



PUBLIC DISCLOSURE

February 13, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MidCountry Bank
Charter Number 702518

7825 Washington Avenue South, Suite 120
Bloomington, MN 55439

Office of the Comptroller of the Currency

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Minneapolis, MN 55402

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Outstanding

The Community Development (CD) Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on the combined ratings of Minnesota, Nevada, and Illinois listed in order of weight.
- The CD Test rating is based on combined ratings of Minnesota, Nevada, and Illinois listed in order of weight.
- The bank's loan-to-deposit ratio is more than reasonable, with a quarterly average of 103 percent during the evaluation period.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank received no CRA related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and the credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable. The bank's quarterly average LTD ratio is 103.1 percent. This represents the 12 quarters from January 1, 2016 through December 31, 2018. The ratio ranged from a high of 110.3 percent in the fourth quarter of 2018 to a low of 94.8 percent during the first quarter of 2016. The following table shows MCB's LTD ratio compared to similarly-situated financial institutions. Similarly-situated financial institutions are institutions operating within the bank's AAs and have similar lending products.

Loan-to-Deposit Ratio		
Institution	Assets as of 12/31/2018 (\$000)	Average LTD Ratio (%)
<i>MidCountry Bank</i>	<i>\$786,287</i>	<i>103.1%</i>
Deerwood Bank	\$713,817	87.2%
Premier Bank	\$796,738	83.6%
Sunrise Bank, National Association	\$1,127,209	80.4%
Minnesota Bank and Trust	\$666,564	77.1%

Source: Call report data

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 87.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

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	2,093	87.9	287	12.1	2,380	365,811	82.9	75,241	17.1	441,051
Small Business	31	77.5	9	22.5	40	66,652	64.0	37,599	36.0	104,251
Small Farm	30	75.0	10	25.0	40	13,261	92.3	1,100	7.7	14,361
Consumer	110	78.6	30	21.4	140	5,139	86.2	822	13.9	5,961
Total	2,264	87.1	336	12.9	2,600	450,863	79.7	114,762	20.3	565,625

Description of Institution

MidCountry Bank (MCB) is a federally chartered, stock savings association with total assets of \$762.3 million, as of December 31, 2019. The bank's home office is located in Bloomington, Minnesota. It offers a wide range of products and services through various subsidiaries and divisions including MidCountry Investments, MidCountry Insurance, and MidCountry Mortgage. MCB is wholly owned by MidCountry Acquisition Corp (MAC). MAC purchased the bank in November 2018. MAC acquired MCB from MidCountry Financial Corp., a bank holding company headquartered in Greenville, South Carolina. MAC is headquartered in Minneapolis, Minnesota. MCB had 14 branches in Minnesota, eight branches in Illinois, and one branch in Nevada. In addition, MCB operated 20 deposit-taking automated teller machines (ATMs); 12 in Minnesota, seven in Illinois, and one in Nevada. MCB sold the Illinois branches in August 2017.

MCB's primary focus was in both commercial and residential real estate lending. The bank also offered other traditional commercial, agricultural, and consumer products. Retail products include 1-4 family home loans, open- and closed-end home equity loans, construction loans, and consumer loans. Non-retail products include commercial, multi-family housing, and farm real estate loans, as well as commercial construction and business loans. As of December 31, 2019, the bank reported \$612.9 million in outstanding loans and had a net loans and leases to total assets ratio of 80 percent. The loan portfolio consisted of 56 percent commercial, 35 percent home mortgage, five percent agricultural, and two percent consumer loans.

The bank had six AAs in three states. Minnesota had three AAs: a portion of the Minneapolis Metropolitan Statistical Area (Minneapolis MSA), St. Cloud MSA, and Minnesota Non-MSA. Illinois had two AAs: Carbondale-Marion IL MSA (Carbondale MSA) and Illinois Non-MSA (IL Non-MSA). Nevada had only one AA: Las Vegas-Paradise MSA (Las Vegas MSA).

MidCountry received a "Satisfactory" rating at their last Community Reinvestment Act (CRA) evaluation, dated April 18, 2016. There are no financial, legal, or other factors impeding the bank's ability to help meet the credit needs in its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2016 through December 31, 2018. We determined MCB's primary loan products for each AA by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. MCB's primary loan products differed by AA and some AAs had two primary products. Consumer loans were a primary product in four of the six AAs. Home mortgage loans were a primary product in two AAs, and business and farm loans were each a primary product in one AA. Refer to the applicable Lending Test narratives under each Rating area section for details on loan products analyzed.

We selected initial samples of 20 loans for consumer, business, and farm loans for each AA in which it was a primary product. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distributions within each AA. We relied on Home Mortgage Disclosure Act (HMDA) data to complete our analysis of home mortgage loans. The evaluation period covered more than one census period, so data is analyzed and presented based on the applicable census period. Loans originated or purchased in 2016 were compared to 2010 U.S. Census data, and loans originated or purchased in 2017 and 2018 were compared to 2015 American Community Service (ACS) survey data.

The evaluation period for the CD test is January 1, 2016 through December 31, 2018. We reviewed CD loans, investments, donations, and services submitted by bank management. The activities that meet the definition of CD are included in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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) 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

The bank's overall rating is a blend of the three state ratings. Examiners placed the most weight on the bank's performance in the State of Minnesota because it represents the majority of the bank's deposits, loan originations and purchases, and branches during the evaluation period. Minnesota represented 97.4 percent of the bank's total deposits, 92.9 percent of branches, and 69 percent of loan originations by dollar volume. The State of Nevada is weighted second highest based upon loan volumes, representing 30.3 percent of loan originations by dollar. The State of Illinois received the least weight as branches were only open roughly half of the evaluation period and had minimal loan originations.

When determining conclusions for the Lending Test, we weighed loan products to be reflective of MCB's loan volume by product type during the evaluation period. We completed this analysis separately for each of the bank's AAs as lending volumes by product varied depending on the market

area. The 2017-2018 analysis period will receive more weight than the 2016 analysis period, as this period represents a larger portion of the bank's lending activity.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

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: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels in Minnesota is excellent.
- The distribution of loans to borrowers of different income levels and businesses and farms of different sizes in Minnesota is excellent.
- MCB's CD performance demonstrates adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Minnesota

MCB has three AAs located in Minnesota: a portion of the Minneapolis-St. Paul-Bloomington MN-WI MSA (Minneapolis MSA AA), MN Non-MSA AA, and St Cloud MSA AA. The Minneapolis MSA and MN Non-MSA AAs are located in central Minnesota. St. Cloud MSA is located just north of the Minneapolis MSA.

Minneapolis MSA AA

The Minneapolis MSA AA consists of Anoka, Carver, Dakota, Hennepin, Mille Lacs, Ramsey, Scott, Sherburne, Sibley, Washington and Wright counties. The Minneapolis MSA AA included 63 low-income, 148 moderate-income, 321 middle-income, 207 upper-income CTs, and four CTs not assigned an income designation for 2016. For 2017-2018, the AA consisted of 56 low-income, 173 moderate-income, 323 middle-income, 184 upper-income CTs, and seven CTs not assigned an income designation. MCB had ten branches located within the AA.

Deposit competition is high with 133 reporting institutions in the AA. According to the June 30th, 2018 FDIC Deposit Market Share Report, MCB ranked 29th out of 133 reporting institutions with \$352.7 million in deposits and a 0.19 percent deposit market share. The Minneapolis MSA deposit base represents 63.1 percent of total bank deposits as of June 30, 2018. MCB's major competitors are U.S. Bank and Wells Fargo Bank holding 38.24 percent and 36.41 percent deposit market share, respectively. All other institutions hold less than four percent deposit market share.

Economic conditions in the area improved. According to the Bureau of Labor Statistics, each county's unemployment rate decreased from 2016-2018. The unemployment rate in the Minneapolis MSA decreased from 3.9 percent in January 2016 to 2.8 percent in December 2018. The rate is slightly higher than the State of Minnesota's unemployment rate of 3.7 percent in January 2016 and 3.1 percent in December 2018.

We reviewed three community contacts representing affordable housing within the Minneapolis MSA. The contacts listed the greatest areas in need of assistance are the low- and moderate-income neighborhoods in north Minneapolis and St. Paul. All three organizations felt that involvement from larger financial institutions are good, but banks are still hesitant to get involved with any non-tax credit projects. Other mentions included awareness and knowledge of applicable bank products and services for low-income customers.

The following tables provide information on the demographic composition of the Minneapolis MSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis MN MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	743	7.5	23.3	43.5	24.8	0.9
Population by Geography	3,212,036	6.2	20.0	45.9	27.5	0.3
Housing Units by Geography	1,308,367	5.8	21.0	46.7	26.2	0.3
Owner-Occupied Units by Geography	859,748	2.3	16.3	49.5	31.8	0.1
Occupied Rental Units by Geography	382,305	13.0	30.9	40.5	14.7	0.9
Vacant Units by Geography	66,314	9.5	25.7	44.7	19.4	0.7
Businesses by Geography	236,281	4.8	17.4	47.4	30.1	0.3
Farms by Geography	6,536	1.5	14.4	56.1	27.8	0.1
Family Distribution by Income Level	799,621	20.4	17.4	22.0	40.3	0.0
Household Distribution by Income Level	1,242,053	23.7	16.1	18.5	41.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$228,678
			Median Gross Rent			\$963
			Families Below Poverty Level			7.0%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis MN MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	743	8.5	19.9	43.2	27.9	0.5
Population by Geography	3,104,089	6.6	17.2	45.8	30.3	0.1
Housing Units by Geography	1,277,275	6.6	18.5	46.5	28.4	0.0
Owner-Occupied Units by Geography	866,732	2.6	14.2	49.2	33.9	0.0
Occupied Rental Units by Geography	334,277	15.8	28.5	40.3	15.4	0.0
Vacant Units by Geography	76,266	11.6	24.6	42.2	21.6	0.0
Businesses by Geography	224,182	4.8	15.7	45.0	34.5	0.0
Farms by Geography	6,425	1.4	14.0	53.9	30.7	0.0
Family Distribution by Income Level	772,116	19.1	17.5	23.1	40.3	0.0
Household Distribution by Income Level	1,201,009	22.8	16.4	19.4	41.4	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$255,176
			Median Gross Rent			\$860
			Families Below Poverty Level			6.4%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

MN Non-MSA

The MN Non-MSA AA consists of McLeod and Meeker counties. The AA included no low-income CTs, no moderate-income CTs, ten middle-income CTs, and three upper-income CTs for 2016. For 2017-2018, the AA consisted of no low-income CTs, no moderate-income CTs, 12 middle-income CTs, and one upper-income CTs. MidCountry has three branches within the AA. There were no CTs designated as distressed and/or underserved by the FFIEC.

Deposit competition is low with 13 reporting institutions in the AA. According to the June 30th, 2018 FDIC Deposit Market Share Report, MCB is ranked 5th out of 13 reporting institutions with \$149.6 million in deposits and a 11.3 percent of total market share. The MN Non-MSA deposit base represents 26.8 percent of total bank deposits as of June 30, 2018. MCB's 2016 and 2017 deposit market share is similar with 2018. MCB's major competitors are Security Bank, Wells Fargo, Citizens Bank, and Center National bank holding 21.8 percent, 15.9 percent, 14.3 percent and 11.436 percent, respectively. All other institutions hold less than eight percent market share.

Economic conditions in the area improved. According to the Bureau of Labor Statistics, the unemployment rate in both counties decreased significantly from January 2016 to December 2018. Unemployment in McLeod and Meeker counties was 5.2 percent and 6.0 percent, respectively. Unemployment was significantly higher than the state average of 3.5 percent in January 2016. By

December 2018, unemployment rates in McLeod and Meeker counties improved to 3.8 percent and 4.3 percent, respectively, but remain higher than the state average of 3.1 percent.

We reviewed a community contact whose organization's focus is to support business and labor force needs for Meeker County, MN. The contact noted that affordable housing is the biggest need for Meeker County. Additionally, he stated there is little being done for affordable rents. The contact felt that banks need to improve communication with family housing needs. He noted he does not see bankers at community seminars and discussions.

The following tables provide information on the demographic composition of the MN Non-MSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	0.0	92.3	7.7	0.0
Population by Geography	59,175	0.0	0.0	92.8	7.2	0.0
Housing Units by Geography	26,434	0.0	0.0	93.6	6.4	0.0
Owner-Occupied Units by Geography	18,649	0.0	0.0	92.7	7.3	0.0
Occupied Rental Units by Geography	5,344	0.0	0.0	95.5	4.5	0.0
Vacant Units by Geography	2,441	0.0	0.0	96.5	3.5	0.0
Businesses by Geography	3,869	0.0	0.0	92.6	7.4	0.0
Farms by Geography	617	0.0	0.0	86.7	13.3	0.0
Family Distribution by Income Level	16,232	16.0	16.7	24.7	42.6	0.0
Household Distribution by Income Level	23,993	19.4	15.0	19.7	45.9	0.0
Median Family Income Non-MSAs - MN		\$63,182	Median Housing Value			\$154,768
			Median Gross Rent			\$685
			Families Below Poverty Level			5.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	0.0	76.9	23.1	0.0
Population by Geography	59,951	0.0	0.0	72.3	27.7	0.0
Housing Units by Geography	26,379	0.0	0.0	73.6	26.4	0.0
Owner-Occupied Units by Geography	19,254	0.0	0.0	72.5	27.5	0.0
Occupied Rental Units by Geography	4,650	0.0	0.0	78.2	21.8	0.0
Vacant Units by Geography	2,475	0.0	0.0	73.8	26.2	0.0
Businesses by Geography	3,840	0.0	0.0	72.2	27.8	0.0
Farms by Geography	717	0.0	0.0	68.9	31.1	0.0
Family Distribution by Income Level	16,986	13.2	16.1	24.7	45.9	0.0
Household Distribution by Income Level	23,904	16.8	14.7	18.9	49.6	0.0
Median Family Income Non-MSAs - MN		\$57,683	Median Housing Value			\$173,685
			Median Gross Rent			\$649
			Families Below Poverty Level			5.2%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

We completed full-scope reviews of the Minneapolis MSA and the MN Non-MSA AAs. The MN Non-MSA AA was limited-scope during the previous CRA evaluation but was added since both the Minneapolis MSA and the MN Non-MSA represent a majority of the state's branches, deposits, and lending. The St. Cloud MSA will remain a limited-scope review this evaluation.

The Minneapolis MSA AA was weighted most heavily, followed by the MN Non-MSA AA. The Minneapolis MSA has 69 percent of branches, 79 percent of loan originations by number, and 65 percent of deposits in the State of Minnesota. The MN Non-MSA has 23 percent of branches, 18 percent of loan originations by number, and 27 percent of deposits in the State of Minnesota.

Primary products used in the geographic and borrower distribution analyses varied based on the AA. Primary products in the Minneapolis MSA were business and home mortgage loans. Business loans received more weight as they accounted for 67 percent of originations by dollar within the AA. Farm loans were the sole primary product in the MN Non-MSA AA with 91 percent of originations by dollar within this AA. Home mortgage and consumer loans were primary products in the St. Cloud MSA. Home mortgage lending received more weight as they represented 47 percent of originations by dollar during the evaluation period.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Based on full-scope and limited-scope reviews, the bank's lending performance in the State of Minnesota is excellent.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Refer to Table Q in the State of Minnesota section 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.

Minneapolis MSA

The overall geographic distribution of small loans to businesses is excellent.

During the 2017-2018 analysis period, the distribution of small loans to businesses is excellent. The percentage of small business loans made in low-income geographies exceeded both the percentage of businesses and aggregate lenders in those geographies. The proportion of loans in the moderate-income geographies was near the percentage of businesses but exceeded aggregate lenders in those geographies.

During the 2016 analysis period, the distribution of small loans to businesses is adequate. The percentage of small business loans made in the both the low- and moderate-income geographies was below the percentage of businesses and somewhat below aggregate lenders in those geographies.

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.

Minneapolis MSA

The geographic distribution of home mortgage lending is excellent.

During the 2017-2018 analysis period, the distribution of loans is excellent. The proportion of loans in both low- and moderate-income geographies significantly exceeded the proportion of owner-occupied housing units and aggregate lending.

During the 2016 analysis period, the distribution of loans is excellent. The proportion of loans in both low- and moderate-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending.

Small Loans to Farms

Refer to Table S in the State of Minnesota section 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 farms.

MN Non-MSA

The MN Non-MSA AA contained no low- or moderate-income geographies so analysis is not meaningful.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes.

Small Loans to Businesses

Refer to Table R in the State of Minnesota section 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.

Minneapolis MSA

The overall borrower distribution of small loans to businesses is adequate.

During the 2017-2018 analysis period, the distribution of loans to businesses by revenue is adequate. The percentage of small business loans was significantly below the percentage of small businesses but was near to the percentage of aggregate lenders in the AA.

The 2016 analysis period was consistent with the 2017-2018 analysis period and is adequate. The distribution for the 2016 analysis period is good and was consistent with the 2017-2018 analysis period.

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.

Minneapolis MSA

The borrower distribution of home mortgage lending is excellent.

During the 2017-2018 analysis period, the borrower distribution of home mortgage loans to borrowers of different income levels is excellent. The percentage of loans to both low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income families and aggregate lending.

During the 2016 analysis period, the borrower distribution of home mortgage loans to borrowers of different income levels is excellent. The percentage of loans to low-income borrowers was below the percentage of low-income families but significantly exceeded aggregate lending. The percentage of loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Farms

Refer to Table T in the State of Minnesota section 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 farms.

MN Non-MSA

The overall borrower distribution of small loans to farms is excellent.

During the 2017-2018 analysis period, the distribution of loans to farms by revenue is excellent. The percentage of small farm loans was below the percentage of small farms but significantly exceeded aggregate lenders in the AA.

The 2016 analysis period is consistent with the 2017-2018 analysis period and is excellent.

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the St. Cloud MSA is consistent with the bank’s overall performance under the Lending Test in the full scope areas.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test in the State of Minnesota is rated Satisfactory.

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AAs.

Number and Amount of Community Development Loans

The CD Loans table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$

Minneapolis MSA	16	94.1	\$56,038	91.2%
MN Non-MSA	0	0.0	\$0	0%
St. Cloud MSA	1	5.9	\$5,400	8.8%
Total	17	100.0	\$61,438	100.0%

Minneapolis MSA

Management originated 16 CD loans totaling \$56 million that benefited the Minneapolis MSA during the evaluation period. The largest volume of CD loans supported affordable housing initiatives such as loans for rental properties where greater than 50 percent of units are below market rent. The bank also originated a loan for a grocery store in a low-income census tract.

MN Non-MSA

Management did not originate any CD loans during the evaluation period.

Number and Amount of Qualified Investments

The Qualified Investment table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MSA	0	0	15	82	15	51.7	82	11.7	0	0
MN Non-MSA	0	0	1	5	1	3.5	5	0.7	0	0
St. Cloud MSA	0	0	13	612	13	44.8	612	87.6	0	0
Total	0	0	29	699	29	100.0	699	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Minneapolis MSA

MidCountry made 15 qualified investments totaling \$82 thousand in the Minneapolis MSA during the evaluation period. Qualified investments were comprised entirely of donations. Donations primarily supported affordable housing, which is identified as a primary credit need in the AA.

MN Non-MSA

MidCountry made one qualified investment totaling \$5 thousand in the MN Non-MSA AA during the evaluation period. The donation supported affordable housing for LMI.

Extent to Which the Bank Provides Community Development Services

Minneapolis MSA

During the evaluation period, 32 employees in the Minneapolis MSA AA, or approximately 15 percent of all employees working in the AA, provided services to 16 different organizations. These organizations provided community services to LMI individuals and supported affordable housing

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

initiatives. Of the services performed, 15 employees demonstrated leadership by serving on the Board of Directors or as a committee member for these organizations. For example, one employee served on the Board of Directors in a moderate-income CT where the organization provides education, job training, and placement services to eliminate barriers to employment. Another employee served on the Board of Directors of an organization focusing on preservation of affordable housing.

MN Non-MSA

During the evaluation period, two employees, or approximately four percent of all employees in the AA, provided services to two different organizations and both served in a leadership capacity. One employee served on the Board of Directors to an entity aiding those affected by domestic violence, and the other employee served on the Board of Directors for an entity which safeguards affordable housing programs.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the St. Cloud MSA AA is stronger than the bank's overall satisfactory performance under the CD Test in the full scope areas. MCB's performance in the St. Cloud MSA was outstanding with respect to CD loans, investments, and services.

State Rating

State of Nevada

CRA rating for the State of Nevada: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels in Nevada is reasonable.
- The distribution of loans to borrowers of different income in Nevada is reasonable.
- MCB's CD performance demonstrates adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Nevada

MCB has one AA, the Las Vegas MSA AA, which includes all of Clark county. The Las Vegas MSA AA included 28 low-income, 113 moderate-income, 201 middle-income, and 145 upper-income CTs in 2016. For 2017-2018, the AA consisted of 28 low-income, 128 moderate-income, 181 middle-income, 149 upper-income CTs, and one CT not assigned an income designation. The bank had one branch and one deposit-taking ATM open during the evaluation period. These were later closed in September 2019.

Deposit competition is high with 40 reporting institutions in the AA. According to the June 30, 2018 FDIC Deposit Market Share Report, MCB ranked 36th out of 40 reporting institutions with \$14.7 million in deposits and a .01 percent market share. The Las Vegas MSA deposits represent 2.6 percent of total bank deposits as of June 30, 2018. MCB's 2016 deposit market share is similar to 2017-2018. MCB's major competitor is Charles Schwab Bank holding 73.6 percent market share. All other institutions hold less than ten percent.

Economic conditions in the area improved. According to the Bureau of Labor Statistics, Clark County's unemployment rate decreased from 5.9 percent in 2016 to 4.8 percent in 2018.

We reviewed comments from a 2016 listening session for community organizations that held discussions with leaders working for local governments, economic development organizations, and nonprofits. Contacts noted that workers were unable to find full employment, the cost of living was increasing, and low-income housing construction projects were not being built. Contacts identified several needs for the Las Vegas MSA, including down payment assistance for homeownership, financial literacy programs, and loan accessibility for small business. More recent information suggests economic activity reaching pre-recession levels and tourism and gaming recoveries since the great recession. Local government and small business development organization have been trying to diversify the economy by helping non-gaming smaller businesses and startups. Affordable housing and financial education are also needs identified. Contacts noted that banks were supportive of local programs but grant dollars have shrunk and banks can do more. Banks are supportive of community development financial institutions (CDFIs) but more could be done to develop referral relationships.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Las Vegas MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	106,481	3.8	22.4	38.2	35.0	0.7
Farms by Geography	1,578	2.3	20.6	41.6	35.4	0.1
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$169,213
			Median Gross Rent			\$1,032
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Las Vegas MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	23.2	41.3	29.8	0.0
Population by Geography	1,951,269	5.3	22.8	42.2	29.7	0.0
Housing Units by Geography	812,840	5.8	23.7	42.3	28.2	0.0
Owner-Occupied Units by Geography	405,047	1.7	15.5	45.7	37.1	0.0
Occupied Rental Units by Geography	290,654	10.8	33.2	39.2	16.8	0.0
Vacant Units by Geography	117,139	7.5	28.4	38.2	25.9	0.0
Businesses by Geography	94,127	5.1	21.0	42.4	31.5	0.0
Farms by Geography	1,497	1.9	18.0	46.3	33.8	0.0
Family Distribution by Income Level	457,592	20.1	18.0	22.0	39.9	0.0
Household Distribution by Income Level	695,701	21.7	17.6	19.8	40.9	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$63,888	Median Housing Value			\$253,307
			Median Gross Rent			\$1,061
			Families Below Poverty Level			8.7%

Source: 2010 U.S. Census and 2016 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Nevada

We completed a full-scope review of the Las Vegas MSA as it is the only AA within the State of Nevada. The State of Nevada rating is based entirely on performance within the Las Vegas MSA.

The primary product in the Las Vegas MSA was consumer loans. Consumer loans represented 98 percent of loan originations by dollar in this AA during the evaluation period.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the State of Nevada is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Consumer Loans

Refer to Table U in the State of Nevada 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 overall geographic distribution of loans to consumers is good.

During the 2017-2018 analysis period, the distribution of consumer loans is good. The percentage of consumer loans made in moderate-income tracts exceeded the percentage of households in those geographies. However, no loans within our sample were made within low-income tracts. These tracts are located approximately five miles and more from the bank's branch location, with multiple other financial institutions in closer proximity. Five percent of households in the AA are located within low-income census tracts. Thirty-six percent of those households living in the low-income census tracts are below poverty level, making it difficult to qualify for loans. Given these factors, the bank's performance is reasonable.

During the 2016 analysis period, the distribution of consumer loans is good. The percentage of consumer loans made in the moderate-income geographies was slightly below the percentage of households in those geographies. Lending to low-income tracts was significantly lower than the demographic comparator but considered reasonable given similar factors presented above.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Consumer Loans

Refer to Table V in the State of Nevada 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 is good.

During the 2017-2018 analysis period, the borrower distribution of consumer loans is good. The percentage of loans made to moderate-income borrowers was near to the percentage of moderate-income households. The percentage of loans made to low-income borrowers was significantly below the percentage of low-income households, but reasonable considering 13.8 percent of households are below poverty level.

During the 2016 analysis period, the borrower distribution of consumer loans is good. The percentage of loans made to moderate-income borrowers significantly exceeded the percentage of moderate-income households. Lending to low-income borrowers was consistent with 2017-2018 lending performance.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the State of Nevada is rated Satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

MCB did not originate any CD loans within the Las Vegas MSA during the evaluation period.

Number and Amount of Qualified Investments

The Qualified Investment table, shown below, sets forth the information and data used to evaluate the

bank’s level of qualified CD investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Las Vegas MSA	0	\$0	4	\$501	4	100%	\$501	100%	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, MCB made four qualified investments and donations totaling \$501 thousand in the Las Vegas MSA. The bank donated to a local food bank and made three qualified investments into a CRA Qualified Investment Fund which benefited LMI by providing affordable housing.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, one employee, or approximately 20 percent of all employees working in the AA, provided services to one organization. The employee served on an advisory council to discuss fundraising efforts to end hunger in the Las Vegas MSA.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

State Rating

State of Illinois

CRA rating for the State of Illinois: Needs to Improve

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Needs to Improve

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels in Illinois is excellent.
- The distribution of loans to borrowers of different income levels in Illinois is reasonable.
- MCB's CD performance demonstrates poor responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Illinois

MCB had two AAs, the Carbondale MSA (Carbondale AA) and IL Non-MSA AA, both located in Southern Illinois. MCB had four branches within the AA for a portion of the evaluation period but all were sold in August of 2017.

Carbondale MSA

The Carbondale AA includes Jackson and Williamson counties in Illinois. The AA included one low-income, eight moderate-income, 14 middle-income, and six upper-income CTs for 2016. For 2017-2018, the AA included two low-income, six moderate-income, 12 middle-income, seven upper-income, and two CTs not assigned an income designation.

Deposit competition is moderate with 19 reporting institutions in the AA. According to the June 30, 2017 FDIC Deposit Market Share Report, MidCountry ranked 13th out of 25 reporting institutions with \$58.5 million in deposits and a 2.75 percent deposit market share. The Carbondale MSA deposit base represented 8.4 percent of total bank deposits as of June 30, 2017, similar to 2016. Competitors First Southern Bank, Banterra Bank, and the Bank of Herrin held 21.2 percent, 11.4 percent, and 10.6 percent deposit market share, respectively. All other institutions held less than ten percent of deposit market share.

Economic conditions improved over the evaluation period. According to the Bureau of Labor Statistics, Carbondale MSA's unemployment rate decreased from 6.8 percent in January 2016 to 5.2 percent in December 2018. However, both unemployment rates were significantly higher than the state's unemployment of 6.1 percent and 4.4 percent, respectively. The Illinois Budget Impasse, a 793-day long budget crisis in the State of Illinois, affected fiscal years 2016 through part of 2018. Many state agencies had to cut services and the impasse affected most local economies.

We reviewed a community contact whose focus is helping improve the economy and quality of life in rural Illinois. The organization supports loans, grants and loan guarantees for individual housing projects, economic development and small businesses. The contact noted that Jackson and Williamson counties (within the Carbondale MSA) are experiencing some economic growth with small increases in population/labor force. From the contact's vantage point, banks within the MSA do a good job lending to low- and moderate-income customers and that banks do utilize the USDA Guaranteed Program. The contact noted the biggest credit disadvantage that the AA has is difficulty finding comparable sales for appraisals in communities under 500 people. Other information available also identified opportunities for lending to small businesses and lower-income consumers.

The following tables provide information on the demographic composition of the Carbondale MSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Carbondale IL MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	20.7	41.4	24.1	6.9
Population by Geography	126,655	9.5	15.9	42.3	26.8	5.5
Housing Units by Geography	59,329	8.5	17.1	41.9	25.8	6.7
Owner-Occupied Units by Geography	31,666	2.4	16.0	47.7	32.8	1.1
Occupied Rental Units by Geography	18,520	16.8	17.7	34.6	16.8	14.2
Vacant Units by Geography	9,143	13.1	19.9	36.3	19.9	10.8
Businesses by Geography	6,609	8.7	18.3	44.3	24.6	4.1
Farms by Geography	302	3.6	21.2	43.0	31.5	0.7
Family Distribution by Income Level	30,141	21.8	18.4	18.7	41.2	0.0
Household Distribution by Income Level	50,186	27.7	13.7	16.5	42.2	0.0
Median Family Income MSA - 16060 Carbondale-Marion, IL MSA		\$56,287	Median Housing Value			\$103,030
			Median Gross Rent			\$669
			Families Below Poverty Level			13.5%
<i>Source: 2015 ACS Census and 2017 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Carbondale IL MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	27.6	48.3	20.7	0.0
Population by Geography	126,575	5.5	24.0	49.1	21.4	0.0
Housing Units by Geography	58,343	3.7	28.4	46.4	21.6	0.0
Owner-Occupied Units by Geography	32,304	1.5	16.5	56.1	26.0	0.0

Occupied Rental Units by Geography	17,793	6.5	44.8	31.9	16.8	0.0
Vacant Units by Geography	8,246	6.4	39.6	39.4	14.7	0.0
Businesses by Geography	6,566	2.7	43.9	34.3	19.1	0.0
Farms by Geography	289	2.8	15.2	64.7	17.3	0.0
Family Distribution by Income Level	29,548	22.3	16.5	20.0	41.2	0.0
Household Distribution by Income Level	50,097	27.6	13.6	16.6	42.2	0.0
Median Family Income MSA - 16060 Carbondale-Marion, IL MSA		\$50,689	Median Housing Value			\$97,594
			Median Gross Rent			\$579
			Families Below Poverty Level			15.0%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

We completed a full-scope review of the Carbondale MSA and a limited-scope review of the IL Non-MSA AA. During the last evaluation, the IL Non-MSA AA received a full-scope review while the Carbondale MSA AA received a limited-scope review.

The Carbondale MSA AA was weighted most heavily in the analysis with 55 percent of loan originations by dollar volume originated within the State of Illinois.

Consumer loans were the primary products in both the Carbondale MSA and IL Non-MSA AAs. Consumer loans accounted for 77 percent and 78 percent, respectively, of originations by number within each AA. Branches in both AAs were sold in August 2017. Our analysis will focus on the 2016 analysis period, since there was insufficient lending volume in the 2017-2018 analysis period for meaningful analysis.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Based on full-scope and limited-scope reviews, the bank's lending performance in the State of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

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

Consumer Loans

Refer to Table U in the State of Illinois 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 loans to consumers is excellent. During the 2016 analysis period, the percentage of consumer loans made in moderate-income tracts exceeded the percentage of households in those geographies. Lending in low-income tracts was near to the percent of households in those geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Consumer Loans

Refer to Table V in the State of Illinois 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 loans to consumers is good. During the 2016 analysis period, the percentage of consumer loans made in moderate-income tracts significantly exceeded the percentage of households in those geographies. Lending in low-income tracts was significantly below the percent of households in those geographies but considered reasonable given the disproportionate impact of the poverty level on lending opportunities to low-income households. Approximately twenty-three percent of households were below poverty level.

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the IL Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the State of Illinois is rated Needs to Improve.

Based on full-scope and limited-scope reviews, the bank exhibits poor responsiveness to CD needs in the state through CD loans, qualified investments, and CD services given the bank's capacity and AAs needs. CD investments and services are limited compared to opportunities available within the AAs.

Number and Amount of Community Development Loans

The CD Loans table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Carbondale MSA	2	66.7%	\$3,978	95.6%
IL Non-MSA	1	33.3%	\$184	4.4%
Total	3	100.0%	\$4,162	100.0%

MCB originated two loans totaling \$3.9 million in the Carbondale MSA during the evaluation period. Both loans supported economic development initiatives by financing SBA 504 loans in a moderate-income CT. SBA loans are loan programs that offer small businesses another avenue for business financing, while promoting business growth, and job creation.

Number and Amount of Qualified Investments

The Qualified Investments table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Carbondale MSA	0	\$0	4	\$4	4	66.7%	\$4	66.7%	0	0
IL Non-MSA	0	\$0	2	\$2	2	33.3%	\$2	33.3%	0	0
Total	0	\$0	6	\$6	6	100.0%	\$6	100.0%	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

MCB made four qualified investments totaling \$4 thousand in the Carbondale MSA during the evaluation period. Qualified investments were comprised entirely of donations. The donations supported emergency shelters, transitional housing, and other needs for the homeless.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, no employees served in a CD capacity in the Carbondale MSA.

Conclusions for Area Receiving a Limited Scope Review

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Based on a limited-scope review, the bank's performance under the CD Test in the IL Non-MSA is weaker than the bank's overall performance under the CD Test in the full scope area and had a negative impact on the overall conclusions in the State of Illinois. MCB made minimal CD loans and qualified investments in the IL Non-MSA. One CD loan was made totaling \$184 thousand. Qualified investments, consisting entirely of donations, totaled two thousand dollars.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	Lending Test: 01/01/2016 to 12/31/2018 Community Development Test: 01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Commercial (Minneapolis MSA) Consumer (St. Cloud MSA, Carbondale MSA, IL Non-MSA, Las Vegas MSA) Residential Real Estate (Minneapolis MSA, St. Cloud MSA) Ag loans (Minnesota Non-MSA) Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota:		
Minneapolis MSA	Full-Scope	Anoka, Carver, Dakota, Hennepin, Mille Lacs, Ramsey, Scott, Sherburne, Sibley, Washington, and Wright Counties.
Minnesota Non-MSA	Limited Scope	McLeod and Meeker County
St. Cloud MSA	Full-Scope	Benton and Stearns County
Nevada:		
Las Vegas MSA	Full-Scope	Clark County
Illinois:		
Carbondale MSA	Full-scope	Jackson and Williamson County
Illinois Non-MSA	Limited-scope	Franklin, Jefferson, Johnson, Massac, Pulaski, and Union Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS MidCountry Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
MidCountry Bank	Outstanding	Satisfactory	Satisfactory
State:			
Minnesota	Outstanding	Satisfactory	Satisfactory
Nevada	Satisfactory	Satisfactory	Satisfactory
Illinois	Satisfactory	Needs to Improve	Needs to Improve

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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.

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

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table 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.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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.

MINNESOTA

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018
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
Minneapolis MSA	60	40,641	100.0	67,660	4.8	5.0	4.2	17.4	16.7	15.8	47.4	60.0	47.4	30.1	18.3	32.4	0.3	0.0	0.2
Total	60	40,641	100.0	67,660	4.8	5.0	4.2	17.4	16.7	15.8	47.4	60.0	47.4	30.1	18.3	32.4	0.3	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
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
Minneapolis MSA	60	95,600	100.0	75,683	4.8	1.7	3.7	15.7	11.7	13.8	45.0	60.0	43.1	34.5	26.7	39.5	0.0	0.0	0.0
Total	60	95,600	100.0	75,683	4.8	1.7	3.7	15.7	11.7	13.8	45.0	60.0	43.1	34.5	26.7	39.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-2018**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	60	40,641	100.0	67,660	84.3	48.3	53.2	6.7	51.7	9.1	0.0
Total	60	40,641	100.0	67,660	84.3	48.3	53.2	6.7	51.7	9.1	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	60	95,600	100.0	75,683	83.9	38.3	46.8	7.0	61.7	9.1	0.0
Total	60	95,600	100.0	79,345	83.8	38.3	46.6	7.0	61.7	9.3	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018	
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	
Minneapolis MSA	1,155	214,734	96.7	132,709	2.3	9.8	3.0	16.3	27.3	16.6	49.5	46.7	49.8	31.8	16.3	30.5	0.1	0.0	0.1	
St Cloud MSA	39	8,924	3.3	5,951	0.0	0.0	0.0	7.9	10.3	10.0	76.5	79.5	73.8	15.7	10.3	16.2	0.0	0.0	0.0	
Total	1,194	223,657	100.0	138,660	2.2	9.5	2.9	15.8	26.7	16.3	51.0	47.7	50.8	30.9	16.1	29.9	0.1	0.0	0.1	

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Minneapolis MSA	626	112,455	97.2	158,395	2.6	3.5	2.5	14.2	16.6	12.7	49.2	54.2	49.3	33.9	25.7	35.6	0.0	0.0	0.0	
St Cloud MSA	18	2,987	2.8	6,713	0.0	0.0	0.0	12.5	27.8	11.9	80.0	72.2	78.8	7.5	0.0	9.3	0.0	0.0	0.0	
Total	644	115,442	100.0	165,108	2.5	3.4	2.4	14.1	16.9	12.6	51.0	54.7	50.5	32.5	25.0	34.5	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
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		
Minneapolis MSA	1,155	214,734	95.7	132,709	20.4	28.3	9.2	17.4	39.5	21.8	22.0	17.1	22.0	40.3	13.3	29.6	0.0	1.7	17.3		
St Cloud MSA	39	8,924	4.3	5,951	20.0	5.1	7.9	17.5	28.2	22.7	23.0	28.2	22.2	39.5	23.1	31.2	0.0	15.4	16.0		
Total	1,194	223,658	100.0	138,660	20.4	27.6	9.2	17.4	39.1	21.8	22.1	17.5	22.0	40.2	13.7	29.7	0.0	2.2	17.3		

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016		
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		
Minneapolis MSA	626	112,455	97.2	158,395	19.1	16.8	7.9	17.5	33.5	19.5	23.1	26.0	21.7	40.3	20.4	33.2	0.0	3.2	17.6		
St Cloud MSA	18	2,987	2.8	6,713	19.1	11.1	9.1	17.0	38.9	22.4	26.1	16.7	22.9	37.7	16.7	30.9	0.0	16.7	14.6		
Total	644	115,442	100.0	165,108	19.1	16.6	8.0	17.5	33.7	19.6	23.3	25.8	21.8	40.2	20.3	33.1	0.0	3.6	17.5		

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018	
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	
St Cloud MSA	20	647	100.0	0.0	0.0	13.4	10.0	72.7	65.0	13.9	25.0	0.0	0.0	
Total	20	647	100.0	0.0	0.0	13.4	10.0	72.7	65.0	13.9	25.0	0.0	0.0	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
St Cloud MSA	27	521	100.0	0.0	0.0	19.4	7.4	74.0	88.9	6.6	3.7	0.0	0.0	
Total	27	521	100.0	0.0	0.0	19.4	7.4	74.0	88.9	6.6	3.7	0.0	0.0	

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

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

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
St Cloud MSA	20	647	100.0	23.7	15.0	16.0	15.0	19.4	15.0	40.9	55.0	0.0	0.0
Total	20	647	100.0	23.7	15.0	16.0	15.0	19.4	15.0	40.9	55.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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 **2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
St Cloud MSA	20	431	100.0	23.0	15.0	16.9	25.0	19.3	20.0	40.7	40.0	0.0	0.0
Total	20	431	100.0	23.0	15.0	16.9	25.0	19.3	20.0	40.7	40.0	0.0	0.0

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-2018**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MN Non MSA	20	2,540	100.0	147	0.0	0.0	0.0	0.0	0.0	0.0	86.7	60.0	85.0	13.3	40.0	15.0	0.0	0.0	0.0
Total	20	2,540	100.0	147	0.0	0.0	0.0	0.0	0.0	0.0	86.7	60.0	85.0	13.3	40.0	15.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MN Non MSA	20	6,392	100.0	136	0.0	0.0	0.0	0.0	0.0	0.0	68.9	70.0	77.9	31.1	30.0	22.1	0.0	0.0	0.0
Total	20	6,392	100.0	136	0.0	0.0	0.0	0.0	0.0	0.0	68.9	70.0	77.9	31.1	30.0	22.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MN Non MSA	20	2,540	100.0	147	98.1	90.0	38.1	1.1	10.0	0.8	0.0
Total	20	2,540	100.0	147	98.1	90.0	38.1	1.1	10.0	0.8	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MN Non MSA	20	6,392	100.0	136	98.2	85.0	41.9	1.3	15.0	0.6	0.0
Total	20	6,392	100.0	136	98.2	85.0	41.9	1.3	15.0	0.6	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

NEVADA

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018	
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	
Las Vegas MSA	60	385	100.0	5.1	0.0	24.5	25.0	39.4	72.7	30.8	2.3	0.1	0.0	
Total	60	385	100.0	5.1	0.0	24.5	25.0	39.4	72.7	30.8	2.3	0.1	0.0	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Las Vegas MSA	60	1,605	100.0	5.5	1.7	22.9	20.0	43.0	48.3	28.6	30.0	0.0	0.0	
Total	60	1,605	100.0	5.5	1.7	22.9	20.0	43.0	48.3	28.6	30.0	0.0	0.0	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2017-2018**

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
Las Vegas MSA	60	387	100.0	22.6	8.3	17.0	13.3	18.8	46.7	41.6	31.7	0.0	0.0
Total	60	387	100.0	22.6	8.3	17.0	13.3	18.8	46.7	41.6	31.7	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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 **2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Las Vegas MSA	60	1,605	100.0	21.7	6.7	17.6	30.0	19.8	45.0	40.9	18.3	0.0	0.0
Total	60	1,605	100.0	21.7	6.7	17.6	30.0	19.8	45.0	40.9	18.3	0.0	0.0

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

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Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Carbondale MSA	32	719	61.5	3.2	3.1	26.5	28.1	47.5	59.3	22.7	9.4	0.0	0.0	
IL Non MSA	20	587	38.5	1.0	0.0	36.3	30.0	60.1	70.0	2.6	0.0	0.0	0.0	
Total	52	1,306	100.0	2.1	1.9	31.5	28.8	53.9	63.5	12.5	5.8	0.0	0.0	

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

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Carbondale MSA	32	719	78.1	27.6	9.4	13.6	28.1	16.6	31.3	42.2	31.3	0.0	0.0	
IL Non MSA	20	587	21.9	27.8	20.0	18.3	15.0	18.2	35.0	35.8	30.0	0.0	0.0	
Total	52	1,306	100.0	27.7	13.5	16.0	23.1	17.4	32.7	39.0	30.8	0.0	0.0	

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