



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

December 15, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bremer Bank, National Association
Charter Number: 23300

605 Second Street
Menomonie, WI 54751

Office of the Comptroller of the Currency

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of **Bremer Bank, National Association** with respect to the lending, investment, and service tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Bremer’s lending performance within the Menomonie assessment area was excellent.
- The bank provided an excellent level of qualified investments. The qualified investments consist primarily of charitable contributions that address social service needs.
- Bremer’s delivery systems are reasonably accessible to low- and moderate-income individuals. Bank personnel provide an excellent level of finance expertise through participation in community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low- and moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 do 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 applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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.

Description of Institution

Bremer Bank, National Association (Bremer) has its main office located in Menomonie, Wisconsin. It operates sixteen additional offices located in Ashland, Bayfield, Burnett, Dunn, Polk and St. Croix Counties in Wisconsin. Bremer also operates 10 automated teller machines (ATMs) in Wisconsin, including two deposit-taking ATMs. In November 2007, Bremer closed its office in Danbury, Wisconsin and opened a new branch just down the street. There have been no other branch changes, mergers or acquisitions during this evaluation period.

Bremer is a subsidiary of Bremer Financial Corporation (BFC). BFC is a \$7.3 billion financial services company with banking affiliates in over 100 locations throughout Minnesota, North Dakota and Wisconsin. BFC non-bank affiliates include trust and insurance companies. BFC is owned by the Otto Bremer Foundation (Foundation) and its employees. The Foundation is headquartered in St. Paul, MN. The Foundation's profits are distributed to support nonprofit activities through its grant-making activities in communities served by BFC affiliates. At Bremer's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test performance.

As of December 31, 2007, Bremer had total assets of just over \$600 million and held \$40 million in Tier 1 Capital. As of December 31, 2007, Bremer's \$387 million loan portfolio consisted of 46% commercial loans, 32% residential real estate loans, 17% agricultural loans and 5% consumer loans, representing 64% of total assets.

There are no financial, legal, or other factors that impede Bremer's ability to help meet the credit needs of its AAs. Bremer received an "Outstanding" rating at its last CRA evaluation dated June 27, 2005.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Bremer's small business, small farm, and home mortgage data for the period January 1, 2004 through December 31, 2007. We used 2007 peer lending data, the most recent available, to compare Bremer's lending performance to other reporting lenders in the assessment areas. Loan products are weighted based on the distribution of originated loans by number. Due to the minimal number of multifamily loan originations, analysis of that data was not meaningful and was not used in this analysis.

For community development loans, investments and services, the evaluation period was January 1, 2005 through December 31, 2007.

Data Integrity

Prior to conducting this evaluation, we tested the accuracy of Bremer's HMDA, small loans to businesses, and small loans to farms data. We found the data to be accurate and used the data in this evaluation.

We also reviewed information on community development loans, investments, and services provided by Bremer management to ensure they met the regulatory definition of community development. The few that did not meet this definition were excluded from this evaluation.

Selection of Areas for Full-Scope Review

All of Bremer's assessment areas (AAs) are located within the state of Wisconsin. We selected the Menomonie AA to receive a full-scope review as loan originations in that AA represented 75% of the total number throughout the evaluation period. This AA also contains 80% of Bremer's deposits within Wisconsin and 71% of their branch locations. The St. Croix and Bayfield AAs received limited-scope reviews due to their lesser impact upon Bremer's overall performance.

Ratings

Bremer's rating is based predominately upon our findings related to the AA that received a full-scope review, the Menomonie AA. While considered, data related to the AAs that received limited-scope reviews, was given less weight in our analyses.

Other

We made two community contacts during this evaluation from the Menomonie AA with direct knowledge of the business and real estate markets. Information obtained from these contacts helped to confirm the AA performance context, opportunities for local financial institutions to meet credit needs and make qualified investments, and the perceived performance of the financial institutions operating within the AA.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Area Receiving Full-Scope Review

Bremer's performance under the Lending Test in the Menomonie AA is excellent. Bremer's lending activity and distribution of loans by income is excellent. Bremer's geographic distribution of loans is adequate.

Lending Activity

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity.

Bremer ranks first in deposit market share among 32 financial institutions operating in the AA. As of June 30, 2008, Bremer had 28% of the market. Refer to the market profile in the appendix for detailed demographic and other performance context information for the AA.

Bremer's loan market share performance was strongest for home mortgage refinance loans, small loans to businesses, and small loans to farms. With the exception of small loans to farms, the market leaders in each loan category are large financial institutions based outside of the AA.

Based upon 2007 peer mortgage data, Bremer ranked second out of 276 financial institutions that reported HMDA loans in 2007. During the evaluation period and within the AA, Bremer's 1,619 home mortgage loans totaled \$143 million and represented a 5.66% market share. This market share data also detailed that Bremer ranked fifth for home purchase loans with a market share of 5.45%, eleventh for home improvement loans with a market share of 2.17%, and second for home mortgage refinance loans with a market share of 6.16%.

During the evaluation period and within the Menomonie AA, Bremer originated 1,425 small loans to businesses totaling \$130 million. Based upon 2007 peer small business data, Bremer ranked fifth out of 33 financial institutions reporting this data with a market share of 7.73%.

During the evaluation period and within the Menomonie AA, Bremer originated 1,251 small loans to farms totaling \$78 million. Based upon 2007 peer small business data, Bremer ranked first out of 16 financial institutions reporting this data with a market share of 57.91%.

Distribution of Loans by Income Level of the Geography

Bremer's geographic distribution of loans by income level of geographies in the Menomonie AA is adequate. The AA is comprised of 24 census tracts. None of these tracts are designated as low-income and only one small tract near the northwest corner of the AA is designated as moderate-income. While rated, this factor is not weighted heavily in the bank's overall Lending Test rating given the limited amount of moderate-income census tracts in the AA.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. Bremer's geographic distribution of home mortgage loans in the Menomonie AA is considered good when considering that only 2.33% of the owner-occupied housing units are located in this census tract.

Home Purchase Loans

Bremer's geographic distribution of home purchase loans is good. The percentage of loans originated from the moderate-income census tract is near to the percentage of its owner-occupied units. However, Bremer's market share of home purchase loans to this moderate-income tract is significantly lower than their overall market share.

Home Improvement Loans

Bremer had no penetration in the moderate-income census tract for home improvement lending. As Bremer originated only 76 home improvement loans during the entire evaluation period, this lack of performance in the moderate-income census tract is not given substantial consideration.

Home Refinance Loans

Bremer's geographic distribution of home refinance loans is good. The percentage of loans originated in the moderate-income geography is near to the percentage of owner-occupied units. Bremer's market share of home refinance loans to the moderate-income geography exceeds their overall market share and represents excellent performance.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Bremer's geographic distribution of small loans to businesses in the Menomonie AA is very poor. Bremer originated small loans to businesses in the moderate-income tract of the AA at a level significantly lower than the percentage of businesses within that geography. Similarly, Bremer's market share of such loans in this geography was significantly lower than its overall market share.

We noted that there are 202 reported businesses in this census tract and that there are no Bremer or other bank branches located within this census tract. In addition, there are four other bank branches located closer to this tract than a Bremer location so while Bremer's

penetration in this census tract is poor, it is not weighted heavily for overall Lending Test performance.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Bremer had no penetration in the moderate-income census tract for small loans to farms. As there are only 37 reported farms in this census tract, and given Bremer's distance from this census tract, this lack of performance is not given substantial consideration.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in the moderate-income geography. We did not identify any unexplained or conspicuous lending gaps in Bremer's loan originations in the Menomonie AA.

Inside/Outside Ratio

Bremer originated and purchased a substantial majority of its loans within its three AAs. During the evaluation period, Bremer originated 90% of home mortgage, small loans to business, and small loans to farms, by number, within its AAs. By product type, Bremer originated 89% of its home mortgage loans, 93% of its small loans to businesses, and 87% of its small loans to farms within the AAs. We viewed this as a positive consideration in our overall Lending Test analysis.

Distribution of Loans by Income Level of the Borrower

Bremer's distribution of loans by income level of the borrower in the Menomonie AA is excellent.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Bremer's distribution of home mortgage loans by the income level of the borrower in the Menomonie AA is good.

Home Purchase Loans

Bremer's distribution of home purchase loans is excellent. Bremer's percentage of loans originated to families with low-incomes was near to the demographics of the AA and is good. Bremer's percentage of loans originated to families with moderate-incomes exceeded the demographics of the AA and is excellent. In addition, Bremer's market share of home loans to low- and moderate-income borrowers exceeds their overall market share and represents excellent performance.

Home Improvement Loans

Bremer's distribution of home improvement loans is excellent. Bremer's percentage of loans originated to families with low- and moderate-incomes exceeded the demographics of the AA and is considered excellent. Bremer's market share of home improvement loans to low-income borrowers is significantly lower than its overall market share and represents poor performance while loans to moderate-income borrowers exceeds its overall market share and represents excellent performance.

Home Refinance Loans

Bremer's distribution of home refinance loans is good. Bremer's percentage of loans originated to families with low- and moderate-incomes were near to the demographics of the AA and are good. Bremer's market share of home refinance loans to low-income borrowers exceeds their overall markets share and represents excellent performance while loans to moderate-income borrowers is somewhat lower than their market share and represents adequate performance.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Bremer's distribution of small loans to businesses with revenues of \$1 million or less is excellent. Bremer's percentage of loans originated to these businesses exceeded the demographics of the AA. In addition, Bremer's market share of small loans to businesses with revenues of \$1 million or less exceeded their overall market share and represents excellent performance.

Small Loans to Farms

Refer to Table 12 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

Bremer's distribution of small loans to farms with revenues of \$1 million or less is good. Bremer's percentage of loans originated to these farms was near to the demographics of the AA. In addition, Bremer's market share of small loans to farms with revenues of \$1 million or less exceeds their overall market share and represents excellent performance.

Community Development Lending

Refer to Table 1 Lending Volume of Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

Bremer's community development lending had a neutral impact on the overall Lending Test performance. Bremer originated eight community development loans within the Menomonie AA during the evaluation period. These loans, totaling \$235 thousand, helped five low-income

families purchase affordable housing and three small businesses finance exterior improvements to their storefronts through a special loan program made up of a consortium of local lenders.

Product Innovation and Flexibility

Bremer's loan products are consistent with those found throughout the Bremer banking organization. Throughout this evaluation period, Bremer has noted that none of these products are innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Bremer's performance under the Lending Test in the St. Croix and Bayfield AAs is not inconsistent with its overall excellent performance under the Lending Test. Refer to the Tables 1 through 11 in Appendix C for the facts and data that support these conclusions. Geographic analysis for the St. Croix AA was not performed as it has no low- or moderate-income geographies.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Outstanding. Based on a full-scope review of the Menomonie AA, Bremer's performance is excellent.

Refer to Table 14 of Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Bremer's level of investments in the Menomonie AA is excellent. The bank has 35 qualified investments totaling \$1.1 million plus another \$36 thousand of local qualified donations. Bremer also has \$1.4 million of qualified investments in nearby areas of WI. As we were unable to determine the effect these broader regional investments had on the AA, they were given less weight in our analysis.

These qualified investments helped many organizations to provide various needed services to individuals and families with low- and moderate-incomes, provided affordable housing options and provided services to those low- and moderate-income disabled and immigrant populations in the AA. Specific examples of the organizations benefiting from these investments include the Catholic Community Services, Hmong American Community Association, Literacy Volunteers of America, Polk County Housing Collaborative, Positive Alternatives and the Chippewa Valley Technical College Foundation.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bayfield and St. Croix AAs is not inconsistent with the Bremer's overall Outstanding rating. Refer to Table 14 of Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Menomonie AA is good.

Retail Banking Services

Refer to Table 15 of Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Bremer's delivery systems are reasonably assessable to individuals of different income levels due to the distribution of the bank's branches and ATMs and considered adequate. Bremer has all twelve of its offices and all ATM's in this AA located in middle-income tracts. Bremer closed and opened a branch during this evaluation period in the AA, each in Danbury, Wisconsin. Hours of operation are reasonable and include Saturday lobby hours at nine locations and Saturday drive-up hours at ten locations.

Alternative delivery systems for small business and retail banking services are routine to the industry. Bremer utilizes Internet banking, telephone banking, ATMs, and bank-by-mail systems to foster accessibility to all customers. Bremer does not track the impact of these services on its low- and moderate-income customers. Absent this impact data, and given the routine nature of these services, such alternative delivery systems did not receive significant weight in the Service Test analysis.

Community Development Services

Bremer's level of community development services is excellent. These services provide training, information, referral and collaboration efforts along with key leadership and technical support roles in various organizations focused upon community development, affordable and transitional housing, and meeting the needs of persons with low- and moderate-incomes.

Bremer's community development services are coordinated by a staff member designated as a "Non-profit Resource Specialist". This person works with local nonprofits to assess community needs and compiles Bremer staff reports regarding their involvement in activities to provide community development services to more than 30 organizations.

Community development service examples include utilizing bank staff's financial expertise for the benefit of The Greater Menomonie Development Corporation, Dunn County Housing Authority, Grace Place Homeless Shelter, West CAP Revolving Loan Fund, Dunn County

Family Resource Center, The City of Amery Housing program and Housing Authorities of the Cities of Amery and Menomonie. In addition, Bremer staff provided first-time homebuyer seminars to low-income applicants and helped to operate the Turtle Lake Food Pantry.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the St. Croix AA is not inconsistent with the bank's overall Service Test Rating. In the Bayfield AA, the bank's performance is stronger than the bank's overall performance due to the concentration of offices in moderate-income and underserved census tracts. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

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 metropolitan and nonmetropolitan areas 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 (excludes CD Loans): 01/01/2004 to 12/31/2007 Investment and Service Tests and CD Loans: 01/01/2005 to 12/31/2007	
Financial Institution		Products Reviewed
Bremer Bank, National Association (Bremer) Menomonie, Wisconsin		Home Mortgage Small Loans to Businesses Small Loans to Farms
Affiliate(s)	Affiliate Relationship	Products Reviewed
Otto Bremer Foundation (Foundation)	Affiliate	Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Menomonie AA	Full-Scope	Burnett, Dunn & Polk Counties, WI
Bayfield AA	Limited-Scope	Bayfield County, WI and one census tract from Ashland County, WI
St. Croix AA	Limited-Scope	St. Croix County, WI, part of the Minneapolis/St. Paul MSA #33460

Appendix B: Market Profiles for Full-Scope Area

Menomonie AA

Demographic Information for Full-Scope Area: Menomonie AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0	4.17	91.67	4.16	0
Population by Geography	96,851	0	2.13	92.84	5.03	0
Owner-Occupied Housing by Geography	28,507	0	2.33	91.85	5.82	0
Businesses by Geography	8,682	0	2.33	93.50	4.17	0
Farms by Geography	977	0	3.79	90.79	5.42	0
Family Distribution by Income Level	25,322	0	20.04	25.55	37.61	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,329	0	3.48	93.10	3.42	0
Median Family Income	= \$46,680					
HUD Adjusted Median Family Income for 2007	= \$54,700					
Households Below the Poverty Level	=10%					
				Median Housing Value	= \$95,086	
				Unemployment Rate	= 2.97%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2007 HUD updated MFI.

The Menomonie AA consists of the Counties of Dunn, Polk and Burnett in west-central Wisconsin. This area is made up of small towns surrounded by lakes, forests and agricultural lands. Roughly 43% of the population resides in Dunn County, 41% in Polk County and 16% in Burnett County.

Throughout the evaluation period, the economy of the Menomonie AA was stable with growth in the business, home and second home and recreational land sectors. The Wisconsin Department of Workforce Training reports major industries in the AA include manufacturing, education, health, public administration and retail. The largest employers are from the medical field, public school systems, light manufacturing, and local governments. The Department of Labor reported year-end 2007 unemployment figures of 5.0% in Dunn County, 7.6% for Polk County, and 8.5% for Burnett County. In comparison, the State of Wisconsin unemployment rate was 5.9% and the national unemployment rate was 7.2%.

Credit needs in the AA are typical. Credit needs exist for business, primary and secondary home loans, retail lending, and agriculture.

Competition amongst financial institutions in the AA is high. The FDIC June 30, 2008 market share report details 32 competing state and national banks including local, intrastate and interstate banks. There are also a variety of credit unions, mortgage companies, and other financial intermediaries in the AA.

Appendix C: Tables of Performance Data

Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** – Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As 25.12 (i) – 5 and – 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 2. Geographic Distribution of Home Purchase Loans** – 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** – See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** – See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** – The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** – 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** – 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** – See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** – See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of

the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 14. Qualified Investments – Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank’s financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank’s assessment area. See Interagency Q&As __.12 (i) – 5 and – 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings – Compares the percentage distribution of the number of the bank’s branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: WISCONSIN						Evaluation Period: January 1, 2004 to December 31, 2007				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Menomonie AA	74.28	1,619	142,824	1,425	129,721	1,251	77,781	8	235	4,303	350,561	80.34
Limited Review:												
Bayfield AA	10.38	236	17,628	361	25,763	3	423	0	0	600	43,814	12.91
St. Croix AA	15.34	376	40,117	257	22,124	254	17,896	0	0	887	80,137	6.75

* Loan Data as of December 31, 2007. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 1, 2005 to December 31, 2007.

*** Deposit Data as of December 31, 2007. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: WISCONSIN				Evaluation Period: January 1, 2004 to December 31, 2007					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Menomonie AA	452	74.46	0.00	0.00	2.33	1.99	91.85	94.03	5.82	3.98	5.79	0.00	2.38	6.01	4.12	
Limited Review:																
Bayfield AA	50	8.24	0.00	0.00	40.00	38.00	60.00	62.00	0.00	0.00	6.46	0.00	4.73	8.22	0.00	
St. Croix AA	105	17.30	0.00	0.00	0.00	0.00	77.74	92.38	22.26	7.62	1.22	0.00	0.00	1.44	0.27	

* Based on 2007 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: WISCONSIN															
Evaluation Period: January 1, 2004 to December 31, 2007															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Menomonie AA	76	64.41	0.00	0.00	2.33	0.00	91.85	93.42	5.82	6.58	3.48	0.00	0.00	3.44	5.26
Limited Review:															
Bayfield AA	25	21.19	0.00	0.00	40.00	56.00	60.00	44.00	0.00	0.00	5.69	0.00	8.00	4.11	0.00
St. Croix AA	17	14.40	0.00	0.00	0.00	0.00	77.74	100.00	22.26	0.00	2.17	0.00	0.00	2.97	0.00

* Based on 2007 Peer Mortgage Data (Western)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WISCONSIN				Evaluation Period: January 1, 2004 to December 31, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Menomonie AA	1,086	72.55	0.00	0.00	2.33	2.30	91.85	90.42	5.82	7.27	8.38	0.00	8.62	8.47	7.18	
Limited Review:																
Bayfield AA	160	10.69	0.00	0.00	40.00	40.00	60.00	60.00	0.00	0.00	8.16	0.00	8.90	7.65	0.00	
St. Croix AA	251	16.76	0.00	0.00	0.00	0.00	77.74	98.41	22.26	1.59	2.19	0.00	0.00	2.81	0.00	

* Based on 2007 Peer Mortgage Data (Western)

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WISCONSIN						Evaluation Period: January 1, 2004 to December 31, 2007							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Menomonie	5	55.56	0.00	0.00	0.37	0.00	99.32	100.00	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bayfield AA	1	11.11	0.00	0.00	52.11	0.00	47.89	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
St. Croix AA	3	33.33	0.00	0.00	0.00	0.00	82.16	100.00	17.84	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Mortgage Data (Western).

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: WISCONSIN		Evaluation Period: January 1, 2004 to December 31, 2007				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Menomonie AA	1,425	69.75	0.00	0.00	2.33	0.98	93.50	96.70	4.17	2.32	7.73	0.00	1.49	8.47	3.43			
Limited Review:																		
Bayfield AA	361	17.67	0.00	0.00	46.79	72.85	53.21	27.15	0.00	0.00	5.59	0.00	9.22	3.99	0.00			
St. Croix AA	257	12.58	0.00	0.00	0.00	0.00	83.23	94.16	16.77	5.84	2.10	0.00	0.00	2.65	0.43			

* Based on [Year] Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (Year).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: WISCONSIN					Evaluation Period: January 1, 2004 to December 31, 2007				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Menomonie AA	1,251	82.96	0.00	0.00	3.79	0.00	90.79	93.53	5.42	6.47	57.91	0.00	0.00	56.86	87.50									
Limited Review:																								
Bayfield AA	3	0.20	0.00	0.00	34.88	33.33	65.12	66.67	0.00	0.00	4.35	0.00	0.00	6.25	0.00									
St. Croix AA	254	16.84	0.00	0.00	0.00	0.00	93.73	100.00	6.27	0.00	51.79	0.00	0.00	52.73	0.00									

* Based on 2007Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2007).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WISCONSIN						Evaluation Period: January 1, 2004 to December 31, 2007							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Menomonie AA	452	74.46	16.80	10.25	20.04	25.51	25.55	31.89	37.61	32.35	6.44	11.11	7.61	7.47	4.86
Limited Review:															
Bayfield AA	50	8.24	25.10	6.25	22.59	29.17	25.30	20.83	27.00	43.75	7.06	0.00	11.76	9.30	6.32
St. Croix AA	105	17.30	15.56	21.78	20.93	37.62	28.42	31.68	35.08	8.91	1.34	2.70	2.07	0.97	0.41

* Based on 2007 Peer Mortgage Data (Western).

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: WISCONSIN						Evaluation Period: January 1, 2004 to December 31, 2007							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
Menomonie AA	76	64.41	16.80	17.81	20.04	23.29	25.55	13.70	37.61	45.21	3.54	0.00	3.64	2.00	5.00
Limited Review:															
Bayfield AA	25	21.19	25.10	20.83	22.59	20.83	25.30	29.17	27.00	29.17	5.83	0.00	9.52	2.63	8.89
St. Croix AA	17	14.40	15.56	17.65	20.93	11.76	28.42	41.18	35.08	29.41	2.25	0.00	3.08	1.82	2.60

* Based on 2007 Peer Mortgage Data (Western).

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WISCONSIN						Evaluation Period: January 1, 2004 to December 31, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Menomonie AA	1,086	72.55	16.80	9.90	20.04	18.36	25.55	30.64	37.61	41.10	9.38	14.53	7.59	9.95	8.93
Limited Review:															
Bayfield AA	160	10.69	25.10	14.56	22.59	20.89	25.30	32.91	27.00	31.65	8.90	14.55	8.82	10.07	6.79
St. Croix AA	251	16.76	15.56	13.41	20.93	25.61	28.42	36.18	35.08	24.80	2.54	5.03	1.79	3.15	1.94

* Based on 2007 Peer Mortgage Data (Western).

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: WISCONSIN		Evaluation Period: January 1, 2004 to December 31, 2007		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Menomonie AA	1,425	69.75	52.84	70.18	77.75	13.33	8.91	7.73	11.67
Limited Review:									
Bayfield AA	361	17.67	52.65	78.39	81.72	14.68	3.60	5.59	8.93
St. Croix AA	257	12.58	55.45	76.26	75.10	18.29	6.61	2.10	3.71

* Based on 2007 Peer Small Business Data: US and PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2007).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.66% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: WISCONSIN		Evaluation Period: January 1, 2004 to December 31, 2007			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Menomonie AA	1,251	82.96	97.75	85.05	80.66	15.83	3.52	57.91	60.39
Limited Review:									
Bayfield AA	3	0.20	95.35	100.00	33.33	33.33	33.33	4.35	5.00
St. Croix AA	254	16.84	97.21	81.10	82.68	9.45	7.87	51.79	57.30

* Based on 2007 Peer Small Business Data: US and PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2007).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.83% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WISCONSIN				Evaluation Period: January 1, 2005 to December 31, 2007			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Menomonie AA	0	0	35	1,133	35	1,133	37.64	0	0
Regional	0	0	20	1,438	20	1,438	47.77	0	0
Limited Review:									
Bayfield AA	0	0	9	164	9	164	5.45	0	0
St. Croix AA	0	0	10	275	10	275	9.14	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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WISCONSIN Evaluation Period: January 1, 2004 to December 31, 2007																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Menomonie AA	80.34	12	100.00	0.00	0.00	100	0.00	1	1	0	0	0	0	0.00	2.13	92.84	5.04
Limited Review:																	
Bayfield AA	12.91	3	100.00	0.00	66.7	33.3	0.00	0	0	0	0	0	0	0.00	42.80	57.20	0.00
St. Croix AA	6.75	2	100.00	0.00	0.00	100	0.00	0	0	0	0	0	0	0.00	0.00	78.60	21.40