



## **PUBLIC DISCLOSURE**

April 12, 2021

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

Lake City Federal Bank  
#702828

201 East Marion Street  
Lake City, MN 55041-1000

Office of the Comptroller of the Currency

222 South Ninth Street Suite 800  
Minneapolis, MN 55402-3933

**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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	3
Lending Test .....	4
State Rating.....	
State of Minnesota.....	4
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

# 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 distribution of loans among individuals of different income levels is excellent.
- The distribution of loans throughout different geographies is excellent.
- A majority of the bank’s loans are inside its assessment area (AA).
- The bank’s loan-to-deposit (LTD) ratio is reasonable.

## Loan-to-Deposit Ratio

Lake City Federal Bank's (LCFB) LTD ratio is reasonable given the bank's size, financial condition, and credit needs of the AA. The bank's LTD ratio averaged 86.1 percent over the 21 quarters included in this evaluation period. The LTD ratio ranged from a high of 91.2 percent in the second quarter of 2017 to a low of 74.6 percent in the fourth quarter of 2020. The following table shows LCFB's average LTD ratio compared to four similarly situated financial institutions.

<b>Institution</b>	<b>Assets as of 12/31/20</b>	<b>Average LTD Ratio (%)</b>
Pine Island Bank	103,232	100.06
Security State Bank of Kenyon	54,179	90.30
<b>Lake City Federal Bank</b>	<b>79,473</b>	<b>86.13</b>
Security State Bank of Wanamingo	65,856	71.57
First State Bank of Red Wing	76,549	33.06

Source: Call Report Data from December 31, 2015 through December 31, 2020.

## Lending in Assessment Area

A majority of the bank’s loans are inside its AA.

The bank originated and purchased 88 percent of its total loans by number and 80 percent by dollar volume inside the bank’s AA during the evaluation period. We analyzed 20 home mortgage loans and 20 consumer loans originated between January 1, 2018 and December 31, 2020. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	16	80	4	20	20	1,828	79	496	21	2,324
Consumer	19	95	1	5	20	191	98	3	2	194
Total	35	88	5	13	40	2,019	80	499	20	2,518

## **Description of Institution**

LCFB is a \$79 million mutual thrift as of December 31, 2020 and headquartered in Lake City, Minnesota (MN). LCFB is a single-state institution with one full-service branch and one cash dispensing ATM in operation during the evaluation period. For CRA purposes, LCFB operates only within the State of MN. The MN rating area consists entirely of the Wabasha County AA, located within the Rochester Metropolitan Statistical Area (MSA). LCFB did not have merger or acquisition activity during the evaluation period. LCFB does not operate any subsidiaries and did not elect to have affiliate activity considered in this evaluation.

LCFB is a full-service commercial bank offering a variety of loan and deposit products. The bank's primary focus is home mortgage and consumer lending. The bank offers a variety of traditional banking products and services, such as various checking and savings accounts and consumer and commercial lending products. Available consumer lending products include overdraft protection, home mortgage loans (i.e. single-family homes, home improvement, home equity lines of credit, etc.) and installment loans (i.e. vehicle, recreational vehicle, etc.). Available commercial products include commercial real estate, equipment loans, working capital loans, and agriculture loans (land, machinery, livestock, crops, etc.). The bank also offers safety deposit boxes, gift cards, and wire transfer services.

Net loans and leases represent 63 percent of total assets. The loan portfolio is comprised of 71 percent home mortgage loans, 14 percent business loans, 11 percent farm loans, and four percent consumer loans, based on dollar volume. Tier one capital was \$9.5 million or 12 percent of total assets at the end of the evaluation period.

There are no known financial, legal, or other factors that impede LCFB's ability to help meet the credit needs of its AA. LCFB received an Outstanding rating at the last CRA examination dated January 25, 2016.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period for this examination is January 1, 2018 to December 31, 2020. We reviewed a sample of home mortgage loans and consumer loans originated in the Wabasha County AA during the evaluation period. These products were selected based on an analysis of the bank's lending activity and the level of originations during the evaluation period.

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), which took effect on January 1, 2017.

### **Selection of Areas for Full-Scope Review**

A full-scope review was completed for the Wabasha County AA, the bank's only AA within the State of Minnesota, the bank's only rating area. For purposes of this evaluation, bank delineated assessment areas located within the same MSA or a Non-MSA within the same state are combined and evaluated as a single AA. Refer to the "Scope" section under the Minnesota State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is based solely on the State of MN rating, as it is the bank's only rating area.

Home mortgage loans and consumer loans were selected as primary products in the bank's only AA. Home mortgage loans received more weight in the Lending Test analysis as they comprise the substantial majority of the bank's originations by dollar volume during the evaluation period.

Home mortgage loans represent 37 percent of loan originations by number and 70 percent by dollar volume. Consumer loans represent 49 percent of loan originations by number and eight percent by dollar volume. Business loans and farm loans were not included in our analysis given limited volume.

### **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 an excellent geographic distribution of loans in the State of MN. There were no gaps identified within the bank's lending to moderate-income census tracts (CTs). There were not any low-income CTs within the bank's only AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.
- The bank exhibits an excellent distribution of loans to individuals of different income levels in the State of MN.
- The bank did not receive any CRA related complaints during the evaluation period.

## Description of Institution's Operations in Minnesota

### Wabasha County AA

The Wabasha County AA is included within the Rochester MSA for the purpose of demographic comparison. The bank's only AA includes all six CTs in Wabasha County and one CT in Goodhue County. Although Goodhue County is located in the MN Non-MSA, it is included within the bank's AA as it does not extend substantially beyond the county border. Additionally, Lake City, in which the bank is headquartered is split between Wabasha County and the one CT included from Goodhue County. The bank's one branch and non-deposit taking ATM is located in a moderate-income CT within the Wabasha County AA.

The June 30, 2020 FDIC Deposit Market Share Report indicated that LCFB had \$64 million, 100 percent of its deposits in the Wabasha County AA. LCFB ranks fifth of eight deposit-taking institutions in the AA with deposit market share of 9.2 percent. The leaders of the market are Foresight Bank, Peoples State Bank of Plainview, and WNB Financial, N.A. with a combined market share of 69 percent.

LCFB's primary business focus is home mortgage and consumer lending. Home mortgage loans comprised 37 percent by number and 70 percent by dollar volume of all loans originated. Consumer loans comprised 49 percent by number and eight percent by dollar volume of all loans originated.

We completed a community contact in the Wabasha County AA as part of this examination. The contact has several locations in Southeast Minnesota, with an office in Wabasha, MN. This organization connects residents with local employers to find viable long-term employment. The contact stated that the area is currently experiencing a workforce shortage, representing a shift from prior years. This is due to many local residents deciding to leave the workforce rather than seeking employment during the

current pandemic, which is likely a driver of lower unemployment in Wabasha County (4.1 percent) when compared to the state of Minnesota (6.2 percent) at year-end 2020. The contact was not aware of any significant credit needs, aside from small business loans at the start of the pandemic, which were not identified as a primary product during this exam.

The following table provides information on the demographic composition of the Wabasha County AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Wabasha County AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	7	0.0	28.6	57.1	14.3	0.0
Population by Geography	25,326	0.0	27.5	56.9	15.6	0.0
Housing Units by Geography	11,967	0.0	30.0	53.8	16.2	0.0
Owner-Occupied Units by Geography	8,663	0.0	27.7	56.4	15.9	0.0
Occupied Rental Units by Geography	1,892	0.0	43.1	45.1	11.8	0.0
Vacant Units by Geography	1,412	0.0	26.3	49.9	23.8	0.0
Businesses by Geography	2,083	0.0	33.5	53.0	13.5	0.0
Farms by Geography	318	0.0	8.2	75.5	16.4	0.0
Family Distribution by Income Level	7,339	21.2	20.8	24.3	33.7	0.0
Household Distribution by Income Level	10,555	24.1	18.7	19.9	37.3	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		\$81,036	Median Housing Value			\$181,652
Median Family Income Non-MSAs - MN		\$63,045	Median Gross Rent			\$747
			Families Below Poverty Level			4.8%
<i>Source: 2015 ACS and 2020 D&amp;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

A full-scope review was completed for the bank’s only AA, the Wabasha County AA located within the State of Minnesota, the bank’s only rating area. Refer to Appendix A, Scope of Examination, for more information.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s lending performance in the Wabasha County AA is excellent.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the State. The geographic distribution conclusion is based on the bank's performance in its only AA, the Wabasha County AA. There were not any low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

### ***Home Mortgage Loans***

The bank exhibits excellent geographic distribution of home mortgage loans in the State of Minnesota. Refer to Table O in the State of MN 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 distribution of home mortgage loans to geographies of different income levels in the Wabasha County AA is excellent. LCFB originated 55 percent of home mortgage loans within moderate-income geographies during the evaluation period, significantly exceeding demographic and aggregate comparators.

### ***Consumer Loans***

The bank exhibits excellent geographic distribution of consumer loans in the State of Minnesota. Refer to Table U in the State of MN 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 distribution of consumer loans to geographies of different income levels in the Wabasha County AA is excellent. LCFB originated 65 percent of consumer loans within moderate-income geographies during the evaluation period, significantly exceeding the demographic comparator.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans to individuals of different income levels. The borrower distribution conclusion is based on the bank's performance in its only AA, the Wabasha County AA.

### ***Home Mortgage Loans***

The bank exhibits an excellent distribution of home mortgage loans to individuals of different income levels. Refer to Table P in the State of MN 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 to borrowers of different income levels in the Wabasha County AA is excellent. LCFB originated 35 percent of home mortgage loans to moderate-income borrowers and 15 percent to low-income borrowers during the evaluation period, significantly exceeding the majority of demographic and aggregate comparators.



### ***Consumer Loans***

The bank exhibits an excellent distribution of consumer loans to individuals of different income levels. Refer to Table V in the State of MN 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 to borrowers of different income levels in the Wabasha County AA is excellent. LCFB originated 35 percent of consumer loans to low-income borrowers and 30 percent to moderate-income borrowers during the evaluation period, significantly exceeding both demographic comparators.

### **Responses to Complaints**

LCFB did not receive any CRA related complaints during the evaluation period.

## 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”.

<b>Time Period Reviewed:</b>	01/01/2018 to 12/31/20	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Minnesota</b>		
Wabasha County (Rochester MSA)	Full-scope	Wabasha County (all CTs) and one CT in Goodhue County (803), a bordering Non-MSA County, which does not extend substantially beyond the border

# Appendix B: Summary of State Ratings

---

RATINGS	
Overall Bank:	Lending Test Rating
Lake City Federal 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 30<sup>th</sup> 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% 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	
Wabasha County AA	20	2,616	100	889	0.0	0.0	0.0	27.7	55.0	28.6	56.4	20.0	57.0	15.9	25.0	14.4	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	Overall Market (#)	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Wabasha County AA	20	2,616	100	889	21.2	15.0	13.3	20.8	35.0	24.5	24.3	10.0	20.6	33.7	40.0	31.3	0.0	0.0	10.3	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 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** **2018-20**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wabasha County AA	20	198	100	0.0	0.0	30.5	65.0	54.4	25.0	15.2	10.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 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** **2018-20**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wabasha County AA	20	198	100	24.1	35.0	18.7	30.0	19.9	10.0	37.3	20.0	0.0	5.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data,  
Due to rounding, totals may not equal 100.0