



PUBLIC DISCLOSURE

April 27, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Buhl
Charter Number 11622

8355 Unity Drive, Suite 400
Mountain Iron, MN 55768

Office of the Comptroller of the Currency
222 South 9th Street, 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's loan-to-deposit (LTD) ratio is more than reasonable.
- The bank originated a substantial majority of its loans inside its assessment area (AA).
- The distribution of loans reflect excellent distribution among borrowers of different income levels.
- The distribution of loans reflect reasonable dispersion through geographies of different income levels.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

The First National Bank of Buhl's (FNB Buhl) LTD ratio averaged 86.7 percent over the 20 quarters since the previous CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 80.6 percent in the fourth quarter of 2019 to a high of 91.7 percent in the second quarter of 2018. FNB Buhl ranked first out of six similarly-situated institutions. Similarly-situated institutions include institutions operating in or near the bank's AA with total assets between \$24 million and \$76 million. The following table shows the bank's LTD compared to similarly-situated institutions:

Institution (Headquarters)	Total Assets as of 12/31/2019 (\$000s)	Average LTD Ratio (%)
The First National Bank of Buhl (Mountain Iron, MN)	\$26,104	86.7
Northern State Bank of Virginia (Virginia, MN)	\$76,473	78.2
The First National Bank of Gilbert (Gilbert, MN)	\$48,744	64.2
The First National Bank of Proctor (Proctor, MN)	\$24,872	63.5
The Miners National Bank of Eveleth (Eveleth, MN)	\$69,662	41.9
First National Bank (Chisholm, MN)	\$73,875	20.9

Source: Call Report data from March 31, 2015 through December 31, 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 92.2 percent of its loans by dollar volume inside its AA during the evaluation period. To determine lending inside the AA, we analyzed 20 home mortgage and 20 consumer loans originated between January 1, 2017 and December 31, 2019. The following table shows FNB Buhl's lending inside and outside of its AA:

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	19	95.0	1	5.0	20	981	97.5	25	2.5	1,006
Consumer	17	85.0	3	15.0	20	183	71.1	74	28.9	257
Total	36	90.0	4	10.0	40	1,164	92.2	99	7.8	1,263

Description of Institution

FNB Buhl is a \$26 million federally chartered single-state bank headquartered in Mountain Iron, Minnesota. The bank has two locations; a main office located in Mountain Iron and a branch located in Buhl, MN. There are two non-proprietary ATMs available for cash withdrawals by customers, both of which are in the bank's AA. Neither of these ATMs are deposit-taking. There have been no mergers, acquisitions, branch openings, or branch closings since the last CRA evaluation. FNB Buhl is wholly owned by Timberland Bancorp, a single-bank holding company.

FNB Buhl offers a traditional mix of banking products and services. FNB Buhl's business strategy historically focused on home mortgage and consumer lending. The bank's current strategic plan focuses on consumer, small business, and home mortgage lending. As of December 31, 2019, the bank's outstanding loan portfolio totaled \$19.2 million. The loan portfolio by dollar is comprised of 62 percent home mortgage loans, 26 percent commercial, and 12 percent consumer loans. As of December 31, 2019, tier one capital totaled \$2.04 million and represented 13.9 percent of risk-weighted assets.

There are no legal, financial, or other factors that impede FNB Buhl's ability to meet the credit needs in its AA during the evaluation period. FNB Buhl was rated Outstanding at the last CRA evaluation dated February 17, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2017 through December 31, 2019. We determined the bank's primary loan products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. Home mortgage and consumer loans were determined to be the bank's primary products during the timeframe. Refer to the table below to view loan originations and purchases by dollar and number during the evaluation period:

Total Loan Originations by Product Type		
	Percentage by Number of Loans	Percentage by Dollar Volume
Agriculture	0	0
Commercial	9.7	21.3
Consumer	66.9	27.7
Home Mortgage	23.4	51.0
Total	100.0	100.0

We selected initial samples of 20 home mortgage loans and 20 consumer loans for the analysis period. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distributions within the AA. Demographic data was used in part to determine the bank's lending performance. All loans originated or purchased were compared to the 2015 American Community Survey (ACS) data. The evaluation period for the LTD ratio analysis covered the quarters ending March 31, 2015 to December 31, 2019, and the evaluation period for the complaint review covered February 17, 2015 to April 15, 2020.

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.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States is not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Ratings

FNB Buhl's overall rating is based on the bank's lending performance in the State of Minnesota. It is the bank's only rating area. Home mortgage loans received more weight than consumer loans given the larger dollar volume originated during the evaluation period. FNB Buhl has one AA, which is referred to as the FNB Buhl AA. Refer to Appendix A for an outline of the examination scope.

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 distribution of home mortgage and consumer loans among borrowers of different income levels is excellent.
- The distribution of home mortgage and consumer loans throughout geographies of different income levels is reasonable.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

FNB Buhl's only AA consists of 22 census tracts in the central portion of St. Louis County, which is part of the Duluth, MN-WI MSA. During the entire evaluation period, there were seven moderate-income CTs and 15 middle-income CTs.

Competition in the area is high. The June 30, 2019 FDIC Deposit Share Report indicates 20 institutions with 68 branches operating in the bank's AA. FNB Buhl is ranked 18th with 0.7 percent of the deposit market share. The top five institutions are Wells Fargo Bank, U.S. Bank, Republic Bank Inc, American Bank of the North, and North Shore Bank of Commerce. Combined, the top two institutions have 48.2 percent of the deposit market share. Combined, the top five institutions have 72.3 percent of the deposit market share.

We completed one community contact in conjunction with this examination. The contact noted the area is highly dependent on mining and tourism. The population has been shrinking due to mines closing and people leaving the area, which has caused an over-supply of housing units. The contact noted that local financial institutions are proactive in developing relationships and offering assistance and did not identify any credit needs that were not being met by local financial institutions. The contact stated all the banks in the area have a good reputation for home mortgage and consumer lending.

Top industries in the area are health care and social assistance, wholesale and retail trade, manufacturing, construction, and mining, quarrying, and oil and gas extraction. The top employers are Essentia Health, US Steel, Cleveland Cliffs, ArcelorMittal, and Blue Cross Blue Shield.

The following table shows the demographic and economic characteristics of the FNB Buhl AA for the evaluation period:

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Buhl AA - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	31.8	68.2	0.0	0.0
Population by Geography	63,043	0.0	30.8	69.2	0.0	0.0
Housing Units by Geography	35,720	0.0	28.6	71.4	0.0	0.0
Owner-Occupied Units by Geography	21,485	0.0	23.8	76.2	0.0	0.0
Occupied Rental Units by Geography	6,893	0.0	53.9	46.1	0.0	0.0
Vacant Units by Geography	7,342	0.0	18.9	81.1	0.0	0.0
Businesses by Geography	4,120	0.0	33.1	66.9	0.0	0.0
Farms by Geography	142	0.0	14.1	85.9	0.0	0.0
Family Distribution by Income Level	16,768	22.1	19.6	23.1	35.3	0.0
Household Distribution by Income Level	28,378	27.9	15.7	17.8	38.6	0.0
Median Family Income MSA - 20260 Duluth, MN-WI MSA		\$64,033	Median Housing Value			\$107,564
			Median Gross Rent			\$536
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS and 2019 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 FNB Buhl AA as it is the only AA in the state. The FNB Buhl AA received a full-scope review.

Refer to Appendix A for additional information on the AA under review.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State of Minnesota. There were seven moderate-income CTs during the evaluation period. These seven moderate-income CTs are spread throughout the AA, with five located around other towns that have at least one other bank located in that town. Three moderate-income CTs are located 12-15 miles southwest of the Buhl branch in one of the larger towns in the area, with several banks located in that town. Two moderate-income CTs are located 10 miles south and 23 miles east of the bank's Mountain Iron branch. The two-remaining moderate-income CTs are located adjacent to the Mountain Iron branch. There were no low-income census tracts in the AA during the evaluation period.

Home Mortgage Loans

Refer to Table O in the State of Minnesota section of 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 is reasonable considering the performance context noted above. The proportion of loans in moderate-income geographies was near the proportion of owner-occupied housing units but below aggregate lending. There were no low-income geographies in the AA during the evaluation period.

Consumer Loans

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

The geographic distribution of consumer loans is reasonable considering the performance context noted above. The proportion of loans in moderate-income geographies was below the percentage of moderate-income households in those geographies. There were no low-income geographies in the AA during the evaluation period.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The borrower distribution of home mortgage loans reflects excellent distribution among borrowers of different income levels. The percentage of home mortgage loans to low- and moderate-income (LMI) borrowers exceeded the combined proportion of LMI families and aggregate lending. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and the aggregate lending data. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but near the percentage of aggregate lending. The percentage of families below the poverty level was 10.8 percent, making it more difficult to originate home mortgage loans to low-income borrowers.

Consumer Loans

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

The borrower distribution of consumer loans reflects excellent distribution among households of different income levels. The percentage of consumer loans to LMI borrowers exceeded the combined proportion of LMI households. The percentage of consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households. The percentage of consumer loans to low-income borrowers was below the percentage of low-income households. However, the percentage of households below the poverty level was 14.7 percent, making it more difficult to originate consumer loans to low-income borrowers.

Responses to Complaints

FNB Buhl did not receive any complaints related to performance in meeting the AA's credit needs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the AAs 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:	1/1/2017-12/31/2019	
Bank Products Reviewed:	Home mortgage and consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
FNB Buhl AA	Full-scope	Central portion of St. Louis County, including CTs: 113, 114, 121-128, 130-136, 138-140, 151, 152

Appendix B: Summary of State Ratings

RATING – The First National Bank of Buhl	
Overall Bank	Lending Test Rating
The First National Bank of Buhl	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 (MMSA), 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.

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
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	
FNB Buhl AA	20	1,271	100.0	1,412	0.0	--	0.0	23.8	20.0	30.4	76.2	80.0	69.6	0.0	--	0.0	0.0	--	0.0	
Total	20	1,271	100.0	1,412	0.0	--	0.0	23.8	20.0	30.4	76.2	80.0	69.6	0.0	--	0.0	0.0	--	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 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															2017-19	
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			
FNB Buhl AA	20	209	100.0	0.0	--	31.1	20.0	68.9	80.0	0.0	--	0.0	--			
Total	20	209	100.0	0.0	--	31.1	20.0	68.9	80.0	0.0	--	0.0	--			

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
FNB Buhl AA	20	1,271	100.0	1,412	22.1	10.0	15.2	19.6	40.0	24.0	23.1	10.0	21.7	35.3	40.0	23.7	0.0	--	15.4	
Total	20	1,271	100.0	1,412	22.1	10.0	15.2	19.6	40.0	24.0	23.1	10.0	21.7	35.3	40.0	23.7	0.0	--	15.4	

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017-19	
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		
FNB Buhl AA	20	209	100.0	27.9	20.0	15.7	45.0	17.8	25.0	38.6	10.0	0.0	--		
Total	20	209	100.0	27.9	20.0	15.7	45.0	17.8	25.0	38.6	10.0	0.0	--		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data.
Due to rounding, totals may not equal 100.0%*