



PUBLIC DISCLOSURE

February 04, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

St. Martin National Bank
Charter Number 15198

136 Maine Street
St. Martin, MN 56376

Office of the Comptroller of the Currency

Campbell Mithun Tower
222 South 9th Street
Suite 800
Minneapolis, MN 55402-3393

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

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Overall CRA Rating

The Lending Test is rated: Satisfactory.

The primary factors supporting the St. Martin National Bank (SMNB) rating include:

- The distribution of loans reflects reasonable penetration among borrowers of different income levels and farms of different sizes when compared to Assessment Area (AA) demographics.
- The geographic distribution of loans among low- and moderate-income census tracts within the bank's AA reflects reasonable dispersion.
- A majority of loans originated are located inside the designated AA.
- The average loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its AA.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Description of Institution

SMNB is a \$22 million single-state national bank located in St. Martin, Minnesota. Bank ownership is widely held among a group of shareholders. The bank operates one location in Stearns County with no additional branches or deposit-taking automated teller machines. No merger or acquisition activities occurred during the evaluation period.

SMNB offers a range of banking products and services to their customers. The bank's business strategy focuses on traditional activities. The bank's primary products are agricultural and residential real estate lending. As of September 30, 2018, the loan portfolio totaled \$12 million, representing 55 percent of total assets. The loan portfolio is comprised of agricultural loans (43 percent), residential real estate loans (40 percent), commercial loans (11 percent), and consumer loans (6 percent).

SMNB has one AA located in the St. Cloud, MN Metropolitan Statistical Area (MSA). The AA consists of five contiguous census tracts located in Stearns County. The AA consists of the census tracts surrounding the branch which the bank can reasonably serve. The AA complies with the regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies. For the 2015/2016 analysis, the AA consisted of four middle-income census tracts and one moderate-income census tract. For the 2017 analysis, the AA consisted of five middle-income census tracts.

Competition is strong within the bank's market. As of June 31, 2018, the FDIC market share report indicates there were 28 financial institutions operating in Stearns County. SMNB ranks 28th with 0.37 percent of the total Stearns County market share. SMNB has competition from 11 other financial institutions within its AA.

There are no legal, financial, or other factors that impede the bank's ability to help meet the credit needs of its AA. SMNB received a "Satisfactory" rating at the prior CRA evaluation dated March 25, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated SMNB's CRA performance utilizing the small bank CRA performance standards. The bank's CRA performance was assessed under the lending test, which focused on the bank's primary loan products based on loan originations from January 1, 2015 to December 31, 2017 (evaluation period). The evaluation period for the LTD analysis and complaint review portions of the lending test covered March 25, 2013 to September 30, 2018.

We determined agricultural and residential real estate loans to be the bank's primary loan products during the evaluation period based on loan originations. Agricultural loan

originations totaled 43 percent of all loan originations by dollar in 2015/2016 and 39 percent by dollar in 2017. Residential real estate loan originations totaled 24 percent by dollar in 2015/2016 and 23 percent by dollar in 2017.

Data Integrity

To evaluate SMNB's lending performance, we selected a random sample of 71 primary product loans. The sample included 20 agricultural loans and 20 residential real estate loans from 2015/2016 and 20 agricultural loans and 11 residential real estate loans from 2017. We sampled all 11 residential real estate loans that were originated in 2017. We used information from the bank's loan files, call report, and the annual deposit information reported to the Federal Deposit Insurance Corporation (FDIC) to complete our review.

Selection of Areas for Full-Scope Review

SMNB has one AA, referred to as the St Cloud MSA AA throughout this Report. We performed a full-scope review of the St Cloud MSA AA. Refer to Appendix A for an outline of the examination scope and Appendix B for a full description of the AA and the community profile.

Ratings

SMNB's overall rating is based on lending performance within the St Cloud MSA AA. The bank's lending performance was evaluated on five performance criteria: the loan-to-deposit ratio, lending in the AA, lending to borrowers of different incomes, geographic distribution of loans, and responses to CRA related complaints.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

SMNB’s performance under the lending test is rated satisfactory. The bank’s lending activity reflects satisfactory responsiveness to AA credit needs for agricultural and residential real estate loans.

Loan-to-Deposit Ratio

SMNB’s net loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and the credit needs of its AA. The LTD ratio averaged 61.66 percent over the 23 quarters since the prior CRA examination. The LTD ratio ranged from a quarterly low of 51.76 percent in the first quarter of 2014 to a high of 68.88 percent in the second quarter of 2016.

SMNB’s LTD ratio is reasonable and ranked fourth among five similarly situated financial institutions located within the AA. Similarly situated institutions are defined as having total assets between \$63 million and \$109 million as of September 30, 2018 and located in Stearns County. It is noted that all similarly situated banks have greater total assets than SMNB.

The table below summarizes the average LTD ratios of similarly situated institutions within the same reporting period.

Loan-to-Deposit Ratios for Similarly Situated Banks		
Institution (as of 9/30/18)	Total Assets (in thousands, as of 9/30/18)	Average LTD (1Q13- 3Q18)
Stearns Bank Holdingford, National Association	\$83,604	93.92%
Bonanza Valley State Bank	\$63,750	92.08%
First State Bank of Sauk Centre	\$109,455	64.87%
St. Martin National Bank	\$22,322	61.66%
State Bank of Cold Spring	\$63,006	58.38%

Source: Call Report Data

Lending in Assessment Area

SMNB originates a majority of its loans inside the AA. We reviewed 40 agricultural loans and 31 residential real estate loans originated between January 1, 2015 and December 31, 2017. SMNB originated 84.51 percent of loans by number and 84.43 percent by dollar volume within its AA. The table below shows the bank’s lending activity by product type inside and outside the AA.

Lending in St. Cloud MSA AA 2015 -2017										
Loan Type	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Residential Real Estate Loans	25	80.65	6	19.35	31	3,114	77.76	89.1	22.24	4,005
Agricultural Loans	35	87.50	5	12.50	40	2,804	93.33	20.0	6.67	3,004
Total	60	84.51	11	15.49	71	5,918	84.43	1,091	15.57	7,009

Source: OCC Loan Sample

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

SMNB’s overall distribution of loans to consumers of different income levels and farms of different sizes in 2015/2016 and 2017 reflects reasonable penetration. Loans originated in 2015 and 2016 were compared to 2010 U.S. Census data, and loans originated in 2017 were compared to 2015 ACS survey data.

Agricultural Loans

The distribution of agricultural loans reflects reasonable penetration among farms of different sizes. SMNB’s lending to small farms is near the demographic comparator, both by number and dollar volume of loans. Based on our sample, SMNB’s distribution of agricultural loans in 2015/2016 to farms with revenues less than or equal to \$1 million is reasonable. The bank originated 95 percent of agricultural loans to farms with revenues less than or equal to \$1 million compared to the demographic comparator of 99 percent. Based on our sample, SMNB’s distribution of agricultural loans in 2017 to farms with revenues less than or equal to \$1 million is excellent. The bank originated 100 percent of agricultural loans to farms with revenues less than or equal to \$1 million compared to the demographic comparator of 98 percent. Refer to Table T in Appendix C for the distribution of loans among farms of different sizes.

Residential Real Estate Loans

The distribution of home loans in the AA reflects reasonable penetration among borrowers of different income levels when compared to AA demographics. Based on our sample, SMNB’s distribution of residential real estate loans in 2015/2016 is reasonable. The bank originated 52 percent of residential real estate loans to moderate-income families. This significantly exceeds the demographic comparator that indicates 20 percent of families in the AA are moderate-income. The bank originated 12 percent of residential real estate loans to low-income families, which is below the demographic comparator of 20 percent. Based on our sample, SMNB’s distribution of residential real estate loans in 2017 is reasonable. The bank originated 33 percent of residential real estate loans to moderate-income families. This significantly exceeds the demographic comparator of 19 percent. The bank originated 11 percent of residential real estate loans to low-income families. This is below the demographic comparator or 20 percent.

Although the bank falls below the comparator for low-income families in 2015/2016 and 2017, it is reasonable given performance context. The AA has a moderate poverty level, which negatively impacts a low-income family's ability to qualify for financing. Based on the 2010 U.S. Census data, 7.9 percent of families are living in poverty. Refer to Table P in Appendix C for the bank's performance lending to families of different income levels compared to the percentage of families in each income level.

Geographic Distribution of Loans

SMNB's distribution of residential real estate and agricultural loans in 2015/2016 reflects reasonable dispersion throughout census tracts of different income levels. We did not conduct a geographic distribution test for 2017 residential real estate and agricultural loans. SMNB's 2017 AA did not include any low- or moderate-income tracts. Therefore, the analysis would not be meaningful.

Agricultural Loans

The geographic distribution of agricultural loans reflects reasonable dispersion throughout census tracts of different income levels. In our sample, SMNB originated 25 percent of agricultural loans to farms located in moderate-income census tracts compared to the demographic comparator of 29 percent. There are no low-income tracts located in the assessment area. Refer to Table S in Appendix C for the distribution of agricultural loans among census tracts of different income levels.

Residential Real Estate Loans

The geographic distribution of residential real estate loans reflects poor dispersion throughout census tracts of different income levels. In our sample, SMNB did not originate any loans to moderate-income families, compared to the demographic comparator of 17 percent. Poor penetration is due to a small presence in the one moderate-income census tract combined with competition from other financial institutions. There are three institutions located in the moderate-income census tract. Refer to Table O in Appendix C for the distribution of home loans among census tracts of different income levels.

Responses to Complaints

There have been no consumer complaints related to SMNB CRA performance during this evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Evaluation Period: 03/25/2013 to 09/30/2018 Lending Test (excludes CD loans): (01/01/2015 to 12/31/2017)	
Financial Institution	Products Reviewed	
St. Martin National Bank (SMNB) St. Martin, Minnesota	Agricultural Loans Residential Real Estate Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
St. Martin Insurance Agency	Affiliate	Agricultural and residential and real estate loans.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
St. Cloud MSA AA	Target CRA (full-scope)	The AA includes five contiguous census tracts in Stearns County. See Appendix B below for additional detail.

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area - 2017						
Assessment Area: St Cloud MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0%	0%	100%	0%	0%
Population by Geography	22,462	0%	0%	100%	0%	0%
Housing Units by Geography	10,635	0%	0%	100%	0%	0%
Owner-Occupied Units by Geography	7,425	0%	0%	100%	0%	0%
Occupied Rental Units by Geography	1,437	0%	0%	100%	0%	0%
Vacant Units by Geography	1,773	0%	0%	100%	0%	0%
Businesses by Geography	1,606	0%	0%	100%	0%	0%
Farms by Geography	445	0%	0%	100%	0%	0%
Family Distribution by Income Level	6,132	19.65%	18.53%	26.09%	35.73%	0%
Household Distribution by Income Level	8,862	22.58%	15.96%	20.54%	40.93%	0%
Median Family Income Non-MSAs - KS	\$69,359		Median Housing Value			\$161,604
			Median Gross Rent			\$660
			Families Below Poverty Level			9.13%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment in the AA is centered in agriculture and services. Agricultural production plays an important role in the local economy, with a number of self-employed farmers in dairy, cattle, and crop production. The agricultural sector has slowed due to low agriculture prices, and the bank has felt the trickle-down effect through slow loan growth in the agriculture area. Agriculture real estate values have held steady.

According to the 2015 ACS U.S. Census, unemployment rates in the AA showed a decrease over the evaluation period. In 2015, unemployment rates for the AA averaged 3.38 percent and fell to 2.51 percent in 2017. The AA's average unemployment rates were in line with Minnesota's 2015 unemployment rates of 3.9 percent and have fallen below the 2017 rate of 3.5 percent.

As part of this review, we contacted a member of the community to gain an understanding of the economic conditions of the area, credit needs in the area, and involvement of local financial institutions. The community contact, from an affordable housing community development financial institution, indicated the local economy is doing well overall. The community contact stated that the local financial institutions are actively involved in helping to meet the credit needs of the community, including single-family housing. The contact indicated

there is sufficient access to agriculture and home mortgage lending, leaving opportunities for financial institutions to finance construction and multi-family housing projects due to a general lack of housing stock as St. Cloud grows. Commercial lending remains less vibrant, and may even be troubled in some areas.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems. The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography – 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. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues – 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. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
2015/2016	20	2,632	100	712	0	0	0	16.5	0	13.9	83.5	100	86.1	0	0	0	0	0	0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2015/2016	20	2,632	100	712	20.1	11.76	8.4	19.85	52.94	18.8	27.98	11.76	26.1	32.04	23.53	32.4	0	0	14.2
2017	11	1,373	100	687	19.65	11.11	9.9	18.53	33.33	22.71	26.09	22.22	24.75	35.37	33.33	32.31	0	0	10.3

Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Note that 14.19% of aggregate lenders income data was not available in 2016. ¹ Note that 10.33% of aggregate lenders income data was not available in 2017. Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
2015/2016	20	1,627	100	101	0	0	0	28.8	25	26.7	71.2	75	73.3	0	0	0	2015/2016	20	1,627

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
2015/2016	20	1,627	100	101	98.6	95	35.6	.91	5	.37	0
2017	20	1,377	100	107	98.43	100	38.3	1.12	0	.45	0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data. Note that 14.19% of aggregate lenders income data was not available in 2016. Note that 10.33% of aggregate lenders income data was not available in 2017. Due to rounding, totals may not equal 100.0