



## **PUBLIC DISCLOSURE**

October 19, 2020

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

The First National Bank of Henning  
Charter Number 6906

106 Mn Highway 78 N  
Ottetail, MN 56571

Office of the Comptroller of the Currency

222 S 9<sup>th</sup> 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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	3
State Rating.....	4
State of MN .....	4
Lending Test .....	5
Appendix A: Scope of Examination.....	Appendix A
Appendix B: Summary of MMSA and State Ratings.....	Appendix B
Appendix C: Definitions and Common Abbreviations.....	Appendix C
Appendix D: Tables of Performance Data.....	Appendix D

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

### Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable when considering the bank's size, financial condition, and the credit needs of the AA(s). The First National Bank of Henning's (FNB Henning) average LTD ratio is 78 percent for the past 22 quarters. The bank's quarterly LTD ratio ranged from a low of 74 percent (2Q20) to a high of 83 percent (3Q2017). The bank ranks third when compared to five similarly situated institutions. Similarly situated banks include those in Otter Tail County with total assets ranging from \$50 million to \$300 million.

Institution (Headquarters)	Assets as of 12/31/2019 (\$000)	Average LTD Ratio (%)
Security State Bank of Fergus Falls (Fergus Falls, MN)	149,698	91.71
Farmers State Bank of Underwood (Underwood, MN)	81,239	82.27
<b>The First National Bank of Henning (Ottertail, MN)</b>	<b>217,946</b>	<b>78.17</b>
United Community Bank (Perham, MN)	295,493	66.81
Farmers and Merchants State Bank of New York Mills (New York Mills, MN)	69,435	57.12
Vergas State Bank (Vergas, MN)	52,414	43.83

*Source: Call Report data from March 31, 2015 through December 31, 2019.*

### Lending in Assessment Area

A majority of the bank's loans are originated inside its AAs. We analyzed 20 consumer and 20 home mortgage loans originated between January 1, 2017 and December 31, 2019. The bank originated 70 percent of its total loans by number and 71 percent by dollar volume inside the bank's AAs during the evaluation period.

<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	13	65.0%	7	35.0%	20	2,619	69.8%	\$1,134	30.2%	3,753
Consumer	17	85.0%	3	15.0%	20	175	93.5%	\$12	6.5%	187
Total	30	70.0%	10	30.0%	40	2,794	70.9%	\$1,146	29.1%	3,940

Source: Consumer and home mortgage loan samples.

## Description of Institution

FNB Henning is a \$218 million single-state national bank chartered in Ottertail, Minnesota. The bank is 100 percent owned by Henning Bancshares, Inc. Holding company assets consist solely of the bank as FNB Henning successfully merged with their affiliate bank, FNB Battle Lake, in March 2018. There were no acquisitions, branch openings, or branch closings during the evaluation period. FNB Henning has three branches located in Henning, MN, Ottertail, MN, and Battle Lake, MN with non-deposit taking automated teller machines (ATMs) located at each branch. FNB Henning has no deposit taking ATMs. The communities of Ottertail, Battle Lake, and Henning are located in Otter Tail County in west central Minnesota.

FNB Henning is a rural bank that offers traditional banking products and services. As of December 31, 2019, the bank's loan portfolio totaled \$152 million or 69.7 percent of total assets. According to the December 31, 2019 Call Report, the bank's loan portfolio consists of commercial (38.8%), residential real estate (35.2%), agricultural (18.2%), and consumer (7.8%). The bank's tier 1 leverage capital ratio was 11.9 percent as of December 31, 2019.

FNB Henning received an "Outstanding" rating at its June 22, 2015 CRA evaluation. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB Henning's CRA performance using small bank performance standards consisting of the Lending Test, which evaluates the bank's record of meeting the credit needs of its AA. The evaluation period for the complaint review portion covered June 22, 2015 to June 30, 2020. The evaluation period for the LTD ratio analysis covered the quarters ending March 31, 2015 to December 31, 2019. We assessed the bank's lending performance using primary products based on the number and dollar volume of loans originated between January 1, 2017 and December 31, 2019. Our analysis found that consumer loans are a primary product based on number of loan originations (51.8%) and home mortgage loans are a primary product based on dollar volume of loan originations (60.7%). We selected a sample of 20 consumer loans and 20 residential real estate loans to evaluate lending activities in the AA.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each 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**

FNB Henning’s overall rating is based on the bank’s lending performance within the State of Minnesota. It is the bank’s only rating area. We evaluated lending performance using the following performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels, distribution of loans to geographies of different income levels, and responses to CRA-related complaints. In developing our conclusions, we placed an equal weight on home mortgage and consumer lending for the lending tests.

## **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 loans to borrowers of different income levels is excellent.
- The distribution of loans throughout geographies of different income levels is excellent.
- The bank originated a majority of its loans within its AA.
- The bank received no CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Minnesota

FNB Henning's only AA consists of Otter Tail County, which is in a non-MSA area of Minnesota. The AA includes eight CTs. Throughout the evaluation period, the AA consisted of one moderate-income tract, six middle-income tracts, and one upper-income tract. Competition in the bank's market is moderate. As of June 30, 2019, the FDIC Deposit Share Report indicates there were 18 financial institutions operating in the bank's AA. FNB Henning ranked second with 13.6 percent of the deposit market share.. Major competitors in the county include United Community Bank, Bell Bank, and Wells Fargo Bank.

We reached out to one community member who is part of a community development organization to gain a better understanding of the local community's needs and the current economic condition. The contact stated that the banks within the county have a good reputation for meeting customers' banking needs. The community contact stated that there is a need in the county for additional residential real estate lending given a housing shortage.

#### MN Non MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non MSA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0	12.5%	75%	12.5%	0.00
Population by Geography	24,115	0	12.84%	74.27%	12.89%	0.00
Housing Units by Geography	16,430	0	11.38%	77.2	11.5%	0.00
Owner-Occupied Units by Geography	8,464	0	12.78%	73.71%	13.5%	0.00

Occupied Rental Units by Geography	1,536	0	12.76%	79.88%	7.36%	0.00
Vacant Units by Geography	6,430	0	919%	81.04%	9.77%	0.00
Businesses by Geography	1,846	0	13.54%	75.24%	11.21%	0.00
Farms by Geography	334	0	16.17%	68.26%	15.57%	0.00
Family Distribution by Income Level	6,965	0	12.69%	74.1%	13.21%	0.00
Household Distribution by Income Level	10,000	0	16.36%	75.66%	7.98%	0.00
Median Family Income MSA	\$68,800	Median Housing Value			\$178,624	
			Median Gross Rent			\$658
			Families Below Poverty Level			1,025
<p><i>Source: 2015 ACS Census and 2019 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></p>						

## 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 performance in the MN Non MSA AA is excellent.

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

The bank exhibits excellent geographic distribution of loans in the State.

#### *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 excellent. During the evaluation period, FNB Henning originated 25 percent of home mortgage loans within the moderate-income census tract. FNB Henning significantly exceeded both the demographic and aggregate comparators. 2015 ACS data indicates 12.8 percent of owner-occupied housing units are located in moderate-income geographies and aggregate lending data indicates 11.5 percent of home mortgage loans were originated within moderate-income geographies. There are no low-income tracts.

#### *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. During the evaluation period, FNB Henning originated 15 percent of consumer loans within the moderate-income census tract. FNB

Henning exceeded the demographic comparator for consumer loans. 2015 ACS data indicates 12.5 percent of households reported moderate-income.

### **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.

Borrower distribution of home mortgage loans is excellent. During the evaluation period, FNB Henning significantly exceeded the demographic and aggregate lending data for mortgage loans to low-income borrowers. The demographic data indicates 18.8 percent of families are low-income, and aggregate data indicates 6.4 percent of mortgages originated were to low-income borrowers in the AA. The bank originated 30 percent of mortgage loans in our sample to low-income borrowers. The bank is below demographic and aggregate loans to moderate-income borrowers due to income levels on the east side of the county declining in recent years from moderate-income to low-income due to the affordability of the homes in this area. This is reflected in our sample results as the bank significantly exceeds the demographic and aggregate data to low-income borrowers. Many of the low-income borrowers in our sample purchased homes on the east side of the county.

#### ***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.

Borrower distribution of consumer loans is excellent. During the evaluation period, FNB Henning significantly exceeded the demographics for consumer lending to low- and moderate-income borrowers. The percent of households that are low-income in the AA is 22.3 percent while 16.2 percent of households are moderate-income borrowers. The bank originated 30 percent of consumer loans in our sample to low-income borrowers and 55 percent of loans to moderate-income borrowers.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the review period.



## Appendix A: Scope of Examination

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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>	(01/01/2017 to 12/31/2019)	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<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>States</b>		
Minnesota	Full-scope	Ottertail County CTs: 9606, 9607, 9608, 9612, 9613, 9614, 9615, and 9616.

# Appendix B: Summary of State Ratings

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RATINGS – The First National Bank of Henning	
Overall Bank:	Lending Test Rating
The First National Bank of Henning	Outstanding
State:	
Minnesota	Outstanding

## Appendix C: Definitions and Common Abbreviations

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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.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**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 Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**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.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**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.

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**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

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### 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>2017-2019</b>																		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% 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
MN Non MSA AA	1,055	\$156	100	0	0	0	12.8	25	8.9	73.7	75	71	13.5	0	17.5	0	0	0
<b>Total</b>	<b>1,055</b>	<b>\$156</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12.8</b>	<b>25</b>	<b>8.9</b>	<b>73.7</b>	<b>75</b>	<b>71</b>	<b>13.5</b>	<b>0</b>	<b>17.5</b>	<b>0</b>	<b>0</b>	<b>0</b>

*Source: 2015 ACS Census; 01/01/2017 – 12/31/2019 Bank 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>2017-2019</b>																		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
MN Non MSA AA	1,055	\$156	23	18.8	30	6.4	19.4	10	16.1	24.6	25	21	37.2	35	43.3	0	0	13.1
<b>Total</b>	<b>1,055</b>	<b>\$156</b>	<b>23</b>	<b>18.8</b>	<b>30</b>	<b>6.4</b>	<b>19.4</b>	<b>10</b>	<b>16.1</b>	<b>24.6</b>	<b>25</b>	<b>21</b>	<b>37.2</b>	<b>35</b>	<b>43.3</b>	<b>0</b>	<b>0</b>	<b>13.1</b>

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



<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													
<b>2017-2019</b>													
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
MN Non MSA AA	2,363	\$26MM	100	0	0	12.8	15	74.7	85	12.6	0	0	0
<b>Total</b>	<b>2,363</b>	<b>\$26MM</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>12.8</b>	<b>15</b>	<b>74.7</b>	<b>85</b>	<b>12.6</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													
<b>2017-2019</b>													
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
MN Non MSA AA	2,363	\$26MM	100	22.3	30	16.2	55	20.6	15	40.9	0	0	0
<b>Total</b>	<b>2,363</b>	<b>\$26MM</b>	<b>100</b>	<b>22.3</b>	<b>30</b>	<b>16.2</b>	<b>55</b>	<b>20.6</b>	<b>15</b>	<b>40.9</b>	<b>0</b>	<b>0</b>	<b>0</b>

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