



PUBLIC DISCLOSURE

August 25, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Neighborhood National Bank
Charter Number 15161

45 North Union Street
Mora, MN 55051

Office of the Comptroller of the Currency
222 9th Street S, Suite 800
Minneapolis, MN 55402

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The bank's loan-to deposit (LTD) ratio is reasonable.
- The bank originated a majority of its loans inside its assessment areas (AA).
- The distribution of loans reflects satisfactory distribution among borrowers of different income levels.
- The distribution of loans reflects excellent dispersion through geographies of different income levels and businesses of different sizes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

Neighborhood National Bank's (NNB) LTD ratio averaged 70.8 percent over the 20 quarters since the previous CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 52.9 percent in the first quarter of 2015 to a high of 80.3 percent in the first quarter of 2019. NNB ranked third out of five similarly situated institutions. Similarly situated institutions include institutions operating in or near the bank's AA with similar asset size. The following table shows the bank's LTD compared to similarly situated institutions:

Institution (Headquarters)	Total Assets as of 12/31/2019 (\$000s)	Average LTD Ratio (%)
Viking Bank, NA (Alexandria, MN)	\$224,346	101.3
Flagship Bank Minnesota (Wayzata, MN)	\$239,153	88.2
Neighborhood National Bank (Mora, MN)	\$221,715	70.8
Woodlands National Bank (Hinckley, MN)	\$207,944	68.9
The First National Bank of Milaca (Milaca, MN)	\$213,384	68.5

Source: Call Report data from March 31, 2015 through December 31, 2019

Lending in Assessment Areas

A majority of the bank's loans are inside its AAs.

NNB originated and purchased 74.9 percent of its total loans by number and 65.5 percent of its loans by dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. To determine lending inside the AA, we analyzed 295 home mortgage loans, 60 small business loans, and 60 consumer loans originated between January 1, 2017 and December 31, 2019. The following table shows NNB's lending inside and outside of its AA:

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	222	75.3	73	24.7	295	32,107	71.8	12,615	28.2	44,722
Small Business	41	68.3	19	31.7	60	4,037	38.5	6,441	61.5	10,478
Consumer	48	80.0	12	20.0	60	764	64.1	428	35.9	1,192
Total	311	74.9	104	25.1	415	36,908	65.5	19,484	34.5	56,392

Description of Institution

NNB is a single-state, national bank headquartered in Mora, Minnesota (MN). The bank had total assets of approximately \$222 million, as of December 31, 2019. NNB is wholly owned by Peoples Bankshares, Inc, a holding company also headquartered in Mora, MN. NNB did not have any merger or acquisition activity during the evaluation period. NNB does not operate any subsidiaries or affiliates.

NNB had six full-service branches and six cash dispensing ATMs in operation during the evaluation period. The six locations include two locations in Mora, MN and one branch in each of the following cities in MN: Aitkin, Alexandria, Brainerd, and North Branch. NNB closed the Crosby, MN branch in May of 2017. See Description of Operations in the Minneapolis MSA and Description of Operations in the MN Non-MSA for additional branch and ATM information. For CRA purposes, NNB operates only within the State of MN. The MN rating area consists of the Minneapolis MSA AA and the MN Non-MSA AA.

NNB offers a variety of traditional banking products and services. The bank's primary lending focus is consumer, commercial, and home mortgage loans. Available consumer lending products include home mortgage loans (i.e. FHA, home construction, home equity), installment loans (i.e. new and used auto, recreational vehicles), and revolving lines of credit. The bank refers a significant number of customers to Crescent Mortgage to obtain conventional home mortgage loans. The numbers in the chart below do not reflect the loan volume that is referred to Crescent Mortgage. Available commercial products include commercial real estate, terms loans, working capital, and revolving lines of credit.

As of December 31, 2019, net loans and leases represent 64.3 percent of total assets. The loan portfolio based on dollar volume outstanding was comprised of 52.1 percent commercial loans, 32 percent home mortgage loans, 11.8 percent consumer loans, and 4.1 percent agriculture loans. Tier 1 capital totaled \$25.5 million or 11.5 percent of total assets at the end of the evaluation period.

NNB staff are active in the community. One employee was the chair of the county's economic development association as well as on the committee for the regional economic development group. Several bank employees were active in local organizations that assist with low- and moderate-income individuals and providing affordable housing.

There are no known financial, legal, or other factors that impede NNB's ability to help meet the credit needs in its AA. NNB received a 'Satisfactory' rating at the last CRA examination, dated February 17, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the LTD ratio analysis covered March 31, 2015 to December 31, 2019. The evaluation period for the lending test and the complaint review covered January 1, 2017 to December 31, 2019. We reviewed a sample of home mortgage, commercial, and consumer loans from each AA during the evaluation period. We determined the bank's primary loan products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. In both AAs, the primary products were home mortgage, commercial, and consumer loans. Refer to the table below to view loan originations and purchases by dollar and number during the evaluation period:

Total Loan Originations by Product Type		
	Percentage by Number of Loans	Percentage by Dollar Volume
Agriculture	1.9	3.6
Commercial	19.1	44.7
Consumer	67.9	22.5
Home Mortgage	11.1	29.2
Total	100.0	100.0

Demographic data is used in part to determine the bank's lending performance. All consumer loans originated or purchased were compared to the 2015 American Community Survey (ACS) data, and all commercial loans originated were compared to the Dunn and Bradstreet business data for the origination year. We relied on HMDA data to assess home mortgage loans.

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted two community members with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AAs.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States is not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Ratings

NNB's overall rating is based solely on the State of MN rating, as it is the bank's only rating area. We evaluated lending performance using five performance criteria: the LTD ratio, lending in the AAs, lending to borrowers of different income levels and business of different sizes, distribution of loans to geographies of different income levels, and responses to CRA-related complaints.

Consumer loans, commercial loans, and home mortgage loans were selected as primary products. Consumer loans received more weight in the Lending Test analysis as it serves as the largest loan portfolio segment by number of loans, comprising the majority of the bank's originations by number

volume during the evaluation period. Consumer loans represent 68 percent of loan originations by number and 23 percent by dollar volume. Commercial loans represent 19 percent of loan originations by number and 45 percent by dollar volume. Home mortgage loans represent 11 percent of loan originations by number and 29 percent by dollar volume. Agriculture loans were not included in our analysis given the limited volume.

NNB has two AAs, which are referred to as the Minneapolis MSA AA and the MN Non-MSA AA. Refer to Appendix A for an outline of the examination scope.

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 Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans among borrowers of different income levels and business of different sizes is reasonable.
- The distribution of loans throughout geographies of different income levels is excellent.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

Minneapolis MSA

The Minneapolis MSA AA consists of nine census tracts (CTs) in Chisago and Isanti counties. NNB operates one full-service branch in the Minneapolis MSA. This branch is located in North Branch, MN. One non-deposit taking ATM is located in the Minneapolis MSA, which is at the bank's branch location. The branch location in the Minneapolis MSA accounts for 17 percent of the bank's branch network.

The June 30, 2019 FDIC Deposit Market Share Report indicated that NNB had \$32.4 million or 17 percent of its deposits in the Minneapolis MSA AA. NNB ranks 12th of 15 deposit-taking institutions in the AA with deposit market share of 3.4 percent. The leaders of the market are First State Bank of Wyoming, First Bank & Trust, and MidWestOne Bank with combined market share of 36.5 percent (10-15 percent each).

NNB's primary business focus in the Minneapolis MSA is consumer loans, followed by commercial loans and home mortgage loans. Consumer loans comprised 45 percent by number and 13 percent by dollar volume of all loans originated within the Minneapolis MSA AA. Commercial loans comprised 39 percent by number and 54 percent by dollar volume of all loans originated within the Minneapolis MSA AA. Home mortgage loans comprised 14 percent by number and 29 percent by dollar volume of all loans originated within the Minneapolis MSA AA.

We completed two community contacts in conjunction with this examination. The first was a contact in the Minneapolis MSA AA that is a Director of a local organization familiar with the local economy and economic development in the area. The contact stated local economic conditions of the area continue to grow. Housing and industrial growth have improved economic conditions in recent years. Larger local businesses in the area have experienced growth as well with three large employers expanding and building new facilities, which created additional jobs in the area. Our contact stated the income level in the community is slightly higher than surrounding communities, and approximately 75 percent of the community works outside of this area, most specifically commuting to the metropolitan twin cities of Minneapolis and St Paul, MN.

The following table provides information on the demographic composition of the Minneapolis MSA for 2019:

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis MSA - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	33.3	66.7	0.0	0.0
Population by Geography	46,449	0.0	35.2	64.8	0.0	0.0
Housing Units by Geography	18,068	0.0	35.6	64.4	0.0	0.0
Owner-Occupied Units by Geography	13,976	0.0	33.2	66.8	0.0	0.0
Occupied Rental Units by Geography	3,124	0.0	47.8	52.2	0.0	0.0
Vacant Units by Geography	968	0.0	30.2	69.8	0.0	0.0
Businesses by Geography	3,371	0.0	32.1	67.9	0.0	0.0
Farms by Geography	179	0.0	21.2	78.8	0.0	0.0
Family Distribution by Income Level	12,069	19.5	22.5	27.9	30.0	0.0
Household Distribution by Income Level	17,100	22.1	17.6	22.9	37.4	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$84,589	Median Housing Value			\$178,040
			Median Gross Rent			\$881
			Families Below Poverty Level			3.7%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

MN Non-MSA

The MN Non-MSA AA consists of the entire counties of Aitkin and Douglas, as well as 16 CTs in Crow Wing county, four CTs in Kanabec county, three CTs in Mille Lacs county, and four CTs in Pine county. NNB operates five full-service branches in the MN Non-MSA AA. Branch locations in the MN Non-MSA AA account for 83 percent of the bank's branch network. Branches are located in Aitkin, Alexandria, Brainerd, and two locations in Mora. The bank's only deposit-taking ATM is located in the MN Non-MSA, in Mora. There are four non-deposit taking ATMs located in the MN Non-MSA, all of which are located within the bank's branches.

The June 30, 2019 FDIC Deposit Market Share Report indicated that NNB had \$154.9 million or 82.7 percent of its deposits in the MN Non-MSA AA. NNB ranks ninth of 34 deposit-taking institutions in the AA with deposit market share of 4 percent. The leader of the market is Bremer Bank with almost 20 percent market share.

NNB's primary business focus in the MN Non-MSA AA is consumer, commercial, and home mortgage loans. Consumer loans comprised 72 percent by number and 26 percent by dollar volume of all loans originated within the MN Non-MSA AA. Commercial loans comprised 15 percent by number and 41 percent by dollar volume of all loans originated within the MN Non-MSA AA. Home mortgage loans

comprised 10 percent by number and 29 percent by dollar volume of all loans originated within the MN Non-MSA AA.

We completed two community contacts in conjunction with this examination. The second was a contact in Kanabec County that is a Director of a local organization familiar with the local economy and economic development in the area. Our contact stated a large portion of the population of the county is low- and moderate-income. Our contact stated that Mora is the largest town in the county. The county has two industrial parks, with one located in Mora.

The following table provides information on the demographic composition of the MN Non-MSA for 2018 and 2019:

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non-MSA AA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	20.5	74.4	5.1	0.0
Population by Geography	147,678	0.0	18.8	75.3	5.9	0.0
Housing Units by Geography	93,292	0.0	18.5	76.4	5.1	0.0
Owner-Occupied Units by Geography	48,005	0.0	16.3	77.5	6.2	0.0
Occupied Rental Units by Geography	14,269	0.0	30.2	67.0	2.9	0.0
Vacant Units by Geography	31,018	0.0	16.4	79.0	4.5	0.0
Businesses by Geography	11,194	0.0	21.5	73.1	5.3	0.0
Farms by Geography	748	0.0	11.0	82.4	6.7	0.0
Family Distribution by Income Level	41,161	20.0	20.2	23.4	36.4	0.0
Household Distribution by Income Level	62,274	24.3	16.7	19.4	39.5	0.0
Median Family Income Non-MSAs - MN		\$63,182	Median Housing Value			\$181,090
			Median Gross Rent			\$735
			Families Below Poverty Level			7.7%
<i>Source: 2015 ACS and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN Non-MSA AA - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	17.9	76.9	5.1	0.0
Population by Geography	147,678	0.0	17.2	76.9	5.9	0.0
Housing Units by Geography	93,292	0.0	17.1	77.8	5.1	0.0
Owner-Occupied Units by Geography	48,005	0.0	15.2	78.6	6.2	0.0
Occupied Rental Units by Geography	14,269	0.0	26.2	71.0	2.9	0.0
Vacant Units by Geography	31,018	0.0	15.9	79.6	4.5	0.0

Businesses by Geography	12,459	0.0	17.6	76.8	5.7	0.0
Farms by Geography	784	0.0	11.2	81.5	7.3	0.0
Family Distribution by Income Level	41,161	20.0	20.2	23.4	36.4	0.0
Household Distribution by Income Level	62,274	24.3	16.7	19.4	39.5	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$181,090
			Median Gross Rent			\$735
			Families Below Poverty Level			7.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Minnesota

We completed full-scope reviews of the Minneapolis MSA AA and the MN Non-MSA AA. Both AAs were selected for full-scope reviews.

The MN Non-MSA was weighted most heavily based on the volume of branches, deposits, and loan originations located in this AA.

Refer to Appendix A for additional information.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The bank exhibits excellent geographic distribution of home mortgage loans in the State of Minnesota. Refer to Table O in the State of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA

The geographic distribution of home mortgage loans to geographies of different income levels in the Minneapolis MSA AA is adequate. NNB originated 26.1 percent of home mortgage loans within moderate-income geographies, which is somewhat lower than both the demographic and aggregate comparators. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

MN Non-MSA

The geographic distribution of home mortgage loans to geographies of different income levels in the MN Non-MSA AA is excellent. NNB originated 23.2 percent of home mortgage loans within moderate-income geographies in 2017-18 and 23 percent in 2019, significantly exceeding both the demographic and aggregate comparators for each year. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

Small Loans to Businesses

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

Minneapolis MSA

The distribution of small loans to businesses in CTs of different income levels in the Minneapolis MSA AA is good. NNB originated 30 percent of loans to small businesses located in a moderate-income geography in the MSA AA, which is near to the demographic comparator and somewhat lower than the aggregate comparator. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

MN Non-MSA

The distribution of small loans to businesses in CTs of different income levels in the MN Non-MSA AA is excellent. NNB originated 18.3 percent of loans to small businesses located in a moderate-income geography in 2017-18, which is near the demographic and aggregate comparators. NNB originated 20 percent of loans to small businesses located in a moderate-income geography in 2019, which exceeds the demographic and aggregate comparators. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

Consumer Loans

The bank exhibits excellent distribution of consumer loans in the State of Minnesota. Refer to Table U in the State of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Minneapolis MSA

The distribution of consumer loans to geographies of different income levels in the Minneapolis MSA AA is good. NNB originated 35 percent of consumer loans in moderate-income geographies, which is near to the demographic comparator. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

MN Non-MSA

The distribution of consumer loans to geographies of different income levels in the MN Non-MSA MSA AA is excellent. NNB originated 40 percent of consumer loans in moderate-income geographies in 2017-18 and 50 percent in 2019, significantly exceeding the demographic comparator for each year. There were no low-income CTs within the AA during the evaluation period; therefore, low-income CTs were not considered in our analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The bank exhibits reasonable distribution of loans to individuals of different income levels in the State of Minnesota. Refer to Table P in the State of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA

The borrower distribution of home mortgage loans to borrowers of different income levels in the Minneapolis MSA AA is adequate. NNB originated 17.4 percent of home mortgage loans to low-income borrowers, which is near to the demographic comparator and exceeds the aggregate comparator. NNB originated 8.7 percent of home mortgage loans to moderate-income borrowers, which is lower than both the demographic and aggregate comparators.

MN Non-MSA

The borrower distribution of home mortgage loans to borrowers of different income levels in the MN Non-MSA AA is good. NNB originated 5.8 percent of home mortgage loans to low-income borrowers in 2017-2018, which is lower than the demographic comparator but near the aggregate comparator. NNB originated 16.7 percent of home mortgage loans to moderate-income borrowers in 2017-2018, which is somewhat lower than the demographic comparator but near to the aggregate comparator. NNB originated 13.1 percent of home mortgage loans to low-income borrowers in 2019, which is somewhat lower than the demographic comparator but exceeds the aggregate comparator. NNB originated 6.6 percent of home mortgage loans to moderate-income borrowers in 2019, which is lower than both the demographic and aggregate comparators.

Small Loans to Businesses

The bank exhibits an excellent distribution of loans to businesses of different sizes in the State of Minnesota. Refer to Table R in the State of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis MSA

The distribution of loans to businesses of different sizes in the Minneapolis MSA is excellent. NNB originated 65 percent of loans to small businesses, which is somewhat lower than the demographic comparator and exceeds the aggregate comparator.

MN Non-MSA

The distribution of loans to businesses of different sizes in the MN Non-MSA is excellent. NNB originated 75 percent of loans to small businesses in 2017-2018 and 80 percent in 2019. The bank was near each demographic comparator but exceeded each aggregate comparator.

Consumer Loans

The bank exhibits reasonable distribution of loans to individuals of different income levels in the State of Minnesota. Refer to Table V in the State of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Minneapolis MSA

The borrower distribution of consumer loans to borrowers of different income levels in the Minneapolis MSA AA is excellent. NNB originated 40 percent of consumer loans to low-income borrowers, which exceeds the demographic comparator. NNB originated 15 percent of consumer loans to moderate-income borrowers, which is near to the demographic comparator.

MN Non-MSA

The borrower distribution of consumer loans to borrowers of different income levels in the MN Non-MSA AA is good. NNB originated 10 percent of consumer loans to low-income borrowers in 2017-2018, which is lower than the demographic comparator. NNB originated 30 percent of consumer loans to moderate-income borrowers in 2017-2018, which exceeds the demographic comparator. NNB originated 20 percent of consumer loans to low-income borrowers and 15 percent to moderate-income borrowers in 2019, both which are near the demographic comparators.

Responses to Complaints

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the AAs 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:	1/1/2017-12/31/2019	
Bank Products Reviewed:	Home mortgage, consumer, and commercial loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
Minneapolis MSA	Full-scope	Chisago County CTs 1001, 1003.01, 1003.02, 1004.01, 1004.02 and Isanti County CTs 1302, 1303.01, 1303.02, 1304.
MN Non-MSA	Full-scope	Counties of Aitken and Douglas, and portions of the following counties: Crow Wing (CTs 9501, 9502.04, 9504, 9505.01, 9505.02, 9507-9512, 9513.01, 9513.02, 9514, 9516, 9517), Kanabec (CTs 4801-4804), Mille Lacs (CTs 9701-9703), and Pine (CTs 9505-9508).

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

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

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. 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 assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
MN Non-MSA 2017-2018	138	18,618	100.0	5,462	0.0	0.0	0.0	16.3	23.2	16.6	77.5	73.9	76.5	6.2	2.9	6.9	0.0	0.0	0.0	
Total	138	18,618	100.0	5,462	0.0	0.0	0.0	16.3	23.2	16.6	77.5	73.9	76.5	6.2	2.9	6.9	0.0	0.0	0.0	

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
MN Non-MSA 2019	61	8,009	100.0	6,386	0.0	0.0	0.0	15.2	23.0	13.3	78.6	75.4	79.6	6.2	1.6	7.1	0.0	0.0	0.0	
Total	61	8,009	100.0	6,386	0.0	0.0	0.0	15.2	23.0	13.3	78.6	75.4	79.6	6.2	1.6	7.1	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Minneapolis MSA	23	5,480	100.0	5,037	0.0	0.0	0.0	33.2	26.1	36.5	66.8	73.9	63.5	0.0	0.0	0.0	0.0	0.0	0.0	
Total	23	5,480	100.0	5,037	0.0	0.0	0.0	33.2	26.1	36.5	66.8	73.9	63.5	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
MN Non-MSA 2017-2018	138	18,618	100.0	5,462	20.0	5.8	7.2	20.2	16.7	18.2	23.4	31.2	21.3	36.4	38.4	36.4	0.0	8.0	17.0	
Total	138	18,618	100.0	5,462	20.0	5.8	7.2	20.2	16.7	18.2	23.4	31.2	21.3	36.4	38.4	36.4	0.0	8.0	17.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
MN Non-MSA 2019	61	8,009	100.0	6,386	20.0	13.1	5.8	20.2	6.6	16.5	23.4	31.1	19.2	36.4	42.6	40.8	0.0	6.6	17.7	
Total	61	8,009	100.0	6,386	20.0	13.1	5.8	20.2	6.6	16.5	23.4	31.1	19.2	36.4	42.6	40.8	0.0	6.6	17.7	

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Minneapolis MSA	23	5,480	100.0	2,696	19.5	17.4	10.2	22.5	8.7	28.5	27.9	13.0	22.1	30.0	56.5	17.5	0.0	4.4	21.7	
Total	23	5,480	100.0	2,696	19.5	17.4	10.2	22.5	8.7	28.5	27.9	13.0	22.1	30.0	56.5	17.5	0.0	4.4	21.7	

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA 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			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MN Non-MSA 2017-2018	60	5,924	100.0	0.0	0.0	0.0	21.5	18.3	19.7	73.1	81.7	73.2	5.3	0.0	7.1	0.0	0.0	0.0
Total	60	5,924	100.0	0.0	0.0	0.0	21.5	18.3	19.7	73.1	81.7	73.2	5.3	0.0	7.1	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 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																2019		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MN Non-MSA 2019	20	1,741	100.0	0.0	0.0	0.0	17.6	20.0	19.7	76.8	80.0	73.2	5.7	0.0	7.1	0.0	0.0	0.0
Total	20	1,741	100.0	0.0	0.0	0.0	17.6	20.0	19.7	76.8	80.0	73.2	5.7	0.0	7.1	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 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																2017-19		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minneapolis MSA	20	3,456	100.0	0.0	0.0	0.0	32.1	30.0	38.9	67.9	70.0	61.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	3,456	100.0	0.0	0.0	0.0	32.1	30.0	38.9	67.9	70.0	61.1	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
MN Non-MSA 2017-2018	20	2,169	100.0	2,551	83.2	75.0	53.1	5.2	25.0	11.6	0.0	
Total	20	2,169	100.0	2,551	83.2	75.0	53.1	5.2	25.0	11.6	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 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											2019	
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 Loan	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
MN Non-MSA 2019	20	1,741	100.0	2,551	84.5	80.0	53.1	4.8	20.0	10.7	0.0	
Total	20	1,741	100.0	2,551	84.5	80.0	53.1	4.8	20.0	10.7	0.0	

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 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											2017-19	
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 Loan	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minneapolis MSA	20	3,456	100.0	682	86.2	65.0	54.1	4.9	35.0	8.9	0.0	
Total	20	3,456	100.0	682	86.2	65.0	54.1	4.9	35.0	8.9	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate 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		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Household	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA 2017-2018	20	329	100.0	0.0	0.0	19.5	40.0	75.1	55.0	5.4	5.0	0.0	0.0	
Total	20	329	100.0	0.0	0.0	19.5	40.0	75.1	55.0	5.4	5.0	0.0	0.0	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA 2019	20	247	100.0	0.0	0.0	17.7	50.0	76.9	40.0	5.4	10.0	0.0	0.0	
Total	20	247	100.0	0.0	0.0	17.7	50.0	76.9	40.0	5.4	10.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 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													2017-19	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Minneapolis MSA	20	570	100.0	0.0	0.0	35.9	35.0	64.1	65.0	0.0	0.0	0.0	0.0	
Total	20	570	100.0	0.0	0.0	35.9	35.0	64.1	65.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 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		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA 2017-2018	20	329	100.0	24.3	10.0	16.7	30.0	19.4	15.0	39.5	30.0	0.0	15.0	
Total	20	329	100.0	24.3	10.0	16.7	30.0	19.4	15.0	39.5	30.0	0.0	15.0	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA 2019	20	247	100.0	24.3	20.0	16.7	15.0	19.4	25.0	39.5	45.0	0.0	0.0	
Total	20	247	100.0	24.3	21.1	16.7	15.8	19.4	21.1	39.5	42.1	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 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													2017-19	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Minneapolis MSA	20	570	100.0	22.1	40.0	17.6	15.0	22.9	15.0	37.4	30.0	0.0	0.0	
Total	20	570	100.0	22.1	40.0	17.6	15.0	22.9	15.0	37.4	30.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%

