



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

August 5, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CorTrust Bank, N.A.
Charter Number: 23771

100 E. Havens
Mitchell, SD 57301

Office of the Comptroller of the Currency

4900 S. Minnesota Avenue, Suite 300
Sioux Falls, SD 57108

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a combination of performance in the State of South Dakota and the State of Minnesota. Performance in the State of South Dakota was rated more heavily because this area represents the largest portion of the bank's branches, loan volume during the evaluation period, and deposit volume as of June 30, 2018.
- The distribution of loans to geographies, businesses, and households of different income levels is reasonable.
- The Community Development (CD) Test rating is based on a combination of performance in the State of South Dakota and the State of Minnesota. Performance in the State of South Dakota was rated more heavily because this area represents the largest portion of the bank's branches, loan volume during the evaluation period, and deposit volume as of June 30, 2018.
- CD loans represent excellent responsiveness to assessment area (AA) needs and opportunities. Management originated 13 CD loans totaling \$14.9 million during the evaluation period.
- CD investments and donations represent adequate responsiveness to AA needs and opportunities. Management received credit for 40 CD investments and donations totaling \$1.2 million during the evaluation period.
- CD services represent adequate responsiveness to AA needs and opportunities. Thirty-seven employees provided service hours to 41 CD organizations during the evaluation period.

In addition to the activities considered at the AA level, we considered the following activities at the bank-wide level:

- CorTrust Bank, N.A. (CorTrust or bank) uses flexible lending practices in a safe and sound manner to address the credit needs of small farms and businesses and low- or moderate-income (LMI) individuals. CorTrust offers Farm Service Agency, Farmer Mac, and Small Business Administration loans. CorTrust also offers Veteran Administration, Federal Housing Administration, Farmers Home Administration, Federal Home Loan Bank of Des Moines Affordable Housing and Community Investment, and Community Home Improvement loans.
- CorTrust offers a full line of deposits such as checking accounts, savings accounts, certificates of deposit, and individual retirement accounts. Retail banking services targeted to LMI individuals, but available to all customers, include free checking accounts and basic savings accounts, which have a low minimum amount to open and avoid fees.

- The loan-to-deposit (LTD) ratio is more than reasonable.
- Management originated or purchased a majority of loans to borrowers within the bank's AAs during the evaluation period.

LTD Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, CorTrust's LTD ratio is more than reasonable.

CorTrust's average LTD ratio for the 12 quarters from January 1, 2016 to December 31, 2018 is 93.9 percent. The ratio ranged from an average quarterly low of 90.4 percent to an average quarterly high of 98.2 percent. This analysis is performed at the bank level rather than the AA level.

CorTrust's average LTD ratio compares favorably to the average LTD ratio of six similarly-situated banks operating in the bank's AAs. The average LTD ratio for the 12 quarters from January 1, 2016 to December 31, 2018 is 87.9 percent. The ratio ranged from an average quarterly low of 80.7 percent to an average quarterly high of 93.7 percent.

Lending in AA

Management originated or purchased a majority of the bank's loans inside its AAs.

Management originated and purchased 82.5 percent of its total loans by number and 65.1 percent of its total loans by dollar inside the bank's AAs during the evaluation period. This analysis is performed at the bank level rather than the AA level.

Lending Inside and Outside of the AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	93	77.5	27	22.5	120	30,851	63.9	17,407	36.1	48,258
Consumer	72	90.0	8	10.0	80	2,260	85.6	380	14.4	2,640
Total	165	82.5	35	17.5	200	33,110	65.1	17,787	34.9	50,898

Description of Institution

CorTrust is an \$894 million institution headquartered in Mitchell, South Dakota. Hopkins Financial Corporation, a one-bank holding company located in Mitchell, South Dakota, owns the majority of CorTrust. As of December 31, 2018, Hopkins Financial Corporation had total assets of \$90 million.

CorTrust owns two operating subsidiaries, CorTrust Mortgage Company and HHC, Inc. CorTrust Mortgage Company is headquartered in Sioux Falls, South Dakota and operates 37 locations throughout South Dakota and Minnesota. CorTrust Mortgage Company originates home mortgage loans. Loans originated by CorTrust Mortgage Company were considered in this evaluation. HHC, Inc. holds other

assets acquired by CorTrust. CorTrust also owns CorTrust Community Development, a CD corporation that holds four pieces of real estate in South Dakota for CRA purposes.

CorTrust is an interstate institution with 37 branches in South Dakota and Minnesota. CorTrust operates in 22 locations in South Dakota. Five branches are located in Sioux Falls, two branches are located in Mitchell, and two branches are located in Yankton. CorTrust operates one branch in each of the following towns in South Dakota: Aberdeen, Arlington, Artesian, Bowdle, Freeman, Gayville, Leola, Letcher, Mount Vernon, Pierpont, Tabor, Vermillion, and Webster. CorTrust's Minnesota operations are located in the Minneapolis metropolitan area. CorTrust operates 15 branches in Minnesota with one branch in each of the following towns in Minnesota: Anoka, Blaine, Brooklyn Park, Buffalo, Champlin, Delano, Edina, Glencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, Stewart, and Woodbury.

CorTrust acquired State Bank of Delano on August 3, 2018. The acquisition resulted in the addition of the Delano branch. CorTrust also acquired First Minnesota Bank on August 16, 2019. The acquisition resulted in the addition of the Anoka, Buffalo, Champlin, Edina, Glencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, and Stewart branches. The Delano branch was not included in the scope of this examination because the acquisition occurred fewer than six months before the end of the evaluation period. The Anoka, Buffalo, Champlin, Edina, Glencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, and Stewart branches were not included in the scope of this examination because the acquisition occurred outside of the evaluation period.

In addition to its branch locations, CorTrust operates 28 cash-dispensing Automated Teller Machines (ATMs). Five ATMs are located in Sioux Falls, two are located in Mitchell, two are located in Yankton, and one is located in each of the following towns: Aberdeen, Anoka, Arlington, Blaine, Brooklyn Park, Buffalo, Champlin, Delano, Edina, Glencoe, Hutchinson, Leola, Mayer, Minnetonka, Monticello, Mound, Vermillion, Webster, and Woodbury.

For purposes of the CRA, CorTrust operates with two rating areas and three AAs. The rating areas include the State of Minnesota and the State of South Dakota. The AAs include the Minneapolis Metropolitan Statistical Area (MSA) AA, the Sioux Falls MSA AA, and the South Dakota Non-MSA AA.

CorTrust's primary business focus is commercial loans to small and medium-sized businesses and home mortgage loans; however, the bank offers a full range of credit products within its AAs including agricultural loans and consumer loans. The bank also operates a trust department and offers credit cards and the sale of non-deposit investment products. Net loans represent 79 percent of total assets as of December 31, 2018. By dollar volume, the loan portfolio is comprised of the following types of credit: 72 percent real estate loans, 16 percent commercial loans, 6 percent agricultural loans, and 5 percent individual loans. Tier one capital totals \$98.4 million as of December 31, 2018.

There are no legal, financial, or other factors impeding CorTrust's ability to help meet the credit needs of its AAs. CorTrust received a "Satisfactory" rating at the prior CRA examination dated August 22, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is January 1, 2016 to December 31, 2018. We reviewed commercial loans in all AAs and consumer loans in the Sioux Falls MSA AA and the South Dakota Non-MSA AA as these were determined to be the bank's primary loan products when considering volume by number and dollar. Loans were weighted equally when determining performance under the Lending Test.

Loans originated in 2016 are compared to 2006-2010 American Community Survey (2010 ACS) data and loans originated in 2017-2018 are compared to 2011-2015 ACS (2015 ACS) data and, therefore, were evaluated separately.

The evaluation period for the CD Test is August 23, 2016 to December 31, 2018. We reviewed all CD loans, investments, donations, and services submitted by management as part of our examination.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings.

When determining conclusions for CorTrust, we weighted the bank's performance in the State of South Dakota most heavily. The bank's operations in South Dakota represent 88 percent of branch locations reviewed as part of this CRA evaluation, 89 percent of total deposits as of June 30, 2018, and 84 percent of total loan originations by dollar when considering branch locations reviewed as part of this CRA examination.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution or any affiliate whose loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of South Dakota

CRA rating for the State of South Dakota: Satisfactory.

The Lending Test is rated: Satisfactory.

The CD Test is rated: Satisfactory.

The major factors that support this rating include:

- The distribution of loans to geographies, businesses, and households of different income levels is reasonable.
- CD loans represent excellent responsiveness to AA needs and opportunities. Management originated 11 CD loans totaling \$13.9 million to borrowers located in South Dakota during the evaluation period.
- CD donations and investments represent adequate responsiveness to AA needs and opportunities. Management made 30 donations totaling \$134 thousand to 23 CD organizations in South Dakota during the evaluation period. Management also received credit for two prior-period investments totaling \$1.1 million during the evaluation period.
- CD services represent adequate responsiveness to AA needs and opportunities. Twenty-eight employees provided services hours to 34 CD organizations located in South Dakota during the evaluation period.

Description of Institution's Operations in South Dakota

South Dakota represents CorTrust's primary area of operations. CorTrust operates 22 branch locations and 14 cash-dispensing ATMs in South Dakota. South Dakota operations are divided into two AAs: South Dakota Non-MSA AA and Sioux Falls MSA AA.

South Dakota Non-MSA AA

The South Dakota Non-MSA AA includes all of the following counties: Brown, Clay, Davison, Day, Kingsbury, McPherson, Miner, Sanborn, and Yankton. The AA also includes one census tracts (CTs) in each of the following counties: Bon Homme, Edmunds, and Hutchinson. CorTrust operates 17 branches in the South Dakota Non-MSA AA. There are two branches in Mitchell, two branches in Yankton, and one branch in each of the following towns: Aberdeen, Arlington, Artesian, Bowdle, Freeman, Gayville, Leola, Letcher, Mount Vernon, Pierpont, Tabor, Vermillion, and Webster. The bank also operates nine cash-dispensing ATMs in the South Dakota Non-MSA. Two ATMs are located in Mitchell, two are located in Yankton, and one is located in each of the following towns: Aberdeen, Arlington, Leola, Vermillion, and Webster. According to 2015 ACS data, the South Dakota Non-MSA AA includes 31 CTs.

As of June 30, 2018, CorTrust gathered \$465.7 million of deposits in the South Dakota Non-MSA AA. This represents 68 percent of total bank deposits. CorTrust ranks third in deposit market share in the AA with total market share of 10.5 percent.

CorTrust's primary business focus in the South Dakota Non-MSA AA is commercial and consumer loans, although management also originates a significant number of agricultural loans. During the evaluation period, CorTrust and CorTrust Mortgage Company originated 5,705 loans totaling \$390.2 million in the South Dakota Non-MSA AA. This represents 71 percent of total loan originations by number and 41 percent of total loan originations by dollar during the evaluation period.

Lending In the South Dakota Non-MSA AA				
	#	% of #	\$ (000s)	% of \$
Agricultural	1,543	27.1	138,554	35.5
Commercial	1,065	18.7	177,576	45.5
Consumer	2,927	51.3	47,374	12.1
Home Mortgage	170	2.9	26,651	6.9
Total	5,705	100.0	390,155	100.0

Competition in the South Dakota Non-MSA AA is significant. According to the June 30, 2018, FDIC Deposit Market Share Report, CorTrust ranked third out of 33 deposit-taking institutions in the AA. This is a significant amount of competition when considering the institutions operate a total of 86 branches in the AA, which has a population of 130,328 per 2015 ACS data. Banks with market shares greater than CorTrust in the South Dakota Non-MSA include First Dakota National Bank and Wells Fargo Bank, N.A.

We completed one community contact in the South Dakota Non-MSA AA as part of this examination. The contact was completed via telephone with the Director of an organization that promotes economic development in the AA. The contact stated economic conditions in the AA were generally stable with low unemployment and decent demand for business expansion and housing. The contact stated that opportunity for CD participation in the AA is limited.

The following tables provide information on the demographic composition of the South Dakota Non-MSA AA.

Table A – Demographic Information of the AA						
AA: South Dakota Non-MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	0.0	0.0	90.3	9.7	0.0
Population by Geography	118,665	0.0	0.0	90.0	10.0	0.0
Housing Units by Geography	54,810	0.0	0.0	90.2	9.8	0.0
Owner-Occupied Units by Geography	33,247	0.0	0.0	90.2	9.8	0.0
Occupied Rental Units by Geography	14,818	0.0	0.0	90.6	9.4	0.0
Vacant Units by Geography	6,745	0.0	0.0	89.5	10.5	0.0
Businesses by Geography	8,781	0.0	0.0	90.8	9.2	0.0
Farms by Geography	1,907	0.0	0.0	91.3	8.7	0.0
Family Distribution by Income Level	29,532	15.9	17.4	25.2	41.6	0.0
Household Distribution by Income Level	48,065	23.3	16.3	17.8	42.6	0.0
Median Family Income Non-MSAs - SD		\$54,734	Median Housing Value			\$101,351
			Median Gross Rent			\$489
			Families Below Poverty Level			6.5%

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

Table A – Demographic Information of the AA						
AA: South Dakota Non-MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	0.0	3.2	80.6	16.1	0.0
Population by Geography	120,328	0.0	2.3	78.1	19.6	0.0
Housing Units by Geography	56,145	0.0	2.5	78.2	19.3	0.0
Owner-Occupied Units by Geography	33,640	0.0	1.2	75.8	23.0	0.0
Occupied Rental Units by Geography	16,525	0.0	5.2	82.5	12.2	0.0
Vacant Units by Geography	5,980	0.0	2.2	80.1	17.8	0.0
Businesses by Geography	8,694	0.0	6.5	74.6	18.9	0.0
Farms by Geography	1,683	0.0	0.4	71.0	28.6	0.0
Family Distribution by Income Level	30,757	19.0	16.9	22.6	41.5	0.0
Household Distribution by Income Level	50,165	24.1	15.9	17.6	42.4	0.0
Median Family Income Non-MSAs - SD		\$60,961	Median Housing Value			\$120,497
			Median Gross Rent			\$596
			Families Below Poverty Level			8.6%

*Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.
(*) The NA category consists of geographies that have not been assigned an income classification.*

Sioux Falls MSA AA

The Sioux Falls MSA AA includes Lincoln, Minnehaha, and Turner counties in South Dakota. These counties comprise a portion of the Sioux Falls MSA. The MSA also includes McCook County; however, management did not include this portion of the MSA in the bank's AA. CorTrust operates five branches and cash-dispensing ATMs in the Sioux Falls MSA AA. All of the branches and ATMs are located in Sioux Falls. According to 2015 ACS data, the Sioux Falls MSA AA includes 55 CTs.

As of June 30, 2018, CorTrust gathered \$143.3 million of deposits in the Sioux Falls MSA AA. This represents 21 percent of total bank deposits. CorTrust ranks 12th in deposit market share in the AA with total market share of 0.02 percent.

CorTrust's primary business focus in the Sioux Falls MSA AA is commercial and consumer loans. During the evaluation period, CorTrust and CorTrust Mortgage Company originated 1,831 loans totaling \$400.5 million in the Sioux Falls MSA AA. This represents 23 percent of total loan originations by number and 42 percent of total loan originations by dollar during the evaluation period.

Lending In the Sioux Falls MSA AA				
	#	% of #	\$ (000s)	% of \$
Agricultural	24	1.3	11,634	2.9
Commercial	525	28.7	280,866	70.1
Consumer	848	46.3	36,686	9.2
Home Mortgage	434	23.7	71,329	17.8
Total	1,831	100.0	400,515	100.0

Competition in the Sioux Falls MSA AA is strong. According to the June 30, 2018, FDIC Deposit Market Share Report, two large national banks control 98 percent of the deposit market share in the Sioux Falls MSA AA. CorTrust ranked 12th out of 35 deposit-taking institutions operating 138 branches in the AA. In addition to large banks, competition includes regional and locally-owned institutions.

The following tables provide information on the demographic composition of the Sioux Falls MSA AA.

Table A – Demographic Information of the AA						
AA: Sioux Falls MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	25.5	52.7	21.8	0.0
Population by Geography	222,643	0.0	25.1	52.8	22.1	0.0
Housing Units by Geography	90,400	0.0	28.0	51.9	20.1	0.0
Owner-Occupied Units by Geography	57,874	0.0	18.5	56.9	24.6	0.0
Occupied Rental Units by Geography	26,773	0.0	45.8	41.9	12.3	0.0
Vacant Units by Geography	5,753	0.0	40.9	48.3	10.8	0.0
Businesses by Geography	16,253	0.0	35.4	44.8	19.8	0.0
Farms by Geography	1,246	0.0	7.1	75.5	17.3	0.0
Family Distribution by Income Level	56,598	17.9	18.0	26.2	37.8	0.0
Household Distribution by Income Level	84,647	21.3	17.7	20.3	40.7	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$66,496	Median Housing Value			\$147,865
			Median Gross Rent			\$668
			Families Below Poverty Level			5.9%

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

Table A – Demographic Information of the AA						
AA: Sioux Falls MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	30.9	47.3	21.8	0.0
Population by Geography	237,118	0.0	28.4	49.5	22.1	0.0
Housing Units by Geography	97,514	0.0	31.4	47.6	21.0	0.0
Owner-Occupied Units by Geography	61,512	0.0	20.5	54.0	25.5	0.0
Occupied Rental Units by Geography	30,185	0.0	51.8	35.5	12.7	0.0
Vacant Units by Geography	5,817	0.0	40.3	43.4	16.4	0.0
Businesses by Geography	17,247	0.0	37.4	38.8	23.7	0.0
Farms by Geography	1,135	0.0	7.0	71.6	21.4	0.0
Family Distribution by Income Level	60,077	18.9	18.1	24.4	38.6	0.0
Household Distribution by Income Level	91,697	22.0	18.1	18.9	41.0	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$72,948	Median Housing Value			\$158,153
			Median Gross Rent			\$722
			Families Below Poverty Level			7.1%

Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in South Dakota

For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area.

We completed a full-scope review of the South Dakota Non-MSA AA and a limited-scope review of the Sioux Falls MSA AA. The South Dakota Non-MSA AA represents 77 percent of branches, 76 percent of deposit volume as of June 30, 2018, and 49 percent of loan volume by dollar originated during the evaluation period. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

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

Based on a full-scope and a limited-scope review, the bank's performance in South Dakota is reasonable.

Distribution of Loans by Income Level of the Geography

We did not analyze the distribution of loans by income level of the geography in the South Dakota Non-MSA AA. The South Dakota Non-MSA AA includes 31 CTs. There were no LMI CTs in the AA in 2016. Only one CT was moderate-income in 2017 and 2018. An analysis of this distribution would not provide meaningful information.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to households of different income levels and businesses of different sizes, given the product lines offered by the bank.

Loans originated in 2016 are compared to 2010 ACS data and loans originated in 2017-2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Small Loans to Businesses

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

The distribution of small loans to businesses of different sizes in the South Dakota Non-MSA AA is excellent. In 2016, CorTrust originated 90.0 percent of loans by number to small businesses. Small businesses are businesses with gross annual revenues of \$1 million or less. 2010 ACS data indicates 77.3 percent of businesses in the AA are small businesses. Aggregate CRA data indicates 48.3 percent of business loans were originated to small businesses. In 2017-2018, CorTrust originated 90.0 percent of loans by number to small businesses. 2015 ACS data indicates 76.1 percent of businesses in the AA are

small businesses. Aggregate CRA data indicates 56.7 percent of business loans were originated to small businesses.

Consumer Loans

Refer to Table V in the State of South Dakota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to households of different income levels in the South Dakota Non-MSA AA is reasonable. In 2016, CorTrust originated 13.3 percent of consumer loans by number to low-income borrowers. 2010 ACS data indicates 23.3 percent of AA households are low-income. CorTrust originated 25.0 percent of consumer loans by number to moderate-income borrowers. 2010 ACS data indicates 16.3 percent of AA households are moderate-income.

In 2017-2018, CorTrust originated 40.0 percent of consumer loans by number to low-income borrowers. 2015 ACS data indicates 24.1 percent of AA households are low-income. CorTrust originated 15.0 percent of consumer loans by number to moderate-income borrowers. 2015 ACS data indicates 15.9 percent of AA households are moderate-income.

Responses to Complaints

No complaints related to CorTrust's CRA performance in the South Dakota Non-MSA AA were received by the bank or the OCC during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

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

The bank exhibits a reasonable geographic distribution of loans in the Sioux Falls MSA AA.

CD TEST

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

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

CorTrust Community Development did not have any qualifying activity during the evaluation period.

Number and Amount of CD Loans

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CorTrust made an excellent level of CD loans in the South Dakota Non-MSA AA during the evaluation period. Management originated four CD loans totaling \$5.1 million during the evaluation period. This represents 7.5 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the South Dakota Non-MSA AA. One loan supported affordable housing and three loans provided funding to revitalize/stabilize a distressed/underserved middle-income CTs.

Number and Amount of Qualified Investments

Qualified Investments										
AA	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
South Dakota Non-MSA	2	1,062	27	99	29	90.6	1,161	97.1	--	--
Sioux Falls MSA	--	--	3	35	3	9.4	35	2.9	--	--

* 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

CorTrust made an adequate level of CD investments in the South Dakota Non-MSA AA during the evaluation period. CD investments and donations total \$1.1 million and represent 1.7 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the South Dakota Non-MSA AA.

Management did not purchase any CD investments during the evaluation period. Management received credit for two CD investments purchased in a prior evaluation period. The combined book value for the investments as of December 31, 2018 is \$1.1 million. The investments support affordable housing.

CorTrust made 27 donations totaling \$99 thousand to 20 qualified CD organizations in the South Dakota Non-MSA AA during the evaluation period. Four donations totaling \$44 thousand supported economic development activities, seventeen donations totaling \$40 thousand supported activities that revitalize/stabilize a distressed/underserved middle-income CT, and six donations totaling \$15 thousand supported community service organizations.

Statewide

CorTrust made four donations totaling \$11 thousand to two qualified CD organizations that provide services to the entire State of South Dakota during the evaluation period. Both organizations provide community services to LMI individuals living in South Dakota.

Extent to Which the Bank Provides CD Services

CD service represents adequate responsiveness to CD needs and opportunities in the South Dakota Non-MSA AA. Fourteen employees provided service hours to 21 qualified CD organizations during the evaluation period. Management does not track community service hours. The following are examples of some of the CD services provided to the South Dakota Non-MSA AA during the evaluation period:

- One employee serves on a Board of Directors (Board) responsible for providing road maintenance, signs, and drainage to a distressed/underserved middle-income CT.
- One employee serves as Board President for an organization that provides affordable housing in the AA.
- Several employees serve on the Boards of organizations that provide community services to LMI individuals in the AA.

Statewide

Four employees provided service hours to three qualified CD organizations during the evaluation period. Management does not track community service hours. The following are examples of some of the CD services provided to the State of South Dakota during the evaluation period:

- Two employees served on the Boards of organizations that provide community services to LMI children in South Dakota.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Sioux Falls MSA AA is weaker than the bank's overall performance under the CD Test in the full scope area.

CD Loans

CorTrust made an excellent level of CD loans in the Sioux Falls MSA AA during the evaluation period. Management originated seven CD loans totaling \$8.8 million during the evaluation period. This represents 42.5 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Sioux Falls MSA AA. Two loans supported affordable housing and five loans supported economic development activities.

CD Investments

CorTrust made a poor level of CD investments in the Sioux Falls MSA AA during the evaluation period. CD investments and donations totaled \$35 thousand and represented 0.2 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Sioux Falls MSA AA.

Management did not purchase any CD investments during the evaluation period. There were no prior period investments to consider.

CorTrust made three donations totaling \$35 thousand to three qualified CD organizations in the Sioux Falls MSA AA during the evaluation period. The donations supported community service organizations.

CD Services

CD service represents adequate responsiveness to CD needs and opportunities in the Sioux Falls MSA AA. Fourteen employees provided service hours to 13 qualified CD organizations during the evaluation period. Management does not track community service hours. The following are examples of some of the CD services provided to the Sioux Falls MSA AA during the evaluation period:

- One employee served as a loaned executive to an organization that provides community services to LMI individuals in the AA.
- One employee served on the selection committee for an organization that provides affordable housing.
- One employee served on a committee that coordinates capital fund drives for non-profit organizations in the AA.

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding.

The Lending Test is rated: Outstanding.

The CD Test is rated: Satisfactory.

The major factors that support this rating include:

- The distribution of loans to geographies and businesses of different income levels is excellent.
- CD loans represent excellent responsiveness to AA needs and opportunities. Management originated two CD loans totaling \$1.1 million to borrowers located in Minnesota during the evaluation period.
- CD donations and investments represent poor responsiveness to AA need and opportunities. Management made four donations totaling \$26 thousand to three CD organizations in Minnesota during the evaluation period.
- CD services represent adequate responsiveness to AA needs and opportunities. Five employees provided services hours to four CD organizations located in Minnesota during the evaluation period.

Description of Institution's Operations in Minnesota

CorTrust's Minnesota operations are limited to the Minneapolis MSA AA. For purposes of this examination, the Minneapolis MSA AA is limited to all of Anoka, Dakota, Hennepin, Ramsey, and Washington counties. These counties are part of the Minneapolis-Saint Paul-Bloomington, MN-WI MMSA; however, CorTrust's operations are limited to the Minnesota portion of the MMSA. CorTrust operated three branches in the Minneapolis MSA AA during the evaluation period. The branches are located in Blaine, Brooklyn Park, and Woodbury. According to 2015 ACS data, the Minneapolis MSA AA includes 664 CTs.

CorTrust operates 15 branches in Minnesota. One branch is located in each of the following towns: Anoka, Blaine, Brooklyn Park, Buffalo, Champlin, Delano, Edina, Glencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, Stewart, and Woodbury. The bank also operates 14 cash-dispensing ATMs in the Minneapolis MSA AA. One ATM is located in each of the following towns: Anoka, Blaine, Brooklyn Park, Buffalo, Champlin, Delano, Edina, Glencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, and Woodbury.

CorTrust acquired State Bank of Delano on August 3, 2018. The acquisition resulted in the addition of the Delano branch. CorTrust also acquired First Minnesota Bank on August 16, 2019. The acquisition resulted in the addition of the Anoka, Buffalo, Champlin, Edina, Gencoe, Hutchinson, Mayer, Minnetonka, Monticello, Mound, and Stewart branches. The Delano branch was not included in the scope of this examination because the acquisition occurred fewer than six months before the end of the evaluation period. The Anoka, Buffalo, Champlin, Edina, Gencoe, Hutchinson, Mayer, Minnetonka,

Monticello, Mound, and Stewart branches were not included in the scope of this examination because the acquisition occurred outside of the evaluation period.

As of June 30, 2018, CorTrust gathered \$72.8 million of deposits in the Minneapolis MSA AA. This represents 11 percent of total bank deposits. CorTrust ranks 65th in deposit market share in the AA with total market share of 0.04 percent.

CorTrust's primary business focus in the Minneapolis MSA AA is commercial loans. During the evaluation period, CorTrust and CorTrust Mortgage Company originated 469 loans totaling \$151.8 million in the Minneapolis MSA AA. This represents 6 percent of total loan originations by number and 16 percent of total loan originations by dollar during the evaluation period.

Lending In the Minneapolis MSA AA				
	#	% of #	\$ (000s)	% of \$
Agricultural	--	--	--	--
Commercial	346	73.8	141,075	92.9
Consumer	105	22.4	6,954	4.6
Home Mortgage	18	3.8	3,773	2.5
Total	469	100.0	151,802	100.0

Competition in the Minneapolis MSA AA is strong. According to the June 30, 2018, FDIC Deposit Market Share Report, two large national banks control 77 percent of the deposit market share in the Minneapolis MSA AA. CorTrust ranked 65th out of 105 deposit-taking institutions operating 581 branches in the AA. In addition to large banks, competition includes regional and locally-owned institutions.

We completed one community contact in the Minneapolis MSA AA as part of this examination. The contact was completed via telephone with the Research Manager of an organization that promotes economic development in the AA. The contact stated economic conditions in the AA are solid with good gross domestic product growth, low unemployment, and a strong housing market. The contact stated that credit needs in the AA include affordable housing for moderate-income borrowers and funding for start-up businesses.

The following tables provide information on the demographic composition of the Minneapolis MSA AA.

Table A – Demographic Information of the AA						
AA: Minneapolis MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	664	9.5	20.2	41.7	28.0	0.6
Population by Geography	2,628,597	7.8	18.0	42.7	31.4	0.1
Housing Units by Geography	1,097,854	7.7	19.1	43.7	29.5	0.0
Owner-Occupied Units by Geography	725,972	3.1	14.7	46.4	35.7	0.0
Occupied Rental Units by Geography	308,729	17.1	28.4	38.5	15.9	0.0
Vacant Units by Geography	63,153	14.0	24.8	37.7	23.5	0.0
Businesses by Geography	192,562	5.5	16.5	42.2	35.8	0.0
Farms by Geography	4,039	2.3	12.3	46.8	38.6	0.0
Family Distribution by Income Level	647,942	19.8	17.4	22.4	40.5	0.0
Household Distribution by Income Level	1,034,701	23.6	16.6	19.1	40.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$256,772
			Median Gross Rent			\$864
			Families Below Poverty Level			6.8%

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

Table A – Demographic Information of the AA						
AA: Minneapolis MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	664	8.4	24.1	41.9	24.5	1.1
Population by Geography	2,719,077	7.3	21.9	42.3	28.1	0.4
Housing Units by Geography	1,122,136	6.8	22.5	43.5	26.8	0.4
Owner-Occupied Units by Geography	718,849	2.8	17.8	46.4	33.0	0.1
Occupied Rental Units by Geography	350,079	14.2	31.9	38.0	14.9	0.9
Vacant Units by Geography	53,208	11.8	25.3	40.3	21.7	0.9
Businesses by Geography	203,197	5.6	18.9	44.6	30.6	0.4
Farms by Geography	4,266	2.3	14.7	50.0	32.8	0.1
Family Distribution by Income Level	669,081	21.1	17.1	21.6	40.2	0.0
Household Distribution by Income Level	1,068,928	24.5	16.3	18.2	40.9	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$230,168
			Median Gross Rent			\$965
			Families Below Poverty Level			7.5%

Source: 2015 ACS Census and 2018 D&B data. Due to rounding, totals may not equal 100.0.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Minnesota

For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area.

CorTrust's operations in the State of Minnesota are limited to the Minneapolis MSA AA. We completed a full-scope review of the Minnesota MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in Minnesota.

Loans originated in 2016 are compared to 2010 ACS data and loans originated in 2017-2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the Minneapolis MSA AA is excellent. In 2016, CorTrust did not originate any small loans to businesses to borrowers located in a low-income CT. 2010 ACS data indicates 5.5 percent of businesses are located in a low-income geography. Aggregate CRA data indicates 4.2 percent of small loans to businesses in the AA were originated to businesses located in a low-income CT. CorTrust originated 20.0 percent of small loans to businesses by number to borrowers located in a moderate-income CT. 2010 ACS data indicates 16.5 percent of businesses are located in a moderate-income CT. Aggregate CRA data indicates 14.8 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income CT.

In 2017, CorTrust originated 20.0 percent of small loans to businesses by number to borrowers located in a low-income CT. 2015 ACS data indicates 5.6 percent of small loans to businesses are located in a low-income CT. Aggregate CRA data indicates 4.9 percent of small loans to businesses in the AA were originated to businesses located in a low-income CT. CorTrust originated 25.0 percent of small loans to businesses by number to borrowers located in a moderate-income CT. 2015 ACS data indicates 18.9 percent of businesses are located in a moderate-income CT. Aggregate CRA data indicates 17.7 percent of small loans to businesses in the AA were originated to businesses located in a moderate-income CT.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Loans originated in 2016 are compared to 2010 ACS data and loans originated in 2017-2018 are compared to 2015 ACS data and, therefore, were evaluated separately.

Small Loans to Businesses

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

The distribution of small loans to businesses of different sizes in the Minneapolis MSA AA is excellent. In 2016, CorTrust originated 80.0 percent of loans by number to small businesses. 2010 ACS data indicates 83.4 percent of businesses in the AA are small businesses. Aggregate CRA data indicates 46.6 percent of business loans were originated to small businesses. In 2017-2018, CorTrust originated 65.0 percent of loans by number to small businesses. 2015 ACS data indicates 83.8 percent of businesses in the AA are small businesses. Aggregate CRA data indicates 55.8 percent of business loans were originated to small businesses.

Responses to Complaints

No complaints related to CorTrust's CRA performance in the Minneapolis MSA AA were received by the bank or the OCC during the evaluation period.

CD TEST

The bank's performance under the CD Test in the state of Minnesota is rated Satisfactory.

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

Number and Amount of CD Loans

Refer to the Lending Activity tables shown above for the facts and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CorTrust made an excellent level of CD loans in the Minneapolis MSA AA during the evaluation period. Management originated two CD loans totaling \$1.1 million during the evaluation period. This represents 10.1 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Minneapolis MSA AA. The loans supported economic development in the AA.

Number and Amount of Qualified Investments

Qualified Investments										
AA	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Minneapolis MSA	--	--	4	26	4	100.0	26	100.0	--	--

* 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

CorTrust made a poor level of CD investments in the Minneapolis MSA AA during the evaluation period. CD investments and donations totaled \$26 thousand and represented 0.2 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Minneapolis MSA AA.

Management did not purchase any CD investments during the evaluation period. There were no prior period investments to consider.

CorTrust made four donations totaling \$26 thousand to three qualified CD organizations in the Minneapolis MSA AA during the evaluation period. The donations supported community service organizations.

Extent to Which the Bank Provides CD Services

CD service represents adequate responsiveness to CD needs and opportunities in the Minneapolis MSA AA when considering the bank's limited presence in the AA. Five employees provided service hours to four qualified CD organizations during the evaluation period. Management does not track community service hours. The following are examples of some of the CD services provided to the Minneapolis MSA AA during the evaluation period:

- One employee serves on the Board of an organization that provides scholarships for secondary education to LMI individuals.
- Two employees serve on the Board for an organization that provides community services to LMI individuals in the AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2016 to 12/31/2018	
Bank Products Reviewed:	Small business and consumer loans CD loans, qualified investments, donations, and services	
Affiliate	Affiliate Relationship	Products Reviewed
CorTrust Mortgage Company	Operating Subsidiary	Home mortgage and consumer loans
CorTrust Community Development Corporation	CD Corporation	CD loans and qualified investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
None	N/A	N/A
State of Minnesota		
Minneapolis MSA AA	Full-scope	Includes all of Anoka, Dakota, Hennepin, Ramsey, and Washington counties.
State of South Dakota		
Sioux Falls MSA AA	Limited-scope	Includes all of Lincoln, Minnehaha, and Turner counties.
South Dakota Non-MSA AA	Full-scope	Includes all of Brown, Clay, Davison, Kingsbury, McPherson, Miner, Sanborn, and Yankton counties and one CT in Bon Homme, Edmunds, and Hutchinson counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS: CORTRUST BANK, N.A.			
Overall Bank	Lending Test Rating*	CD Test Rating	Overall Bank/ State Rating
CorTrust Bank, N.A.	Satisfactory	Satisfactory	Satisfactory
State			
State of Minnesota	Outstanding	Satisfactory	Outstanding
State of South Dakota	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending and CD 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 CT 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 MSA area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending and CD Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low-Income Geography: A CT with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): 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 MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose CD.

Rating Area: A rated area is a state or multi-state MSA. 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 MSA, the institution will receive a rating for the multi-state MSA.

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

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

Tier 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless

of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Sioux Falls MSA	60	20,842	37.1	5,566	0.0	0.0	0.0	35.4	30.0	34.1	44.8	31.7	42.3	19.8	38.3	23.5	
Total	60	20,842	37.1	5,566	0.0	0.0	0.0	35.4	30.0	34.1	44.8	31.7	42.3	19.8	38.3	23.5	

Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data; 2016 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Sioux Falls MSA	60	17,441	17.3	5,197	0.0	0.0	0.0	37.4	25.0	37.8	38.8	35.0	35.4	23.7	40.0	26.8	
Total	60	17,441	17.3	5,197	0.0	0.0	0.0	37.4	25.0	37.8	38.8	35.0	35.4	23.7	40.0	26.8	

Source: 2018 D&B data; 1/1/2017 - 12/31/2018 bank data; 2017 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Minneapolis MSA	20	14,060	4.6	65,298	5.5	0.0	4.2	16.5	20.0	14.8	42.2	35.0	40.7	35.8	45.0	40.2	
Total	20	14,060	4.6	65,298	5.5	0.0	4.2	16.5	20.0	14.8	42.2	35.0	40.7	35.8	45.0	40.2	

Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data; 2016 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Minneapolis MSA	20	8,473	67.59	55,663	5.6	20.0	4.9	18.9	25.0	17.7	44.6	30.0	44.6	30.6	25.0	32.5	
Total	20	8,473	67.59	55,663	5.6	20.0	4.9	18.9	25.0	17.7	44.6	30.0	44.6	30.6	25.0	32.5	

Source: 2018 D&B data; 1/1/2017 - 12/31/2018 bank data; 2017 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Sioux Falls MSA	20	4,782	71.4	5,566	80.2	75.0	48.6	7.3	25.0	12.5	0.0		
South Dakota Non-MSA	20	1,562	92.3	1,995	77.3	90.0	48.3	6.8	10.0	15.9	0.0		
Total	40	6,344	76.6	7,561	79.2	82.5	48.5	7.1	17.5	13.7	0.0		

Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data; 2016 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Sioux Falls MSA	20	9,281	21.82	5,197	80.4	55.0	53.7	7.0	45.0	12.6	0.0		
South Dakota Non-MSA	20	1,477	55.5	2,024	76.1	90.0	56.7	7.1	10.0	16.8	0.0		
Total	40	10,758	26.5	7,221	78.9	72.5	54.5	7.0	27.5	14.0	0.0		

Source: 2018 D&B data; 1/1/2017 - 12/31/2018 bank data; 2017 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minneapolis MSA	20	14,060	94.0	65,298	83.4	80.0	46.6	7.3	20.0	9.4	0.0	
Total	20	14,060	94.4	65,298	83.4	80.0	46.6	7.3	20.0	9.4	0.0	

Source: 2016 D&B data; 1/1/2016 - 12/31/2016 bank data; 2016 CRA aggregate data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minneapolis MSA	20	8,473	82.3	55,663	83.8	65.0	55.8	7.0	35.0	9.2	0.0	
Total	20	8,473	82.3	55,663	83.8	65.0	55.8	7.0	35.0	9.2	0.0	

Source: 2018 D&B data; 1/1/2017 - 12/31/2018 bank data; 2017 CRA aggregate data. Due to rounding, totals may not equal 100.00.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Sioux Falls MSA	60	3,420	5.5	0.0	0.0	27.1	23.3	52.2	31.7	20.7	45.0	
Total	60	3,420	5.5	0.0	0.0	27.1	23.3	52.2	31.7	20.7	45.0	

Source: 2010 U.S Census; 1/1/2016 - 12/31/2016 bank data. Due to rounding, totals may not equal 100.0.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography											2017-18
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Sioux Falls MSA	60	3,324	13.5	0.0	0.0	30.8	15.0	47.9	50.0	21.3	35.0
Total	60	3,324	13.5	0.0	0.0	30.8	15.0	47.9	50.0	21.3	35.0

Source: 2015 ACS Census; 1/1/2017 - 12/31/2018 bank data. Due to rounding, totals may not equal 100.0.

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Sioux Falls MSA	60	3,420	6.87	21.3	10.0	17.7	13.3	20.3	20.0	40.7	56.7
South Dakota Non-MSA	60	869	15.5	23.3	13.3	16.3	25.0	17.8	23.3	42.6	38.3
Total	120	4,289	8.6	22.0	11.7	17.2	19.2	19.4	21.7	41.4	47.5

Source: 2010 U.S Census; 1/1/2016 - 12/31/2016 bank data. Due to rounding, totals may not equal 100.0.

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2017-18
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Sioux Falls MSA	60	3,324	6.6	22.0	10.0	18.1	11.7	18.9	20.0	41.0	50.0
South Dakota Non-MSA	20	292	19.5	24.1	40.0	15.9	15.0	17.6	5.0	42.4	35.0
Total	80	3,616	7.6	22.8	17.5	17.3	12.5	18.4	16.3	41.5	46.3

Source: 2010 U.S Census; 1/1/2016 - 12/31/2016 bank data. Due to rounding, totals may not equal 100.0.