Wisconsin Assessment Area	0	\$0	0%	0	\$0	0%	0	\$0	0%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.
 (**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	State: Minnesota		Evaluation Period: March 1, 1997 TO December 31, 1998			
MSA/Assessment Area:	Deposits	Branches						ATMs						Population								
	% of Total MNB Deposits	# of MNB Branches	% of Total MNB Branches	Location of Branches by Income of Geographies				# of MNB ATMs	% of Total MNB ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full-Scope:																						
Winona Assessment Area	100%	3	100%	n/a	n/a	67%	33%	7	100%	n/a	n/a	100%	0%	n/a	n/a	85%	15%					
Limited-Scope:																						
Rochester MSA*	0%	0	0%	n/a	n/a	n/a	n/a	0	0%	n/a	n/a	n/a	n/a	n/a	18%	64%	14%					
Wisconsin Assessment Area	0%	0	0%	n/a	n/a	n/a	n/a	0	0%	n/a	n/a	n/a	n/a	n/a	n/a	100%	n/a					

* Note: 4% of the population in the Rochester MSA lives in a census tract that has no designated income level.