

### PUBLIC DISCLOSURE

November 27, 2017

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Miners National Bank of Eveleth Charter Number 6991

401 Grant Avenue Eveleth, MN 55734

Office of the Comptroller of the Currency

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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 primary factors supporting The Miners National Bank of Eveleth's (Miners NB) rating include:

- Miners NB's net loan to deposit (LTD) ratio is reasonable based on the institution's size, financial condition, assessment area (AA) credit needs, and secondary market loan sales;
- Miners NB originated a substantial majority of its loans inside its designated AA;
- The bank's distribution of loans reflects reasonable penetration among borrowers of different income levels; and
- The bank's overall geographic distribution of loans reflects reasonable dispersion throughout AA geographies of different income levels.

#### **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 (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The 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**

Miners NB is a \$70 million privately-owned, single-state national bank located in Eveleth, Minnesota. The bank has one full-service location that offers traditional banking products and services to individuals and businesses. The location also has an ATM and a drive-up. The ATM is not a deposit-taking ATM. The bank did not open or close branches since the prior CRA examination in June 2012. No merger or acquisition activities affected the bank during the evaluation period. The bank has no affiliates or subsidiaries.

Retail lending, including residential mortgages, continues to be the bank's primary focus. As of September 30, 2017, the bank's outstanding loan portfolio totaled \$26 million. The loan portfolio by dollar volume is comprised of 54 percent home mortgage loans, 36 percent business loans, and ten percent consumer loans.

Miners NB has one AA which includes 28 census tracts within St. Louis County in northern Minnesota. This area is often referred to as the Iron Range. The bank's AA is within the Duluth MN-WI multistate metropolitan statistical area (MSA). The bank's AA reasonably excludes Duluth and the Wisconsin portions of the MSA. The bank does not have a presence in these areas, and the areas would otherwise be too large for the bank to reasonably serve.

Competition is strong within the bank's AA. As of June 30, 2017, the FDIC deposit share report indicated that Miners NB ranks 12th with 1.70 percent of the total deposit share within St. Louis County. The bank's deposits totaled \$59 million. There were 22 institutions operating in the market at the time of the report. Large national banks control most of the market and operate several branches in the area. Wells Fargo has 11 branches with \$1 billion or 31 percent of the market share. U.S. Bank has ten branches with \$589 million or 17 percent of the market share.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The bank received a "Satisfactory" rating at the prior CRA examination dated June 26, 2012.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

Miners NB's CRA performance was evaluated under the small bank procedures, which include the lending test only. The lending test evaluated the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the LTD deposit and complaint portions of the lending test covered June 27, 2012 to November 27, 2017. The evaluation period for the remaining portions of the lending test covered January 1, 2015 to December 31, 2016.

The lending test focused on the bank's primary loan products, which were determined based on loan origination volume during 2015 and 2016. We determined home mortgage loans and consumer loans to be the bank's primary loan products. During this time period, the bank originated 323 loans, totaling \$20 million. Home mortgage loans represented 74 percent of new loans by dollar and 37 percent by number. Home mortgage loans include home purchase, home improvement, and home refinance loans. Consumer loans represented 57 percent of new loans by number and 12 percent by dollar. Business loans and farm loans were excluded from this evaluation, as neither were considered primary loan products.

#### **Data Integrity**

To evaluate the bank's performance, we selected a sample of the primary product loans. This included all 87 home mortgage loans and 60 randomly selected consumer loans originated between January 1, 2015 and December 31, 2016. Prior to this evaluation, we tested the accuracy of the bank's Home Mortgage Disclosure Act Loan Application Register (HMDA-LAR) data. We determined the loan data was accurate and reliable. We used the HMDA-LAR data without exception in this evaluation.

#### Selection of Areas for Full-Scope Review

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

## Ratings

The bank's overall rating is based on the performance within the Iron Range AA. Residential real estate loans (also referred to as home loans) and consumer loan products were given equal weight in the analysis.

## **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**

Miners NB's performance under the lending test is rated satisfactory. Overall, the bank's lending activity reflects satisfactory responsiveness to AA credit needs for home mortgage loans and consumer loans when considering performance context.

Miners NB'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.

#### Loan-to-Deposit Ratio

Miners NB's net LTD ratio is reasonable given the bank's size, financial condition, credit needs of the AA, and loan sales to the secondary market. The bank's LTD ratio averaged 37 percent over the 22 quarters since the last CRA examination. The bank's quarterly LTD ratio ranged from a low of 33 percent in December 2012 to a high of 42 percent in June 2012. The bank ranked fourth among five similarly situated banks. Similarly situated banks are defined as banks located in the AA with total assets between \$26 million and \$78 million as of September 30, 2017. Net LTD ratios for these banks during the same time period ranged from a quarterly average of 21 percent to 84 percent. Miners NB's average LTD ratio was adversely impacted by a lack of loan demand during most of the evaluation period. Additionally, the bank sells home mortgage loans to the secondary market, and these sold loans are not included in the LTD ratio. During the evaluation period, the bank sold \$13.6 million in home loans. The bank's net LTD ratio would be approximately 61 percent if the bank had retained these loans in-house. The bank's LTD ratio, in light of secondary market loan sales, is considered reasonable.

Loan-to-Deposit Ratios for Similarly Situated Banks							
Bank	Total Assets (as of 9/30/17)	Average LTD (2Q12-3Q17)					
The First National Bank of Buhl	26,046	83.60%					
Northern State Bank of Virginia	64,277	76.33%					
The First National Bank of Gilbert	36,759	51.85%					
The Miners National Bank of Eveleth	69,516	37.43%					
First National Bank (Chisholm)	78,442	21.19%					

Source: Call Report Data.

#### **Lending in Assessment Area**

Miners NB originates a substantial majority of its loans inside its AA. We analyzed a random sample of 20 consumer loans and all 87 HMDA-reportable home loans originated between January 1, 2015 and December 31, 2016. Miners NB originated 96

percent of its loans by number and 98 percent by dollar within its AA. The following table shows the lending by product type inside and outside of the AA.

Lending in Iron Range Assessment Area											
		Nur	nber of I	_oans		Dollars of Loans					
							(in	thousands	s)		
Loop Type	Ins	side	Ou	Outside			ide	Outs	ide	Tatal	
Loan Type	#	%	#	%	Total	\$	%	\$	%	Total	
Home Purchase	42	91.30	4	8.70	46	5,222	93.55	360	6.45	5,582	
Home Refinance	33	100.00	0	0.00	33	4,444	100.00	0	0.00	4,444	
Home	8	100.00	0	0.00	8	391	100.00	0	0.00	391	
Improvement Consumer	20	100.00	0	0.00	20	257	100.00	0	0.00	257	
Totals	103	96.26	4	3.74	107	10,314	96.63	360	3.37	10,674	

Source: 2015-2016 HMDA data; OCC loan sample.

#### **Lending to Borrowers of Different Incomes**

Miners NB's overall distribution of loans to borrowers of different income levels reflects reasonable penetration when considering performance context.

#### Residential Real Estate Loans

Miners NB's distribution of residential real estate loans among borrowers of different income levels reflects reasonable penetration given performance context. Home purchase loans were given the most weight in the analysis since the bank originated a larger volume of home purchase loans in comparison to home refinance and home improvement loans. Home improvement loans received the least weight. The bank originated 42 home purchase loans in the AA compared to 33 home refinance and eight home improvement loans.

The bank's distribution of home purchase and home refinance loans to moderateincome borrowers is near the percentage of moderate-income families living in the AA, which reflects reasonable penetration. The bank's performance lending to low-income borrowers is well below the demographic comparator for all home loan types. Although the bank falls below the comparator, it is still considered reasonable given performance context. During the evaluation period, the lack of affordable housing inventory is a contributor to the bank's limited origination of loans to low-income borrowers. The median home value in the AA is \$133,792. Low-income families make less than 50 percent of the median family income, which as of 2016 equates to \$31,350 or less per year. Furthermore, 8 percent of families in the AA are below the poverty level. Lowincome families' demand for home loans and ability to qualify for financing is negatively impacted. Community contacts confirmed the lack of loan demand in the area and cited the poor economy as a contributing factor. Slowdowns in the mining industry caused higher unemployment levels during the evaluation period. In 2015 and 2016, the average unemployment rate for the county was 5 percent and 6 percent, respectively. The following table illustrates the distribution of home loans among borrowers of

different income levels in comparison to the percentage of families in the AA in each income level.

Borrower Distribution of Residential Real Estate Loans in Iron Range AA										
Borrower	Low		Moderate		Mic	ldle	Upper			
Income Level										
Loan Type	% of AA	% of	% of AA	% of	% of AA	% of	% of AA	% of		
	Families	Number	Families	Number of	Families	Number of	Families	Number		
		of Loans		Loans		Loans		of Loans		
Home Purchase	21.36%	4.76%	20.70%	19.05%	23.04%	28.57%	34.90%	47.62%		
Home Refinance	21.36%	9.09%	20.70%	18.18%	23.04%	18.18%	34.90%	54.55%		
Home	21.36%	12.50%	20.70%	0.00%	23.04%	25.00%	34.90%	62.50%		
Improvement										

Source: 2015-2016 HMDA data; 2010 U.S. Census data.

#### Consumer Loans

The bank's distribution of consumer loans to borrowers of different income levels reflects reasonable penetration. Based on a sample of 60 consumer loans, the bank's lending to moderate-income borrowers exceeds the percent of moderate-income households in the AA. Miners NB's performance lending to low-income borrowers was below the demographic comparator, but is considered reasonable given poverty and unemployment levels in the AA. The AA has a high poverty level, which negatively impacts a household's ability to qualify for financing. Based on the 2010 U.S. Census data, 13 percent of households in the AA are in poverty. As described above, unemployment was also high which contributed to lower loan demand from low-income households. The following table displays the bank's performance lending to borrowers of different income levels compared to the percentage of households in each income level.

Borrower Distribution of Consumer Loans in Iron Range AA										
	Low		Moderate		Middle		Upper			
Borrower Income Level	% of AA Households	% of Number of Loans								
Consumer Loans	26.81%	6.67%	15.58%	18.33%	18.95%	16.67%	38.66%	58.33%		

Source: Loan sample; 2010 U.S. Census data.

#### **Geographic Distribution of Loans**

Miners NB's overall distribution of loans reflects reasonable dispersion across geographies of different income levels.

#### Residential Real Estate Loans

The bank's distribution of residential real estate loans reflects reasonable dispersion across different income-level geographies. The bank's home purchase loan originations to borrowers in a moderate-income census tract is near the demographic comparator and reflects reasonable dispersion. The table below shows the bank's performance in comparison to the percentage of owner-occupied housing in each income level geography.

Geographic Distribution of Residential Real Estate Loans in Iron Range AA										
Census Tract Income Level	Low		Moderate		Middle		Upper			
Loan type	% of AA Owner Occupied Housing	% of Number of Loans								
Home Purchase	0.00%	0.00%	16.52%	14.29%	83.48%	85.71%	0.00%	0.00%		
Home Refinance	0.00%	0.00%	16.52%	6.06%	83.48%	93.94%	0.00%	0.00%		
Home Improvement	0.00%	0.00%	16.52%	0.00%	83.48%	100.00%	0.00%	0.00%		

Source: 2015-2016 HMDA data; 2010 U.S. Census data.

#### Consumer Loans

The bank's distribution of consumer loans reflects poor dispersion throughout geographies of different income levels. In a random sample of 60 consumer loans, the bank originated 10 percent of loans to borrowers in a moderate-income census tract. The bank's performance is lower than the demographic comparator of 21 percent. The table below illustrates the bank's performance compared to the percentage of households in each census tract income level.

	Geographic Distribution of Consumer Loans in Iron Range AA										
Census Tract	Low	,	Moderate		Midd	le	Upper				
Income											
Level											
	% of AA	% of	% of AA	% of	% of AA	% of	% of AA	% of			
	Households	Number	Households	Number	Households	Number	Households	Number			
		of		of		of		of			
		Loans		Loans		Loans		Loans			
Consumer Loans	0.00%	0.00%	21.04%	10.00%	78.96%	90.00%	0.00%	0.00%			

Source: Loan sample; 2010 U.S. Census data.

#### **Responses to Complaints**

Miners NB has not received any CRA-related complaints since the prior CRA examination.

# **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 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): 06/27/2012 to 11/27/2017				
Financial Institution		Products Reviewed			
The Miners National Bank of Eveler Eveleth, Minnesota	th (Miners NB)	Home mortgage loans and consumer loans.			
List of Assessment Areas and Ty	pe of Examination				
Assessment Area	Type of Exam	Other Information			
Iron Range AA	Full-Scope	The bank's AA is limited to 28 census tracts from the northern Minnesota portion of the Duluth MSA #20260.			

# **Appendix B: Community Profiles for Full-Scope Areas**

#### **Iron Range Assessment Area**

Demographic Information for	Full-Scope A	rea: Iron	Range AA (	part of Dul	uth MN-W	I MSA)
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	0.00%	25.00%	75.00%	0.00%	0.00%
Population by Geography	85,695	0.00%	19.95%	80.08%	0.00%	0.00%
Owner-Occupied Housing by Geography	31,335	0.00%	16.52%	83.48%	0.00%	0.00%
Businesses by Geography	5,624	0.00%	21.12%	78.88%	0.00%	0.00%
Farms by Geography	227	0.00%	9.69%	90.31%	0.00%	0.00%
Family Distribution by Income Level	24,270	21.36%	20.70%	23.04%	34.90%	0.00%
Distribution of Low- and Moderate- Income Families throughout AA Geographies	10,207	0.00%	25.36%	74.64%	0.00%	0.00%
Median Family Income for 2016	\$55,740	Median Housing Value for 2016 \$133,79				
FFIEC Updated Median Family Income for 2016	\$62,700	Unemployment Rate (October 2017) 3.00%				
Households Below the Poverty Level for 2016	13.35%					

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census, 2016 FFIEC updated MFI, U.S. Bureau of Labor Statistics October 2017 unemployment data.

The Miners National Bank of Eveleth (Miners NB) is a \$70 million privately-owned national bank located in Eveleth, Minnesota. The one full-service location offers traditional banking products and services to individuals and businesses, an ATM, and a drive-up. Retail lending, including residential home mortgages, continues to be the bank's primary focus.

Miners NB's AA includes 28 contiguous census tracts (CT) within St. Louis County in northern Minnesota. The AA includes the census tract where the bank is located, as well as the surrounding CTs. This region is often referred to as the Iron Range. The bank's AA includes seven moderate-income CTs and 21 middle-income CTs. There are no low- or upper-income CTs within the bank's AA. The bank is located in a middle-income census tract. The bank's AA is within the Duluth MN-WI multistate MSA. Given the large size of the MSA, the bank's AA reasonably excludes Duluth and the Wisconsin portion of the MSA. The bank does not have a presence in these areas. The bank's stated AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies nor reflect illegal discrimination.

The 2010 U.S. Census data indicates the bank's AA has a total population of 85,695. Approximately 20 percent of the population lives in a moderate-income CT and the remaining 80 percent lives in a middle-income CT. The 2016 FFIEC updated median family income is estimated at \$62,700. Approximately 13 percent of households and 8 percent of families in the AA are below the poverty level. As of October 2017, unemployment in St. Louis County is 3.0 percent, according to the U.S. Bureau of Labor Statistics. The County's unemployment rate improved during 2017, but remains above the state unemployment rate of 2.4 percent and national unemployment rate of 4.1 percent. The County's unemployment rate in 2015 and 2016 averaged 5.0 percent and 5.8 percent, respectively.

The local economy is largely dependent on the mining industry. The timber industry, healthcare, and education also contribute to the local economy. As part of this review, a community contact was made with an Eveleth city government official. We also reviewed information from a prior community contact with a local economic development organization. The contacts confirmed the local economy was poor for several years and there was minimal demand for loans during that time. Many individuals were unemployed when the mines were not in operation. Over the past year, mines have reopened and the economy is showing improvement. The Eveleth city government contact said there has been some opportunity for local banks to participate in city improvement projects. The contacts indicated that Miners NB and other local banks are meeting local credit needs and actively participate in the community.