



## **PUBLIC DISCLOSURE**

February 07, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

American National Bank of Minnesota  
Charter Number: 24219

7638 Woida Road  
Baxter, MN 56425

Office of the Comptroller of the Currency

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Alexandria, MN 56308-0849

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 **Satisfactory**.

The lending test is rated **Satisfactory**.

The major factors that support this rating include:

- The distribution of loans among geographies of different income levels is reasonable.
- A majority of the bank’s loans are originated inside its assessment areas (AA).
- The distribution of loans among businesses of different sizes is reasonable.
- The dispersion of loans among borrowers of different income levels is reasonable.
- The bank’s loan-to-deposit (LTD) ratio is more than reasonable.

The Lending Test rating is based on an analysis of lending in the Non-MSA AA and the St. Cloud MSA AA in Minnesota. Lending products vary by AA and include home mortgage loans and small business loans.

## Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and the credit needs of the AA(s), the bank’s LTD ratio is more than reasonable. American National Bank of Minnesota’s (ANBM) LTD ratio ranged from 94.83 percent to 106.16 percent and averaged 98.13 percent over the twelve quarters since the previous CRA evaluation. ANBM’s LTD ratio ranks second among six similarly situated banks. Similarly situated institutions are financial institutions in the bank’s AA with total assets between \$288MM and \$536MM. The following table shows LTD details and rankings:

<b>Institution (Headquarters)</b>	<b>Total Assets (000s) *</b>	<b>Average LTD Ratio (%) **</b>
Glenwood State Bank (Glenwood, MN)	\$431,785	103.13
<b>American National Bank of Minnesota (Baxter, MN)</b>	<b>\$381,488</b>	<b>98.13</b>
The Citizens National Bank of Park Rapids	\$343,081	89.45
Riverwood Bank (Baxter, MN)	\$535,761	79.87
The First National Bank of Henning (Ottertail, MN)	\$288,328	72.67
United Community Bank (Perham, MN)	\$338,886	66.15

\*Total assets as of 9/30/2021, Call Report Data

\*\*Average LTD from 12/31/2018-9/30/2021

## Lending in Assessment Area

A majority of the bank's loans are originated inside its AAs.

The bank originated or purchased 76 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level. We analyzed Home Mortgage Disclosure Act (HMDA) data to assess home mortgage lending in aggregate. Additionally, we analyzed 20 small business loans from the non-MSA AA and 20 small business loans from the St. Cloud MSA 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	531	75.1	176	24.9	707	90,544	75.6	29,168	24.4	119,711
Small Business	37	92.5	3	7.5	40	10,525	84.3	1,967	15.7	12,492
<b>Total</b>	<b>567</b>	<b>76.0</b>	<b>179</b>	<b>24.0</b>	<b>747</b>	<b>100,969</b>	<b>76.5</b>	<b>31,235</b>	<b>23.5</b>	<b>132,203</b>

Source: Bank Data  
Due to rounding, totals may not equal 100.0%

## Description of Institution

ANBM is a \$381 million national bank chartered in Baxter, Minnesota. The bank is wholly owned by American Bancorporation of Minnesota Inc., a single bank holding company located in Brainerd, MN. ANBM is a single-state community bank with nine branches as of the end of the evaluation period. Those branches include eight locations in the non-MSA AA, and one location within the St. Cloud MSA AA. During the evaluation period, the bank closed its Elk River branch, which was its only location within the Minneapolis-St. Paul, MN MSA. The bank does not operate any deposit-taking ATMs.

ANBM has one CRA rating area, which consists of the state of Minnesota (MN). The MN rating area includes three AAs; the Minnesota Non-MSA AA, the St. Cloud MSA AA, and the Minneapolis MSA AA. The Non-MSA AA consists of twelve whole counties, including Becker, Cass, Crow Wing, Douglas, Grant, Hubbard, Morrison, Otter Tail, Pope, Todd, Wadena, and Wilkin. The St. Cloud MSA consists of two whole counties: Benton and Stearns. The Minneapolis MSA AA consisted of all of Sherburne County. Competition within the bank's AAs is strong. Refer to the Ratings sections below for details about ANBM's market share within each AA.

ANBM is a full-service commercial bank offering a variety of loan and deposit products. As of December 31, 2021, the bank's loan portfolio totaled \$327 million or 85 percent of average assets. When considering all lending activity, the bank's primary focus is business and residential loans. During the Covid-19 pandemic, the bank was an active lender to small businesses throughout its market area utilizing the Small Business Administration (SBA) Paycheck Protection Program (PPP). The loan portfolio consists of 49 percent commercial loans, 47 percent residential loans, three percent consumer loans, and one percent agricultural loans. Tier one capital totaled \$33 million and represented 9.5 percent of total assets at the end of the evaluation period.

There are no known financial, legal, or other factors that impede ANBM's ability to meet the credit needs of its AAs during the evaluation period. ANBM received a satisfactory rating at the last CRA examination dated December 3, 2018.

## **Scope of the Evaluation**

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

We evaluated ANBM's CRA performance utilizing small bank performance standards. The evaluation period for the LTD ratio analysis and consumer compliant review covered December 31, 2018, through September 30, 2021. The bank's primary loan products were based on loan originations and purchases from January 1, 2018, to December 31, 2020. We determined the primary products to be commercial lending and home mortgage lending in the non-MSA AA and commercial lending in the St. Cloud MSA AA. There was not sufficient lending volume to complete a meaningful analysis of commercial or residential lending in the Minneapolis MSA AA.

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). The loans in our sample were compared to 2015 ACS data.

### **Data Integrity**

Prior to starting this evaluation, we independently reviewed the accuracy of ANBM's publicly reported home mortgage data. We verified the data by testing a sample of 83 originated loans and five non-originated loan applications covering the years 2018 through 2020. We determined the bank's HMDA data is reliable and accurately reported. In addition to HMDA data, we completed loan file sampling for commercial loan products during this CRA evaluation.

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

The Non-MSA AA received a full-scope review, while the St. Cloud MSA AA and the Minneapolis MSA AA received limited-scope reviews. Due to minimal lending volume in the Minneapolis MSA AA, analysis would not provide meaningful data. Therefore, we did not evaluate lending performance to businesses of different sizes or the geographic distribution of loans within the Minneapolis MSA AA. Refer to the Scope of Evaluation 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 on lending performance in the State of Minnesota. We placed greater weight on the non-MSA AA lending test results, as ANBM derives the greatest volume of deposits and originates the majority of its loans from this AA. Within the non-MSA AA, the greatest weight was placed on home mortgage lending.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks 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: Satisfactory

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- ANBM exhibits a reasonable distribution of loans in the State of MN. Home mortgage lending to borrowers located in geographies of different income levels was excellent. Commercial lending to borrowers located in geographies of different income levels was reasonable.
- ANBM exhibits a reasonable borrower distribution of loans in the State of MN. Home mortgage lending to borrowers of different income levels is reasonable. Commercial lending to businesses of different sizes is excellent.
- The bank received no CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Minnesota

#### Non-MSA AA

The Non-MSA AA consists of 96 contiguous census tracts (CTs) across twelve counties throughout west-central and north-central Minnesota. This AA covers territory that the bank can reasonably serve from its branch locations, and its delineations within non-MSA counties are consistent with the legal requirements for an AA under the CRA. The AA consists of ten moderate-income CTs, 80 middle-income CTs, and six upper-income CTs. There are no low-income CTs in the AA.

The June 30, 2021, FDIC Deposit Market Share Report indicated ANBM had \$249 million or 82 percent of its deposits within the AA. ANBM ranked thirteenth out of 54 financial institutions in the market with a deposit market share of 2.6 percent. The top five market leaders are Bremer Bank, First National Bank North, Wells Fargo, Bell Bank, and Midwest Bank with a combined deposit market share of 39 percent.

According to 2020 peer mortgage data, ANBM ranked twentieth in the AA with a 1 percent market share. U.S. Bank, Bremer Bank, and Bell Bank were the top three in the AA with a combined market share of 29.1 percent.

The unemployment rate at the end of 2020 was 5.9 percent in the AA, which was higher than the overall state of Minnesota at 4.9 percent. The local economy includes a significant tourism and hospitality industry, which was impacted by the Covid-19 pandemic. Additionally, some manufacturing jobs in the area were forced into shutdowns and layoffs due the pandemic, which contributes to unemployment. Many of the pandemic-related shutdowns have ended and the local economy has come through those challenges relatively well. The largest employers in the region include health care systems, resorts, local government entities, and education systems.

We referenced recent community contact interviews with representatives from community groups and economic development organizations in the region. Credit priorities within the AA include affordable

housing for low- and moderate-income individuals, as well as small-dollar commercial lending for local small businesses. Our contacts were not aware of any unmet needs and generally had a favorable opinion of local community banks in the region. Overall, lending institutions remain active in the communities they serve and provide benefits to their customers.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA 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)	96	0.0	10.4	83.3	6.3	0.0
Population by Geography	334,032	0.0	10.5	83.3	6.2	0.0
Housing Units by Geography	203,896	0.0	11.4	83.0	5.7	0.0
Owner-Occupied Units by Geography	109,868	0.0	9.6	83.7	6.7	0.0
Occupied Rental Units by Geography	30,282	0.0	15.4	81.9	2.7	0.0
Vacant Units by Geography	63,746	0.0	12.5	82.2	5.2	0.0
Businesses by Geography	30,772	0.0	11.2	82.7	6.0	0.0
Farms by Geography	2,997	0.0	6.9	86.9	6.2	0.0
Family Distribution by Income Level	94,167	19.4	19.2	24.0	37.4	0.0
Household Distribution by Income Level	140,150	23.9	16.5	19.2	40.5	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$176,874
			Median Gross Rent			\$667
			Families Below Poverty Level			7.8%
<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>						

**St. Cloud MSA AA**

The St. Cloud MSA AA consists of Benton and Stearns counties within the St. Cloud MSA. The AA is made up of 38 contiguous CTs, which includes four moderate-income CTs, 29 middle-income CTs, and five upper-income CTs. There are no low-income CTs within the AA. The bank operates one full-service branch location in the AA, located in St. Cloud, and there are no deposit-taking ATMs. This AA consists of territories that the bank can reasonably serve from its branch location, and the AA’s delineations are consistent with the legal requirements for an AA under the CRA.

The June 30, 2021, FDIC Deposit Market Share Report indicated ANBM had \$55 million or 18 percent of its deposits within the AA. ANBM ranked 25th out of 32 financial institutions in the market with a deposit market share of 0.8 percent. The top five market leaders are Stearns Bank, Bremer Bank, Wells Fargo, U.S. Bank, and Falcon National Bank with a combined deposit market share of 57 percent.

According to 2020 peer mortgage data, ANBM ranked 97th in the AA with a 0.1 percent market share. Liberty Bank Minnesota, Central Minnesota Credit Union, U.S. Bank, Bremer Bank, and St. Cloud Financial were the top five in the AA with a combined market share of 36.1 percent.

The unemployment rate at the end of 2020 was 5.1 percent in the AA, which was slightly higher than the overall state of Minnesota at 4.9 percent. The local unemployment rates have decreased from the peaks

during the Covid-19 pandemic recession and have continued to trend positively since the evaluation period ended.

### Minneapolis MSA AA

The Minneapolis MSA AA consisted of eleven contiguous CTs, making up the entire county of Sherburne County, MN. The AA includes one moderate-income CT, nine middle-income CTs, and one upper-income CT. There are no low-income CTs in the AA. Sherburne county is situated at the northwest corner of the Minneapolis-St. Paul-Bloomington, MN-WI Multistate MSA. The bank operated one branch location in Sherburne County from the beginning of the evaluation period through the branch's closure in September 2019. The AA met the legal definition for an AA under the CRA and did not arbitrarily exclude any low-or moderate-income geographies.

Competition within the Minneapolis MSA AA is robust, and ANBM did not have a significant market share in deposits or loans within the AA. As referenced earlier in this performance evaluation, there was not sufficient lending volume for a meaningful analysis of commercial or residential lending.

## **Scope of Evaluation in Minnesota**

A full-scope review was completed for the non-MSA AA, which is the bank's largest AA by lending and deposit volume. For this same reason, the non-MSA AA is also given the most weight in determining the rating for the State of Minnesota. Limited-scope reviews were completed for the St. Cloud MSA AA and Minneapolis MSA AA. Refer to Appendix A, Scope of Examination, for more information.

## **Lending Test**

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

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the non-MSA AA is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the State of MN. The geographic distribution conclusion is based on the bank's performance of lending to individuals and businesses located in geographies of different income levels within the non-MSA AA.

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

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

The distribution of home mortgage loans to geographies of different income levels in the non-MSA AA was excellent. ANBM originated 10.3 percent of home mortgage loans within moderate-income geographies during the evaluation period. This rate exceeds demographic and aggregate comparators.

### ***Small Loans to Businesses***

Refer to Table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small business loans to geographies of different income levels in the non-MSA AA was reasonable. The bank originated ten percent of its small business loans in the AA to businesses located in moderate-income CTs, which is near both demographic and aggregate comparators.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes. The distribution of loans conclusion is based on the bank's performance of lending to borrowers of different income levels within the non-MSA AA.

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

Refer to Table P 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 bank originated 5.2 percent of its home mortgage loans in the AA to low-income borrowers. While this is below the demographic comparator, it exceeds aggregate lending data. ANBM originated 17.1 percent of its home mortgage loans in the AA to moderate-income borrowers. This is near to the demographic comparator and exceeds aggregate lending data.

### ***Small Loans to Businesses***

Refer to Table R of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans to businesses of different sizes is excellent. ANBM originated 95 percent of its business loans in the AA to small businesses with gross annual revenues of \$1 million or less. This rate exceeded both the demographic and aggregate lending comparators in the AA.

### **Responses to Complaints**

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

### **Conclusions for Areas Receiving Limited Scope Reviews**

Based on limited scope reviews, the bank's performance under the Lending Test in the St. Cloud MSA AA and the Minneapolis MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope AA. Refer to Tables Q and R in Appendix D for facts and data used to assess performance. Additionally, lending activity in all loan types in the Minneapolis MSA AA was minimal, so we did not evaluate lending performance from that AA.

## **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>	<b>(1/1/2018 to 12/31/2020)</b>	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<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>		
Non-MSA AA	Full-scope	Becker, Cass, Crow Wing, Douglas, Grant, Hubbard, Morrison, Otter Tail, Pope, Todd, Wadena, and Wilkin Counties (All complete counties, 96 total CTs)
St. Cloud MSA AA	Limited-scope	Benton and Stearns Counties (Complete counties, 38 total CTs)
Minneapolis MSA AA	Limited-scope	Sherburne County (Complete county, 11 CTs, AA only in place until September 2019)



## 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.

**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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

<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				
	#	\$	% 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		
Non-MSAA	485	83,160	33.3	19,613	0.0	0.0	0.0	9.6	10.3	7.9	83.7	83.1	83.4	6.7	6.6	8.6	0.0	0.0	0.0		
<b>Total</b>	<b>485</b>	<b>83,160</b>	<b>33.3</b>	<b>19,613</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.6</b>	<b>10.3</b>	<b>7.9</b>	<b>83.7</b>	<b>83.1</b>	<b>83.4</b>	<b>6.7</b>	<b>6.6</b>	<b>8.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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				
	#	\$	% Of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Non-MSAA	485	83,160	33.3	19,613	19.4	5.2	4.7	19.2	17.1	14.4	24.0	16.5	18.5	37.4	40.6	45.1	0.0	20.6	17.3		
<b>Total</b>	<b>485</b>	<b>83,160</b>	<b>33.3</b>	<b>19,613</b>	<b>19.4</b>	<b>5.2</b>	<b>4.7</b>	<b>19.2</b>	<b>17.1</b>	<b>14.4</b>	<b>24.0</b>	<b>16.5</b>	<b>18.5</b>	<b>37.4</b>	<b>40.6</b>	<b>45.1</b>	<b>0.0</b>	<b>20.6</b>	<b>17.3</b>		

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2018-20</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Non-MSA AA	20	5,425	100	5,576	0.0	0.0	0.0	11.2	10.0	11.2	82.7	90.0	80.6	6.0	0.0	9.1	0.0	0.0	0.0	
St. Cloud MSA AA	20	5,352	100	2,932	0.0	0.0	0.0	13.9	10.0	14.4	68.9	70.0	68.9	17.2	20.0	16.7	0.0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>10,777</b>	<b>100</b>	<b>8,508</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>12.1</b>	<b>10.0</b>	<b>12.3</b>	<b>77.9</b>	<b>80.0</b>	<b>76.5</b>	<b>9.8</b>	<b>10.0</b>	<b>11.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2018-20</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000s)	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA AA	20	\$5,425	100.0	5,576	85.9	95.0	45.3	4.2	5.0	9.9	0.0	
St. Cloud MSA AA	20	\$5,352	100.0	2,932	84.1	60.0	37.3	5.9	40.0	10.1	0.0	
<b>Total</b>	<b>40</b>	<b>\$10,777</b>	<b>100.0</b>	<b>8,508</b>	<b>85.3</b>	<b>77.5</b>	<b>42.5</b>	<b>4.8</b>	<b>22.5</b>	<b>10.0</b>	<b>0.0</b>	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%