



Public Disclosure

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Community Reinvestment Act Performance Evaluation

Bremer Bank, National Association
Charter Number: 23300

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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Bremer Bank, National Association** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **July 12, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

The following table indicates the performance level of **Bremer Bank, National Association (BBNA)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bremer Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
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:

- < BBNA's lending activity in the Menomonie AA reflects excellent responsiveness to business and farm credit needs. BBNA's lending activity in the Amery AA reflects excellent responsiveness to business credit needs and good responsiveness to farm credit needs. BBNA originated 1,437 reportable business loans and 1,372 reportable farm loans during the evaluation period. Eighty-six percent of the business loans and 80% of the farm loans were in the bank's AAs. In most cases, BBNA originated the majority of reported business and farm loans in each of its AAs.
- < The loan distribution to businesses of different sizes is good in all of BBNA's AAs. Most businesses in the AAs are small (i.e. annual gross revenues of \$1 million or less) and most of BBNA's reported business loans are to small businesses. For example, of all businesses with known revenues in the Amery AA, 92% are small. Of BBNA's reported business loans, 90% were to small businesses.
- < The loan distribution to farms of different sizes is excellent in the Menomonie AA and good in the Amery AA. Most farms in the AAs are small (i.e. annual gross revenues of \$1 million or less) and most of BBNA's reported farm loans are to small farms. For example, of all farms with known revenues in the Amery AA, 98% are small. Of BBNA's reported farm loans, 96% were to small farms.

- < The geographic distribution of business loans is excellent in both the Amery and Washburn AAs. For example, 28% of the businesses in the Amery AA are located in moderate-income geographies and the bank made 53% of its reported business loans in moderate-income geographies.
- < The geographic distribution of farm loans in the Amery AA is adequate.
- < BBNA originated an excellent level of community development loans in the Menomonie AA. The loans totaled \$1.3 million, which represents 5.6% of the bank's Tier 1 capital.
- < The bank's level of qualified investments is good. Qualifying investments total \$238,000 in the Menomonie AA, \$846,000 in the Amery AA, and \$270,000 in the Washburn AA. On a combined basis, this volume of investments represents 5.6% of the bank's Tier 1 capital.
- < BBNA's retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs.
- < BBNA provides an adequate level of community development services in its AAs. During the evaluation period, the bank provided community development services to 21 organizations or their committees.

Description of Institution

Bremer Bank, National Association (BBNA) is a \$365 million intrastate institution headquartered in Menomonie, Wisconsin. In addition to its main office, BBNA operates 16 branches in Dunn, Polk, Burnett, St. Croix, Ashland, and Bayfield Counties. Bank customers also have access to the bank through 13 automated teller machines (ATMs) located in Dunn, Polk, Burnett, and Bayfield Counties.

BBNA is a full-service bank, offering a variety of deposit and loan products. The bank's lending focus is business credit, closely followed by both agricultural and residential credit. This is evidenced by the distribution of outstanding loans, as well as the distribution of loan originations considered in this evaluation. As of December 31, 1998, BBNA's loan portfolio consisted of: commercial (37%); residential (25%); agricultural (20%); consumer (11%); and other (7%) loans. BBNA's loan to deposit ratio was 67% on December 31, 1998 and 66% as of June 30, 1999. Tier 1 Capital was \$24 million on December 31, 1998. There are no financial, legal, or other factors which impede the bank's ability to meet its CRA obligations.

BBNA is owned by the Bremer Financial Corporation (BFC), a \$3 billion holding company headquartered in St. Paul, Minnesota. BFC has 14 national bank subsidiaries (with more than 85 banking locations) throughout Minnesota, North Dakota, and Wisconsin. Non-bank affiliates include trust, insurance, management, and operations service companies. BFC is owned by the Otto Bremer Foundation, a charitable trust. As a charitable trust, the Foundation must disperse at least 5% of its assets for charitable causes annually.

The bank has delineated three separate assessment areas. The Menomonie AA consists of Dunn County. The Amery AA consists of Polk County, Burnett County and one CT in the northern portion of St. Croix County. The Washburn AA consists of Bayfield County and one BNA in the northwest portion of Ashland County. The AAs meet the requirements of the regulation, and they do not arbitrarily exclude any low- or moderate-income geographies.

Scope of Evaluation

Evaluation Period/Products Evaluated

We examined BBNA using the large bank tests pursuant to the revised CRA regulation. This evaluation covers lending, investment, and service activities since the previous CRA examination dated November 29, 1994 with the following exceptions and notations:

- < Our analysis of business and farm lending included all 1997 and 1998 reported originations. We excluded year-to-date 1999 originations because data is reported and aggregated in whole years. We also excluded 1996 originations because the bank used a different geocoding system in that year. Business and farm lending information was not publicly reported prior to 1996.
- < Market comparisons for business and farm lending are based on 1997 CRA data. At the time of the examination, 1998 information was available for BBNA, but not for the market in aggregate.
- < We placed more reliance on market demographics than market share analysis in our evaluation. Of the eleven financial institutions with an office facility in Dunn County (Menomonie AA), only three are subject to large bank data reporting. Of the thirteen financial institutions with an office facility in Burnett or Polk Counties (Amery AA), only two are subject to large bank data reporting. Of the four financial institutions with an office facility in Bayfield County (Washburn AA), only two are subject to large bank data reporting.
- < Our analysis of home mortgage loans included 1997 and 1998 originations. We chose this period to be consistent with other loan products.
- < Our analysis of home mortgage loans did not include home improvement loans. Bank systems do not separately code this product.
- < The evaluation does not include geographic distribution analysis for the Menomonie AA. This analysis was not meaningful given the homogeneity of this area, which consists entirely of middle-income geographies.
- < In both the Menomonie and Amery AAs, we gave the most weight to farm and business loans, with slightly more emphasis on farm loans. We gave the least weight to home mortgage loans. In the Menomonie AA, 43% of the bank's reported loan originations were farm loans, 37% were business loans, 19% were home mortgage loans, and 1% were community development loans. In the Amery AA, 38% of the bank's reported loan originations were farm loans, 36% were business loans, and 26% were home mortgage loans.

- < For the Washburn AA, we gave the greatest weight to business loans, as they represented 75% of BBNA's loan originations during the evaluation period. We gave lesser weight to home mortgage loans. We did not evaluate farm lending in the Washburn AA, as the bank originated only one such loan during the evaluation period.
- < Although the refinance product comprised 73% of the bank's home mortgage originations over the evaluation period, we gave it little weight in our overall assessment of home mortgage loans. This type of lending is primarily used to decrease a borrower's cost of credit, and it is not unusual to have weaker borrower income distributions. Many settlement costs associated with a loan refinancing do not vary based on loan amount. Therefore, it generally takes longer to recoup these costs (through interest savings) on smaller dollar loans. And it is likely the low- and moderate-income sectors have a higher proportion of small dollar loans given the direct correlation between income and debt service ability.
- < At the bank's request, we considered qualified investments of the affiliated Otto Bremer Foundation in the bank's "Investment Test" assessment.
- < At the bank's request, we considered automated teller machines (ATMs) owned by the affiliated Bremer Services, Incorporated in the bank's "Service Test" assessment.

Data Integrity

- < We identified some reporting errors in the bank's CRA Disclosure Statements. The bank revised the data. After validating its accuracy, we used the revised information in our analysis of business and farm lending. We also adjusted the aggregate loan data released by the Federal Financial Institutions Examination Council (FFIEC) for the bank's reporting errors.
- < After validating the accuracy of the bank's HMDA Loan Application Register, we used this information in our evaluation. We noted one type of reporting error which caused the bank to overstate home mortgage refinance originations. However, we did not ask the bank to revise the data given the relatively low significance the product carries in the bank's overall CRA evaluation.

Selection of Areas for Full-Scope Review/Ratings

- < We performed full-scope reviews of the Menomonie and Amery AAs and a limited scope review of the Washburn AA. The Menomonie and Amery AAs account for 89% of BBNA's loan originations by both number and dollar over the evaluation period. These AAs contain 81% of the bank's branches and 85% of the bank's ATMs. In the Menomonie AA, BBNA has a 29% deposit market share and a deposit market rank of 1. In the Amery AA, BBNA has a 26% deposit market share in Polk County (rank of 1) and a 26% deposit market share in Burnett County (rank of 2).
- < We generally try to obtain a representative sample of both significant and less significant markets in which the bank operates when we select areas for full-scope reviews.
- < The bank's overall CRA rating is a blend of our conclusions for all three AAs. The rating is primarily based on the areas that received full-scope reviews. We gave the greatest weight to the Amery AA, as the bank originated the greatest percentage of its loans in (54%) and obtained the greatest percentage of its deposits (54%) from that AA. We gave somewhat less weight to the Menomonie AA - that area represents 35% of the bank's loans and 30% of the bank's deposits. We gave the least weight to the Washburn AA - that area represents only 11% of the bank's loans and 16% of the bank's deposits.
- < Refer to the table in Appendix A for more information regarding the examination scope.

Fair Lending Review

Examiners did not identify any instances of illegal discrimination or discouragement in a 1999 fair lending review. We reviewed override decisions to the bank's consumer loan scoring model (CreditDesk) between September 1998 and February 1999 using gender as the prohibited basis.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "High Satisfactory" based on our full-scope reviews of the Menomonie and Amery AAs.

Lending Activity

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

Lending levels reflect adequate responsiveness to home mortgage credit needs. BBNA originated 816 home mortgage loans (totaling \$57 million) during the evaluation period. A substantial majority of these loans (708 or 87%) were in the bank's AAs. BBNA made 204 home mortgage loans (totaling \$15 million) in the Menomonie AA and 425 home mortgage loans (totaling \$29 million) in the Amery AA. Of all reported 1997 HMDA loan activity, BBNA originated 11% in both the Menomonie and Amery AAs.

Lending levels reflect excellent responsiveness to business credit needs. BBNA originated 1,437 reportable business loans (totaling \$83 million) during the evaluation period. A substantial majority of these loans (1,240 or 86%) were in the bank's AAs. BBNA originated 401 business loans (totaling \$24 million) in the Menomonie AA and 600 business loans (totaling \$35 million) in the Amery AA. BBNA originated 52% of all reported 1997 business loans in the Menomonie AA, ranking first of 15 reporting lenders. BBNA originated 52% of all reported 1997 business loans in the Amery AA, ranking first of nineteen reporting lenders.

Lending levels reflect excellent responsiveness to farm credit needs in the Menomonie AA and good responsiveness to farm credit needs in the Amery AA. BBNA originated 1,372 reportable farm loans (totaling \$60 million) during the evaluation period. A majority of these loans (1,098 or 80%) were in the bank's AAs. BBNA made 468 farm loans (totaling \$25 million) in the Menomonie AA and 629 farm loans (totaling \$23 million) in the Amery AA. BBNA originated 75% of all reported 1997 farm loans in the Menomonie AA, ranking first of five reporting lenders. BBNA originated 71% of all reported 1997 farm loans in the Amery AA, ranking first of four reporting lenders.

In both the Menomonie and Amery AAs, BBNA's lending market share ratios exceed its deposit market share ratios for business and farm loans and are less than its deposit market share ratios for home mortgage loans. In the Menomonie AA, BBNA has a 29% deposit market share, ranking first of eleven lenders. In the Amery AA, BBNA has a 26% deposit market share in Polk County (ranking first of twelve lenders) and a 26% deposit market share in Burnett County (ranking second of four lenders).

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

(Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.)

- Menomonie AA -

The overall distribution of home mortgage loans to borrowers of different income levels in the Menomonie AA is good.

Bank performance involving home purchase loans to moderate-income borrowers is excellent in light of the AA's need for affordable housing stock. The percentage of home purchase loans to moderate-income borrowers (19%) essentially equals market demographics - 20% of the families in the AA have moderate incomes. BBNA's market share for home purchase loans to moderate-income borrowers (13%) is equal to its overall home purchase loan market share.

Bank performance involving home purchase loans to low-income borrowers is adequate. The percentage of home purchase loans to low-income borrowers (7%) is less than market demographics - 18% of the families in the AA have low incomes. However, this is not unreasonable given the lack of affordable housing, the median housing cost, and the percentage of families living below poverty (9%). Families below poverty have annual incomes less than \$12,550. At this level, it can be difficult to afford a home at the AA's median value of \$48,405. BBNA's market share for home purchase loans to low-income borrowers (16%) is actually stronger than its overall home purchase loan market share (13%).

Bank performance involving refinance loans to moderate-income borrowers is adequate. The percentage of refinance loans to moderate-income borrowers (13%) is less than market demographics - 20% of the families in the AA have moderate incomes. BBNA's market share for refinance loans to moderate-income borrowers (12%) is equal to its overall refinance loan market share.

Bank performance involving refinance loans to low-income borrowers is poor. The percentage of refinance loans to low-income borrowers (2%) is significantly less

than market demographics - 18% of the families in the AA have low incomes. BBNA's market share for refinance loans to low-income borrowers (9%) is less than its overall refinance loan market share (12%).

- Amery AA -

The overall distribution of home mortgage loans to borrowers of different income levels in the Amery AA is adequate.

Bank performance involving home purchase loans to moderate-income borrowers is excellent. The percentage of home purchase loans to moderate-income borrowers (26%) significantly exceeds market demographics - 21% of the families in the AA are moderate-income.

Bank performance involving refinance loans to moderate-income borrowers is adequate. The percentage of refinance loans to moderate-income borrowers (17%) is somewhat less than market demographics - 21% of the families in the AA are moderate-income.

Bank performance involving both home purchase and refinance loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers and refinance loans to low-income borrowers (both 5%) is significantly less than market demographics - 23% of the families in the AA are low-income.

BBNA's market shares for both home purchase and refinance loans to both low- and moderate-income borrowers exceed BBNA's overall market shares.

Small Business Loans

(Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.)

The following assessments for small business loans give more emphasis to market demographics. In each AA, most banks are not subject to large bank reporting requirements.

- Menomonie AA -

The distribution of loans to businesses of different sizes in the Menomonie AA is good. BBNA made 332 (or 83%) of its 401 reported business loans to businesses with gross annual revenues of \$1 million or less (i.e. small business). While bank performance appears better than AA demographics (75% of businesses in the AA are small), 18% of businesses did not report revenue information. Of the businesses that reported revenue information, 91% have revenues of \$1 million or less. Bank performance is better than other lenders who reported loans in the

Menomonie AA. In aggregate, other lenders originated 52% of their 1997 reported business loans to small businesses.

Of all banks subject to CRA data reporting, BBNA originated the most loans to small businesses in the Menomonie AA. BBNA made 165 (or 63%) of the 263 reported loans to small businesses in 1997.

The bank's willingness to make loans to small businesses is further evidenced by a good loan size distribution. BBNA originated 85% of its reported business loans in amounts of \$100 thousand or less, with an average loan size of \$59 thousand. Bank performance is better than other lenders reporting loans in the Menomonie AA. In aggregate, other lenders originated 80% of their 1997 business loans in amounts of \$100 thousand or less, with an average loan size of \$76 thousand.

- Amery AA -

The distribution of loans to businesses of different sizes in the Amery AA is good. BBNA originated 537 (or 90%) of its 600 reported business loans to businesses with gross annual revenues of \$1 million or less. While bank performance appears better than AA demographics (81% of businesses in the AA are small), 13% of businesses did not report revenue information. Of the businesses that reported revenue information, 92% have revenues of \$1 million or less. Bank performance is better than other lenders reporting loans in the Amery AA. In aggregate, other lenders originated 55% of their 1997 reported business loans to small businesses.

Of all banks subject to CRA data reporting, BBNA originated the most loans to small businesses in the Amery AA. BBNA originated 277 (or 63%) of the 439 reported loans to small businesses in 1997.

The bank's willingness to extend credit to small businesses is further evidenced by a good loan size distribution. BBNA originated 85% of its reported business loans in amounts of \$100 thousand or less, with an average loan size of \$58 thousand. Bank performance approximates that of other lenders reporting loans in the Amery AA. In aggregate, other lenders originated 88% of their 1997 business loans in amounts of \$100 thousand or less, with an average loan size of \$58 thousand.

Small Farm Loans

(Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small farm loan originations.)

The following assessments for small farm loans give more emphasis to market demographics. In each AA, most banks are not subject to large bank reporting requirements.

- Menomonie AA -

The distribution of loans to farms of different sizes is excellent. BBNA originated 449 (or 96%) of its 468 reported farm loans to farms with gross annual revenues of \$1 million or less (i.e. small farms). Bank performance is better than AA demographics - 90% of AA farms are small, although revenue information is not available for an additional 4%. Of the farms that report revenue information, 94% have revenues of \$1 million or less. BBNA's performance approximates that of other lenders, who made 98% of their 1997 reported farm loans to small farms.

Of all banks subject to CRA data reporting, BBNA ranked first in small farm loan originations in the Menomonie AA. BBNA made 246 (or 75%) of the 329 reported loans to small farms in 1997.

The bank's willingness to make loans to small farms is further evidenced by a good loan size distribution. BBNA made 83% of its reported farm loans in amounts of \$100 thousand or less, with an average loan size of \$54 thousand. Bank performance is consistent with that of other lenders reporting loans in the Menomonie AA. In aggregate, other lenders made 81% of their 1997 farm loans in amounts of \$100 thousand or less, with an average loan size of \$62 thousand.

- Amery AA -

The distribution of loans to farms of different sizes is good. BBNA originated 603 (or 96%) of its 629 reported farm loans to farms with gross annual revenues of \$1 million or less. While bank performance appears better than AA demographics (92% of farms in the AA are small), 6% of the farms did not report revenue information. Of the farms that reported revenue information, 98% have revenues of \$1 million or less. BBNA's performance approximates the performance of other lenders, who made 98% of their 1997 reported farm loans to small farms.

Of all banks subject to CRA data reporting, BBNA ranked first in small farm loan originations in the Amery AA. BBNA made 265 (or 71%) of the 372 reported loans to small farms in 1997.

The bank's willingness to make loans to small farms is further evidenced by a good loan size distribution. BBNA made 91% of its reported farm loans in amounts of \$100 thousand or less, with an average loan size of \$37 thousand. Bank performance approximates that of other lenders who reported loans in the Amery AA. In aggregate, other lenders made 96% of their 1997 farm loans in amounts of \$100 thousand or less, with an average loan size of \$25 thousand.

Distribution of Loans by Income Level of the Geography

Our analysis of the geographic distribution of the bank's lending activity included a review to identify any unexplained gaps in lending in the Amery AA, particularly in moderate-income areas. We did not identify any unexplained lending gaps.

Home Mortgage Loans

(Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.)

- Menomonie AA -

Geographic distribution is not a meaningful analysis in the Menomonie AA.

- Amery AA -

The overall distribution of home mortgage loans is excellent.

Bank performance for both home purchase and refinance lending in moderate-income BNAs is excellent. The percentage of home purchase loans in moderate-income BNAs (53%) significantly exceeds market demographics (27%). The percentage of refinance loans in moderate-income BNAs (47%) also significantly exceeds market demographics (27%).

BBNA's market share for both home purchase and refinance loans in the moderate-income BNAs of the AA is also excellent. BBNA's market share for home purchase loans in moderate-income BNAs (14%) is better than its overall home purchase loan market share (9%). BBNA's market share for refinance loans in moderate-income BNAs (29%) is also better than its overall refinance loan market share (18%).

BBNA originated a substantial majority of its home mortgage loans (87%) to borrowers in its AAs.

Small Business Loans

(Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.)

- Menomonie AA -

Geographic distribution is not a meaningful analysis in the Menomonie AA.

- Amery AA-

The geographic distribution of business loans is excellent.

Bank performance involving business loans in moderate-income BNAs is excellent. The percentage of the bank's loans to businesses in moderate-income BNAs (53%) is substantially better than the percentage of businesses in those BNAs (28%). BBNA's market share in the moderate-income BNAs (57%) is better than its overall business loan market share (52%).

BBNA originated a substantial majority of its reported business loans (86%) in its AAs.

Small Farm Loans

(Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations.)

- Menomonie AA -

Geographic distribution is not a meaningful analysis in the Menomonie AA.

- Amery AA -

The geographic distribution of farm loans is poor.

Bank performance involving farm loans in moderate-income BNAs is poor. The percentage of bank loans to farms in moderate-income BNAs (15%) is less than the percentage of farms in the moderate-income BNAs (27%). BBNA's market share in moderate-income BNAs (73%) is consistent with BBNA's overall farm loan market share (71%).

BBNA originated a majority of its reported farm loans (80%) in its AAs.

Community Development Lending

(Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.)

- Menomonie AA -

BBNA originated an excellent volume of community development loans in the Menomonie AA. BBNA originated five community development loans totaling \$1.3 million. This volume represents 5.6% of BBNA's Tier 1 capital. This is an excellent volume given that the bank operates in rural areas that have more limited community development opportunities. The following are examples of BBNA's community development lending.

- < BBNA originated a \$900,000 loan to a builder for the construction of a 24-unit rental housing complex for LMI families in Colfax. The bank subsequently provided a portion (\$242,000) of the permanent financing for the project.
- < BBNA originated a \$50,000 line of credit to a nonprofit organization that employs people with disabilities, the majority of whom are LMI.

- *Amery AA* -

BBNA did not originate community development loans in the Amery AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on our limited scope review, bank performance in the Washburn AA is consistent with BBNA's overall Lending Test performance. Refer to Tables 1 through 11 in Appendix C for the facts and data that support this conclusion.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

(Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.)

The bank's performance under the Investment Test is rated "High Satisfactory" based on our full-scope reviews of the Menomonie and Amery AAs.

Opportunities for qualified investment securities that specifically target the Menomonie or Amery AAs are limited. However, there are opportunities for community development grants and donations. The presence of an Indian Reservation in the Amery AA provides additional opportunities.

BBNA's level of qualified investments is good given the bank's capacity, available opportunities, and the length of the evaluation period (approximately 42 months). Qualified investments total \$238 thousand in the Menomonie AA and \$846 thousand in the Amery AA. In relation to the bank's Tier 1 capital (\$24 million), this level of qualifying investments (5.6%) shows BBNA's strong commitment to helping its communities. All of the investments attributed to the bank are grants made by the affiliated Otto Bremer Foundation. None of the investments are considered innovative or complex, and all are routinely provided by private investors.

The grants assisted a wide range of community development needs. Most of the organizations that received grants provide social services to LMI people and some focus on affordable housing for LMI people. Specific examples of BBNA's qualified investments follow:

- < In the Menomonie AA, BBNA provided grants of \$39,000 to develop a homeless shelter and expand the services of a food pantry.
- < BBNA provided grants totaling \$50,000 to an organization that serves both its Menomonie and Amery AAs. The organization helps low-income people develop opportunities for self-employment.
- < BBNA provided a \$95,000 grant to a nonprofit organization in the Amery AA. The proceeds of the grant were used to construct a new child care and educational facility (Head Start) for LMI families in Siren.

Conclusions for Area Receiving Limited-Scope Reviews

(Refer to the Tables 12 in Appendix C for the facts and data that support these conclusions.)

Based on a limited scope review, bank performance in the Washburn AA is consistent with BBNA's overall performance under the Investment Test. Refer to Table 12 for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory" based on our full-scope reviews of the Menomonie and Amery AAs.

Retail Banking Services

(Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.)

Retail delivery systems are reasonably accessible to geographies and individuals of different income levels.

The bank's main facility is in the Menomonie AA, as are seven of its branches. A geographic distribution analysis is not meaningful in the Menomonie AA as there are no LMI geographies. Six (or 75%) of the Menomonie offices have drive-ups and one (or 13%) has an onsite, full-service ATM. There are five other ATMs in the AA, all of which are cash-dispensing only.

The geographic distribution of branches in the Amery AA is excellent. The Amery AA has five branches. While 25% of the population in the Amery AA resides in the moderate-income BNAs, three (or 60%) of BBNA's branches are located in moderate-income BNAs. Four (or 80%) of the branches have drive-up facilities and one (or 20%) has an onsite, full-service ATM. There are four other ATMs in the AA, all of which are cash-dispensing only.

Business hours in both the Menomonie and Amery AAs do not vary in a way that inconveniences low- or moderate-income geographies or individuals. The hours of BBNA's offices and drive-up facilities vary. Some locations have more convenient hours than others, but the hours are not less convenient in moderate-income areas. In general, drive-up hours are more extended (as late as 5:00 p.m. or 6:00 p.m.) than branch hours. Some of the branches and most of the drive-up facilities offer Saturday morning hours.

Accessibility to lenders varies slightly by bank location, but not in a way that inconveniences low- or moderate-income geographies or individuals. While some branches do not have onsite lenders for all products, lenders will visit other branches to accommodate customers. Onsite accessibility to lenders at branches in moderate-income geographies is similar to lender accessibility at branches in middle-income geographies.

BBNA offers a wide variety of traditional banking products and services. Product offerings include a free consumer checking account with no minimum balance. BBNA does not charge its customers ATM maintenance fees or transaction fees at proprietary ATMs. Bank services include a 24-hour telephone banking service (account inquiries, transfers and loan payments) and accessibility to an interpreter for any nonEnglish language. The bank does not gather income information from the users of these products and services, so we could not place significant weight on these offerings. However, it is likely these products and services enhance accessibility to low- and moderate-income individuals.

The bank did not open or close any branches during the evaluation period.

Community Development Services

BBNA provides an adequate level of community development services in both the Menomonie and Amery AAs. During the evaluation period, two employees provided community development services to nine organizations or their committees in the Menomonie AA. In the Amery AA, six employees provided community development services to ten organizations or their committees. The following are examples of community development services provided by the bank.

- < In the Menomonie AA, a bank employee served on a commission to study the possibility of land development. A substantial portion of the development would involve housing for low- or moderate-income families.

- < A bank employee serves on a City of Amery committee that lends to businesses and manufacturers that create jobs for low- or moderate-income workers. Most (79%) of the businesses in the City of Amery and in the entire Polk County are small (i.e. annual gross revenues of \$1 million or less).
- < A bank employee serves on a planning commission that serves both the Amery and Washburn AAs. The commission makes loans to start-up businesses and provides technical support to area businesses (most businesses are small). The commission also works on low- and moderate-income housing issues, which relates to a need identified by community contacts.

BBNA also offers a checking account tailored to the needs of community and nonprofit organizations with low transaction volumes.

Conclusions for Areas Receiving Limited-Scope Reviews

(Refer to Table 13 in Appendix C for the facts and data that support these conclusions.)

Bank performance in the Washburn AA is consistent with BBNA's overall performance under the Service Test. Refer to Table 13 for the facts and data that support this conclusion.

Appendix A: Scope of Evaluation

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: January 1, 1997 to December 31, 1998* Investment Test: January 1, 1996 to July 12, 1999 Service Test: November 30, 1994 to July 12, 1999**	
Financial Institution	Loan Products Reviewed	
Bremer Bank, N.A. (BBNA) Menomonie, Wisconsin	Small Business, Small Farm, Home Mortgage, Community Development	
Affiliate(s)	Affiliate Relationship	Activities Reviewed
Otto Bremer Foundation Bremer Services, Inc.	Parent Company Sister Company	Qualified Investments Automated Teller Machines
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Menomonie Assessment Area	Full-Scope	Dunn County, Wisconsin; nonmetropolitan
Amery Assessment Area	Full-Scope	Polk County (nonmetropolitan), Burnett County (nonmetropolitan) and Census Tract #1206 from St. Croix County (MSA #5120), Wisconsin
Washburn Assessment Area	Limited-Scope	Bayfield County and Block Numbering Area #9504 from Ashland County, Wisconsin; nonmetropolitan

* The time period for community development lending was January 1, 1996 to July 12, 1999.

** The time period for community development services was January 1, 1996 to July 12, 1999.

Appendix B: Market Profiles for Full-Scope Areas

Menomonie Assessment Area

Demographic Information for Full-Scope Area: Menomonie Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	8	n/a	n/a	100%	n/a	n/a
Population by Geography	35,909	n/a	n/a	100%	n/a	n/a
Owner-Occupied Housing by Geography	8,234	n/a	n/a	100%	n/a	n/a
Businesses by Geography	908	n/a	n/a	100%	n/a	n/a
Farms by Geography	71	n/a	n/a	100%	n/a	n/a
Family Distribution by Income Level	8,443	18%	20%	24%	38%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,197	n/a	n/a	100%	n/a	n/a
Median Family Income (MFI) HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$30,290 = \$41,800 = 16.5%	Median Housing Value Unemployment Rate (1990)		= \$48,405 = 3.2%		

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The Menomonie AA consists of Dunn County, Wisconsin. This is BBNA's second-most predominant AA. Thirty-five percent of the loans we evaluated were from this AA, as were 30% of the deposits. Farm-related loans are BBNA's primary loan product in the Menomonie AA followed by business loans. BBNA has the largest deposit market share in the AA. Other banks with significant deposits in the AA are First Bank and Trust, M & I Community State Bank, and Mutual Savings Bank. BBNA operates eight branches and six ATMs in this AA.

The economy of the area is good. Area industry is diverse and not as dependent on agriculture as it had once been. The August 1999 unemployment rate was a low 2.0%.

During the examination, we reviewed information from three recent community contacts. These contacts included representatives of an area economic development corporation and a regional planning commission. The contacts cited a need for banks to provide technical assistance to individuals developing business plans and financing strategies, and to provide financing for start-up businesses.

They also cited a need for affordable, owner-occupied housing stock in the \$50,000 to \$80,000 range.

Amery Assessment Area

Demographic Information for Full-Scope Area: Amery Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	22	n/a	45%	55%	n/a	n/a
Population by Geography	52,279	n/a	25%	75%	n/a	n/a
Owner-Occupied Housing by Geography	15,631	n/a	27%	73%	n/a	n/a
Businesses by Geography	2,240	n/a	28%	72%	n/a	n/a
Farms by Geography	137	n/a	27%	73%	n/a	n/a
Family Distribution by Income Level	14,560	23%	21%	24%	32%	n/a
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,394	n/a	34%	66%	n/a	n/a
Median Family Income (Polk, Burnett Ctys)		Households Below the Poverty Level		= 16.5%		
HUD Adjusted Median Family Income for 1998	= \$30,290 = \$41,800	Median Housing Value		= \$48,405		
		Unemployment Rate (1990)		= 3.2%		
Median Family Income (St. Croix C.T. #1206)	= \$43,063					
HUD Adjusted Median Family Income for 1998	= \$60,800					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The Amery AA consists of Polk County, Burnett County, and one CT in the northern portion of St. Croix County.

This is BBNA's most predominant AA. Fifty-four percent of the loans we evaluated were from this AA, as were 54% of the deposits. Farm loans are BBNA's primary loan product in the Amery AA, closely followed by business loans. BBNA has the largest volume of deposits of all banks in Polk County and the second largest volume in Burnett County. Other banks with significant deposits in the AA are Firststar Bank Wisconsin, RiverBank, and Polk County Bank. BBNA operates five branches and five ATMs in this AA.

The economy of the area is strong. The area has experienced economic development and expansion which has led to a shortage of affordable housing. The August 1999 unemployment rate was low at 2.4% in Polk County and 2.8% in Burnett County.

During the examination, we reviewed information from six recent community contacts. The organizations included government officials involved in economic development and housing, an Indian Band, and a Realtor. The primary need cited by the organizations was affordable housing.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated 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 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME												
State: Wisconsin												
Evaluation Period: January 1, 1997 to December 31, 1998												
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Menomonie Assessment Area	30%	204	\$14,806	401	\$23,819	468	\$25,051	5	\$1,723	1,078	\$65,399	35%
Amery Assessment Area	54%	425	\$29,225	600	\$35,013	629	\$23,166	0	\$0	1,654	\$87,404	54%
Limited-Scope:												
Washburn Assessment Area	16%	79	\$5,297	239	\$12,907	1	\$16	0	\$0	319	\$18,220	11%

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE LOANS										State: Wisconsin		Evaluation Period: January 1, 1997 to December 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BBNA Loans**	% Owner Occ Units	% BBNA Loans**	% Owner Occ Units	% BBNA Loans**	% Owner Occ Units	% BBNA Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Menomonie Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	3	13%	n/a	n/a	13%	n/a	70	36%
Amery Assessment Area	n/a	n/a	27%	53%	73%	47%	n/a	n/a	3	9%	n/a	14%	6%	n/a	96	50%
Limited-Scope:																
Washburn Assessment Area	n/a	n/a	48%	46%	52%	54%	n/a	n/a	4	7%	n/a	6%	8%	n/a	26	14%

(*) Based on 1997 Aggregate HMDA Data only.

(**) As a percentage of loans with geocode information available. Geocode information was available for 100% of BBNA loans.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT LOANS														State: Wisconsin		Evaluation Period: January 1, 1997 to December 31, 1998			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans				
	% Owner Occ Units	% BBNA Loans	% Owner Occ Units	% BBNA Loans	% Owner Occ Units	% BBNA Loans	% Owner Occ Units	% BBNA Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Not applicable.																			
Limited-Scope:																			

(*) Based on 1997 Aggregate HMDA Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM LOANS																	State: Wisconsin		Evaluation Period: January 1, 1997 to December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans					
	% of Farms	% BBNA Loans	% of Farms	% BBNA Loans	% of Farms	% BBNA Loans	% of Farms	% BBNA Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Menomonie Assessment Area	n/a	n/a	n/a	n/a	100%	100%	n/a	n/a	1	75%	n/a	n/a	75%	n/a	468	43%				
Amery Assessment Area	n/a	n/a	27%	15%	73%	85%	n/a	n/a	1	71%	n/a	73%	70%	n/a	629	57%				
Limited-Scope:																				
Washburn Assessment Area	n/a	n/a	74%	100%	26%	0%	n/a	n/a	n/a	0%	n/a	0%	0%	n/a	1	0%				

(*) Based on 1997 Aggregate Small Farm Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS LOANS			State: Wisconsin		Evaluation Period: January 1, 1997 to December 31, 1998						
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BBNA Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Menomonie Assessment Area	75%	83%	52%	85%	11%	4%	52%	63%	401	32%	\$59
Amery Assessment Area	81%	90%	55%	85%	11%	4%	52%	63%	600	49%	\$58
Limited-Scope:											
Washburn Assessment Area	82%	87%	76%	87%	10%	3%	45%	48%	239	19%	\$54

(*) As a percentage of all businesses in the AA. Revenue information was not available for 18% of the businesses in the Menomonie AA, 13% in the Amery AA, and 14% in the Washburn AA.
 (**) As a percentage of all BBNA loans. Revenue information was not available for 2% of the loans originated by BBNA in the Washburn AA.
 (***) The market consists of all other Small Business reporters in BBNA's assessment area and is based on 1997 Aggregate Small Business Data only.
 (****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM LOANS			State: Wisconsin		Evaluation Period: January 1, 1997 to December 31, 1998						
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BBNA Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Menomonie Assessment Area	90%	96%	98%	83%	16%	1%	75%	75%	468	43%	\$54
Amery Assessment Area	92%	96%	98%	91%	7%	2%	71%	71%	629	57%	\$37
Limited-Scope:											
Washburn Assessment Area	94%	100%	100%	100%	0%	0%	0%	0%	1	0%	\$16

(*) As a percentage of all farms in the AA. Revenue information was not available for 4% of the farms in the Menomonie AA, 6% in the Amery AA, and 6% in the Washburn AA.

(**) As a percentage of all BBNA loans. Revenue information was available for 100% of loans originated by BBNA.

(***) The market consists of all other Small Farm reporters in BBNA's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
			State: Wisconsin	Evaluation Period: January 1, 1996 to July 12, 1999					
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Menomonie Assessment Area	0	\$0	0%	30	\$238	100%	30	\$238	18%
Amery Assessment Area	0	\$0	0%	41	\$846	100%	41	\$846	62%
Limited-Scope:									
Washburn Assessment Area	0	\$0	0%	28	\$270	100%	28	\$270	20%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	State: Wisconsin		Evaluation Period: November 30, 1994 to July 12, 1999			
MSA/Assessment Area:	Deposits	Branches						ATMs						Population								
	% of Total BBNA Deposits	# of BBNA Branches	% of Total BBNA Branches	Location of Branches by Income of Geographies				# of BBNA ATMs	% of Total BBNA ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full-Scope:																						
Menomonie Assessment Area	30%	8	50%	n/a	n/a	100%	n/a	6	46%	n/a	n/a	100%	n/a	n/a	n/a	100%	n/a					
Amery Assessment Area	54%	5	31%	n/a	60%	40%	n/a	5	39%	n/a	60%	40%	n/a	n/a	25%	75%	n/a					
Limited-Scope:																						
Washburn Assessment Area	16%	3	19%	n/a	33%	67%	n/a	2	15%	n/a	100%	0%	n/a	n/a	44%	56%	n/a					