

# **PUBLIC DISCLOSURE**

October 2, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Center National Bank Charter Number 20448

301 N Ramsey Ave, Litchfield, MN 55355

Office of the Comptroller of the Currency

222 South Ninth 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**

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are originated or purchased inside the bank's assessment areas (AAs).
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- Center National Bank (CNB) did not receive any CRA-related complaints during the evaluation period.

#### Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable considering the bank's size, financial condition, and the credit needs of the AAs. The LTD ratio averaged 63.56 percent over the 12 quarters since the previous CRA evaluation. The quarterly LTD ratio ranged from a low of 48.10 percent in fourth quarter 2021 to a high of 71.25 percent in third quarter 2020. CNB ranked third out of five similarly situated institutions. Similarly situated institutions are defined as institutions with similar asset-size located in at least one of the bank's AAs. The following table shows the bank's LTD ratio compared to similarly situated institutions.

Loan-to-Deposit Ratio											
Institution	Total Assets* (\$000s)	Average LTD Ratio (%)									
Luminate Bank	248,395	92.32									
Flagship Bank Minnesota	319,301	88.09									
Center National Bank	250,072	63.56									
Home State Bank	205,238	60.47									
First Minnetonka City Bank	255,416	57.96									
Perennial Bank	147,986	32.47									
Source: Call Report data from March 31, 201	9 to December 31, 2021.										

<sup>\*</sup>Total Assets as of 12/31/21

## **Lending in Assessment Area**

A majority of the bank's loans are inside its AAs. The bank originated and purchased 55.0 percent by number and 54.8 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The following table shows the bank's lending performance inside and outside its AAs.

Lending Inside and Outside of the Assessment Area												
Loan Category	l l	Number o	of Loans			Dollar A						
	Inside Outside		Total	Inside		Outside		Total				
	#	%	#	%	#	\$	%	\$	%	\$(000s)		
Small Business	19	47.5	21	52.5	40	8,373	54.8	6,917	45.2	15,290		
Consumer	14	70.0	6	30.0	20	167	58.7	117	41.3	285		
Total	33	55.0	27	45.0	60	8,541	54.8	7,034	45.2	15,575		
Source: Bank Data from 01/0.	Source: Bank Data from 01/01/2019-12/31/21											

# **Description of Institution**

CNB is a \$250 million bank headquartered in Litchfield, MN. CNB operates three branches and no deposit-taking ATMs. CNB is 100 percent owned by a single bank holding company, CNB Financial Corporation. CNB has three affiliates, Sparboe Farms, Inc., Sparboe Foods Corp., and Center Insurance Agency, Inc. No merger or acquisition activities have affected the bank during the evaluation period. The bank opened one branch in Chaska, MN in September 2021.

CNB's only rating area is the State of Minnesota. The bank has two AAs in the state of Minnesota, including Meeker County AA and Plymouth AA. The Meeker County AA is comprised of the six census tracts (CTs) of Meeker County. The Plymouth AA is located within the Minneapolis-St.Paul-Bloomington MSA and is comprised of 12 CTs in Hennepin County.

CNB is a full-service community bank offering traditional loan and deposit products. The bank's primary lending focus is business loans. As of December 31, 2021, the bank's outstanding loan portfolio totaled \$118.5 million or 44 percent of total assets. The loan portfolio by dollar value is comprised of 58.5 percent commercial, 18.4 percent home mortgage, 14.4 percent farm, 8.1 percent consumer, and 0.6 percent other. Tier 1 capital totaled \$24.8 million.

There are no financial impediments that hinder the bank's ability to help meet the credit needs of its AAs. CNB was rated Satisfactory at the last CRA evaluation dated April 8, 2019.

# **Scope of the Evaluation**

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

We evaluated CNB's CRA performance using small bank performance standards. The time period for the LTD ratio analysis was March 31, 2019 to December 31, 2021, and the complaint analysis period covered April 9, 2019 to October 2, 2023. The evaluation period for the remaining portions of the Lending Test covered January 1, 2019 to December 31, 2021.

To determine the bank's lending performance in its AAs, we selected primary products for each AA based on the number and dollar volume of loan originations and purchases during the evaluation period. We determined the primary products for the Meeker County AA to be business and consumer loans. Commercial loans represented 36.9 percent by number and 56.4 percent by dollar of the bank's total originations and purchases within the Meeker County AA during the evaluation period. Similarly, consumer loans accounted for 40.6 percent by number and 9.9 percent by dollar of total purchases and

originations. We determined the primary product for the Plymouth AA to be business loans. Commercial loans comprised 44.0 percent by number and 77.2 percent by dollar of the bank's originations and purchases within the Plymouth AA during the evaluation period.

We also reviewed the financial, economic, and environmental factors in the AAs to determine the bank's lending performance. Additionally, we contacted a local community member with knowledge of the economic conditions and demographics within each AA to gain an understanding of the credit needs of the AAs.

## Selection of Areas for Full-Scope Review

The Meeker County and Plymouth AAs were both selected for full-scope reviews.

## **Ratings**

The bank's overall rating is based entirely on the lending performance in the state of Minnesota. The state of Minnesota performance is based on the performance in the Meeker County AA and the Plymouth AA. We evaluated lending performance using the following performance criteria: the LTD ratio, lending in the AAs, lending to borrowers of different income levels, and responses to CRA-related complaints. We did not assess the distribution of loans to geographies of different income levels. The Meeker County AA is comprised entirely of middle-income geographies, so the geographical distribution would not provide meaningful analysis. While the Plymouth AA contains one-moderate income CT, the bank did not have enough lending activity in the AA to provide a meaningful analysis for the geographic distribution test.

## Discriminatory or Other Illegal Credit Practices Review

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

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

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

# **State Rating**

#### **State of Minnesota**

**CRA rating for the State of Minnesota:** Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans to individuals of different income levels and business of different sizes is reasonable.
- The bank received no CRA related complaints during the evaluation period.

# **Description of Institution's Operations in Minnesota**

CNB operates three branches in two AAs in the state of MN.

#### Meeker County AA

The Meeker County AA is comprised of all six CTs in Meeker County. CNB operates one branch in this AA, which is located in Litchfield, MN.

Competition within the Meeker County AA is low. As of June 30, 2021, there were eight financial institutions within the AA. According to the June 30, 2021, FDIC Deposit Market Share Report, CNB holds the majority of the market share, totaling \$194 thousand or 35.0 percent of the deposits within the AA. Wells Fargo Bank and Perennial Bank join CNB as the top three market shareholder, together they hold 64.6 percent of deposits within the AA.

Meeker County's economy was less impacted by the Covid-19 pandemic than Minnesota. According to the U.S. Bureau of Labor Statistics, the unemployment rate during 2020 averaged 5.4 percent in Meeker County compared to the Minnesota statewide average of 6.3 percent. The unemployment rate in the state and county reached a peak in May 2020 at 11.0 percent and 7.1 percent, respectively. Unemployment rates recovered in 2021 with Meeker County unemployment rate at 3.4 percent compared to Minnesota's 2.9 percent as of December 31, 2021.

As part of this evaluation, we contacted a community member whose organization focused on providing economic opportunities, safe housing, and a healthy environment through identifying local needs, planned projects, and project funding. The contact identified financing for single and multi-family housing projects as a credit need within the AA. The contact noted banks are meeting the credit needs of the AA and mentioned CNB's positive work with the Housing Task Force.

The following table provides demographic information within the Meeker County AA.

Table A – Dem	ographic In	formation o	f the Meeker	County AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	6	0.0	0.0	100.0	0.0	0.0	
Population by Geography	23,129	0.0	0.0	100.0	0.0	0.0	
Housing Units by Geography	10,688	0.0	0.0	100.0	0.0	0.0	
Owner-Occupied Units by Geography	7,350	0.0	0.0	100.0	0.0	0.0	
Occupied Rental Units by Geography	1,824	0.0	0.0	100.0	0.0	0.0	
Vacant Units by Geography	1,514	0.0	0.0	100.0	0.0	0.0	
Businesses by Geography	1,835	0.0	0.0	100.0	0.0	0.0	
Farms by Geography	313	0.0	0.0	100.0	0.0	0.0	
Family Distribution by Income Level	6,294	16.2	16.0	25.7	42.1	0.0	
Household Distribution by Income Level	9,174	20.4	14.2	20.1	45.3	0.0	
Median Family Income Non-MSAs - MN		\$63,045	Median Hous	ing Value		\$162,096	
			Median Gross	\$689			
			Families Belo	w Poverty Le	vel	6.3%	

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

#### Plymouth AA

The Plymouth AA is comprised of 12 CTs within Hennepin County. The Plymouth AA is located in the Minneapolis-St. Paul-Bloomington MSA. CNB operates two branches within the MSA, the Plymouth branch and the Chaska branch. The Chaska branch was not considered in this evaluation as the bank only operated within the AA for four months of the evaluation period.

Competition within the Plymouth AA is significant. As of June 30, 2021, there were 70 financial institutions within the AA. According to the June 30, 2021, FDIC Deposit Market Share Report, CNB ranked 64 with \$19 thousand or 0.01 percent of the deposits within the Plymouth AA. The top three deposit shareholders within the AA are Wells Fargo Bank, U.S. Bank, and Ameriprise Bank with a combined deposit share of 73.1 percent.

A Plymouth area community contact was conducted as part of this evaluation. The community contact's organization focuses on improving infrastructure to draw people to the Plymouth area and works with developers to determine the impact of development on transportation and public safety and to provide the right mix of housing. The contact identified home purchases and affordable housing as credit needs.

The following table provides information on the demographic composition of the Plymouth AA.

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

Table A – De	emographic	Informatio	n of the Plymo	outh AA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	25.0	66.7	0.0
Population by Geography	77,325	0.0	6.2	16.7	77.1	0.0
Housing Units by Geography	29,539	0.0	8.0	19.5	72.5	0.0
Owner-Occupied Units by Geography	23,618	0.0	3.3	19.6	77.0	0.0
Occupied Rental Units by Geography	5,087	0.0	29.3	17.9	52.8	0.0
Vacant Units by Geography	834	0.0	11.5	23.1	65.3	0.0
Businesses by Geography	10,395	0.0	21.5	15.9	62.6	0.0
Farms by Geography	258	0.0	7.8	31.8	60.5	0.0
Family Distribution by Income Level	21,865	12.1	12.0	17.3	58.5	0.0
Household Distribution by Income Level	28,705	13.1	11.9	15.0	60.0	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$84,589	Median Housi	ing Value		\$328,017
			Median Gross	Rent		\$1,258
			Families Belo	w Poverty Le	vel	3.9%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

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

# **Scope of Evaluation in Minnesota**

The rating for the state of Minnesota is based on the performance of the Meeker County AA and the Plymouth AA, each AA received a full-scope review. The Meeker County AA received the most weight in the evaluation due to the volume of deposits, and lending activity within the AA. The Meeker County AA accounts for 91.1 percent of the bank's deposits and 89.7 percent of the bank's lending activity during the evaluation period. Refer to Appendix A for additional information on the AAs under review.

# **Lending Test**

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

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

Based on full-scope reviews, the bank's performance in the Meeker County AA and the Plymouth AA is reasonable.

# Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is not meaningful as the Meeker County AA does not contain any LMI CTs and the Plymouth AA did not have enough lending activity to create a meaningful sample. Refer to Table Q and Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of consumer and small business loans.

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

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. The distribution of loans to businesses of different sizes in the Plymouth AA is not meaningful. The bank's lending activity within the Plymouth AA was low during the evaluation period and resulted in a sample too small to provide meaningful analysis.

#### Small Loans to Businesses

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small businesses.

The distribution of loans to businesses of different sizes in the Meeker County AA is reasonable. The percentage of loans to small businesses is near to the aggregate percentage of reporting institutions but well below the demographics. A significant portion of CNB's loans were PPP originations and accounted for 41 percent of total originations and purchases during the evaluation period. Following the conclusion of the PPP program, CNB's loan demand from smaller businesses was limited due to economic uncertainty, competition, reduced business opportunities, and government funding. Additionally, the loan sample selected could have negatively impacted CNB's distribution results. A single large borrower accounted for 16.7 percent of the sample and only accounted for 4.0 percent of CNB's total commercial originations and purchases at the Meeker County branch during the evaluation period.

#### Consumer Loans

Refer to Table V in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels in the Meeker County AA is reasonable. CNB's lending to moderate- income borrowers exceeded the demographic comparator. CNB's lending to low-income borrowers was significantly below the demographic comparator. Low-income borrowers often did not qualify for consumer loans per the bank's underwriting standards. As a result, a co-borrower was added to meet underwriting qualifications, which increased the borrower's income level beyond the low-income borrower threshold. This performance context coupled with the bank's performance of lending to moderate-income borrowers, led to a reasonable distribution conclusion.

#### **Responses to Complaints**

The bank received no CRA related complaints during the 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	01/01/2019 to 12/31/21	
Bank Products Reviewed:	Small Business and Consur	ner loans
Affiliate(s)		
None	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination	N/A	N/A
Rating and Assessment Areas		·
Minnesota	Type of Exam	Other Information
Meeker County AA	Full scope	Meeker County (Full)
Plymouth AA	Full scope	Hennepin County (Partial): 12 contiguous CTs including 265.14, 266.05, 266.06, 266.1, 266.11, 266.12, 266.13, 267.11, 267.15, 267.16, 271.01, and 271.02.

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS – Center National Bank										
Overall Bank:	Lending Test Rating									
Center National Bank	Satisfactory									
MMSA or State:										
Minnesota	Satisfactory									

# **Appendix C: Definitions and Common Abbreviations**

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

# **Appendix D: Tables of Performance Data**

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue
   Compares the percentage distribution of the number of small loans (loans less than or
  equal to \$1 million) originated and purchased by the bank to businesses with revenues of
  \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater
  than \$1 million; and, 2) the percentage distribution of businesses for which revenues are
  not available. The table also presents aggregate peer small business 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q. Assessment Area Distribution of Loans to Sman Dusinesses by Income Category of the Geography	s to Small Businesses by Income Category of the Geography	
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2019-21

	Total Loans to Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	00 0	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Meeker County AA	60	12,480	81.1	261	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	96.0	0.0	0.0	0.0
Plymouth AA	8	3,871	18.9	2,997	0.0	0.0	7.6	21.5	12.5	15.6	15.9	12.5	37.5	62.6	75.0	38.6
Total	68	16,351	100.0	3,258	0.0	0.0	7.5	18.3	12.5	15.5	28.5	12.5	37.9	53.2	75.0	38.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

2019-21

	Т	otal Loans	to Business	ses	Business	es with Rev 1MM	enues <=	Business Revenues		Businesses with Revenues Not Available	
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Meeker County AA	60	12,480	81.1	261	85.3	50.0	53.7	4.3	43.3	10.5	6.7
Plymouth AA	8	3,871	18.9	2,997	88.3	87.5	48.9	5.3	12.5	6.4	0.0
Total	68	16,351	100.0	3,258	87.9	54.4	49.0	5.1	39.7	7.0	5.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table U: Assessment	Cable U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography         2019												2019-21
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Meeker County AA	60	670	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	60	669,898	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0

Assessment Area:	<b>Total Consumer Loans</b>			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Meeker County AA	60	670	100.0	20.4	6.7	14.2	16.7	20.1	30.0	45.3	41.7	0.0	5.0
Total	60	669,898	100.0	14.9	6.7	12.5	16.7	16.2	30.0	56.4	41.7	0.0	5.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%