



## **PUBLIC DISCLOSURE**

October 13, 2016

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Think Mutual Bank  
Charter Number 718037

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Rochester, MN 55903-5949

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.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>7</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>8</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>10</b>
LENDING TEST .....	10
INVESTMENT TEST.....	18
SERVICE TEST.....	18
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

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

The following table indicates the performance level of **Think Mutual Bank (Think)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Think's overall Lending Test performance is good. Think demonstrates good lending activity, overall adequate geographic distributions, and overall good borrower income distributions. Think made a majority of its loans within its designated assessment areas (AAs).
- Think's Investment Test performance is good. Think demonstrated good performance in providing qualified community development investments and donations. The bank made \$6.58 million in qualified community development investments and donations during the evaluation period.
- Think's Service Test performance is good. This rating is heavily based on the location of branches and ATMs for accessibility to low- and moderate-income customers. Think has good hours of operation in all areas.

## 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 usually have between 2,500 and 8,000 persons, and 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 (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; 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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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) and the Thrift Financial Reporting (TFR) 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

Think is a federally-chartered mutual savings bank headquartered in Rochester, Minnesota (MN). Think is an intrastate bank with operations wholly within the state of Minnesota. The bank has a total of 10 full-service branches with six branch locations located in the Metropolitan Statistical Area (MSA) of Rochester and four located in the Minneapolis-St. Paul MSA. Of the bank's four branches in the Minneapolis MSA, two are located in moderate-income census tracts, one is in a middle-income census tract, and one is in an upper-income census tract. Of the six branches located in Rochester, MN, four are located in upper-income census tracts and two are located in middle-income census tracts. Think operates 16 non-deposit taking ATMs in the Rochester MSA and four in the Minneapolis-St Paul MSA.

Based on June 30, 2016 FDIC deposit market share data, there were 35 deposit-taking financial institutions with one or more banking offices in the Rochester MSA. Based on the dollar volume of deposits, Think ranked first with 21.8 percent of the deposit market share. There were 114 deposit-taking financial institutions with one or more banking offices in the Minneapolis MSA AA. Based on dollar volume of deposits, Think ranked 37<sup>th</sup> with 0.11 percent of the deposit market share. Wells Fargo Bank, N.A. is the market leader with more than 48 percent of the Minneapolis MSA market deposits.

As of June 30, 2016, Think had total assets of \$1.55 billion. Net loans and leases represented 61.20 percent of total assets and 72.74 percent of total deposits. Think is a traditional thrift institution with a primary lending focus in residential mortgages. The institution is also an active originator and investor in consumer loans. As of June 30, 2016, the loan portfolio was comprised primarily of one-to-four family residential mortgages (73 percent), with a majority (63 percent) being first lien residential mortgages. Other types of credit held on the bank's balance sheet include consumer loans (22 percent), credit cards (3 percent), home equity lines of credit (4 percent), and commercial-purpose loans (1 percent). Think also has a large volume of U.S. Government Agency securities which represent \$433 million or 27.93 percent of total assets. Tier One Capital was \$230.23 million with a Tier One leverage ratio of 14.67 percent as of June 30, 2016.

Think offers loan products with flexible underwriting and pricing. Think participates in a number of local, statewide, and national lending programs in order to revitalize neighborhoods and/or increase homeownership among low- and moderate-income individuals. For example, Think offers customers an in-house mortgage loan program (American Dream) option geared towards first-time homebuyers. The program provides low- to moderate-income borrowers with broader lending options. The program is catered to borrowers that may not otherwise qualify for a mortgage loan due to mortgage insurance restrictions or industry standard down payment requirements.

During the evaluation period, Think opened one new branch location in a moderate-income census tract area and closed one branch located in an upper-income census tract area, both located in the Minneapolis-St. Paul MSA. Think received a "Satisfactory" CRA rating at its prior CRA examination on December 3, 2012. There are no known legal, financial, or other factors impeding Think's ability to help meet the credit needs in its AAs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

Think's performance was assessed under the large bank evaluation procedures. Under these procedures, the bank is assessed using the following three tests: Lending Test, Investment Test, and Services Test. Refer to appendices A and C of this evaluation for a complete discussion of the performance factors considered under each of these tests.

The evaluation period for the Lending Test was January 1, 2012 through December 31, 2015. The period of review for community development loans as well as community development investments and services was January 1, 2012 through June 30, 2016.

Home mortgage loans represent the largest portion of Think's lending activity by dollar amount. During the review period, the bank originated 4,133 mortgage loans totaling over \$601 million in its combined AAs. Refinance transactions represent the majority of home mortgage lending at 47 percent followed by home purchase transactions at 32 percent and home improvement loans at 21 percent. As such, we placed the greatest weight on refinance loans in our lending analysis for home mortgages.

Consumer loans made up the largest portion of Think's lending activity by number of loans. During the evaluation period, Think originated 22,283 consumer loans totaling approximately \$293 million within the two AAs. Auto loans made up the majority of consumer lending activity with 9,728 auto loans originated totaling \$162 million. Due to the volume of consumer lending, we placed the greatest weight on the bank's performance in this area when arriving at Lending Test conclusions.

The number of small loans to businesses originated by Think during the review period was limited with 794 loans reported totaling approximately \$41 million in the bank's AAs. We did not include an analysis of small loans to farms or multi-family loans in the summary of the Lending Test because Think did not make any such loans during the evaluation period.

For the purposes of our evaluation, all HMDA loans were evaluated using 2010 census data. The banks 2012 and 2013 data was analyzed utilizing the Office of Management and Budget (OMB) Metropolitan Area (MA) geographic boundary revisions which became effective for CRA purposes on January 1, 2012. We utilized the updated OMB geographic boundary delineations as of January 1, 2014 for our analysis of the 2014 and 2015 data. As with HMDA information, the 2012 and 2013 small business loans were analyzed separately from the 2014 and 2015 loans for both of the bank's AAs. Small business loans for 2012-2013 were compared to 2013 peer data. Small business loans for 2014-2015 were compared to 2014 peer data. Consumer loans were evaluated using demographic data alone as there is no aggregate market data for this loan product. As we evaluated Think's Lending Test performance, lending activity in 2014-2015 received greater weight since a majority of loan originations were made during this period compared to 2012-2013.

The geographic distribution conclusions are based on the geographic distribution of Think's loans, any unexplained gaps in lending in either of the AAs, and the degree of benefit to the AAs.

The analysis of borrower distribution takes the poverty level of each AA into consideration and the impact on lower-income families' ability to obtain home loans. Due to their limited incomes, families that live in poverty often experience economic barriers to home ownership. This results in a smaller

potential borrowing base to which the bank can extend home mortgage loans. Housing costs per AA were also considered as a factor that may potentially limit demand by lower-income families. Refer to appendix B: Market Profiles for poverty levels and housing costs in each AA.

The evaluation of community development (CD) activities included grants and donations for the Investment Test. The volume by number and dollar of investments received primary consideration. The Service Test was largely based on the delivery of products and services in Think's AAs. We also gave consideration to CD services provided by bank employees that afforded benefit to the AAs.

The CRA regulation also requires the bank to maintain a CRA Public File, which should include any public comments received for the current year and the previous two calendar years. A review of this file, as well as other OCC records, did not reveal any complaints relating to the bank's CRA performance since the previous evaluation.

### **Data Integrity**

Prior to starting this evaluation, we reviewed the accuracy of HMDA data, consumer loan data, and small business loan data collected and reported by Think during the evaluation period to ensure the accuracy of the data. The bank's data was found reliable.

We also reviewed all CD loans, investments, and services provided to ensure that they met the regulatory definition of CD. Those that did not meet the definition were excluded from this evaluation.

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

Think has two AAs, including the Rochester, MN MSA and the Minneapolis-St. Paul, MN MSA. For purposes of our evaluation, we selected both AAs for a full scope review. Refer to the table in appendix A: Scope of Evaluation for more information.

### **Ratings**

Think's overall rating is based on its two AAs. While both received full scope reviews, we placed greater weight on the Rochester, MN MSA AA as this is the area from which the bank derives the greatest volume of deposits and originates the most loans.

### **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 195.28(c), in determining a Federal Savings Association's (FSA) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA, or in any assessment area by an affiliate whose loans have been considered as part of the FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated high satisfactory. Based on full scope reviews, the bank's performance in the Rochester, MN MSA AA is good and in the Minneapolis-St. Paul, MN MSA AA is adequate.

#### Lending Activity

Refer to Tables 1a and b - Lending Volume and Other Products in appendix C for the facts and data used to evaluate Think's lending activity.

##### Rochester, MN MSA

The level of lending activity in the Rochester MSA AA is excellent. During the review period, Think originated 3,056 mortgage loans within the Rochester, MN MSA AA totaling \$415.8 million. Peer home mortgage loan data for 2014 indicates Think's market share is 6.44 percent and the bank ranked third among 168 lenders that reported home purchase loans. Think originated 16,283 consumer loans totaling \$201.8 million in the AA during the review period; however, market share data for these loans is not available. Think originated a limited number of small business loans during the review period. In the Rochester MSA, Think originated 600 small business loans totaling \$30 million. Peer small business loan data for 2015 indicates the bank ranked fourth among 48 lenders that reported small business loans with a market share of 10.18 percent based on number of loans.

##### Minneapolis-St. Paul, MN MSA

The level of lending activity in the Minneapolis MSA AA is adequate. During the review period, Think originated 1,077 mortgage loans within the Minneapolis MSA AA totaling \$185.3 million. Peer home mortgage loan data for 2014 indicates Think had a market share of 0.18 percent and ranked 72<sup>nd</sup> among 508 lenders that reported home mortgage data. Think originated 6,000 consumer loans in the AA during the review period totaling \$91.2 million; however, market share data for these loans is not available. Think originated a limited volume of small business loans during the review period. Think originated 194 small business loans totaling \$10.8 million in the AA. Peer small business loan data for 2015 indicates the bank ranked 17<sup>th</sup> among 116 lenders that reported small business loans with a market share of 0.21 percent based on number of loans.

#### Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects adequate penetration throughout the bank's AAs. More weight was placed on the geographic distribution within the Rochester MSA AA given there were a larger number of loans made in this AA. There are no low-income CTs in the Rochester MSA AA thus our evaluation of geographic distribution in this AA is based on lending within the seven moderate-income census tracts.

## ***Home Mortgage Loans***

Refer to Tables 2a and b, 3a and b, 4a and b, and 5a and b in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall geographic distribution of home mortgage loans reflects adequate penetration throughout the bank's AAs. The most weight was placed on the performance in the Rochester, MN MSA AA.

### **Rochester MSA AA**

The geographic distribution of loans in the Rochester MSA AA reflects adequate penetration throughout the AA. The greatest weight was placed on the distribution of home refinance loans as this product represents the largest volume of loans originated or purchased. Within the market, Think ranked third and had an 8.60 percent market share among moderate-income tracts compared to the bank's overall ranking of second with an 11.29 percent market share.

### **Home Purchase**

The geographic distribution of home purchase loans reflects adequate penetration throughout the AA. In 2012 and 2013, the bank's performance in the moderate-income census tracts was near to the percentage of owner-occupied units and the aggregate HMDA lending percentage. In 2014 and 2015, the bank's performance in the moderate-income census tracts was below the percentage of owner-occupied units located in those tracts as well as the aggregate HMDA lending percentage. There were approximately twice as many home purchase loans in 2014 and 2015 compared to 2012 and 2013.

### **Home Improvement**

The geographic distribution of home improvement loans reflects good penetration through the AA. In 2012 and 2013, the bank's performance in the moderate-income census tracts was below the percentage of owner-occupied units and the aggregate HMDA lending percentage. In 2014 and 2015, the bank's performance in the moderate-income census tracts exceeded the percentage of owner-occupied units located in those tracts but was below the aggregate HMDA lending percentage. There were more than twice as many home improvement loans in 2014 and 2015 compared to 2012 and 2013. Overall, home improvement loans represent the smallest volume of mortgage loans and thus received the least weight.

### **Refinance**

The geographic distribution of home refinance loans reflects adequate penetration through the AA. In 2012 and 2013, the bank's performance in the moderate-income CTs was significantly lower than the percentage of owner-occupied units and the aggregate HMDA lending percentage. In 2014 and 2015, the bank's performance in the moderate-income CTs was below the percentage of owner-occupied units located in those tracts as well as the aggregate HMDA lending percentage. Home refinance loans represent the largest volume of mortgage loans and thus received the most weight.

### **Minneapolis MSA AA**

The geographic distribution of loans in the Minneapolis MSA AA reflects poor penetration throughout the AA. The greatest weight was placed on the distribution of home refinance loans as this product represents the largest volume of loans originated or purchased. Within the market, Think ranked 78<sup>th</sup> and had a 0.17 percent market share among moderate-income tracts and ranked 174<sup>th</sup> with a 0.04 percent market share in low-income tracts compared to the bank's overall ranking of 58<sup>th</sup> with a 0.30 percent market share.

**Home Purchase**

The geographic distribution of home purchase loans reflects adequate penetration throughout the AA. In 2012 and 2013, the bank made no home purchase loans in low-income census tracts. Performance in moderate-income tracts during this time was good with the percentage of loans made exceeding both the HMDA aggregate lending performance and area demographics. For 2014 and 2015, the bank's performance in low- and moderate-income tracts was below the percentage of owner-occupied units and HMDA aggregate lending performance.

**Home Improvement**

The geographic distribution of home purchase loans reflects adequate penetration throughout the AA. For all four years reviewed, the bank's performance in the low-income tracts fell below both the HMDA aggregate lending performance as well as the percentage of owner-occupied units located in low-income tracts. For 2012 and 2013, the bank's performance in moderate-income tracts exceeded the HMDA aggregate lending performance and percentage of owner-occupied units. For 2014 and 2015, the bank's performance in moderate-income tracts was below the same comparators. Home improvement loans made up the smallest category of home mortgage loans and thus carried the least weight.

**Refinance**

The geographic distribution of home refinance loans reflects poor penetration throughout the AA. For all four years reviewed, the bank's performance in the low-income census tracts was below both the percentage of owner-occupied units located in those tracts as well as the aggregate HMDA lending percentages. The bank's performance in the moderate-income census tracts was well below the same comparators over the same time period.

***Small Loans to Businesses***

Refer to Table 6a and b in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall geographic distribution of small loans to businesses reflects poor penetration throughout the bank's AAs. However, given the small volume of loans originated/purchased during the review period compared to the other bank products reviewed, this analysis received little weight in determining the overall geographic distribution performance rating.

**Rochester MSA AA**

Think's distribution of small loans to businesses by income level of the geographies in the Rochester MSA AA is poor. For all four years reviewed, the bank's lending in the moderate-income tracts was well below both the small business peer group's performance as well as the percentage of businesses located in those tracts.

**Minneapolis MSA AA**

Think's distribution of small loans to businesses by income level of the geographies in the Minneapolis MSA AA is poor. In 2012 and 2013, the bank made no loans to small businesses within low-income census tracts. The bank's lending was below the peer group and the demographic comparator in the low-income census tracts for 2014 and 2015. The bank's lending in the moderate-income tracts was well below the peer group's performance as well as the percentage of businesses located in those tracts for all four years reviewed.

### ***Consumer Loans***

Refer to Table 13a and 13b in appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Overall geographic distribution of consumer loans reflects adequate distribution. More weight was placed on the geographic distribution within the Rochester MSA AA because the bank made more loans to consumers in this AA.

#### **Rochester MSA AA**

The geographic distribution of consumer loans reflects adequate penetration throughout the Rochester MSA AA. The percentage of the bank's loans to consumers in moderate-income census tracts was below the percentage of households located in moderate-income census tracts. There is no peer comparison data for consumer loans.

#### **Minneapolis MSA AA**

The geographic distribution of consumer loans reflects poor penetration throughout the Minneapolis MSA AA. The percentage of the bank's loans to consumers in low-income census tracts was significantly lower than the percentage of households located in low-income census tracts. In 2012 and 2013, the percentage of bank loans to consumers in moderate-income census tracts was significantly lower than the percentage of households located in moderate-income census tracts. In 2014 and 2015, the percentage of bank loans to consumers in moderate-income tracts was lower than the percentage of households in moderate-income census tracts.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review of lending gaps, particularly in low-and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Rochester MSA AA or Minneapolis MSA AA.

### ***Inside/Outside Ratio***

Think made the majority of its loans within its designated AAs. This includes all loan originations and purchases. Think made 72.42 percent of its HMDA loans, 90.84 percent of its small loans to businesses, and 67.86 percent of its consumer loans to borrowers within its AAs. Overall, the bank made 69.03 percent of total loans during the review period in its designated AAs. This level of lending shows good responsiveness to area credit needs.

### **Distribution of Loans by Income Level of the Borrower**

The borrower distribution of loans reflects good distribution among individuals of different income levels and businesses of different sizes throughout Think's AAs. More weight is placed on the borrower distribution within the Rochester MSA AA because of the larger volume of loans originated in this AA. In both AAs, the greatest weight was placed on the distribution of consumer loans given that this category had the largest volume of loans originated or purchased.

### ***Home Mortgage Loans***

Refer to Tables 8a and b, 9a and b, and 10a and b in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Think's overall borrower distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. We placed the most weight on performance in the Rochester MSA AA more given the larger volume of lending in this AA.

#### **Rochester MSA**

The distribution of home mortgage loans in the Rochester MSA AA reflects adequate penetration among borrowers of different income levels throughout the AA. The greatest weight was placed on the distribution of home refinance loans as this product represents the largest volume of loans originated or purchased.

In determining the bank's performance, we took into consideration the AA poverty level of 7.46 percent for households and 5.10 percent for families. Families living in poverty are included in the low-income demographic comparator. Considering the median housing value in Rochester is \$187,149, living at or below poverty level may present a barrier to homeownership and effect the quantity of residential loans to low-income individuals.

Within the market, Think ranked second with a 9.2 percent market share among low-income borrowers and 11.57 percent among moderate-income borrowers compared with an overall second ranking and 11.29 percent market share among borrowers of all income levels.

#### **Home Purchase**

Think's distribution of home purchase loans reflects good penetration among borrowers of different income levels. In 2012 and 2013, the bank's performance was near to the demographic comparator and HMDA peer group in lending to low-income borrowers. During this same time period, lending to moderate-income borrowers significantly exceeded area demographics but was below the HMDA peer group. In 2014 and 2015, the bank's performance was below the demographic comparator and HMDA peer group in lending to low-income borrowers while lending to moderate-income borrowers significantly exceeded the demographic comparator and was near to the HMDA peer group.

#### **Home Improvement**

Think's distribution of home improvement loans reflects good penetration among borrowers of different income levels. For 2012 and 2013, the bank's performance was near to the demographic comparator and HMDA peer group in lending to low-income borrowers. For moderate-income borrowers, bank performance exceeded area demographics and was near to the HMDA peer group. In 2014 and 2015, the bank's performance was below the demographic comparator for lending to low-income borrowers but near to the HMDA peer group. Lending to moderate-income borrowers in 2014 and 2015 significantly exceeded the demographic comparator and exceeded the HMDA peer group.

#### **Refinance**

Think's distribution of home refinance loans reflects adequate penetration among borrowers of different income levels. For all four years reviewed, the bank's performance was lower than the HMDA peer group in lending to low- and moderate-income borrowers. The bank's lending was well below the

demographic comparator for low-income borrowers for 2012 and 2013 and below the demographic comparator for 2014 and 2015 but we considered the AA poverty level which presents difficulty in lending to these borrowers. Lending to moderate-income borrowers was near to the demographic comparator for 2012 and 2013 and exceeded the demographic comparator for 2014 and 2015.

#### Minneapolis MSA AA

The distribution of loans in the Minneapolis MSA AA reflects adequate penetration among borrowers of different income levels throughout the AA. The greatest weight was placed on the distribution of home refinance loans as this product represents the largest volume of loans originated or purchased.

In determining the bank's performance, we took into consideration the AA poverty level of 9.60 percent for households and 6.82 percent for families. Families living in poverty are included in the low-income demographic comparator. Considering the median housing value in Minneapolis is \$274,414, living at or below poverty level may present a barrier to homeownership and effect the quantity of residential loans to low-income individuals.

Within the market, Think ranked 78<sup>th</sup> with a 0.15 percent market share among low-income borrowers and 68<sup>th</sup> among moderate-income borrowers compared with an overall 58<sup>th</sup> ranking and 0.30 percent market share among borrowers of all income levels.

#### **Home Purchase**

Think's distribution of home purchase loans reflects adequate penetration among borrowers of different income levels. For all four years reviewed, the bank's performance fell well below the HMDA peer group in lending to low-income borrowers. Bank performance was near to the peer group in lending to moderate-income borrowers for 2012 and 2013 and below peer group for 2014 and 2015. For all four years, the bank's performance was also well below the percentage of families that are low-income although we took into consideration the AA poverty level. The bank's lending performance significantly exceeded the percentage of families that are moderate-income for all four years reviewed.

#### **Home Improvement**

Think's distribution of home improvement loans reflects adequate penetration among borrowers of different income levels. In all four years reviewed, the bank's performance was well below the HMDA peer group and demographic comparator in lending to low-income borrowers. However, for the same time period, the bank's performance in lending to moderate-income borrowers was near to the demographic comparator and below the HMDA peer group.

#### **Refinance**

Think's distribution of home refinance loans reflects adequate penetration among borrowers of different income levels. In all four years reviewed, the bank's performance fell well below the performance of the HMDA peer group in lending to low-income borrowers. The bank's performance in lending to moderate-income borrowers for 2012 and 2013 was below peer and well below peer for 2014 and 2015. The bank's lending was well below the demographic comparator for low-income borrowers. However, we considered the AA poverty level which presents difficulty in lending to low-income borrowers. In all four years reviewed, the bank's lending was below the demographic comparator for moderate-income borrowers.

### ***Small Loans to Businesses***

Refer to Table 11a and b in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. The bank's overall borrower distribution of small loan to businesses reflects excellent penetration among business customers of different sizes.

#### *Rochester MSA*

The distribution of small loans to businesses in the Rochester MSA AA reflects excellent penetration among business customers of different sizes. The percentage of Think's loans to small businesses (those with revenues of \$1 million or less) exceeded the percentage of businesses with this revenue size.

#### *Minneapolis MSA*

The distribution of small loans to businesses in the Minneapolis MSA AA reflects excellent penetration among business customers of different sizes. The percentage of Think's loans to small businesses (those with revenues of \$1 million or less) exceeded the percentage of businesses with this revenue size.

### ***Consumer Loans***

Refer to Table 13a and b in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Think's overall borrower distribution of consumer loans reflects excellent penetration among borrowers of different sizes. More weight was placed on the borrower distribution within the Rochester MSA AA because the bank made more loans to consumers in this AA.

#### *Rochester MSA*

The distribution of consumer loans reflects excellent penetration among borrowers of different income levels throughout the Rochester MSA AA. The percentage of the bank's consumer loans to low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income households within the AA for all four years.

#### *Minneapolis MSA*

The distribution of consumer loans reflects good penetration among borrowers of different income levels throughout the Minneapolis MSA AA. For all four years, the percentage of the bank's consumer loans to low-income borrowers was below the percentage of low-income income households within the AA. However, during this same time, the percentage of consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households within the AA.

### **Community Development Lending**

CD lending had a neutral impact on the bank's lending performance. Refer to Table 1a and 1b in appendix C for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multi-family loans that also qualify as CD loans. Table 5a and 5b, which details the geographic distribution of multi-family loans, does not separately list CD loans, however.

Rochester MSA

Think had a low level of CD lending activity in the Rochester MSA AA during the review period. In 2014, the bank made two Small Business Administration Certified Development Company/504 qualifying loans totaling \$2.84 million in the Rochester MSA AA.

Minneapolis MSA

Think had no CD lending within this AA during the review period.

## **Product Innovation and Flexibility**

The bank offers several flexible lending products. An example of this is the American Dream in-house mortgage loan program that benefits low- and moderate-income (LMI) borrowers who may not otherwise qualify for a mortgage loan due to down payment requirements and/or mortgage insurance restrictions. During the evaluation period, Think originated 235 of these loans totaling over \$38 million. The bank also participated in Fannie Mae's My Community Mortgage and Home Ready programs originating 11 loans totaling \$1.72 million. While these programs are not considered innovative, they are given consideration because they demonstrate the bank's willingness to utilize flexible lending practices and products. We could not count these loans towards CD lending as they are already considered in the evaluation of home mortgage loans or small business loans.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test is rated high satisfactory. Based on full-scope reviews, the bank's performance in the Rochester MSA AA is adequate and the Minneapolis MSA AA is good. Think made a total of 150 qualified investments during the review period totaling \$6.58 million. There were no prior period investments outstanding. The bank is responsive to the economic needs of the communities it serves.

For purposes of the Investment Test, "allocated" Tier One Capital represents Tier One Capital as a percentage a bank's deposits in an AA.

Refer to Table 14a and b in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Rochester MSA

The bank's investment performance in the Rochester MSA AA is adequate. The bank made 96 qualified investments totaling \$1.39 million plus sponsored a grant of \$500 thousand during the evaluation period. This amounts to 0.82 percent of allocated Tier One Capital. The investments consist of grants/donations to local organizations that support community services for LMI individuals as well as organizations that promote affordable housing. Two of the investments were geared toward economic development. In addition, the bank partnered with Rochester Youth and Family Housing (RYFH) allowing RYFH to assess a \$500 thousand grant from the FHLB system. The grant allowed RYFH to provide 55 units of housing to people with 60 percent or less of area median income.

Think is a major supporter of the Boys and Girls Club of Rochester. During the evaluation period, the bank made 11 grants totaling \$710,000 to the organization to support low-income youth. The club

serves LMI disadvantaged youth in typically single family homes with mentoring programs, meal services, activities, and educational opportunities.

Think also provided significant support, in the amount of \$140,000, to United Way of Olmsted County during the review period. The United Way provided assistance to low-income and underserved individuals and families through various charitable organizations.

Family Services of Rochester received five donations totaling \$100,000 in support of Meals on Wheels for delivery of meals to the elderly and shut-in LMI adults. Think also provided \$53,000 in affordable housing support to the Rochester Area Foundation. The Foundation provides down payment assistance to LMI individuals and families in the Rochester AA.

None of the investments are considered innovative or complex.

#### Minneapolis MSA

The bank's investment performance in the Minneapolis MSA AA is good. The bank made 53 qualified investments totaling \$247 thousand plus low-income housing tax credits (LIHTC) investments of \$4.4 million during the review period. Total investments in this AA amount to 2.04% of allocated Tier One Capital. LIHTC investments were within the LMI census tracts in the Minneapolis MSA AA. The LIHTC investments assist with the development of affordable housing for people with incomes at 60 percent or less of area median income.

Investments included grants/donations to community non-profit organizations providing needed community services to the LMI population. Specifically, the bank donated \$66 thousand to VEAP, which is a food bank that serves LMI families. The largest donation (\$50 thousand) assisted VEAP to expand its program in a new building to offer more services to LMI families.

Think made donations to Kids 'N Kinship in the amount of \$39 thousand, which helped to support mentorship programs for LMI children in the Twin Cities. During the review period, Think also provided donations totaling \$33 thousand to the Jeremiah Program, which is a leading non-profit organization proven to help single mothers and their children break the cycle of generational poverty. The program provides single mothers and their children with a safe and affordable place to live, quality early childhood education, life skills training, and support for career-track education.

None of the investments are considered innovative or complex.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated high satisfactory. Our full-scope review found that the bank's performance in the Rochester MSA AA is good, and the Minneapolis-St. Paul MSA AA is adequate.

### **Retail Banking Services**

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Rochester MSA

Delivery systems are accessible to cater to all geographies and varying income earners in the Rochester MSA AA. Think operates six branches in the Rochester MSA AA. Four of the branches are in middle-income tracts and two are in upper-income tracts. Four of the branch locations are in close proximity to the moderate-income tracts and are reasonably accessible. There are no low-income tracts in the Rochester MSA. The bank did not open or close a branch in the AA during our evaluation period. In the Rochester MSA AA, the six full-service branches lobby hours are from 8:00am to 5:00pm Monday through Friday with four open on Saturday from 9:00am to 12:30pm. All of the full-service branches offer 24-hour ATM services. Drive-up options are offered at four of the locations with hours of 7:30am to 6:00pm Monday through Friday, and 9:00am to 12:30pm on Saturday.

Think has reasonably accessible ATMs located throughout the Rochester MSA AA. There are no ATMs in the moderate-income tracts but ATMs at four of its six branches are in close proximity to the moderate-income CTs in the AA. Of Think's 16 ATMs, 12 or 85.71 percent are in middle-income tracts and four ATMs in upper-income tracts.

Both branch and ATM services are supplemented by alternative delivery systems. The alternative delivery systems include deposit by mail and free online banking services that allow customers to view account balances, deposit, and loan information as well as make deposits and otherwise manage and transfer funds. Free mobile banking and applications, such as mobile deposit and free online bill pay, allows customers to set-up payees, schedule payments, pay bills from multiple accounts, use a person-to-person option, text, and receive email alerts.

Minneapolis MSA

Delivery systems are reasonably accessible to cater all geographies and varying income earners in the Minneapolis MSA AA. Four bank branches are located in the Minneapolis MSA AA. There are no branches located in a low-income tract; however, there are two branches located in moderate-income tracts, one branch located in a middle-income tract, and one branch located in an upper-income tract. All banking branches are in close proximity to low-income tracts, and appear easily accessible to cater to LMI earners.

Lobby hours for three of the four full-service branches are 8:00am to 5:00pm Monday through Friday. The St. Paul location is open from 7:30am to 5:00pm. Three of the locations have drive-up options on Saturday from 9:00am to 12:30pm. These services enhance the accessibility of the branches and do not inconvenience certain portions of the AA. Twenty-four hour ATM services are available at all locations except for the St. Paul location, which has an ATM but it is not available 24 hours a day.

Think has four reasonably accessible ATMs located throughout the Minneapolis MSA AA. Think does not have any ATMs located in a low-income tract; however, there are two in moderate-income tracts, one in a middle income-tract and one in an upper-income tract.

Both branch and ATM services are supplemented by alternative delivery systems. The alternative delivery systems include deposit by mail and free online banking services that allow customers to view account balances, deposit, and loan information as well as make deposits and otherwise manage and transfer funds. Free mobile banking and applications, such as mobile deposits and free online bill pay, allows customers to set-up payees, schedule payments, pay bills from multiple accounts, use a person-to-person option, text, and receive email alerts.

## **Community Development Services**

### Rochester MSA

Bank employees provide an adequate level of CD services in the Rochester MSA AA. We identified 10 services which qualified under this test. During our review period, 13 bank employees provided qualifying CD services in the Rochester MSA AA totaling approximately 63 hours per month.

Think has offered financial support to local organizations. A majority of the services offered arrive in a format in which community services are provided to LMI individuals. Bank employees offer assistance by fulfilling various positions, including leadership positions in the organizations. Employees fulfill positions as Board members, Board Chairs, and Finance Committee members among other positions, and provide technical assistance on financial matters to the organizations. Think has been a major supporter of the Rochester Boys & Girls Club and Rochester Salvation Army.

### Minneapolis MSA

CD services are limited in the Minneapolis MSA AA. We identified one service which qualified as a CD service. During our review period, one bank employee provided qualifying CD services in the Minneapolis MSA AA, totaling approximately 12 hours per month. The employee served on the advisory board of a non-profit that provides youth housing.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/12 to 12/31/15 Investment and Service Tests and CD Loans: 01/01/12 to 06/30/15	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Think Mutual Bank (Think) 5200 Members Parkway, NW Rochester, MN	HMDA Loans Consumer loans Small business loans Community development loans, investments and service	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>[Instructions: Provide only if affiliate products are reviewed.]</i>  NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Rochester, MN MSA Minneapolis-St. Paul, MN MSA	Full Scope Full Scope	

## Appendix B: Market Profiles for Full-Scope Areas

### Rochester, MN MSA

#### Rochester MSA AA

Demographic Information for Full Scope Area: Rochester MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	44	0.00	15.91	63.64	20.45	0.00
Population by Geography	187,901	0.00	14.18	60.81	25.01	0.00
Owner-Occupied Housing by Geography	56,738	0.00	12.38	61.79	25.83	0.00
Business by Geography	12,532	0.00	13.49	61.49	25.02	0.00
Farms by Geography	1,406	0.00	7.75	68.99	23.26	0.00
Family Distribution by Income Level	49,277	16.23	18.91	24.22	40.64	0.00
Distribution of Low- and moderate-income Families throughout AA Geographies	17,316	0.00	20.22	66.26	13.51	0.00
Median Family Income		74,450	Median Housing Value	180,207		
FFIEC Adjusted Median Family Income for 2015		81,700	Unemployment Rate (2010 US Census)	2.35%		
Households Below Poverty Level		7.46%				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 US Census and 2015 FFIEC updated MFI

The Rochester MSA AA consists of 44 contiguous census tracts located within the whole counties of Olmsted and Dodge and adjacent tracts located in Fillmore and Wabasha counties. The AA does not encompass the entire Rochester MSA as the bank cannot reasonably serve the entire MSA. The AA includes seven moderate-income and no low-income census tracts. The AA complies with regulatory requirements and does not arbitrarily exclude LMI geographies. This AA includes the corporate office and six branch locations. All branch locations offer access to ATMs, which do not accept deposits. The branches are located within the Rochester city limits with four in middle-income tracts and two in upper-income tracts. The bank has 10 additional ATMs located within the AA.

The AA prior to 2014, consisted of 42 contiguous census tracts. Due to new Census delineations on January 1, 2014, the Rochester MSA now includes Fillmore County. The bank elected to expand the AA by adding two census tracts in Fillmore County. The Fillmore County census tracts in the AA include one moderate-income tract and one middle-income tract. The AA does not include the entire county of Fillmore as they cannot reasonably serve the entire county. The expansion did not result in any changes to branch or ATM locations.

Economic conditions in the Rochester AA have improved. Per the Bureau of Labor Statistics, in 2012 unemployment rates in the four counties comprising the AA ranged from a low of 4.4 percent in Olmsted County to a high of 5.5 percent in Fillmore County. This compares lower than the state average of 5.6 percent and significantly lower than the national average of 8.1 percent. In 2015, unemployment rates in the four counties comprising the AA ranged from a low of 3.0 percent in Olmsted County to a high of 4.1 percent in Fillmore County. This compares closely to the state average

of 3.2 percent and significantly lower than the national average of 5.3 percent. The largest employers in the Rochester AA include Mayo Clinic, which is headquartered in the area as well as IBM, which has a major operation in Rochester.

Competition among financial institutions in the Rochester AA is very strong. A large number of national and state banks, thrift banks, credit unions, finance companies, and mortgage companies have a presence in the AA. Based on the June 30, 2016 FDIC Deposit Market Share Report, Think ranks first out of 35 banks in deposit market share, holding 21.81 percent of the AA’s deposits. Wells Fargo Bank, NA ranks second with a deposit market share of 19.27 percent. Based on 2014 Peer Mortgage Data, Think ranks second out of 218 lending institutions with an 8.03 percent market share. Wells Fargo Bank, NA ranks first with a market share of 17.41 percent. Based on 2013 Peer Mortgage Data, Think ranked third out of 233 lending institutions with a 5.08 percent market share behind Wells Fargo Bank, NA and US Bank, NA with market shares of 19.17 percent and 8.49 percent, respectively.

During our evaluation, we made a local community contact to better understand the demographics and primary credit needs of the AA. The contact identified insufficient affordable housing, high child care costs, and a poor public transportation system as the three primary issues affecting the Rochester area. The contact stated there are several opportunities for financial institutions to participate in affordable housing projects. The contact indicated that financial institutions are meeting the needs of their community and are involved in the community.

**Minneapolis-St. Paul, MN MSA**

Demographic Information for Full Scope Area: Minneapolis MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	621	10.14	19.16	39.13	30.92	0.64
Population by Geography	2,518,723	8.11	17.10	39.80	34.84	0.15
Owner-Occupied Housing by Geography	691,325	3.29	13.83	43.06	39.82	0.00
Business by Geography	206,596	5.62	15.60	39.55	39.20	0.03
Farms by Geography	4,940	1.82	9.74	46.90	41.54	0.00
Family Distribution by Income Level	618,832	19.39	16.95	21.89	41.77	0.00
Distribution of Low- and moderate-income Families throughout AA Geographies	224,869	13.57	25.31	40.67	20.44	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		79,301 85,700 10%	Median Housing Value Unemployment Rate (2010 US Census)		262,512 3.72%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2015 FFIEC updated MFI

The Minneapolis-St. Paul MSA AA consists of 621 contiguous census tracts including the following whole counties: Hennepin, Ramsey, Washington, Dakota, Scott, and Carver. The AA does not encompass the entire Minneapolis-St. Paul MSA as the bank cannot reasonably serve the entire MSA. The AA includes 119 moderate-income and 63 low-income census tracts. The AA complies with regulatory requirements and does

not arbitrarily exclude low- or moderate- income geographies. The AA includes four branch locations, including two located in moderate-income census tracts. All branch locations offer access to ATMs, which do not accept deposits.

Economic conditions in the MSP AA have improved. Per the Bureau of Labor Statistics, in 2012 unemployment rates in the six counties comprising the MSP MSA AA ranged from a low of 4.8 percent in Carver County to a high of 5.7 percent in Ramsey County. This compares closely to the state average of 5.6 percent and significantly lower than the national average of 8.1 percent. In 2015, unemployment rates in the six counties comprising the Minneapolis-St. Paul MSA AA ranged from a low of 3.1 percent in Scott County to a high of 3.5 percent in Ramsey County. This compares closely to the state average of 3.2 percent and significantly lower than the national average of 5.3 percent. The largest employers in the MSP AA include many Fortune 500 companies, including UnitedHealth Group, Target, SuperValu, 3M, U.S. Bancorp, Medtronic, and General Mills. Other large employers in the AA include state and local governments, University of Minnesota, and several large financial institutions.

Competition among financial institutions in the MSP AA is very strong. A large number of national and state banks, thrift banks, credit unions, finance companies, and mortgage companies have a presence in the AA. Based on the June 30, 2016 FDIC Deposit Market Share Report, two large banks (Wells Fargo and US Bank) rank first and second in deposit market share and account for 82 percent of the AA's deposits on a combined basis. Think ranks 37th out of 114 banks in deposit market share, holding just 0.11 percent of the AA's deposits. Based on 2014 Peer Mortgage Data, Think ranks 58th out of 580 lending institutions with a 0.21 percent market share.

During our evaluation, we made a local community contact to better understand the demographics and primary credit needs of the AA. The contact identified insufficient affordable housing, insufficient access to homeownership counseling services, and lenders have stopped offering FHA loans as the three primary issues affecting the Minneapolis metro area. The contact stated there are several opportunities for financial institutions to participate in affordable housing projects. The contact indicated that financial institutions are meeting the needs of their community and are involved in the community.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by

the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1a. Lending Volume**

LENDING VOLUME		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Minneapolis MSA AA	23.55	445	76,384	65	1,835	0	0	0	0	510	78,219	0.08
Rochester MSA AA	76.45	1,458	202,826	198	5,426	0	0	0	0	1,656	208,252	22.44

**Table 1b. Lending Volume**

LENDING VOLUME		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Minneapolis MSA AA	27.56	632	108,899	129	8,965	0	0	0	0	761	117,864	0.11
Rochester MSA AA	72.44	1,598	212,976	402	24,568	0	0	2,835	0	2,002	240,379	21.81

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

\*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1a. Other Products**

LENDING VOLUME		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Minneapolis MSA AA	26.12	2,293	30,873	0	0	99	4,431	1,228	19,518	321	1,362	145	2,356	0.08
Rochester MSA AA	73.88	6,487	76,479	0	0	341	12,969	3,095	45,648	1,113	3,221	456	6,976	22.44

**Table 1b. Other Products**

LENDING VOLUME		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Minneapolis MSA AA	27.45	3,707	60,282	0	0	184	10,476	1,722	33,999	404	1,734	194	3,597	0.11
Rochester MSA AA	72.55	9,796	125,319	0	0	483	21,040	3,683	63,223	1,456	4,648	656	10,485	21.81

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of October 13, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2015.

\*\*\* Deposit Data as of October 13, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1a. Other Products**

LENDING VOLUME		Geography: THINK MUTUAL 2012-13		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Minneapolis MSA AA	500	3,206	0	0	
Rochester MSA AA	1,482	7,665	0	0	

**Table 1b. Other Products**

LENDING VOLUME		Geography: THINK MUTUAL 2014-15		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015	
Assessment Area (2015):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Minneapolis MSA AA	1,203	10,476	0	0	
Rochester MSA AA	3,518	25,923	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2015.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	107	24.26	3.40	0.00	16.09	20.56	43.68	36.45	36.83	42.99	3.35	15.79	41.84	39.03
Rochester MSA AA	334	75.74	0.00	0.00	16.05	15.27	56.91	49.10	27.04	35.63	0.00	16.14	51.22	32.65

**Table 2b. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	227	26.27	3.29	2.20	13.83	10.13	43.06	49.78	39.82	37.89	3.44	13.84	42.05	40.67
Rochester MSA AA	637	73.73	0.00	0.00	12.38	7.22	61.79	56.36	25.83	36.42	0.00	12.15	57.74	30.10

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: THINK MUTUAL 2012-13				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Minneapolis MSA AA	70	29.79	3.40	1.43	16.09	17.14	43.68	37.14	36.83	44.29	2.72	14.10	42.08	41.10	
Rochester MSA AA	165	70.21	0.00	0.00	16.05	13.33	56.91	52.73	27.04	33.94	0.00	17.14	53.33	29.52	

**Table 3b. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: THINK MUTUAL 2014-15				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Minneapolis MSA AA	197	31.67	3.29	0.51	13.83	9.14	43.06	45.69	39.82	44.67	3.14	13.54	43.33	39.99	
Rochester MSA AA	425	68.33	0.00	0.00	12.38	12.94	61.79	54.82	25.83	32.24	0.00	15.59	56.99	27.42	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: THINK MUTUAL 2012-13				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Aggregate HMDA Lending (%) by Tract Income <sup>*</sup>			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans					
<b>Full Review:</b>															
Minneapolis MSA AA	268	21.84	3.40	1.12	16.09	9.70	43.68	41.04	36.83	48.13	2.59	12.88	41.49	43.05	
Rochester MSA AA	959	78.16	0.00	0.00	16.05	8.86	56.91	48.80	27.04	42.34	0.00	15.41	51.55	33.04	

**Table 4b. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: THINK MUTUAL 2014-15				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Aggregate HMDA Lending (%) by Tract Income <sup>*</sup>			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans					
<b>Full Review:</b>															
Minneapolis MSA AA	208	27.96	3.29	1.44	13.83	6.73	43.06	42.79	39.82	49.04	2.76	11.86	41.10	44.27	
Rochester MSA AA	536	72.04	0.00	0.00	12.38	7.65	61.79	55.04	25.83	37.31	0.00	12.32	57.44	30.24	

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>6</sup>			
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>**</sup> *	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	0	0.00	15.47	0.00	30.33	0.00	37.28	0.00	16.92	0.00	21.08	35.27	29.89	13.76
Rochester MSA AA	0	0.00	0.00	0.00	29.60	0.00	55.97	0.00	14.44	0.00	0.00	31.25	59.38	9.38

**Table 5b. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>6</sup>			
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>**</sup> *	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	0	0.00	15.33	0.00	26.26	0.00	39.74	0.00	18.67	0.00	20.79	31.64	33.49	14.09
Rochester MSA AA	0	0.00	0.00	0.00	19.21	0.00	66.67	0.00	14.12	0.00	0.00	44.83	41.38	13.79

<sup>6</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

<sup>6</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: THINK MUTUAL 2012-13		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income <sup>1</sup>								
	#	% of Total <sup>2</sup>	% of Business <sup>3</sup>	% BANK Loans <sup>4</sup>	% of Businesses <sup>2</sup> *	% BANK Loans	% of Business <sup>3</sup> es <sup>3</sup>	% BANK Loans	% of Business <sup>3</sup> es <sup>3</sup>	% BANK Loans	Low	Mod	Mid	Upp					
<b>Full Review:</b>																			
Minneapolis MSA AA	65	24.71	5.86	0.00	18.11	7.69	39.66	33.85	36.35	58.46	4.37	17.24	38.90	39.49					
Rochester MSA AA	198	75.29	0.00	0.00	19.05	10.61	54.79	52.02	26.17	37.37	0.00	18.12	52.63	29.25					

**Table 6b. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: THINK MUTUAL 2014-15		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income <sup>1</sup>								
	#	% of Total <sup>2</sup>	% of Business <sup>3</sup>	% BANK Loans <sup>4</sup>	% of Businesses <sup>2</sup> *	% BANK Loans	% of Business <sup>3</sup> es <sup>3</sup>	% BANK Loans	% of Business <sup>3</sup> es <sup>3</sup>	% BANK Loans	Low	Mod	Mid	Upp					
<b>Full Review:</b>																			
Minneapolis MSA AA	129	24.29	5.62	3.10	15.60	7.75	39.55	43.41	39.20	45.74	4.60	14.82	38.23	42.35					
Rochester MSA AA	402	75.71	0.00	0.00	13.49	3.98	61.49	65.17	25.02	30.85	0.00	14.01	60.07	25.92					

<sup>1</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>2</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>3</sup> Source Data - Dun and Bradstreet (2013).

<sup>4</sup> Based on 2015 Peer Small Business Data -- US and PR

<sup>5</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>6</sup> Source Data - Dun and Bradstreet (2015).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: THINK MUTUAL 2012-13				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Aggregate Lending (%) by Tract Income <sup>1</sup>			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total <sup>2</sup>	% of Farms <sup>3</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans				
<b>Full Review:</b>														
Minneapolis MSA AA	0	0.00	1.77	0.00	11.34	0.00	51.34	0.00	35.55	0.00	0.88	4.11	61.58	33.43
Rochester MSA AA	0	0.00	0.00	0.00	8.58	0.00	63.88	0.00	27.55	0.00	0.00	5.24	76.21	18.55

**Table 7b. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: THINK MUTUAL 2014-15				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Aggregate Lending (%) by Tract Income <sup>1</sup>			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total <sup>2</sup>	% of Farms <sup>3</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans	% of Farms <sup>2</sup>	% BANK Loans				
<b>Full Review:</b>														
Minneapolis MSA AA	0	0.00	1.82	0.00	9.74	0.00	46.90	0.00	41.54	0.00	1.06	5.31	51.72	41.91
Rochester MSA AA	0	0.00	0.00	0.00	7.75	0.00	68.99	0.00	23.26	0.00	0.00	15.06	73.69	11.25

<sup>1</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>2</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>3</sup> Source Data - Dun and Bradstreet (2013).

<sup>1</sup> Based on 2015 Peer Small Business Data -- US and PR

<sup>2</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>3</sup> Source Data - Dun and Bradstreet (2015).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>1</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>1</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	107	24.26	19.95	1.89	17.33	24.53	22.26	27.36	40.46	46.23	12.83	24.59	24.15	38.43
Rochester MSA AA	334	75.74	16.49	16.36	19.71	25.76	24.58	28.18	39.23	29.70	17.94	30.41	22.36	29.29

**Table 8b. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>1</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	227	26.27	19.39	5.75	16.95	20.80	21.89	26.99	41.77	46.46	11.37	26.39	24.48	37.77
Rochester MSA AA	637	73.73	16.23	12.38	18.91	28.94	24.22	24.76	40.64	33.92	15.77	30.34	22.46	31.44

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by BANK.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

<sup>2</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: THINK MUTUAL 2012-13						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>1</sup>			
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sub>3</sub>	% BANK Loans <sup>4</sup>	% Families* <sup>5</sup>	% BANK Loans <sup>4</sup>	% Families* <sup>5</sup>	% BANK Loans <sup>4</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	70	29.79	19.95	3.28	17.33	16.39	22.26	32.79	40.46	47.54	9.57	19.72	26.09	44.63
Rochester MSA AA	165	70.21	16.49	15.86	19.71	22.76	24.58	33.79	39.23	27.59	16.50	22.00	30.55	30.96

**Table 9b. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: THINK MUTUAL 2014-15						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>1</sup>			
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sub>4</sub>	% BANK Loans <sup>4</sup>	% Families* <sup>5</sup>	% BANK Loans <sup>4</sup>	% Families* <sup>5</sup>	% BANK Loans <sup>4</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Minneapolis MSA AA	197	31.67	19.39	2.23	16.95	16.20	21.89	25.14	41.77	56.42	8.87	21.99	24.60	44.54
Rochester MSA AA	425	68.33	16.23	11.36	18.91	26.32	24.22	23.55	40.64	38.78	13.73	24.18	23.02	39.07

<sup>1</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>2</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>3</sup> Percentage of Families is based on the 2010 Census information.

<sup>4</sup> As a percentage of loans with borrower income information available. No information was available for 12.3% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

<sup>1</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>2</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>3</sup> Percentage of Families is based on the 2010 Census information.

<sup>4</sup> As a percentage of loans with borrower income information available. No information was available for 13.2% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: THINK MUTUAL 2012-13				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				Aggregate Lending Data <sup>*</sup>			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>5</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>				
<b>Full Review:</b>														
Minneapolis MSA AA	268	21.84	19.95	2.99	17.33	15.67	22.26	26.12	40.46	55.22	9.34	19.25	25.73	45.67
Rochester MSA AA	959	78.16	16.49	8.34	19.71	17.62	24.58	27.42	39.23	46.61	11.42	21.12	26.06	41.40

**Table 10b. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: THINK MUTUAL 2014-15				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				Aggregate Lending Data <sup>*</sup>			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>6</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>				
<b>Full Review:</b>														
Minneapolis MSA AA	208	27.96	19.39	3.86	16.95	10.14	21.89	27.54	41.77	58.45	9.41	20.94	26.03	43.62
Rochester MSA AA	536	72.04	16.23	12.31	18.91	19.22	24.22	25.75	40.64	42.72	14.35	21.74	27.48	36.43

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by BANK.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: THINK MUTUAL 2012-13		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis MSA AA	65	24.71	72.84	90.77	95.38	3.08	1.54	52,849	27,132
Rochester MSA AA	198	75.29	75.51	91.41	95.96	2.02	2.02	2,722	1,529

**Table 11b. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: THINK MUTUAL 2014-15		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis MSA AA	129	24.29	79.26	98.45	86.05	6.98	6.98	58,764	30,089
Rochester MSA AA	402	75.71	81.28	97.51	85.07	10.95	3.98	3,732	1,995

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.80% of small loans to businesses originated and purchased by the bank.

\* Based on 2015 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: THINK MUTUAL 2012-13			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis MSA AA	0	0.00	97.17	0.00	0.00	0.00	0.00	343	212
Rochester MSA AA	0	0.00	98.61	0.00	0.00	0.00	0.00	248	130

**Table 12b. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: THINK MUTUAL 2014-15			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis MSA AA	0	0.00	96.17	0.00	0.00	0.00	0.00	380	229
Rochester MSA AA	0	0.00	98.51	0.00	0.00	0.00	0.00	632	357

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

<sup>\*</sup> Based on 2015 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 13a. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: THINK MUTUAL 2012-13										Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013							
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans	
<b>Full Review:</b>																			
Minneapolis MSA AA	2,293	26.12	7.79	1.96	20.52	12.69	41.34	44.22	30.34	41.13	23.87	15.57	16.51	19.84	18.83	21.72	40.79	35.24	
Rochester MSA AA	6,487	73.88	0.00	0.00	19.63	15.28	56.27	53.04	24.09	31.68	21.43	27.45	17.25	22.54	20.85	19.95	40.47	23.48	

**Table 13b. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)**

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: THINK MUTUAL 2014-15										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans	
<b>Full Review:</b>																			
Minneapolis MSA AA	3,707	27.45	7.63	2.40	17.82	12.46	41.67	42.57	32.87	42.57	23.50	15.32	16.33	20.31	18.80	19.45	41.37	33.37	
Rochester MSA AA	9,796	72.55	0.00	0.00	15.00	10.13	62.01	59.88	22.99	29.99	20.97	27.68	17.12	21.59	20.29	17.17	41.62	21.49	

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census information.  
 \* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of households is based on 2010 Census information.

**Table 14a. Qualified Investments**

QUALIFIED INVESTMENTS 31, 2013		Geography: THINK MUTUAL 2012-13				Evaluation Period: JANUARY 1, 2012 TO DECEMBER			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Minneapolis MSA AA	0	0	26	1,139	26	1,139	0.00	0	0
Rochester MSA AA	0	0	48	614	47	614	0.00	0	0

**Table 14b. Qualified Investments**

QUALIFIED INVESTMENTS 31, 2015		Geography: THINK MUTUAL 2014-15				Evaluation Period: JANUARY 1, 2014 TO DECEMBER			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Minneapolis MSA AA	0	0	30	3,550	30	3,550	0.00	0	0
Rochester MSA AA	0	0	49	1,277	49	1,277	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15a. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: THINK MUTUAL 2012-13																	
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Minneapolis MSA AA	13.31	4	40.00	0.00	25.00	25.00	50.00	0	0	0	0	0	0	8.29	19.48	39.79	32.29
Rochester MSA AA	86.69	6	60.00	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	18.68	55.19	26.13

**Table 15b. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: THINK MUTUAL 2014-15																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Minneapolis MSA AA	13.98	4	40.00	0.00	50.00	25.00	25.00	1	1	0	+1	0	-1	8.11	17.10	39.80	34.84
Rochester MSA AA	86.02	6	60.00	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	14.18	60.81	25.01



