



PUBLIC DISCLOSURE

March 5, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Winona National Bank
Charter Number 10865

204 Main Street
Winona, MN 55987

Office of the Comptroller of the Currency

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, 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

The overall CRA rating is: Satisfactory

The primary factors supporting Winona National Bank's (WNB's) rating include:

- The bank's loan-to-deposit ratio is reasonable;
- The bank originated a majority of its loans inside the designated assessment area (AA);
- The bank's distribution of loans reflect excellent penetration among borrowers of different income levels; and
- The bank's overall geographic distribution of loans reflects excellent dispersion throughout the AA.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to 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.

Description of Institution

WNB is a \$306 million bank headquartered in Winona, MN. WNB operates three branch locations within the city of Winona. Each branch has a 24-hour ATM, and the bank has one additional ATM at a local Midtown Foods grocery store. None of the ATMs accepts deposits. The bank did not open or close branches or have any merger or acquisition activity since their last CRA examination. The bank is 100 percent owned by Winona Banc Holding Company, a single bank holding company located in Winona, MN. The bank does not have any other affiliates or subsidiaries.

Winona is a southeastern Minnesota community located along the Mississippi River. There are a few small towns on the Wisconsin side of the river that use Winona for local business and banking. These towns function as one economy. Competition within the AA is strong. Eight financial institutions operate within the AA with Merchants National Bank holding the largest share of deposits and commercial loans. Based on the June 30, 2017 FDIC Deposit Market Share Report, WNB ranks second in deposit market share with 22.36 percent of deposits. The bank has one assessment area (AA), the Winona AA. Refer to appendix B for a description.

WNB's primary business strategy is commercial and retail real estate lending. As of December 31, 2017, WNB's loan portfolio totaled \$192 million and consisted of 77.4 percent real estate loans, 13.7 percent commercial loans, 1.6 percent consumer loans, and 7.3 percent other loans. Total loans and leases were 62.7 percent of average assets, and tier 1 capital was \$37 million.

There are no financial, legal, or other factors that impede WNB's ability to meet its CRA obligations. The bank's last CRA rating, dated April 1, 2015, was "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

WNB's CRA performance was evaluated under the small bank procedures, which is limited to the lending test. The lending test evaluated the bank's record of meeting the credit needs of its AA through its lending activities during the evaluation period. The evaluation period was from April 2, 2015 to March 5, 2018.

The lending test focused on the bank's primary loan product, which was determined based on loan origination and purchase volume during the evaluation period. We determined commercial loans to be the bank's primary loan product in both 2016 and 2017. Commercial loans totaled 68 percent by dollar volume and 35 percent by number in 2016, and 71 percent by dollar volume and 38 percent by number in 2017.

Data Integrity

To evaluate the bank's performance, we selected a sample of the primary product loans. This included 40 randomly selected commercial loans originated between January 1, 2016 and December 31, 2017. We used information included in the loan files to complete our review.

Selection of Areas for Full-Scope Review

The bank has one AA, which is referred to as the Winona AA throughout this report. The Winona AA received a full-scope review. Refer to Appendix A for more details about the examination scope and Appendix B for a full description of the AA and the community profile.

Ratings

WNB's performance under the lending test is rated satisfactory overall. WNB's lending performance was evaluated on five performance criteria; the loan-to-deposit ratio; lending in the AA; lending to borrowers of different incomes; geographic distribution of loans; and responses to CRA related complaints.

We assigned the geographic distribution of loans test a lower weight, as there were no low- and moderate-income CTs in 2016, and only one moderate-income CT in 2017. We assigned the lending to borrowers of different incomes test the most weight, as it gave the best representation of the bank's performance of meeting the credit needs within the community.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

WNB’s performance under the lending test is rated satisfactory overall. WNB’s lending performance was evaluated on five performance criteria; the loan-to-deposit (LTD) ratio; lending in the AA; lending to borrowers of different incomes; geographic distribution of loans; and responses to CRA related complaints. We assigned the geographic distribution of loans test a lower weight, as there were no low- and moderate-income CTs in 2016, and only one moderate-income CT in 2017. We assigned the lending to borrowers of different incomes test the most weight, as it gave the best representation of the bank’s performance of meeting the credit needs within the community.

WNB was evaluated under small bank procedures, which does not include the Community Development Test; however, WNB made significant community development (CD) donations, loans, and services during the evaluation period. Please refer to the information below for detail.

Loan-to-Deposit Ratio

WNB’s LTD ratio is reasonable given secondary market loan sales. The bank’s LTD ratio averaged 66 percent over the 12 quarters since the last CRA examination. The bank’s quarterly LTD ratio ranged from a low of 57 percent in March 2015 to a high of 79 percent in September 2017. The bank’s LTD ratio increased over time due to the bank’s strategy to grow real estate loans and the increasing loan demand as the AA economy improved. The bank’s LTD ratio ranked third among four similarly situated banks. Similarly situated banks are defined as banks with market presence within the AA and total assets between \$50 million and \$750 million as of December 31, 2017. LTD ratios for these banks during the same time period ranged from a quarterly average of 61 percent to 88 percent. WNB sells a significant percentage of home mortgage loans to the secondary market, and these sold loans are not included in the LTD ratio. During the lending test period, the bank sold \$30.9 million home loans. The bank’s net LTD ratio would be approximately 90 percent if the bank had retained these loans in-house. The bank’s LTD ratio is reasonable in light of secondary market loan sales. The table below shows the bank’s LTD ratio compared to similarly situated banks.

Loan-to-Deposit Ratios for Similarly Situated Banks		
Bank	Total Assets (as of 12/31/17)	Average LTD (1Q15-4Q17)
Home Federal Savings Bank	722,455	87.85%
Peoples State Bank of Plainview	261,234	78.08%
Winona National Bank	305,579	66.07%
Security State Bank of Lewiston	67,214	61.43%

Source: Call Report Data.

Lending in Assessment Area

WNB originates a majority of its loans inside its AA. WNB originates 78 percent of loans by number and 83 percent by dollar within its AA. The table on the following page shows lending inside and outside the AA.

Lending in Winona AA 2016 and 2017										
Loan Type	Number of Loans					Dollars of Loans (in thousands)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Commercial Loans	31	77.50%	9	22.50%	40	\$8,214	83.26%	\$1,651	16.74%	\$9,865

Source: OCC Loan Sample.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

WNB's overall distribution of loans to borrowers of different income levels reflects excellent penetration. The bank's lending to small businesses was near the demographic comparator in 2016 and exceeded the demographic comparator in 2017. We assigned a higher weight to the 2017 test, as the bank made approximately 27 percent more commercial loans by both number and dollar in 2017 than they did in 2016. The tables below display the bank's performance lending to borrowers of different income levels compared to the percentage of businesses in each income level.

Borrower Distribution of Loans to Businesses in Winona AA 2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	78.57%	7.72%	13.71%	100%
% of Bank Loans in AA by #	70.00%	30.00%	0.00%	100%
% of Bank Loans in AA by \$	71.48%	28.52%	0.00%	100%

Source: OCC Loan Sample; Dun and Bradstreet Data as of June 2016.

Borrower Distribution of Loans to Businesses in Winona AA 2017				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	77.87%	8.15%	13.98%	100%
% of Bank Loans in AA by #	85.00%	15.00%	0.00%	100%
% of Bank Loans in AA by \$	37.04%	62.96%	0.00%	100%

Source: OCC Loan Sample; Dun and Bradstreet Data as of June 2017.

Geographic Distribution of Loans

WNB's overall distribution of loans reflects excellent dispersion across geographies of different income levels in 2017. We did not complete the geographic distribution test for 2016 originations. The results of that test would not be meaningful, as there were no low- or moderate-income CTs in the 2016 AA.

In 2017, WNB's loans to small businesses in moderate-income geographies exceeded the demographic comparator and reflects excellent dispersion. The table below shows the bank's performance in comparison to the percentage of businesses in each income level geography.

Geographic Distribution of Loans to Businesses in Winona AA 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial	0.00%	0.00%	10.89%	25.00%	74.66%	65.00%	14.45%	10.00%

Source: Loan Sample; Dun and Bradstreet Data as of June 2017.

Responses to Complaints

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

Community Development Activity

WNB was evaluated under small bank procedures, which does not include the Community Development Test; however, WNB made significant CD donations, loans, and services during the evaluation period.

Donations

WNB made 109 CD donations during the evaluation period totaling approximately \$272 thousand, which represents 0.70 percent of total capital as of December 31, 2017. These donations were made to organizations that have community development purpose and primarily serve low- and moderate-income individuals within the AA. These donations helped meet the credit needs of the community, including supporting small businesses through donations to organizations such as the Winona Chamber of Commerce and the Southeast MN Small Business Development Center.

Services

During the evaluation period, 18 of the 71 WNB employees provided CD services to 31 organizations. These services include serving on Boards and committees of organizations that have community development purpose and primarily serve low- and moderate-income individuals within the AA, as well as providing financial service

expertise for organizations with CD purpose that primarily serve low- to moderate-income individuals. One WNB employee was also on the Economic Development Committee for the Winona Chamber of Commerce, an entity that supports local small businesses, during the entire evaluation period.

Loans

Additionally, WNB originated seven CD loans during the evaluation period totaling approximately \$3.0 million, which represents 7.75 percent of total capital as of December 31, 2017. The loans were made to organizations that have community development purpose and primarily serve low- and moderate-income individuals within 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 1/1/2016 to 12/31/2017 Evaluation period: 04/02/2015 to 03/05/2018	
Financial Institution	Products Reviewed	
Winona National Bank (WNB) Winona, Minnesota (MN)	Commercial Products	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>N/A – The only affiliate is the bank’s holding company. We did not review any affiliate activity or products.</i>	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Winona AA	Full-Scope	The AA includes 3 CTs in Wisconsin that border the Mississippi river. These CTs have small towns that function as one economy with Winona and do not substantially extend the AA beyond MN state lines. Using demographic data from the 2015 ASC US Census, 80% of the population in the AA live in MN CTs. For demographic comparators, we relied on MN CTs.

Appendix B: Community Profiles for Full-Scope Areas

Winona AA - 2016

Demographic Information for Full-Scope Area: Winona AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0	0	88.89%	11.11%	0
Population by Geography	46,445	0	0	84.30%	15.70%	0
Owner-Occupied Housing by Geography	12,662	0	0	80.15%	19.85%	0
Businesses by Geography	2,618	0	0	85.71%	14.29%	0
Farms by Geography	343	0	0	69.10%	30.90%	0
Family Distribution by Income Level	10,640	15.71%	17.70%	22.75%	43.83%	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,555	0	0	81.97%	18.03%	0
Median Family Income for 2016	\$61,692	Median Housing Value for 2016				\$160,293
FFIEC Updated Median Family Income for 2016	\$63,800	2016 Annual Unemployment Rate				3.6%
Households Below the Poverty Level for 2016	16.30%					

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

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI, U.S. Bureau of Labor Statistic 2016 unemployment data

Winona AA - 2017

Demographic Information for Full-Scope Area: Winona AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0	11.11%	77.78%	11.11%	0
Population by Geography	46,129	0	8.52%	75.92%	15.56%	0
Owner-Occupied Housing by Geography	12,061	0	11.72%	68.29%	19.99%	0
Businesses by Geography	2,589	0	10.89%	74.66%	14.45%	0
Farms by Geography	315	0	1.59%	68.89%	29.52%	0
Family Distribution by Income Level	10,057	14.08%	16.98%	24.95%	43.99%	0

Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,124	0	16.49%	67.54%	15.97%	0
Median Family Income for 2017	\$69,627	Median Housing Value for 2017		\$158,948		
FFIEC Updated Median Family Income for 2017	\$65,300	2017 Annual Unemployment Rate (through November 2017)		3.3%		
Households Below the Poverty Level for 2017	14.94%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 2010 U.S. Census, 2017 FFIEC updated MFI, U.S. Bureau of Labor Statistic 2017 unemployment data

WNB’s AA includes most of Winona County in Minnesota (MN), and parts of Buffalo and Trempealeau Counties in Wisconsin (WI). The AA contains a total of 12 census tracts (CT), including nine in MN and three in WI. The three CTs in WI have small towns that depend on Winona for business and banking, and function as one economy with Winona. Including these CTs does not substantially extend the AA beyond MN state lines. Using demographic data from the 2015 ASC US Census, 80% of the population in the AA live in MN CTs. For demographic comparators, we relied on MN CTs.

In 2016, eight of the MN CTs were middle-income and one was upper-income. In 2017, one of the MN CTs was moderate income, seven were middle-income, and one was upper-income. We included tables for both 2016 and 2017 in our lending test due to the change in CTs. The three WI CTs were middle income in both 2016 and 2017. None of the CTs are in an MSA. The AA is reasonable, complies with regulatory requirements, and does not arbitrarily exclude any low- or moderate-income CTs.

The Winona economy is diverse and not dependent on any one major industry. Per the City of Winona’s 2016 Comprehensive Annual Financial Audit, the largest employers are Fastenal, Winona Health, and Winona State University, which combined make up 26.12% of the county’s employment. Per the Bureau of Labor Statistics, in 2016 and 2017 (through November 2017) the annual unemployment rate for Winona County was 3.6 and 3.3 percent, respectively. This compares favorably to the Minnesota unemployment rate of 3.9 and 3.5 percent, respectively, for the same time periods.

As part of this review, we contacted a member of the community to gain an understanding of the credit needs of the area, and involvement of local financial institutions. The community contact indicated that the local economy is doing well overall; however, small businesses in downtown Winona are in need of a revival, as they are struggling to compete with global competition from Amazon and other online markets. This aligns with the census tract change in downtown Winona from middle-income to moderate-income between 2016 and 2017. The community contact indicated that loans to small businesses to help the downtown area is a credit need in the community. Additional credit needs are funding for public schools and the need of affordable housing for low- and moderate-income families. The community contact stated that banks in the local area have a strong presence and do a great job in meeting the needs of the community through donations to local charities.