



MEMBER
FDIC

UNITED PRAIRIE
BANK™

CRA Public File 2024



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CRA Comment File

United Prairie Bank has not received any written comments for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs.

No comments received in 2023

No comments received in 2022





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Branch Openings and Closings

2023 – None

2022 – None

2021 – None



MADISON

United Prairie Bank

- Address: 303 6th Avenue
PO Box 96
Madison, MN 56256
- Phone: 320.598.7541
- Email: madison@unitedprairiebank.com
- Monday thru Friday 8:00am - 4:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-Up ATM, Accepts Deposits
- 27.073.1801.00

MANKATO

United Prairie Bank / United Prairie Financial Network

- Address: 10 Firestone Drive
Mankato, MN 56001
- Phone: 507.344.1450
- Email: mankato@unitedprairiebank.com
- Monday - Friday 9:00am - 5:00pm
- Drive-Up Hours: Monday - Friday 8:00am - Noon
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-Up ATM, Accepts Deposits
- Investment Hours: Monday - Friday from 8:00am - 5:00pm
- 27.013.1702.00

MOUNTAIN LAKE

United Prairie Bank

- Address: 1141 Third Avenue
Mountain Lake, MN 56159
- Phone: 507.427.2422
- Email: mtlake@unitedprairiebank.com
- Monday -Thursday 9:00am - 3:00pm; Friday 9:00am - 5:00pm
- Drive-Up Hours: Monday - Thursday 8:30am - 4:00pm; Friday 8:30am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-Up ATM, Accepts Deposits
- 27.033.2701.00

NEW ULM

United Prairie Bank/United Prairie Insurance/United Prairie Financial Network

- Address: 200 North Broadway
New Ulm, MN 56073
- Phone: 507.359.2001
- Email: newulm@unitedprairiebank.com
- Monday - Friday 9:00am - 4:00pm
- Drive-Up Hours: Monday - Friday 8:00am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- Investment Hours: Monday - Friday 8:00am - 5:00pm
- 27.015.9601.01

OWATONNA

United Prairie Bank /United Prairie Financial Network

- Address: 110 West Rose Street
Owatonna, MN 55060
- Phone: 507.451.6300
- Email: owatonna@unitedprairiebank.com
- Monday - Friday 8:30am - 5:00pm
- Drive-Up Hours: Monday - Friday 8:00am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- Investment Hours: Monday - Friday 8:00am - 5:00pm
- 27.147.9604.00

SPICER

United Prairie Bank

- Address: 425 Access Drive
PO Box 579
Spicer, MN 56288
- Phone: 320.796.2151
- Email: spicer@unitedprairiebank.com
- Monday - Friday 8:30am - 4:00pm
- Drive-Up Hours: Monday - Friday 8:00am - 4:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- 27.067.7804.00

WASECA

United Prairie Bank

- Address: 1509 North State Street
Waseca, MN 56093
- Phone: 507.835.8180
- Email: waseca@unitedprairiebank.com
- Monday - Friday 8:30am - 4:00pm
- Drive-Up Hours: Monday - Friday 8:00am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- 27.161.7904.00

WILMONT

United Prairie Bank

- Address: 323 4th Avenue
PO Box 8
Wilmont, MN 56185
- Phone: 507.926.5155
- Email: wilmont@unitedprairiebank.com
- Lobby Hours: By appointment during business hours
- Drive-Up Hours: Monday - Friday 8:30am - 11:00am, 12:00pm - 4:30pm
- Walk-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Walk-up ATM, Accepts Deposits
- 27.105.1052.00

WINDOM

United Prairie Bank

- Address: 1545 1st Avenue Hwy 60 East
Windom, MN 56101
- Phone: 507.831.3000
- Email: windom@unitedprairiebank.com
- Monday 9:00am - 5:00pm; Tuesday - Friday 9:00am - 3:00pm
- Drive-Up Hours: Monday - Friday 8:30am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- 27.033.2704.00

WORTHINGTON

United Prairie Bank / United Prairie Financial Network

- Address: 905 McMillan Street
PO Box 776
Worthington, MN 56187
- Phone: 507.376.9754
- Email: worthington@unitedprairiebank.com
- Monday - Friday 8:30am - 3:00pm
- Drive-Up Hours: Monday - Friday 8:30am - 5:00pm
- Drive-up Video Teller (ITM):
 - Monday – Friday 7:00am – 6:00pm
 - Saturday 9:00 - Noon
- Drive-up ATM, Accepts Deposits
- Investment Hours: Monday - Friday 8:00am - 5:00pm
- 27.105.1054.00

Consumer Deposit Accounts

- Free Checking
- Rewards Checking
 - Cash
 - Points
 - Interest
- Growth Savings
- Limited Edition Savings
- Companion Savings
- College Savings Fund
- Health Savings Account
- Success Money Market
- Rise Money Market
- Certificate of Deposit
- Individual Retirement Account

Consumer Services

- Retail Online Banking
- Electronic Statements
- Online BillPay
- Zelle
- Mobile Banking and Deposit
- Electronic and Push Alerts
- Telebanc
- ProtectU Overdraft Program
- IntraFi Network Deposits (formerly ICS and CDARS)
- Online Account Opening

Commercial Deposit Accounts

- Ambassador Checking
- Endeavor Checking
- Venture Checking
- Enterprise Checking
- Business Growth Savings
- Companion Savings
- Business Success Money Market
- Business Rise Money Market
- Limited Edition Savings
- Certificate of Deposit

Commercial Services

- Business Online (Cash Management)
- Remote Deposit
- ACH Manager and Wire Manager
- Business Online BillPay
- Positive Pay and ACH Positive Pay
- Business Debit Card with UChoose Points
- Merchant Card Services
- Electronic Statements
- Business Mobile Banking and Deposit
- Electronic Alerts and Push Alerts
- IntraFi Network Deposits (formerly ICS and CDARS)

Loan Options

- Automobile and Motorcycle Loans
- Equipment Loans
- Power Sport Loans
- Boat Loans
- Campers, Icehouse, Trailer Loans
- Savings, CD-Secured, Unsecured Loans
- ProtectU Line of Credit
- Commercial Loans
- Agriculture Loans
- SBA
- FSA
- Government Secured Loans
- Home Equity Line of Credit
- Home Improvement Loans
- Conventional Real Estate Loans
- Non-Conventional Real Estate Loans

Investments^{1,2}

- Various Investment Products
- Life Insurance and Long-Term Care
- Trust and Estate Planning
- Education Savings Plans
- Wealth and Retirement Planning

¹ Investment products available through affiliate – not bank products.

² Products are not a deposit, not FDIC-insured, have no bank guarantee, may lose value, and not insured by any Federal Government Agency.

³ Product or service listed is not available in all locations.

Miscellaneous Services

- Debit Card
- Docusign/E-Sign
- UChoose Point Debit Card
- Direct Deposit
- Mobile Wallet
- CardHub/CardValet
- Stop Payment
- ITMs /ITM Deposits³
- Night Deposit³
- Money Orders and Official Checks
- Wire Transfers
- ACH Origination
- Gift Cards
- Live Telephone Support
- Credit Cards
- Notary Public
- Safe Deposit Box Rental³
- Online Instructional and Educational Videos
- Harland Clarke Check Ordering
- Foreign Currency Purchase/Collection
- ClickSwitch/CardSwap



IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

From United Prairie Bank

Limits and fees – The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Abandoned Account fee (Upon loss of contact)	\$20.00
Account reconciliation/research (per hr) (min 1 hr)	\$25.00
Account statement printout	\$5.00
ACH automatic transfer (transfer to a non-United Prairie Bank account)	\$2.50
ACH origination chargeback	\$5.00
(ATM) Fee for ATM Withdrawal (non-United Prairie Bank / non-MoneyPass network ATM)	\$1.00
Collection fees (Incoming and Outgoing):	
Domestic checks	\$30.00 per item
Canadian items	\$15.00 per Cash Letter & \$5.00 per item
Foreign checks (non-Canadian)	\$15.00 per Cash Letter & \$20.00 per item
Check Printing	Fees vary by style
Debit/ATM card (replace lost/mishandled card)	\$10.00
Duplicate statement (per month)	\$5.00
Early Account closed fee (within the first 90 days-Checking, Growth Savings, Success Money Market)	\$30.00
eServices fees:	
Account to Account Transfer (to a different financial institution)	\$2.50
Zelle - Stop Payment Fee	\$15.00
Fax fees:	
Incoming	\$1.00 first page & \$0.50 per additional page
Outgoing	\$4.00 first page & \$1.00 per additional page
International	Billed rate + \$2.00 per page
Foreign currency collection/purchase	\$35 +/- exchange rate
Gift cards (If purchased online \$7.95 with shipping & handling)	\$5.00
Hold Mail Request	\$5.00
Inactive fee (Charged once the account has been inactive for 36 months or more.)	\$5.00 per month
IRA closing fee	\$50.00
Levy/Garnishment	\$50.00
Money Order (Classics Checking - free)	\$1.00 per \$100.00 (\$5 max)
Night depository locked bags (1st bag free)	\$15.00
Official Check	\$5.00
Overdraft fee (per each item paid - up to 6 Overdraft / Returned Item fees per day)	\$35.00
(An overdraft fee applies to overdrafts created by check, in person withdrawal, ATM withdrawal or other electronic means.)	
Continuous Overdraft Fee (Business Accounts Only)	
(If account remains overdrawn, on the 2nd business day and each day the account remains overdrawn, you will incur this fee.)	\$5.00

Effective 02-01-2023

Photocopies (per copy) (Classics Checking – free)	\$0.25
Ready Reserve annual fee	\$35.00
Returned item fees (Each time an item is returned not paid – up to 6 Returned Item/Overdraft fees per day. An item may be presented multiple times. You may be charged each time the item is presented for payment)	\$35.00
Returned mail fee (per item)	\$10.00
Safe Deposit Boxes:	
Safe Deposit Box rent (Classics Checking – smallest size box free)	Varies by size
Safe Deposit Box drilling fee	Locksmith Rate + \$50.00
Safe Deposit Box Lost key/Lock Replacement	Locksmith Rate + \$50.00
Safe Deposit Box late payment fee (after 30 days past due)	\$10.00
Stop Item Charge (Classics Checking – free)	\$30.00
Substitute check fee (per item)	\$5.00
Telebanc faxed account statement	\$5.00
Transfer Fee (Includes ProtectU Sweeps) (Classics Checking-free)	\$5.00
Wire transfer:	
Incoming wires	\$10.00
Outgoing wires (Classics Checking - \$5.00 discount)	\$25.00
International outgoing wires	\$50.00
Zipper bags (1st bag free)	\$5.00
Non-customers only:	
Coin counting	5% of total
Coin/currency purchase (\$2.00 minimum)	1% of total order
Money Order	\$10.00
Official Check	\$20.00
Notary service	\$5.00

United Prairie Bank

Loan to Deposit Ratios - 2023

Totals by Quarter	Loans & Leases Net of Allowance (000s)	Deposits Total (000s)	Loan to Deposit %
March 31, 2023	668,057	724,029	92.27%
June 30, 2023	686,048	716,761	95.72%
September 30, 2023	692,650	713,668	97.05%
December 31, 2023	731,134	733,663	99.66%

PUBLIC DISCLOSURE

December 19, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Prairie Bank
Certificate Number: 10958

1141 3rd Avenue
Mountain Lake, Minnesota 56159

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office

1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and credit needs in the assessment areas.
- United Prairie Bank originated a majority of its small business and small farm loans in its assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution by borrowers reflects reasonable penetration of loans among businesses and farms of different revenue sizes.
- United Prairie Bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- United Prairie Bank demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the bank's capacity and the need and availability of such opportunities for community development in its assessment areas.

DESCRIPTION OF INSTITUTION

United Prairie Bank operates 10 full-service offices throughout central and southern Minnesota. The bank's main office is in Mountain Lake while its headquarters is in Mankato. Branches are located in the following cities: Madison, New Ulm, Owatonna, Spicer, Waseca, Wilmont, Windom, and Worthington. On August 7, 2020, United Prairie Bank closed its branch in Jackson and one of its two branches in Owatonna (Cedar Avenue location), which were located in middle-income census tracts. Since the previous CRA evaluation, United Prairie Bank has not opened any offices, and no merger or acquisition activities have occurred.

Farmers State Corporation, a one-bank holding company that is also located in Mankato, Minnesota owns United Prairie Bank. The bank received a Satisfactory rating at its previous FDIC Performance Evaluation, dated December 3, 2019, based on Interagency Intermediate Small Institution Examination Procedures.

United Prairie Bank offers a wide range of loan products, including commercial, agricultural, home mortgage, and consumer loans. Commercial and agricultural loans continue to represent the institution's primary business lines, followed by home mortgage and consumer loans to a much lesser degree. Additionally, United Prairie Bank is a Small Business Administration (SBA) Preferred Lender in addition to active involvement in the following loan programs: Farm Service Agency (FSA), Rural Finance Authority, U.S. Department of Agriculture, Farmer Mac, and Minnesota Department of Agriculture. These programs are generally designed to assist small businesses and small farmers who may not qualify for loans through conventional financing methods. United Prairie Bank was also recognized as the top agricultural lender (based on asset size) in the State of Minnesota, and 14th in the nation, in 2022 by the Independent Community Bankers of America. Further, in 2020 and 2021, the bank originated 1,215 loans totaling \$52.0 million through the SBA's Paycheck Protection Program (PPP), which assisted businesses struggling with the impact of the Coronavirus Disease (COVID-19) pandemic.

United Prairie Bank brokers the vast majority of its home mortgage loans. The bank's arrangement includes participation in the following programs: Federal Housing Administration, Minnesota Housing Finance Agency, and U.S. Department of Veterans Affairs. These programs are designed to assist individuals with home mortgage financing, including programs designed for low- and moderate-income borrowers.

The bank provides a variety of deposit account services including checking, savings, money market, health savings, individual retirement accounts, and certificates of deposit. United Prairie Bank offers electronic banking services such as Internet and telephone banking; mobile banking, including mobile deposit; bill pay; and electronic statements. Additionally, the bank provides access to surcharge-free ATMs through the MoneyPass network. Lastly, affiliated entities offer insurance and wealth management services.

The bank's September 30, 2022, Consolidated Report of Condition and Income (Report of Condition) reflected total assets of \$788.7 million, total loans of \$663.7 million, and total deposits of \$666.2 million. The following table illustrates the bank's loan portfolio as of this date.

Loan Portfolio Distribution as of September 30, 2022		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	23,995	3.6
Secured by Farmland	173,414	26.1
Secured by 1-4 Family Residential Properties	44,612	6.7
Secured by Multifamily (5 or more) Residential Properties	36,306	5.5
Secured by Nonfarm Nonresidential Properties	180,835	27.3
Total Real Estate Loans	459,162	69.2
Commercial and Industrial Loans	91,226	13.8
Agricultural Production and Other Loans to Farmers	94,369	14.2
Consumer Loans	3,846	0.6
Obligations of State and Political Subdivisions in the U.S.	3,603	0.5
Other Loans	11,493	1.7
Lease Financing Receivable (net of unearned income)	0	0
Less: Unearned Income	0	0
Total Loans	663,699	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that would limit the institution's ability to meet the credit needs of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires financial institutions to define one or more assessment areas within which examiners will evaluate CRA performance. United Prairie Bank designated three contiguous assessment areas in the State of Minnesota, which have not changed since the previous evaluation. The assessment areas contain full counties in the nonmetropolitan areas of Minnesota and the Mankato, Minnesota Metropolitan Statistical Area (MSA). Furthermore, the two nonmetropolitan assessment areas are not contiguous to one another. Examiners analyzed the three assessment areas as described in the following table.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Western Nonmetropolitan	Brown, Cottonwood, Jackson, Kandiyohi, Lac qui Parle, Lyon, Martin, Murray, Nobles, Redwood, Renville, Watonwan, & Yellow Medicine	72	7
Eastern Nonmetropolitan	Steele & Waseca	13	2
Mankato MSA	Blue Earth & Nicollet	23	1
<i>Source: Bank Data and 2015 ACS Data</i>			

Examiner's separate analysis of the Western and Eastern Nonmetropolitan Assessment Areas revealed consistent performance conclusions. Therefore, these assessment areas are combined and presented as the Nonmetropolitan Assessment Area throughout this CRA evaluation. Refer to the individual assessment area sections for more detailed information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated December 3, 2019, to the current evaluation dated December 19, 2022. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate United Prairie Bank’s CRA performance. These procedures evaluate an institution’s performance according to the Lending Test and Community Development Test, as detailed in the Appendices.

Examiners conducted a full-scope review to evaluate United Prairie Bank’s performance in the Nonmetropolitan Assessment Area and a limited-scope review of performance in the Mankato MSA Assessment Area. Factors considered when determining which assessment areas received full- or limited-scope reviews included branching structure, deposit volume, loan volume, presence of other financial institutions, scope of review of assessment areas performed at the previous CRA evaluations, and United Prairie Bank’s prior CRA performance in these assessment areas.

To assess the bank’s overall performance, examiners gave greater weight to evaluation results for the Nonmetropolitan Assessment Area because it comprises the vast majority of the loans, deposits, and branches. See the following table for a breakdown of loans, deposits, and branches for each assessment area as of November 30, 2022.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Nonmetropolitan	512,859	74.6	570,208	81.0	9	90.0
Mankato MSA	170,235	24.8	87,009	12.3	1	10.0
Other	4,463	0.6	47,112	6.7	0	0.0
Total	687,557	100.0	704,329	100.0	10	100.0

Source: Bank Data.

Activities Reviewed

Bank records indicated that the lending focus and product mix remained generally consistent throughout the evaluation period. Given this information, examiners selected 2021, the most recent calendar year, as the review period. This timeframe is considered representative of the bank’s performance during the entire evaluation period. Examiners determined that the bank’s major product lines are commercial and agricultural lending followed by home mortgage lending to a much lesser degree. Therefore, examiners reviewed small business and small farm loans for this performance evaluation. Examiners did not review home mortgage or consumer installment lending activities because they each represent a small portion of the loan portfolio, are not a primary business focus of the institution, and provide no material support for conclusions.

For the Lending Test, examiners reviewed all small business and small farm loans originated or renewed in 2021 for the Assessment Area Concentration analysis. Examiners reviewed all loans inside the respective assessment areas for the Geographic Distribution analysis. For the Borrower Profile criterion, examiners reviewed a sample of small business and small farm loans located

within the assessment areas, as revenue information was not readily available. D&B data for 2021 provided a standard of comparison for the bank’s small business and small farm lending performance. Small farm lending received the most weight when deriving overall conclusions in the Nonmetropolitan Assessment Area given the lending focus in these counties is primarily agricultural. However, small business lending received the most weight in the Mankato MSA Assessment Area, as small business lending is more of a focus in this market. The following table details the loan universes and samples selected for review.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Business	1,311	121,055	67	5,772
Small Farm	433	67,982	58	8,462
<i>Source: Bank Data</i>				

While both the number and dollar volume of loans are presented, examiners emphasized performance by the number of loans, because the number of loans is a better indicator of the number of businesses and farms served.

For the Community Development Test, bank management provided data on community development loans, qualified investments and donations, and community development services from the prior evaluation date of December 3, 2019, to the current evaluation date of December 19, 2022. Examiners reviewed community development activity for the entire review period and presented the information for each year within this performance evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

United Prairie Bank demonstrated satisfactory performance under the Lending Test. The bank’s performance under all evaluated criteria supports this conclusion.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is more than reasonable given the institution’s size, financial condition, and credit needs in the assessment areas. The bank’s ratio, calculated from Report of Condition data, averaged 94.2 percent over the past 12 calendar quarters from December 31, 2019, to September 30, 2022. The ratio has remained steady with some seasonal fluctuations over the review period from a high of 100.5 percent on March 31, 2020, to a low of 85.2 percent on March 31, 2021. United Prairie Bank maintained a ratio that exceeds the similarly situated institutions shown in the following table. Examiners selected comparable institutions based on their asset size, geographic location, and lending focus.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 9/30/2022 (\$000s)	Average Net LTD Ratio (%)
Alliance Bank, Lake City, MN	805,605	82.6
Manufacturers Bank & Trust, Forest City, IA	736,285	80.0
Pioneer Bank, Mapleton, MN	781,874	72.2
United Prairie Bank, Mountain Lake MN	788,666	94.2
<i>Source: Reports of Condition and Income 12/31/2019-9/30/2022</i>		

Assessment Area Concentration

As detailed in the following table, United Prairie Bank made a majority of its small business and small farm loans within its assessment areas.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	1,049	80.0	262	20.0	1,311	79,941	66.0	41,114	34.0	121,055
Small Farm	361	83.4	72	16.6	433	58,712	86.4	9,270	13.6	67,982
<i>Source: Bank Data</i>										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion overall. This conclusion is consistent with the bank's performance in the Nonmetropolitan and Mankato MSA Assessment Areas. Refer to comments specific to each assessment area later in this evaluation for further information.

Borrower Profile

The distribution of borrowers reflects reasonable penetration of loans overall. The bank's performance in the Nonmetropolitan and Mankato MSA Assessment Areas is consistent with this conclusion. Refer to comments specific to each assessment area later in this evaluation for further information.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

COMMUNITY DEVELOPMENT TEST

United Prairie Bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the bank's capacity and the need and availability of such opportunities within the assessment areas.

Comparable institutions are also used in the analysis of a financial institution to help provide perspective on a bank’s performance. For this evaluation, examiners reviewed the activities of three institutions that either have operations in a similar assessment area and/or a similar lending focus as United Prairie Bank, and were evaluated using Interagency Intermediate Small Institution Examination Procedures since July 26, 2021. Two institution’s performance included PPP lending, while one institution’s performance did not, given the timeframe of the evaluations. United Prairie Bank’s overall community development performance compares reasonably to these institutions.

Community Development Loans

During the CRA review period, the bank originated or renewed 186 community development loans totaling approximately \$51.6 million throughout its assessment areas and broader regional area. The bank extended loans primarily in an effort to promote economic development by supporting permanent job creation, retention, or improvement to low- and moderate-income persons or within moderate-income geographies; followed by supporting the revitalization and stabilization of moderate-income and distressed and/or underserved middle-income geographies; affordable housing initiatives; and community services targeted to low- and moderate-income persons. The bank was responsive to its assessment areas’ credit needs; therefore, qualified community development lending activity that benefitted the greater regional area was also included.

Community development lending activity includes 109 SBA PPP loans totaling approximately \$12.9 million originated during 2020. These loans helped finance small businesses as they struggle with the impact of the COVID-19 pandemic. Of the \$12.9 million in PPP funds provided, \$920.9 thousand benefitted regional areas outside of the bank’s assessment areas. The bank’s community development loans to total assets ratio (6.5 percent) and community development loans to net loans ratio (7.9 percent) compare reasonably to the ratios of comparable institutions, which ranged from 2.3 to 9.9 percent and 5.7 to 15.5 percent, respectively. The institution with the highest comparable community development loans to net loans ratio also included PPP loans. The following tables provide a breakdown of the community development loans by area benefited and activities by year for each community development purpose.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nonmetropolitan	2	361	1	140	120	22,473	2	3,335	125	26,309
Mankato MSA	1	2,015	1	100	25	6,304	1	2,830	28	11,249
Regional Activities	3	1,274	0	0	27	4,825	3	7,902	33	14,001
Total	6	3,650	2	240	172	33,602	6	14,067	186	51,559
<i>Source: Bank Data</i>										

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	3	481	0	0	142	25,202	3	2,846	148	28,529
2021	3	3,169	2	240	20	5,508	2	8,246	27	17,163
YTD 2022	0	0	0	0	10	2,892	1	2,975	11	5,867
Total	6	3,650	2	240	172	33,602	6	14,067	186	51,559
<i>Source: Bank Data</i>										

Qualified Investments

Qualified investments and donations funded from December 3, 2019, to December 19, 2022, were considered under this criterion as well as qualifying investments purchased prior to this evaluation that are still outstanding as of the date of this evaluation. United Prairie Bank received consideration for 150 qualified investments totaling approximately \$6.8 million. This total included 131 donations totaling \$113.0 thousand, which primarily promoted community development by donating to organizations that provide community services to low- and moderate-income persons and those that help in the revitalization and stabilization of moderate-income census tracts as well as distressed and/or underserved middle-income census tracts. The bank was responsive to its assessment areas' community development investment and donation needs; therefore, qualified community development investment and donation activity that benefitted the statewide area was included.

When aggregated for the evaluation period, the bank's qualified investments to total assets ratio was 0.9 percent and represents 7.5 percent of total securities. United Prairie Bank's qualified investments to total assets ratio was comparable to the peer institutions whose ratios ranged from 0.3 to 1.45 percent. The bank's qualified investments to total securities ratio was greater than the comparable institutions whose ratios ranged from 1.7 to 4.9 percent. Overall, United Prairie Bank's community development investment and donation activity is responsive to the needs within the assessment area. The following tables illustrates the bank's qualified investments by area benefited and by year and activity for each community development purpose.

Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nonmetropolitan	6	1	77	27	2	273	20	3,266	105	3,567
Mankato MSA	14	8	24	491	2	10	2	900	42	1,409
Statewide Activities	0	0	2	1,365	0	0	1	435	3	1,800
Total	20	9	103	1,883	4	283	23	4,601	150	6,776
<i>Source: Bank Data</i>										

Community Development Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	13	3,918	13	3,918
2020	0	0	0	0	1	270	0	0	1	270
2021	0	0	0	0	0	0	2	645	2	645
YTD 2022	0	0	3	1,830	0	0	0	0	3	1,830
Subtotal	0	0	3	1830	1	270	15	4563	19	6,663
Qualified Grants & Donations	20	9	100	53	3	13	8	38	131	113
Total	20	9	103	1,883	4	283	23	4,601	150	6,776

Source: Bank Data

Community Development Services

During the CRA review period, bank employees provided 64 instances of financial expertise or technical assistance totaling approximately 1,430 service hours to 27 different community development-related organizations. Because the bank was responsive to its assessment areas' community development service needs, qualified community development service activity that benefitted the statewide area was included. The bank's level of community development services is comparable to the other institutions, whose community development services ranged from 23 to 138 during their respective evaluation periods. The following tables provides a breakdown of community development services by area benefitted and by year for each community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Nonmetropolitan	0	7	24	6	37
Mankato MSA	1	9	11	3	24
Statewide Activities	3	0	0	0	3
Total	4	16	35	9	64

Source: Bank Data

Community Development Services by Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020	2	7	11	3	23
2021	1	5	13	3	22
YTD 2022	1	4	11	3	19
Total	4	16	35	9	64

Source: Bank Data

In addition to the services noted above, United Prairie Bank operates three branches and ATMs in moderate-income geographies. The bank's headquarters in Mankato is in close proximity to moderate-income geographies. Furthermore, United Prairie Bank operates a branch and ATM in a distressed and underserved geography. The bank continues to waive surcharges and bank fees at Money Pass network ATMs, offers a free checking account, and provides no cost electronic and mobile banking services. As of November 15, 2022, the bank has 3,394 free checking accounts. Branch hours provide residents easy access to personalized services, while electronic banking services provides convenient 24-hour access to account information.

Further, United Prairie Bank was responsive to the needs of low- and moderate-income individuals and small businesses, small farms, and consumers by providing loan accommodations and payment deferrals during the COVID-19 pandemic.

United Prairie Bank also participates in the Interest on Lawyers Trust Account (IOLTA) and Interest-Bearing Real Estate Trust Account (IBRETA) programs, which permit lawyers and real estate brokers to deposit funds held in trust for clients into interest-bearing trust accounts. The interest generated from IOLTAs is given to the Minnesota Lawyer Trust Account Board to provide legal assistance to low- and moderate-income individuals. The interest generated from IBRETAs is given to the Minnesota Housing Trust Fund to provide housing assistance to low- and moderate-income individuals. As of December 13, 2022, United Prairie Bank had 12 IOLTAs and 8 IBRETAs benefitting the State of Minnesota.

Overall, the bank provides reasonable access to product and services, specifically designed to meet the needs of the communities served; including low- and moderate-income residents.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

NONMETROPOLITAN ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMETROPOLITAN ASSESSMENT AREA

Economic and Demographic Data

According to 2015 American Community Survey (ACS) data, the assessment area includes 6 moderate-income census tracts, 69 middle-income census tracts, and 10 upper-income census tracts. This assessment area includes the main office in Mountain Lake and branches in Madison, New Ulm, Owatonna, Spicer, Waseca, Wilmont, Windom, and Worthington. The Owatonna, Windom, and Worthington branches are in moderate-income census tracts while the Mountain Lake office and branches in Madison, New Ulm, Spicer, Waseca, and Wilmont are in middle-income census tracts. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Nonmetropolitan Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	85	0.0	7.1	81.2	11.8	0.0
Population by Geography	280,605	0.0	8.1	76.4	15.4	0.0
Housing Units by Geography	127,065	0.0	7.5	78.0	14.4	0.0
Owner-Occupied Units by Geography	85,127	0.0	5.5	78.4	16.2	0.0
Occupied Rental Units by Geography	27,722	0.0	14.0	76.1	9.8	0.0
Vacant Units by Geography	14,216	0.0	7.3	79.6	13.1	0.0
Businesses by Geography	23,256	0.0	10.8	77.1	12.1	0.0
Farms by Geography	4,554	0.0	2.5	86.3	11.2	0.0
Family Distribution by Income Level	74,507	18.1	17.3	23.6	41.0	0.0
Household Distribution by Income Level	112,849	22.5	15.7	19.3	42.5	0.0
Median Family Income Nonmetropolitan Minnesota	\$63,045	Median Housing Value				\$124,212
		Median Gross Rent				\$626
		Families Below Poverty Level				8.0%
<i>Source: 2015 ACS and 2021 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>						

According to 2021 D&B data, the service industry represents the largest portion of business operations at 31.5 percent; followed by agriculture, forestry, and fishing at 16.4 percent; retail trade at 10.7 percent; and non-classifiable establishments at 10.3 percent. Additionally, 69.7 percent of assessment area businesses have four or fewer employees, and 88.3 percent operate from a single location.

Competition

The assessment area is a highly competitive market for credit products and financial services. According to Reports of Condition data filed by financial institutions, there are 81 financial institutions operating 170 locations within the assessment area. These institutions range from small community banks to larger national financial institutions. United Prairie Bank is ranked fifth with 5.0 percent of the deposit market share.

United Prairie Bank is not required to collect or report small farm or small business CRA loan data and has elected not to do so. Therefore, examiners did not compare the bank's small farm or small business lending performance to aggregate CRA data within this evaluation. However, the aggregate CRA data provides an indication of the level of demand for small farm and small business loans and the level of competition within the assessment area. According to 2020 aggregate CRA data (most recent available), 26 CRA data reporters collectively reported 2,682 small farm loans originated within the assessment area. This same CRA aggregate data revealed that 91 CRA data reporters collectively reported 3,742 small business loans originated within the

assessment area. These figures do not include the number of loans originated by smaller institutions that are not required to report small farm or small business lending data but operate within the assessment area. The overall volume of small farm and small business lending in the assessment area reflects a highly competitive market.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available. For this performance evaluation, examiners reviewed a recently completed community contact with a representative from an economic development entity that serves several counties within the assessment area.

The contact stated that the pandemic and low unemployment rates created challenges for small businesses in the area. Specifically, business operations were limited by shutdowns and a workforce that was experiencing housing, childcare, and broadband limitations. The contact also noted that workforce development is a need in the area to assist employers in being more creative to attract employees.

The contact also stated there is a shortage of housing availability in the area and an increasing trend of home values and market rents. The housing market is competitive and many homes are selling for above asking price, resulting in fewer affordable housing options for lower-income families who may have difficulty qualifying for mortgage loans.

According to the contact, some local crop farmers have been considering growing hemp as a method to diversify crop options. However, they have expressed concerns that financing may be a challenge due to regulatory requirements and state statutes. Lastly, the contact stated there is a need for more financial education for the population. Overall, the contact stated that financial institutions have been responsive to the credit needs of the assessment area.

Credit and Community Development Needs and Opportunities

Examiners considered community contact comments, information received from bank management, and demographic and economic data, when determining the needs and opportunities in the Nonmetropolitan Assessment Area. Examiners concluded that small farm, small business, and home mortgage lending represent the primary credit needs. In addition, community development opportunities in the area include economic development; revitalization and stabilization efforts for moderate-income, distressed, and/or underserved middle-income geographies; increased availability of affordable housing; and community services for low- and moderate-income individuals.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NONMETROPOLITAN ASSESSMENT AREA

LENDING TEST

United Prairie Bank demonstrated reasonable performance under the Lending Test in the Nonmetropolitan Assessment Area. The bank's Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area and is supported by reasonable small business and small farm lending. Examiners focused on the percentage of loans made in moderate-income census tracts. The Nonmetropolitan Assessment Area does not include any low-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank's lending performance in moderate-income census tracts compares reasonably to demographic data.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	10.8	72	8.6	8,490	18.3
Middle	77.1	661	78.5	28,467	61.5
Upper	12.1	109	12.9	9,350	20.2
Total	100.0	842	100.0	46,307	100.0
<i>Source: 2021 D&B Data; Bank Data</i>					

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank's lending performance in moderate-income census tracts compares reasonably to demographic data.

Geographic Distribution of Small Farm Loans					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	2.5	15	5.1	1,502	3.1
Middle	86.3	237	80.6	38,731	80.5
Upper	11.2	42	14.3	7,873	16.4
Total	100.0	294	100.0	48,106	100.0
<i>Source: 2021 D&B Data; Bank Data</i>					

Borrower Profile

The distribution of borrowers reflects reasonable penetration overall in the Nonmetropolitan Assessment Area. The bank’s reasonable lending performance to businesses and farms with gross annual revenues of \$1 million or less primarily supports this conclusion.

Small Business Loans

The distribution of sampled small business loans reflects reasonable penetration to businesses with gross annual revenues of \$1 million or less. As illustrated in the following table, the bank’s lending performance to businesses with gross annual revenues of \$1 million or less is slightly lower than demographic data; however, the sample included nine small business loans that did not have revenue information available. This is because this category includes PPP loan originations whereby the bank was not required to collect revenue information. Of the nine loans with no revenue information available, approximately 77.8 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank’s willingness to serve the needs of smaller businesses.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	80.8	40	72.7	3,700	70.7
> \$1,000,000	5.3	6	10.9	387	7.4
Revenue Not Available	13.9	9	16.4	1,145	21.9
Total	100.0	55	100.0	5,232	100.0
<i>Source: 2021 D&B Data; Bank Data</i>					

Small Farm Loans

The distribution of sampled small farm loans reflects reasonable penetration to farms with gross annual revenues of \$1 million or less. As shown in the following table, the bank’s lending performance to farms with gross annual revenues of \$1 million or less is lower than demographic data. However, according to the 2017 Census of Agriculture, the percentage of farmers that did not pay interest in the Nonmetropolitan Assessment Area was 45.6 percent. Therefore, there is a large population of farms that do not appear to have credit needs. Overall, the bank’s performance is reasonable when considering this factor.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
≤ \$1,000,000	97.7	38	79.2	5,567	78.2
> \$1,000,000	1.1	6	12.5	1,167	16.4
Revenue Not Available	1.1	4	8.3	381	5.4
Total	100.0	48	100.0	7,115	100.0
<i>Source: 2021 D&B Data; Bank Data</i>					
<i>Due to rounding, totals may not equal 100%</i>					

COMMUNITY DEVELOPMENT TEST

United Prairie Bank’s community development performance demonstrates adequate responsiveness to community development needs in the Nonmetropolitan Assessment Area, considering the institution’s capacity, as well as the need for and availability of community development opportunities.

Community Development Loans

United Prairie Bank originated 125 community development loans totaling approximately \$26.3 million within this assessment area during the evaluation period. This includes 77 PPP loans totaling approximately \$6.4 million. Loans primarily supported permanent job creation and retention for low- and moderate-income persons followed by loans to support the revitalization and stabilization of moderate-income geographies.

Qualified Investments

During the evaluation period, United Prairie Bank purchased two equity investments totaling \$480.0 thousand and retained 11 prior period investments totaling approximately \$3.0 million. Further, the bank made 92 donations totaling approximately \$69.5 thousand to organizations that promote economic development, provide affordable housing and community services to low-and moderate-income individuals, and help to revitalize and stabilize moderate-income and distressed and/or underserved middle-income areas in the assessment area.

Community Development Services

During the evaluation period, institution employees provided 37 instances of financial expertise or technical assistance that benefited the Nonmetropolitan Assessment Area. Services were provided to various organizations that promote economic development, assist in the revitalization and stabilization of moderate-income census tracts and distressed and/or underserved middle-income tracts, and community services targeted to low- and moderate-income individuals within the assessment area.

MANKATO MSA ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MANKATO MSA ASSESSMENT AREA

The Mankato MSA Assessment Area includes all census tracts in Blue Earth and Nicollet counties in Minnesota, which comprise the entire Mankato, Minnesota MSA. According to 2015 ACS data, the assessment area consists of 4 moderate-, 18 middle-, and 1 upper-income census tract. This assessment area includes the bank’s Mankato headquarters office, which is in a middle-income census tract. The table below illustrates select demographic characteristics of the Mankato MSA Assessment Area.

Demographic Information of the Mankato Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	17.4	78.3	4.3	0.0
Population by Geography	98,211	0.0	15.0	81.2	3.9	0.0
Housing Units by Geography	39,974	0.0	14.3	82.1	3.6	0.0
Owner-Occupied Units by Geography	25,266	0.0	7.7	87.3	5.0	0.0
Occupied Rental Units by Geography	12,210	0.0	26.9	72.2	0.9	0.0
Vacant Units by Geography	2,498	0.0	19.8	77.1	3.1	0.0
Businesses by Geography	8,386	0.0	18.9	77.5	3.6	0.0
Farms by Geography	799	0.0	2.8	86.4	10.9	0.0
Family Distribution by Income Level	22,825	19.7	17.6	23.8	38.8	0.0
Household Distribution by Income Level	37,476	24.1	16.5	17.7	41.7	0.0
Median Family Income MSA - 31860 Mankato, MN MSA		\$71,814	Median Housing Value			\$165,158
			Median Gross Rent			\$745
			Families Below Poverty Level			8.1%
<i>Source: 2015 ACS and 2021 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>						

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MANKATO MSA ASSESSMENT AREA

LENDING TEST

The institution's lending performance in the Mankato MSA Assessment Area is consistent with the institution's lending performance overall.

Geographic Distribution

Small Business Loans

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	18.9	33	15.9	12,024	35.7
Middle	77.5	166	80.2	20,742	61.7
Upper	3.6	8	3.9	868	2.6
Total	100.0	207	100.0	33,634	100.0
<i>Source: 2021 D&B Data; Bank Data</i>					

Small Farm Loans

Geographic Distribution of Small Farm Loans					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	2.7	0	0.0	0	0.0
Middle	86.4	63	94.0	10,256	96.7
Upper	10.9	4	6.0	350	3.3
Total	100.0	67	100.0	10,606	100.0

Source: 2021 D&B Data; Bank Data

Borrower Profile

Small Business Loans

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	82.8	7	58.3	318	58.9
> \$1,000,000	5.3	1	8.3	92	17.0
Revenue Not Available	11.9	4	33.3	130	24.1
Total	100.0	12	100.0	540	100.0

Source: 2021 D&B Data; Bank Data
Due to rounding, totals may not equal 100%

Small Farm Loans

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
≤ \$1,000,000	97.0	8	80.0	1,132	84.0
> \$1,000,000	1.9	1	10.0	150	11.1
Revenue Not Available	1.1	1	10.0	65	4.8
Total	100.0	10	100.0	1,347	100.0

Source: 2021 D&B Data; Bank Data
Due to rounding, totals may not equal 100%

COMMUNITY DEVELOPMENT TEST

United Prairie Bank’s community development performance in the Mankato MSA Assessment Area is consistent with the community development performance overall.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

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 metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

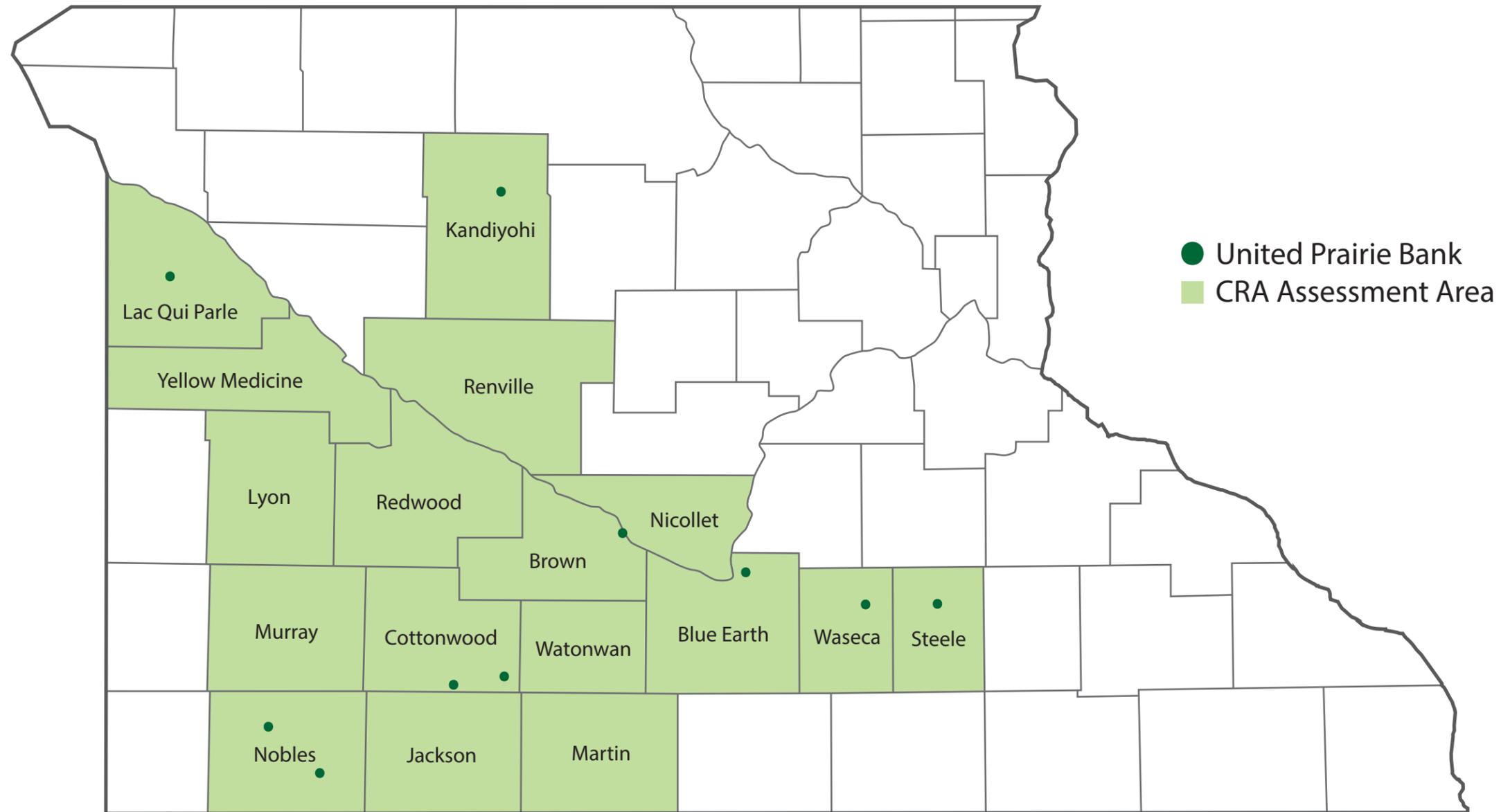
Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

CRA Assessment Area





Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	013	1701.00	31860	Blue Earth	Jamestown LeRay	Eagle Lake Madison Lake
27	013	1702.00	31860	Blue Earth	Lime Mankato	Mankato (N)
27	013	1703.00	31860	Blue Earth	Mankato	Mankato (N)
27	013	1704.00	31860	Blue Earth	Mankato	Mankato (NE)
27	013	1705.00	31860	Blue Earth	Mankato	Mankato (E)
27	013	1706.00	31860	Blue Earth	Mankato	Mankato (Oldtown)
27	013	1707.00	31860	Blue Earth	Mankato	Mankato (Downtown)
27	013	1708.00	31860	Blue Earth	Mankato	Mankato (SW)
27	013	1709.00	31860	Blue Earth	Cambria Butternut Valley Judson Lincoln South Bend	
27	013	1710.00	31860	Blue Earth	Garden City	Lake Cystal Garden City
27	013	1711.01	31860	Blue Earth	Mankato	Mankato (S Central)
27	013	1712.02	31860	Blue Earth	Mankato	Mankato (SE)
27	013	1713.00	31860	Blue Earth	Decoria McPherson Rapidan	St Clair
27	013	1714.00	31860	Blue Earth	Beauford Danville Mapleton Medo Sterling	Mapleton Pemberton
27	013	1715.00	31860	Blue Earth	Ceresco Lyra Pleasant Mound Shelby Vernon Center	Vernon Center Amboy
27	013	1716.00	31860	Blue Earth	Mankato	Mankato (S)
27	015	9601.01	0	Brown		New Ulm (E of Broadway, NE)



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	015	9601.02	NA	Brown		New Ulm (E of Broadway, SE)
27	015	9602.00	0	Brown		New Ulm (W of Broadway & S of Center)
27	015	9603.00	0	Brown		New Ulm (W of Broadway & N of Center)
27	015	9604.00	0	Brown	Burnstown (NE) Eden Home Leavenworth (N) Milford Prairieville	Cobden Evan Essig Leavenworth (N)
27	015	9605.00	0	Brown	Home (SW) Stark (NW)	Sleepy Eye
27	015	9606.00	0	Brown	North Star Burnstown (W) Stately Bashaw (W)	Springfield Comfrey
27	015	9607.00	0	Brown	Burnstown (SE) Leavenworth (S) Stark Sigel Cottonwood Bashaw Mulligan Albin Lake Hanska Linden	Searles Hanska Godahl Leavenworth (S)
27	033	2701.00	0	Cottonwood	Carson Delton Midway Selma	Mountain Lake
27	033	2702.00	0	Cottonwood	Amboy Ann Germantown Highwater Storden Westbrook	Jeffers Storden Westbrook



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	033	2703.00	0	Cottonwood	Amo Dale Great Bend Rose Hill Southbrook Springfield	Windom (NW)
27	033	2704.00	0	Cottonwood	Lakeside Mountain Lake	Bingham Lake Windom (SE)
27	063	4801.00	0	Jackson	Belmont Christiania Delafield Des Moines Enterprise Heron Lake Kimball Middletown Petersburg Wisconsin	Alpha Wilder
27	063	4802.00	0	Jackson	Alba Ewington LaCrosse Rost Round Lake Weimer West Heron Lk	Heron Lake Okabena
27	063	4803.00	0	Jackson	Hunter Minneota Sioux Valley	Lakefield
27	063	4804.00	0	Jackson		Jackson
27	067	7709.00	0	Kandiyohi		Willmar (S Ctrl)
27	067	7801.00	0	Kandiyohi	Burbank Harrison Irving Roseville	Regal
27	067	7802.00	0	Kandiyohi	Arctander Colfax Lake Andrew Norway Lake	Sunberg
27	067	7803.00	0	Kandiyohi	New London	New London



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	067	7804.00	0	Kandiyohi	Green Lake Kandiyohi	Kandiyohi Spicer
27	067	7805.00	0	Kandiyohi		Willmar (N)
27	067	7806.00	0	Kandiyohi	Dovre Mamre St. Johns Willmar	Pennock
27	067	7807.00	0	Kandiyohi		Willmar (SW)
27	067	7808.00	0	Kandiyohi		Willmar (Central)
27	067	7810.00	0	Kandiyohi		Willmar (SE)
27	067	7811.00	0	Kandiyohi	Genessee Fahlun Lake Elizabeth Lake Lillian East Lake Lillian	Atwater Lake Lillian
27	067	7812.00	0	Kandiyohi	Edwards Whitefield Holland Roseland	Prinnsburg Blomkest
27	073	1801.00	0	Lac Qui Parle	Cerro Gordo Hantho Lake Shore Madison	Louisburg Madison
27	073	1802.00	0	Lac Qui Parle	Agassiz Arena Augusta Freeland Garfield Hamlin Manfred Mehurin	Bellingham Marietta Nassau
27	073	1803.00	0	Lac Qui Parle	Baxter Camp Release Lac Qui Parle Maxwell Riverside Ten Mile Lake	Boyd Dawson
27	083	3601.00	0	Lyon	Eidesvold Westerheim Vallers Lucas	Minneota Taunton Cottonwood



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	083	3602.00	0	Lyon	Nordland Grandview Fairview Stanley Island Lake Lynd Lake Marshall Clifton	Ghenta Lynd
27	083	3603.00	0	Lyon		Marshall (SW)
27	083	3604.00	0	Lyon		Marshall (SE)
27	083	3605.00	0	Lyon		Marshall (N-NE)
27	083	3606.00	0	Lyon	Coon Creek Lyons Sodus Amiret Shelburne Rock Lake Custer Monroe	Russell Florence Balaton Garvin
27	083	3607.00	0	Lyon		Tracy
27	091	7901.00	0	Martin	Cedar Galena Waverly Westford Nashville	Trimont Truman
27	091	7902.00	0	Martin	Elm Creek Fox Lake Fraser Rutland Center Creek	Welcome Northrup Granada
27	091	7903.00	0	Martin	Jay Manyaska Rolling Green Fairmont Pleasant Prairie	Sherburn
27	091	7904.00	0	Martin	Lake Freemont Lake Belt Tenhassen Silver Lake East Chain	Dunnell Ceylon
27	091	7905.01	0	Martin		Fairmont (W)
27	091	7905.02	0	Martin		Fairmont (S)



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	091	7906.00	0	Martin		Fairmont (N - NE)
27	101	9001.00	0	Murray	Cameron Ellsborough Holly Lake Sarah Lowville Mason Murray Shetek Skandia	Currie
27	101	9002.00	0	Murray	Bondin Chanarambie Fenton Iona Leeds Moulton	Chandler Fulda Hadley Iona Lake Wilson
27	101	9003.00	0	Murray	Belfast Des Moines River Dovray Lime Lake Slayton	Avoca Dovray Slayton
27	103	4801.00	31860	Nicollet	Ridgely West Newton Lafayette Bernadotte Brighton Courtland	Lafayette Courtland
27	103	4802.00	31860	Nicollet	New Sweden Lake Prairie Granby Traverse Oshawa Nicollet Belgrade	Nicollett
27	103	4803.00	31860	Nicollet		St Peter (N of Broadway)
27	103	4804.00	31860	Nicollet		St Peter (S of Broadway)
27	103	4805.01	31860	Nicollet		North Mankato (S of Highway 14 West)
27	103	4805.02	31860	Nicollet		North Mankato (N of Highway 14 West)
27	103	4806.00	31860	Nicollet		North Mankato (E of Lake Street)



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	105	1051.00	0	Nobles	Bloom Dewald Elk Graham Lake Hersey Lorain Seward Summit Lake Worthington	Brewster Dundee Kinbrae Rushmore
27	105	1052.00	0	Nobles	Larken Leota Lismore Olney Westside Wilmont	Adrian Lismore Wilmont
27	105	1053.00	0	Nobles	Bigelow Grand Prairie Indian Lake Little Rock Ransom	Bigelow Ellsworth Round Lake
27	105	1054.00	0	Nobles		Worthington (N)
27	105	1055.00	0	Nobles		Worthington (SE)
27	105	1056.00	0	Nobles		Worthington (SW)
27	127	7501.00	0	Redwood	Paxton Sherman Three Lakes Morgan Sundown Brookville	Morgan Clements Lower Sioux Reservation
27	127	7502.00	0	Redwood		Redwood Falls (E)
27	127	7503.00	0	Redwood		Redwood Falls (W)
27	127	7504.00	0	Redwood	Swedes Forest Kintire Delhi Sheridan Redwood Falls Vail New Avon Waterbury Willow Lake	Belview Delhi Seaforth Wabasso Wanda



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	127	7505.00	0	Redwood	Underwood Vesta Westline Granite Rock Gales Johnsonville Springdale	Vesta Milroy Lucan Walnut Grove
27	127	7506.00	0	Redwood	North Hero Lamberton Charleston	Lamberton Revere Sanborn
27	129	7901.00	0	Renville	Brookfield Boon Lake Hector Preston Lake	Hector Buffalo Lake
27	129	7902.00	0	Renville	Kingman Osceola Bird Island Melville Norfolk	Bird Island
27	129	7903.00	0	Renville	Wang Ericson Crooks Winfield Hawk Creek Sacred Heart	Sacred Heart Renville (W)
27	129	7904.00	0	Renville	Emmet Flora Henryville Beaver Falls Birch Cooley	Renville (E) Morton
27	129	7905.00	0	Renville	Troy	Danube Olivia
27	129	7906.00	0	Renville	Palmyra Martinsburg Bandon Wellington Camp Cairo	Fairfax Franklin



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	147	9601.00	0	Steele	Deerfield Medford Clinton Falls Merton Havana Owatonna	Medford Owatonna (NW)
27	147	9602.00	0	Steele		Owatonna (E)
27	147	9603.00	0	Steele		Owatonna (N)
27	147	9604.00	0	Steele		Owatonna (W)
27	147	9605.00	0	Steele	Meriden Lemond Somerset Aurora Berlin	
27	147	9606.00	0	Steele		Owatonna (SW)
27	147	9607.00	0	Steele		Owatonna (SE)
27	147	9608.00	0	Steele	Blooming Prairie Summit Berlin (SW)	Blooming Prairie Ellendale
27	161	7901.00	0	Waseca	Janesville Iosco	Janesville
27	161	7902.00	0	Waseca	Freedom Vivian Byron New Richland	New Richland Waldorf
27	161	7903.00	0	Waseca	Alton St. Mary Wilton Otisco Woodville Blooming Grove	
27	161	7904.00	0	Waseca		Waseca (N of Hwy 13)
27	161	7905.00	0	Waseca		Waseca (S of Hwy 13)
27	165	9501.00	0	Watonwan	Adrian Nelson Riverdale Madelia	Darfur LaSalle Madelia
27	165	9502.00	0	Watonwan	Rosendale (W Ctrl) St James (E Ctrl)	St James



Geocode Listing - County Order

State	Cty #	Tract #	MSA	County	Townships	Cities
27	165	9503.00	0	Watonwan	Butterfield St James Rosendale Fieldon	Butterfield Odin Lewisville
27	173	9701.00	0	Yellow Medicine	Lisbon Story Run Hazel Run Minnesota Falls	Hazel Run Granite Falls Upper Sioux Reservation
27	173	9702.00	0	Yellow Medicine	Florida Hammer Fortier Norman	Canby
27	173	9703.00	0	Yellow Medicine	Oshkosh Omro Tyro Friendship Wergeland Burton Swede Prairie Normania	Clarkfield Porter St Leo
27	173	9704.00	0	Yellow Medicine	Sandnes Wood Lake Sioux Agency Posen Echo	Hanley Falls Wood Lake Echo

We'll help you get there.™



Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending is available online for review. The data shows geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions is also available online. For more information, visit the Consumer Financial Protection Bureau's Website.

www.consumerfinance.gov/hmda