



PUBLIC DISCLOSURE

September 04, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Le Center
Charter Number 6921

10 West Minnesota Street
Le Center, MN 56057

Office of the Comptroller of the Currency

Campbell Mithun Tower
222 South Ninth Street
Suite 800
Minneapolis, MN 55402-3393

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The primary factors supporting the rating of The First National Bank (FNB) of Le Center include:

- FNB of Le Center's net loan-to-deposit (LTD) ratio is reasonable given the bank's size and credit needs of the assessment area.
- FNB of Le Center originated a substantial majority of loans within the assessment area.
- The bank's distribution of loans reflects reasonable distribution among farms and businesses of different sizes.
- The bank's distribution of loans reflects excellent distribution across geographies of different income levels within the AA.

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 (Aggregate): 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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

Tier One 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

FNB of Le Center is a \$99 million, full-service bank headquartered in Le Center, MN. The community of Le Center is located in Le Sueur County. The bank has one branch located in Kilkenny, MN, also in Le Sueur County. The bank is 100 percent owned by Traxshares, Inc, a one-bank holding company in Le Center, MN. The bank operates six automated teller machines (ATMs) in the city of Le Center. None of these ATMs accept deposits. No branches were opened or closed during the evaluation period. The bank has no affiliates or subsidiaries.

FNB of Le Center is a rural bank that offers traditional banking products and services. The bank's primary business focus is farm and commercial lending. As of June 30, 2018, the bank's loan portfolio totaled \$77 million, or 76.23 percent of average assets. The loan portfolio is comprised of 37 percent farm loans, 36 percent commercial, 20 percent home mortgage loans, and 7 percent consumer loans. Tier one capital as of June 30, 2018 totaled \$12.75 million.

Competition within the bank's AA is strong. As of June 30, 2017, FNB ranked 10th for deposit share in its market out of 22 institutions. The bank has \$74 million in deposits, or about 3.4 percent of the deposit market share. The bank's competitors include large national banks, regional banks, and comparably sized state banks. Leading the market share is Wells Fargo with 5 branches, \$516 million in deposits, and 23.7 percent of the market share. Following is Klein Bank with 5 branches, \$361 million in deposits, and 16.5 percent of the market share.

There are no financial, legal, or other factors that impeded the bank's ability to meet its CRA obligations. FNB of Le Center was rated Satisfactory at the last CRA evaluation dated March 25, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB of Le Center's Community Reinvestment Act (CRA) performance using small bank procedures, which consists of the lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the LTD ratio and the complaint portions of the lending test covered from March 30, 2013 to September 4, 2018. The evaluation period for the remaining portions of the lending test covered January 1, 2015 to December 31, 2017.

We assessed the bank's performance by selecting primary products based on the number and dollar volume of loans originated between January 1, 2015 and December 31, 2017. Given changes in census data, we completed two separate assessments, one from January 1, 2015 through December 31, 2016, and the other from January 1, 2016 through December 31, 2017. We determined farm and business loans were the

primary products for the bank. See the loan origination volumes below. We selected a random sample of 20 loans for each primary product for each assessment period.

FNB Le Center Loan Origination Volume		
2015-2016	by #	By Volume (000s)
Farm	21%	39%
Business	15%	32%
Residential	13%	21%
Consumer	51%	7%
Total	1031	78,989

FNB Le Center Loan Origination Volume		
2017	by #	By Volume (000s)
Farm	25%	43%
Business	12%	32%
Residential	11%	18%
Consumer	52%	7%
Total	509	38,629

We used call report data to determine the bank’s quarterly LTD ratio and annual deposit information reported to the Federal Deposit Insurance Corporation (FDIC) to find similarly situated banks. The most recent deposit information is as of June 30, 2017.

Data Integrity

We completed a data integrity exam for the loans reported on the Home Mortgage Disclosure Act Loan Application Register (HMDA) and determined the data was accurate. However, we did not use the HMDA information for this evaluation because we determined farm and commercial loans were the primary products.

Selection of Areas for Full-Scope Review

FNB of Le Center has one Assessment Area (AA), which is referred to as the Le Center MSA AA throughout this report. The Le Center MSA AA received a full-scope review. Refer to Appendix A for an outline of the examination scope and Appendix B for a full description of the AA and the community profile.

Ratings

The bank’s overall rating is based on performance within the Le Center MSA AA. The two primary products were given equal weight in the analysis. The 2015-2016 assessment period was given more weight because this assessment period had more loan volume.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

FNB of Le Center's performance under the lending test is satisfactory. The bank's lending activity reflects satisfactory responsiveness to AA credit needs for farms and businesses when considering performance context.

FNB of Le Center's lending performance was evaluated on five performance criteria: the loan-to-deposit ratio, lending in the AA, lending to farms and businesses of different sizes, geographic distribution of loans, and responses to CRA related complaints.

Loan-to-Deposit Ratio

FNB of Le Center's Loan-to-Deposit (LTD) ratio is reasonable given the bank's size and the credit needs in its assessment area. The bank's quarterly LTD ratio ranged from 70.15 percent to 100.51 percent and averaged 87.43 percent since the last CRA evaluation. When compared with similarly situated banks with a presence in the assessment area, FNB of Le Center ranks second out of six institutions. Similarly situated institutions are defined as banks located in the AA with total assets between \$81 million and \$163 million as of June 30, 2018. The following table shows LTD details and rankings:

Average Loan-to-Deposit Ratio (3/31/2013-6/30/2018)	Total Assets (\$000)	Average LTD Ratio (%)
Riverland Bank	127,397	92.44
The First National Bank of Le Center	99,057	87.43
First State Bank of Le Center	80,692	73.19
Cornerstone State Bank	163,376	70.00
New Market Bank	113,256	56.83
State Bank of Belle Plaine	120,241	44.54

Lending in Assessment Area

FNB of Le Center originates a substantial majority of its loans inside its AA. We analyzed a random sample of 20 farm and 20 business loans per assessment period, for a total of 80 loans. FNB of Le Center originated 88.75 percent of loans by number and 96.20 percent of loans by dollar within its AA. The following table shows the lending by product type inside and outside of the AA.

Lending Inside and Outside of the Le Center MSA AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Farms										
2015-2016	17	85.00	3	15.00	20	2,158	89.10	264	10.9	2,422
2017	19	95.00	1	5.00	20	2,917	99.66	10	0.34	2,927
Business										
2015-2016	18	90.00	2	10.00	20	2,768	95.71	124	4.29	2,892
2017	17	85.00	3	15.00	20	3,913	98.32	67	1.68	3,980
Totals	71	88.75	9	11.25	80	11,756	96.20	465	3.80	12,221
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 OCC Loan Sample Due to rounding, totals may not equal 100.0</i>										

Lending to Farms and Businesses of Different Sizes

FNB’s lending to farms and businesses of different sizes reflects reasonable distribution.

Farm loans

Farm loans reflect reasonable distribution among farms of different sizes. FNB’s lending to small farms is below the demographic comparator for the 2015-2016 assessment period, but remains adequate. For the 2017 assessment period, the bank’s lending to small farms was near the demographic comparator for the 2017 assessment period. The bank exceeded the aggregate data for both assessment periods. The following tables show the distribution of loans among farms of different sizes for each assessment period.

Distribution of Loans to Farms by Gross Annual Revenues in the Le Center MSA AA											
Year	Total Loans to Farms				Farms with Revenues ≤ 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans by #	Aggregate	% Farms	% Bank Loans by #	% Farms	% Bank Loans By #
2015-2016	20	2,358	100	111	98.0	75.0	55.0	1.7	10.0	0.4	15.0
2017	20	2,973	100	142	97.7	90.0	53.5	1.9	10.0	0.4	0.0
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2015 CRA Aggregate Data 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>											

Business Loans

Business loans reflect reasonable penetration among businesses of different sizes. The bank is near the demographic comparator for both assessment periods. The bank exceeds the aggregate data for both assessment periods. The following tables show the distribution of loans among businesses of different sizes for each assessment area.

Distribution of Loans to Small Businesses by Gross Annual Revenues in the Le Center MSA AA											
Year	Total Loans to Small Businesses				Businesses with Revenues ≤ 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans By #	Aggregate	% Businesses	% Bank Loans By #	% Businesses	% Bank Loans By #
2015 - 2016	20	2,848	100	2,838	87.0	75.0	51.3	4.5	15.0	8.5	10.0
2017	20	4,010	100	2,905	87.7	80.0	46.9	5.2	15.0	7.1	5.0

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2015 CRA Aggregate Data
2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0*

Geographic Distribution of Loans

FNB’s loans reflect excellent distribution across geographies of different income levels.

Farm Loans

Farm loans reflect excellent distribution across different income-level geographies. The bank originated more than the demographic comparator for both assessment periods. The bank is near the aggregate data for both assessment periods. The following tables show the bank’s performance in comparison to the percentage of farmers in each income level geography.

Distribution of Loans to Farms by Income Category of the Geography in the Le Center MSA AA																
Year	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans by #	Aggregate	% Farms	% Bank Loans by #	Aggregate	% Farms	% Bank Loans by #	Aggregate	% Farms	% Bank Loans by #	Aggregate
2015-2016	20	2,358	100	111	0.0	0.0	0.0	14.7	20.0	28.8	58.3	80.0	50.5	26.9	0.0	20.7
2017	20	2,973	100	142	0.0	0.0	0.0	20.5	25.0	33.8	51.4	75.0	43.7	28.2	0.0	22.5

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2015 CRA Aggregate Data
2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0*

Business Loans

Business loans reflect excellent distribution across different income-level geographies. The bank originated more than the demographic comparator for both assessment periods. The bank also exceeded the aggregate data for both assessment periods. The following tables show the bank’s performance in comparison to the percentage of businesses in each income level geography

Distribution of Loans to Small Businesses by Income Category of the Geography in the Le Center MSA AA																
Year	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans By #	Aggregate	% Businesses	% Bank Loans by #	Aggregate	% Businesses	% Bank Loans by #	Aggregate	% Businesses	% Bank Loans by #	Aggregate
2015-2016	20	2,848	100	2,838	0.0	0.0	0.0	8.8	70.0	7.0	52.0	30.0	50.4	39.2	0.0	42.5
2017	20	4,010	100	2,905	0.0	0.0	0.0	16.8	80.0	12.2	48.8	15.0	46.8	34.4	5.0	41.1

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data
 Due to rounding, totals may not equal 100.0*

Responses to Complaints

FNB has not received any CRA related complaints since the previous CRA evaluation.

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): (01/01/2015-12/31/2017)	
Financial Institution		Products Reviewed
First National Bank of Le Center (FNB of Le Center) Le Center, MN		Farm and Business Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Minneapolis MSA	Full-Scope	N/A

Appendix B: Community Profiles for Full-Scope Areas

Le Center MSA AA

Demographic Information of the Assessment Area						
Assessment Area: FNB Le Center MSA AA 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	57.1	28.6	0.0
Population by Geography	130,720	0.0	9.4	53.0	37.6	0.0
Housing Units by Geography	49,467	0.0	11.3	55.0	33.7	0.0
Owner-Occupied Units by Geography	39,341	0.0	8.7	53.2	38.1	0.0
Occupied Rental Units by Geography	6,448	0.0	23.5	61.9	14.6	0.0
Vacant Units by Geography	3,678	0.0	18.0	61.9	20.1	0.0
Businesses by Geography	8,902	0.0	8.8	52.1	39.1	0.0
Farms by Geography	783	0.0	13.8	58.2	28.0	0.0
Family Distribution by Income Level	33,939	14.9	16.5	26.2	42.4	0.0
Household Distribution by Income Level	45,789	16.4	14.8	21.4	47.4	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$259,199
2016 FFIEC Updated MSA Median Family Income		\$85,200	Median Gross Rent			\$806
Households Below Poverty Level		5.5%	Families Below Poverty Level			3.9%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: FNB Le Center MSA AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	28.6	47.6	23.8	0.0
Population by Geography	136,316	0.0	17.2	48.3	34.5	0.0
Housing Units by Geography	51,413	0.0	20.6	47.9	31.5	0.0
Owner-Occupied Units by Geography	39,353	0.0	16.8	47.4	35.8	0.0

Occupied Rental Units by Geography	8,666	0.0	29.3	52.6	18.1	0.0
Vacant Units by Geography	3,394	0.0	42.5	41.3	16.2	0.0
Businesses by Geography	9,139	0.0	16.8	48.8	34.4	0.0
Farms by Geography	753	0.0	20.5	51.4	28.2	0.0
Family Distribution by Income Level	35,889	16.2	17.9	22.9	43.1	0.0
Household Distribution by Income Level	48,019	18.4	14.6	18.9	48.1	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$236,692
2017 FFIEC Updated MSA Median Family Income		\$89,800	Median Gross Rent			\$983
Households Below Poverty Level		6.6%	Families Below Poverty Level			4.5%
<i>Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies nor reflect illegal discrimination. FNB of Le Center has one AA, which consists of 21 CTs in Le Sueur County and Scott County. The bank’s AA is within the Minneapolis- St. Paul- Bloomington, MN-WI MSA. The bank’s AA is reasonable, as the bank is located in the most southern county of the Minneapolis MSA. From 2015-2016, the AA consisted of no low-income census tracts, three moderate-income CTs, thirteen middle-income CTs, and five upper-income census tracts, prior to 2017. In 2017, three census tracts changed from middle-income to moderate-income, increasing the number of moderate-income tracts to six and decreased the number of middle-income CTs to ten. The AA includes the census tract where the bank is located, and the AA is contiguous.

Based on the 2015 ACS data, the population of the AA is 136,316. Approximately 17 percent of the population lives in a moderate-income census tract, 48 percent live in a middle-income census tract, and 34 percent live in an upper-income census tract. The 2017 FFIEC Updated MSA Median Family Income is \$89,900. Approximately 4.5 percent of families and 6.6 percent of households were below the poverty level in 2017. As of year-end 2017, the unemployment rate in Le Sueur County was 4.7 percent, a decrease from year-end 2016 of 4.9 percent and 2015 of 4.8 percent.

The local economy is dependent on the agricultural industry. As part of this review, a community contact was made with a local branch of a federal government agency. He stated the economy is doing well in the AA; however, the farm economy is softening.

There are other industries in the area as well, such as manufacturing. Lenders in the area do a good job of serving their communities and are proactive in seeking lending relationships with consumers.