



PUBLIC DISCLOSURE

January 6, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Western National Bank
Charter Number 6352

210 2nd Street NW
Cass Lake, MN 56633

Office of the Comptroller of the Currency

222 South 9th St, Suite 800
Minneapolis, MN 55402

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The lending test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans throughout the assessment area (AA),
- The bank exhibits excellent borrower distribution of loans to individuals of different income levels,
- The bank originated a substantial majority of its loans inside its AA,
- The bank's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The bank's average LTD ratio over the past 18 quarters was 64.14 percent. From the prior CRA evaluation in September 2014 through the end of the evaluation period, December 2018, the LTD ratio ranged from a quarterly low of 52.42 percent in September of 2017 to a quarterly high of 78.08 percent in December 2015. Western National Bank (WNB) ranks third of the four similarly-situated institutions used in our analysis. Similarly-situated institutions include banks operating in or near the bank's AA with total assets of \$119 million to \$161 million. WNB is \$34 million in total assets, the smallest of the similarly situated institutions. We did not use institutions that were closer in proximity to WNB in our analysis as they were significantly larger with multiple branches. There were no similarly-situated institutions with total assets less than \$119 million for meaningful comparison.

Institution (Headquarters)	Assets as of 09/30/2019 (\$000s)	Average LTD Ratio (%)
Security Bank USA (Bemidji, MN)	\$161,047	95.68%
Northwoods Bank of Minnesota (Park Rapids, MN)	\$121,184	67.55%
Western National Bank (Cass Lake, MN)	\$33,814	64.14%
Pine River State Bank (Pine River, MN)	\$119,346	58.74%

Source: Call Report data from December 31, 2014 through September 30, 2019.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated and purchased 90 percent of its total loans by number and 94 percent by dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates, as none were considered under other performance criteria. Lending in the AAs had a neutral impact on the overall analysis of the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	31	93.9	2	6.1	33	1,635	95.4	79	4.6	1,713
Consumer	35	87.5	5	12.5	40	197	81.0	46	19.0	244
Total	66	90.4	7	9.6	73	1,832	93.6	125	6.4	1,957

Source: Consumer and residential real estate loan samples.

Description of Institution

Western National Bank (WNB) is an intrastate bank headquartered in Cass Lake, Minnesota (MN). The bank is wholly-owned by Western Bancorporation, Incorporated, headquartered in Duluth, MN. Western Bancorporation, Inc. is a multi-bank holding company, which also owns Western National Bank of Duluth, an affiliate of WNB of Cass Lake. The performance of Western National Bank of Duluth was not considered in the evaluation of the bank's CRA performance.

As of September 30, 2019, the bank had total assets of \$33.8 million. WNB operates a main office in Cass Lake, MN and does not have any other branches. WNB operates one deposit-taking automated teller machine (ATM) in Cass Lake, MN. The bank has not opened or closed any new branches since the prior CRA evaluation.

WNB is a full-service community bank offering a variety of loan and deposit products including checking accounts, mortgage loans, consumer loans, commercial loans, safe deposit boxes and other traditional banking services such as wire transfer and money orders. Savings products also include individual retirement accounts (IRA) and health savings accounts (HSA).

As of December 31, 2018, net loans and leases represent 50 percent of total assets. The loan portfolio is comprised of 55 percent home mortgage loans, 39 percent business loans, and six percent consumer loans, based on dollar volume. Tier one capital totals \$2.9 million with a tier one leverage capital ratio of 8.4 percent.

WNB's AA includes 19 total census tracts (CTs) near Cass Lake, MN. The AA includes seven CTs in Cass County (MN), four CTs in Hubbard County (MN) and eight CTs in southern Beltrami County (MN). The AA complies with CRA regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA includes all census tracts where the institution has its main office and deposit-taking ATMs.

There are no known financial, legal, or other factors that impede WNB's ability to help meet the credit needs of its AA. The bank has not engaged in any merger or acquisition activity since the prior CRA evaluation. WNB received an Outstanding rating at the last CRA examination dated September 22, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

WNB was evaluated under the CRA small bank procedures, which is limited to the lending test. The lending test evaluated the bank's record of meeting the credit needs in its AA through its lending activities. The evaluation period for the lending test, including the lending in assessment area test is January 1, 2016 through December 31, 2018. The LTD analysis and CRA complaints were reviewed since the prior CRA exam in September 2014 through the end of the evaluation period.

The lending test focused on the bank's primary loan products based on loan origination volume from 2016-2018. We determined home mortgage and consumer loans to be the primary products. Consumer loan originations totaled 72 percent of total loan originations by number and 13 percent by dollar volume. Home mortgage loan originations totaled 18 percent of originations by number and 39 percent by dollar volume. While the dollar volume of commercial loan originations totaled 48 percent of total loan originations, commercial loans were not selected as a primary product given the low number of originations (ten percent). Home mortgage and consumer loans received equal weight.

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted a community member with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AA.

Selection of Areas for Full-Scope Review

WNB has one AA, which is referred to as the Cass Lake AA throughout this report. This AA was selected for a full-scope review and evaluated under the State of Minnesota rating area. Refer to Appendix A-1 for additional examination scope details.

Ratings

The bank's overall rating is based on the bank's lending performance within the state of Minnesota, as that is where the bank's branch is located and the majority of loan originations and purchases take place. The demographic information included in this report represents the 19 census tracts, all of which are located in Minnesota.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans throughout the assessment area (AA).
- The bank exhibits excellent borrower distribution of loans to individuals of different income levels.

Description of Institution's Operations in Minnesota

WNB operated only one branch during the evaluation period, located in Cass Lake, Minnesota. The bank also has one deposit-taking ATM in Cass Lake.

The bank's AA includes 19 CTs located in the state of Minnesota, all in or near Cass Lake, MN. The AA includes seven census tracts in Cass County (MN), four CTs in Hubbard County (MN) and eight CTs in Southern Beltrami County (MN). During the evaluation period, the AA included five moderate-income CTs and 14 middle-income CTs.

Competition in the bank's market is strong. The AA contains a variety of state and nationally chartered community banks as well as branches of regional banking institutions. The June 30, 2018 FDIC Deposit Share Report indicates there were 17 financial institutions with 33 locations operating in the bank's AA. WNB is ranked 12th with 1.70 percent market share. The top three institutions are The First National Bank of Bemidji, First National Bank North, and The Citizens National Bank of Park Rapids. When combined, the top three institutions make up 60.09 percent of the deposit market share.

The local economy of the AA is stable and healthy. According to the U.S. Bureau of Labor Statistics, the 2018 unemployment level in the assessment area is 4.95 percent, higher than the statewide average of 2.9 percent in 2018. Major employers in the AA include the Minnesota Chippewa Tribe, Leech Lake Band of Chippewa, and North Country Health Services, as well as a number of lake resorts. Industries in the area include county and tribal government, manufacturing, tourism, service, retail, and medical. In 2018, the population was 66 thousand people. The median property value in AA is \$176 thousand and the homeownership rate is 47.3 percent.

Our evaluation included contact with a community member to gain an understanding of the economic conditions, demographics, and community credit needs of the area. The contact is deeply connected to the economic development activities and financial services within the AA. Community credit needs primarily include quality affordable housing, homeownership assistance, and consumer lending. The contact indicated that local financial institutions are active and involved in the community.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Western NB-Cass Lake AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	26.3	73.7	0.0	0.0
Population by Geography	64,681	0.0	21.2	78.8	0.0	0.0
Housing Units by Geography	42,174	0.0	27.1	72.9	0.0	0.0
Owner-Occupied Units by Geography	20,939	0.0	18.9	81.1	0.0	0.0
Occupied Rental Units by Geography	5,800	0.0	31.1	68.9	0.0	0.0
Vacant Units by Geography	15,435	0.0	36.7	63.3	0.0	0.0
Businesses by Geography	4,537	0.0	21.7	78.3	0.0	0.0
Farms by Geography	245	0.0	17.1	82.9	0.0	0.0
Family Distribution by Income Level	17,862	23.0	18.5	22.2	36.3	0.0
Household Distribution by Income Level	26,739	25.4	16.9	18.8	39.0	0.0
Median Family Income Non-MSAs - MN		\$57,683	Median Housing Value			\$178,246
			Median Gross Rent			\$606
			Families Below Poverty Level			10.0%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Western NB-Cass Lake AA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	26.3	73.7	0.0	0.0
Population by Geography	66,158	0.0	28.5	71.5	0.0	0.0
Housing Units by Geography	43,378	0.0	29.0	71.0	0.0	0.0
Owner-Occupied Units by Geography	20,519	0.0	22.9	77.1	0.0	0.0
Occupied Rental Units by Geography	6,449	0.0	47.9	52.1	0.0	0.0
Vacant Units by Geography	16,410	0.0	29.3	70.7	0.0	0.0
Businesses by Geography	4,422	0.0	32.5	67.5	0.0	0.0
Farms by Geography	236	0.0	18.2	81.8	0.0	0.0
Family Distribution by Income Level	18,042	23.2	20.5	22.1	34.2	0.0
Household Distribution by Income Level	26,968	25.3	17.5	19.6	37.7	0.0
Median Family Income Non-MSAs - MN		\$63,182	Median Housing Value			\$175,950
			Median Gross Rent			\$681
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

The rating for the State of Minnesota is based wholly on the performance of the Cass Lake AA, as it is the only AA in the state. The Cass Lake AA received a full-scope review. As previously discussed under the Scope of the Evaluation section, home mortgage and consumer loans were given equal weighting when arriving at conclusions.

LENDING TEST

The bank's performance under the Lending Test is rated Outstanding.

Farm and business loans were not included in the analysis due to limited lending activity.

Demographic data is used in part to determine the bank's lending performance. The U.S. Census Bureau released updated demographic data from the 2015 American Community Survey (ACS) effective January 1, 2017. Therefore, loans originated in 2016 are compared to 2010 Census data and loans originated in 2017-18 are compared to 2015 ACS data and were evaluated separately.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the Cass Lake AA.

Home Mortgage Loans

The bank exhibits excellent geographic distribution of home mortgage loans in the Cass Lake AA. In 2016, WNB originated 46.2 percent of home loans to borrowers in moderate-income geographies, significantly exceeding both the demographic and aggregate comparators. In 2017-18, WNB originated 60 percent of home loans to borrowers in moderate-income geographies, significantly exceeding both the demographic and aggregate comparators. The bank's assessment area did not include any low-income geographies during the evaluation period.

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. The geographic distribution of home mortgage loans to borrowers located in CTs of different income levels is excellent.

Consumer Loans

The bank exhibits excellent geographic distribution of consumer loans in the Cass Lake AA. In 2016, WNB originated 40 percent of consumer loans to households in moderate-income geographies, significantly exceeding the demographic comparator. In 2017-18, WNB originated 40 percent of consumer loans to households in moderate-income geographies, significantly exceeding the demographic comparator. The bank's assessment area did not include any low-income geographies during the evaluation period.

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

The bank exhibits excellent distribution of home mortgage loans to individuals of different income levels. In 2016, WNB originated 30.8 percent of home mortgage loans to low-income borrowers within the AA, significantly exceeding both the demographic and aggregate comparators. WNB originated 23.1 percent of loans to moderate-income borrowers within the AA, significantly exceeding both the demographic and aggregate comparators.

In 2017-18, WNB originated 35 percent of home mortgage loans to low-income borrowers within the AA, significantly exceeding both the demographic and aggregate comparators. WNB originated 20 percent of loans to moderate-income borrowers within the AA, significantly exceeding the aggregate comparator and similar to the demographic comparator

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Consumer Loans

The bank exhibits excellent distribution of consumer loans to individuals of different income levels. In 2016, WNB originated 45 percent of consumer loans to low-income households and 35 percent of consumer loans to moderate-income households within the AA, significantly exceeding both demographic comparators. In 2017 and 2018, WNB originated 40 percent of consumer loans to low-income households and 45 percent of consumer loans to moderate-income households within the AA, significantly exceeding both demographic comparators.

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Responses to Complaints

During the evaluation period, WNB did not receive any CRA related complaints.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs 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:	1/1/2016 – 12/31/2018	
Bank Products Reviewed:	Home Mortgage Consumer	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
MN Non MSA (Cass Lake AA)	Full Scope	AA Includes: Seven CTs in the Northern portion of Cass County, MN Four CTs in the Eastern portion of Hubbard County, MN Eight CTs in the Southern portion of Beltrami County, MN

Appendix B: Summary of MMSA and State Ratings

RATING – Western National Bank	
Overall Bank:	Lending Test Rating
Western National Bank	Outstanding
State:	
Minnesota	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

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

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

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

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

Geography: A census tract 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area 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 or counties 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.

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.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cass Lake AA	13	735	100.0	1,748	0.0	0.0	0.0	18.9	46.2	20.4	81.1	53.8	79.6	0.0	0.0	0.0	0.0	0	0.0	
Total	13	735	100.0	1,748	0.0	0.0	0.0	18.9	46.2	20.4	81.1	53.8	79.6	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cass Lake AA	20	978	100.0	1,680	0.0	0.0	0.0	22.9	60	25.4	77.1	40	74.6	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	978	100.0	1,680	0.0	0.0	0.0	22.9	60	25.4	77.1	40	74.6	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cass Lake AA	13	735	100.0	1,748	23.0	30.8	5.5	18.5	23.1	15.8	22.2	15.4	20.4	36.3	30.8	45.2	0.0	0.0	13.0
Total	13	735	100.0	1,748	23.0	30.8	5.5	18.5	23.1	15.8	22.2	15.4	20.4	36.3	30.8	45.2	0.0	0.0	13.0

*Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cass Lake AA	20	978	100.0	1,680	23.2	35.0	7.4	20.5	20.0	15.2	22.1	30.0	20.8	34.2	15.0	43.5	0.0	0.0	13.1
Total	20	978	100.0	1,680	23.2	35.0	7.4	20.5	20.0	15.2	22.1	30.0	20.8	34.2	15.0	43.5	0.0	0.0	13.1

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cass Lake AA	20	179	100.0	0.0	0.0	21.6	40.0	78.4	60.0	0.0	0.0	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cass Lake AA	20	74	100.0	0.0	0.0	28.9	40.0	71.1	60.0	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cass Lake AA	20	179	100.0	25.4	45.0	16.9	35.0	18.8	20.0	39.0	0.0	0.0	0.0	
Total	20	179	100.0	25.4	45.0	16.9	35.0	18.8	20.0	39.0	0.0	0.0	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cass Lake AA	20	74	100.0	25.3	40.0	17.5	45.0	19.6	10.0	37.7	5.0	0.0	0.0	
Total	20	74	100.0	25.3	40.0	17.5	45.0	19.6	10.0	37.7	5.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.
Due to rounding, totals may not equal 100.0*