PUBLIC DISCLOSURE

February 11, 2020

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Northwoods Bank of Minnesota
Charter Number 714810

1200 East First Street
Park Rapids, MN 56470

Office of the Comptroller of the Currency
222 South 9th Street, 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 distribution of loans throughout geographies of different income levels is reasonable.

- The distribution of loans reflects excellent distribution among borrowers of different income levels.

- The bank's loan-to-deposit (LTD) is reasonable.

- The bank originated a majority of its loans inside its assessment areas (AAs).

Loan-to-Deposit Ratio

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

Northwoods Bank of Minnesota's (Northwoods) LTD ratio averaged 67.1 percent over the 20 quarters since the previous CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 61.7 percent in June 2014 to a high of 74.2 percent in June 2017. Northwoods ranked fourth out of six similarly situated institutions. Similarly situated institutions include institutions operating in or near the bank's AAs with total assets between $37 million and $170 million. The following table shows the bank's LTD ratio compared to similarly situated institutions:

Institution (Headquarters)	Total Assets as of 12/31/2018 ($000s)	Average LTD Ratio (%)
Mid-Central Federal Savings Bank (Wadena, MN)	$114,070	103.7
Community Development Bank FSB (Ogema, MN)	$169,521	78.0
Wadena State Bank (Wadena, MN)	$168,252	67.1
Northwoods Bank of Minnesota (Park Rapids, MN)	**$120,476**	**67.1**
State Bank of Lake Park (Lake Park, MN)	$37,048	63.2
Community First Bank (Menahga, MN)	$88,272	61.7

Source: Call Report data from March 31, 2014 through December 21, 2018

Lending in Assessment Area

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

The bank originated 77.5 percent of its total loans by number and 75.5 percent of its loans by dollar volume inside the AAs during the evaluation period. To determine lending inside the AAs, we analyzed

40 home mortgages and 40 consumer loans originated between January 1, 2016 and December 31, 2018. The following table shows lending inside and outside of the AAs:

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	31	77.5	9	22.5	40	2,744	75.5	889	24.5	3,633
Consumer	31	77.5	9	22.5	40	387	74.9	129	25.1	516
Total	**62**	**77.5**	**18**	**22.5**	**80**	**3,131**	**75.5**	**1,018**	**24.5**	**4,149**

Source: Loan Sample

Description of Institution

Northwoods is a $120 million single-state bank headquartered in Park Rapids, MN. The bank has four branches, two in Park Rapids, MN, one in Nevis, MN, and one in Pine City, MN. There have been no mergers, acquisitions, or branch openings since the last CRA evaluation. The bank closed their Rush City, MN branch since the last evaluation. This branch was closed as of December 31, 2017. The bank does not have any deposit-taking ATMs. Northwoods is wholly owned by Dorset Bancshares, Inc., a one-bank holding company located in Park Rapids, MN.

Northwoods offers a traditional mix of banking products and services. The bank's primary lending focus is home mortgage lending. As of December 31, 2018, the bank's loan portfolio totaled $73 million based on total commitments. The loan portfolio by dollar is comprised of 57 percent commercial loans, 38 percent home mortgage loans, four percent consumer loans, and less than one percent agricultural loans. As of December 31, 2018, tier 1 capital represented 16.8 percent of risk-weighted assets.

There are no financial, legal, or other factors that impede Northwoods' ability to meet the credit needs in its AA during the evaluation period. Northwoods was rated Outstanding at the last CRA evaluation dated February 18, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Northwoods' CRA performance using small bank performance standards, which evaluates the bank's record of meeting the credit needs of its AA. The evaluation period for the LTD analysis covered the quarters ending March 31, 2014 to December 31, 2018, and the complaint review covered February 19, 2014 to February 10, 2020. The evaluation period for the remaining portions of the Lending Test covered January 1, 2016 to December 31, 2018. Home mortgages and consumer loans are the bank's primary products during the evaluation period. We determined the bank's primary loan products by reviewing the number and dollar volume of loan originations during the evaluation period.

Demographic data is used in part to determine the bank's lending performance. The U.S. Census Bureau released updated demographic data from the 2015 American Community Survey (ACS) effective January 1, 2017. Loans originated in 2016 were compared to 2010 U.S. Census data and loans

originated in 2017 and 2018 were compared to 2015 ACS data. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distributions within the AA.

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

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. 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

Northwoods' overall rating is based on the bank's lending performance within the State of Minnesota. It is the bank's only rating area. We evaluated lending performance using five performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels, distribution of loans to geographies of different income levels, and responses to CRA-related complaints. The 2017-2018 performance received more weight than 2016 performance because it had higher loan volume. Home mortgage loans received more weight than consumer loans due to higher origination volumes by both number and dollar. The Non-MSA AA received more weight due to significantly higher loan volumes and that the bank closed their branch in the MSA AA in 2017.

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 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 home mortgage and consumer loans throughout geographies of different income levels is reasonable.

- The distribution of home mortgage and consumer loans among borrowers of different income levels is excellent.

- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

Northwoods has two AAs within the State of Minnesota. The AAs include the Non-MSA AA and the MSA AA. The Non-MSA AA received a full-scope review and the MSA AA received a limited-scope review.

Non-MSA AA

The Non-MSA AA consists of all of Hubbard county and portions of Becker, Wadena, and Pine counties. The Non-MSA AA is comprised of 12 census tracts (CTs). During the evaluation period, there was one moderate-income CT and 11 middle-income CTs.

Bank competition within the Non-MSA AA is strong. Per the June 30, 2019 FDIC Deposit Market Share Report, there were 21 deposit taking institutions within the AA. Northwoods ranks seventh in market share, holding 5.4 percent of the market. The top three institutions in the market are The Citizens National Bank of Park Rapids, Bremer Bank, and Midwest Bank with combined market share of 39.2 percent.

We completed one community contact in conjunction with this examination. The contact was a local government agency familiar with the local economy and economic development in the area. The contact indicated that the economic conditions are stable, similar to Minnesota and the rest of the nation. The major need identified was housing.

Top industries in the area are health care, hospitality, retail, manufacturing, and tourism. Major employers are RDO Frozen Foods and TEAM Industries, as well as the local hospital, county governments, and school districts.

The following tables show the demographic and economic characteristics of the Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Northwoods Bank Non-MSA AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	91.7	0.0	0.0
Population by Geography	38,104	0.0	9.5	90.5	0.0	0.0
Housing Units by Geography	23,305	0.0	8.3	91.7	0.0	0.0
Owner-Occupied Units by Geography	12,812	0.0	6.9	93.1	0.0	0.0
Occupied Rental Units by Geography	2,568	0.0	32.1	67.9	0.0	0.0
Vacant Units by Geography	7,925	0.0	2.7	97.3	0.0	0.0
Businesses by Geography	2,608	0.0	15.9	84.1	0.0	0.0
Farms by Geography	222	0.0	2.7	97.3	0.0	0.0
Family Distribution by Income Level	10,687	20.7	21.0	24.2	34.2	0.0
Household Distribution by Income Level	15,380	23.9	16.2	21.7	38.3	0.0
Median Family Income Non-MSAs - MN		$57,683	Median Housing Value			$179,891
			Median Gross Rent			$609
			Families Below Poverty Level			9.0%

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 Assessment Area						
Assessment Area: Northwoods Bank Non-MSA AA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	91.7	0.0	0.0
Population by Geography	38,021	0.0	9.7	90.3	0.0	0.0
Housing Units by Geography	23,991	0.0	7.8	92.2	0.0	0.0
Owner-Occupied Units by Geography	12,685	0.0	7.9	92.1	0.0	0.0
Occupied Rental Units by Geography	2,984	0.0	18.6	81.4	0.0	0.0
Vacant Units by Geography	8,322	0.0	3.8	96.2	0.0	0.0
Businesses by Geography	2,553	0.0	11.6	88.4	0.0	0.0
Farms by Geography	197	0.0	4.1	95.9	0.0	0.0
Family Distribution by Income Level	10,507	21.5	20.6	23.5	34.3	0.0
Household Distribution by Income Level	15,669	24.7	18.3	19.3	37.7	0.0
Median Family Income Non-MSAs - MN		$63,182	Median Housing Value			$168,431
			Median Gross Rent			$674
			Families Below Poverty Level			7.6%

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.

MSA AA

The MSA AA consisted of a portion of Chisago county. The MSA AA was comprised of two middle-income CTs. The only bank branch within this AA was in Rush City. This branch was a drive-up only location and did not have a lender. As a result, there were no loans originated in this AA during our evaluation period. Due to the minimal services offered at this branch, Northwoods closed the branch on December 31, 2017.

Given the limited services offered and closure of the Rush City branch, we completed a limited-scope review of the MSA AA as a full-scope review would not provide any meaningful analysis.

The following table shows the demographic and economic characteristics of the MSA AA for 2016.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Northwoods Bank MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	10,972	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,851	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,915	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	402	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	534	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	586	0.0	0.0	100.0	0.0	0.0
Farms by Geography	87	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,555	21.8	20.7	27.0	30.5	0.0
Household Distribution by Income Level	3,317	22.6	16.6	22.2	38.6	0.0
Median Family Income MSA – 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		$79,301	Median Housing Value			$239,847
			Median Gross Rent			$832
			Families Below Poverty Level			5.2%
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.						

Scope of Evaluation in Minnesota

The rating for the state of Minnesota is based mostly on the performance of the Non-MSA AA as it is the only AA with loan data. The Non-MSA AA received a full-scope review. Refer to Appendix A for additional information.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans.

In 2016, the moderate-income CT was in Park Rapids, where the bank has two branches. In 2017, the ACS data changed the income designation of two CTs. The Park Rapids CT changed to middle-income and the CT where the bank's Pine City branch was located previously designated as middle-income was changed to moderate-income.

Home Mortgage Loans

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.

The distribution of home mortgages to geographies of different income levels in the Non-MSA AA is reasonable. In 2017-2018, lending in moderate-income CTs was below both the aggregate data and demographic comparators. This was considered reasonable given the limited lending opportunities and high competition in the rural farmland area of the moderate-income CT. In 2016, lending in moderate-income CTs was excellent and exceeded both the aggregate data and demographic comparator.

Consumer Loans

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.

The distribution of consumer loans to geographies of different income levels in the Non-MSA AA is reasonable. In 2017-2018, lending in moderate-income CTs was poor given the limited lending opportunities and high competition in the rural farmland area of the moderate-income CT. In 2016, lending in moderate-income CTs was excellent and exceeded the percentage of households in moderate-income CTs.

Conclusions for Area Receiving a Limited Scope Review

We completed a limited-scope review of the MSA AA. Northwoods did not originate any loans in the AA in 2016-2017 prior to closing. As a result, there is no meaningful data to analyze.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels.

Home Mortgage Loans

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.

The distribution of home mortgage loans among borrowers of different income levels is excellent. In 2017-2018, the percentage of home loans to low and moderate-income (LMI) borrowers was excellent and exceeded the proportion of LMI families and aggregate lending data. In 2016, the percentage of

home mortgages to moderate-income borrowers was excellent and exceeded the percentage of moderate-income families and aggregate lending data. The percentage of home mortgages to low-income borrowers was similar to aggregate lending data but was below the percentage of low-income families. In 2016, nine percent of families were below the poverty level, making it difficult to originate home loans to low-income borrowers as they are less likely to qualify for a home mortgage loan.

Consumer Loans

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.

The distribution of consumer loans among borrowers of different income levels is excellent. Consumer lending in 2016 reflects reasonable distribution among borrowers of different income levels and excellent distribution in 2017-2018. Lending to moderate-income borrowers significantly exceeded the demographic comparator in both 2016 and 2017-2018. Lending to low-income borrowers was below the demographic comparator for 2016 and near to the demographic comparator for 2017-2018.

Conclusions for Area Receiving a Limited Scope Review

We completed a limited-scope review of the MSA AA. Northwoods did not originate any loans the AA in 2016-2017 prior to closing. As a result, there is no meaningful data to analyze.

Responses to Complaints

During the evaluation period, Northwoods did not receive any complaints related to performance in meeting the AA's credit needs.

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 MSAs and non-MSAs 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:	1/1/2016-12/31/2018	
Bank Products Reviewed:	Home mortgage and consumer	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
Non-MSA AA	Full-scope	Hubbard County and Portions of Pine, Becker, and Wadena Counties Pine County CTs: 9506, 9507, 9508 Becker County CT: 4501 Wadena County CT: 4801
MSA AA	Limited-scope	Chisago County CTs: 1101, 1102

Appendix B: Summary of MMSA and State Ratings

RATING – Northwoods Bank of Minnesota	
Overall Bank	**Lending Test Rating**
Northwoods Bank of Minnesota	Satisfactory
State:	
Minnesota	Satisfactory

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.

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 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; or activities that revitalize or stabilize low- or moderate-income 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, 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 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**.**

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.

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.

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 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. All multistate metropolitan statistical areas, 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/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 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.

State of Minnesota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2016
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
Assessment Area:	#	$	% 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
Non-MSA AA	60	6,433	100.0	1,265	0.0	0.0	0.0	6.9	16.7	5.9	93.1	83.3	94.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	60	6,433	100.0	1,265	0.0	0.0	0.0	6.9	16.7	5.9	93.1	83.3	94.2	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2017-18
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
Assessment Area:	#	$	% 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
Non-MSA AA	60	6,275	100.0	1,174	0.0	0.0	0.0	7.9	3.3	13.4	92.1	96.7	86.6	0.0	0.0	0.0	0.0	0.0	0.0
Total	60	6,275	100.0	1,174	0.0	0.0	0.0	7.9	3.3	13.4	92.1	96.7	86.6	0.0	0.0	0.0	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower — **2016**

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
Non-MSA AA	60	6,433	100.0	1,265	20.7	5.0	5.9	21.0	28.3	18.9	24.2	20.0	22.6	34.2	46.7	40.0	0.0	0.0	12.6
Total	**60**	**6,433**	**100.0**	**1,265**	**20.7**	**5.0**	**5.9**	**21.0**	**28.3**	**18.9**	**24.2**	**20.0**	**22.6**	**34.2**	**46.7**	**40.0**	**0.0**	**0.0**	**12.6**

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
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
Non-MSA AA	60	6,275	100.0	1,174	21.5	13.3	8.6	20.6	26.7	18.9	23.5	20.0	23.2	34.3	40.0	32.5	0.0	0.0	16.8
Total	**60**	**6,275**	**100.0**	**1,174**	**21.5**	**13.3**	**8.6**	**20.6**	**26.7**	**18.9**	**23.5**	**20.0**	**23.2**	**34.3**	**40.0**	**32.5**	**0.0**	**0.0**	**16.8**

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

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		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
Non-MSA AA	20	188	100.0	0.0	0.0	11.1	20.0	88.9	80.0	0.0	0.0	0.0	0.0
Total	**20**	**188**	**100.0**	**0.0**	**0.0**	**11.1**	**20.0**	**88.9**	**80.0**	**0.0**	**0.0**	**0.0**	**0.0**

Source: 2010 U.S Census; 01/01/2016 - 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
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA AA	60	639	100.0	0.0	0.0	9.9	0.0	90.1	100.0	0.0	0.0	0.0	0.0
Total	60	639	100.0	0.0	0.0	9.9	0.0	90.1	100.0	0.0	0.0	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 V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA AA	20	188	100.0	23.9	15.0	16.2	35.0	21.7	30.0	38.3	20.0	0.0	0.0
Total	20	188	100.0	23.9	15.0	16.2	35.0	21.7	30.0	38.3	20.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 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
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA AA	60	639	100.0	24.7	23.3	18.3	35.0	19.3	23.3	37.7	18.3	0.0	0.0
Total	60	639	100.0	24.7	23.3	18.3	35.0	19.3	23.3	37.7	18.3	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