

PUBLIC DISCLOSURE

August 17, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Dacotah Bank
308 South Main Street
Aberdeen, South Dakota 57401
RSSD 256553

**Federal Reserve Bank of Minneapolis
90 Hennepin Avenue, P.O. Box 291
Minneapolis, Minnesota 55480-0291**

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 the safe 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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Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this performance evaluation.

ABBREVIATIONS

The following abbreviations may be used throughout this performance evaluation:

American Community Survey	ACS
Automated teller machine	ATM
Community Reinvestment Act	CRA
Dun & Bradstreet	D&B
Federal Agricultural Mortgage Corporation	Farmer Mac
Federal Deposit Insurance Corporation	FDIC
Federal Financial Institutions Examination Council	FFIEC
Federal Home Loan Bank	FHLB
Federal National Mortgage Association	Fannie Mae
U.S. Department of Agriculture Farm Service Agency	FSA
Home Are Possible, Inc.	HAPI
Home Mortgage Disclosure Act	HMDA
U.S. Department of Housing and Urban Development	HUD
Minnesota Housing Finance Agency	MHFA
Metropolitan Statistical Area	MSA
Native American Homeownership Initiative	NAHI
North Dakota Housing Finance Agency	NDHFA
Office of Management and Budget	OMB
Report of Condition	ROC
South Dakota Housing Development Authority	SDHDA
U.S. Small Business Administration	SBA
Department of Veterans Affairs	VA

INSTITUTION RATING

INSTITUTION'S CRA RATING: Dacotah Bank's rating is Outstanding.

Examiners evaluated the bank's CRA performance using the Large Bank CRA Examination Procedures. The following table shows the CRA performance of Dacotah Bank, Aberdeen, South Dakota, with respect to the Lending, Investment, and Service Tests.

Dacotah Bank Performance Tests			
<i>Performance Levels</i>	<i>Lending Test*</i>	<i>Investment Test</i>	<i>Service Test</i>
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
*Examiners assigned more weight to the Lending Test than to the Investment and Service Tests for determining the overall rating, in accordance with the Large Bank CRA Examination Procedures.			

Major factors supporting the institution's rating include the following:¹

Lending Test

- The bank's lending activity shows excellent responsiveness to credit needs throughout the assessment areas.
- Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the distribution of loans is good throughout the assessment areas, including low- and moderate-income census tracts and nonmetropolitan middle-income census tracts classified as distressed and/or underserved.
- The bank originated a substantial majority of its loans within its assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank uses flexible lending practices in serving assessment area credit needs.

Investment Test

- The level of qualified investments, in the form of securities and donations, is excellent.
- Qualified investments, particularly donations, show excellent responsiveness to local credit and community development needs.

¹ Refer to the Scope of Evaluation discussion in this section for a detailed description of state and performance criteria weighting conclusions.

Service Test

- The bank is a leader in providing community development services, given its capacity and the availability of opportunities.
- Retail banking services generally are readily accessible to all portions of the bank's assessment areas. Services do not vary in a way that inconveniences low- and moderate-income census tracts or individuals.
- The bank did not make any changes in its network of branches, drive-up facilities, or ATMs that adversely affected the accessibility of the bank's products and services.

INSTITUTION

DESCRIPTION OF INSTITUTION

General. Dacotah Bank is an interstate bank with headquarters in Aberdeen, South Dakota, and assets of \$2.6 billion as of December 31, 2018. As of that date, the bank operated 31 offices in South Dakota, North Dakota, and Minnesota. The bank continues to effectively meet the credit and community development needs of the residents, businesses, and farms throughout its assessment areas. No financial constraints or legal impediments prevent the bank from serving the credit needs of its assessment areas. The bank's CRA rating was Outstanding at its previous evaluation, dated July 17, 2017.

Structure. Dacotah Banks, Inc., Aberdeen, South Dakota, wholly owns Dacotah Bank. The bank does not have any subsidiaries or affiliates.

Loan Portfolio. According to the December 31, 2018, ROC, the bank's \$2.0 billion loan portfolio consists of 45.4% commercial, 45.1% agricultural, 5.9% residential real estate, 3.3% consumer, and 0.2% all other loans. Based on ROC data, total assets increased by 11.5% and gross loans increased by 9.7% since the previous evaluation. The composition of the loan portfolio remained relatively stable.

Credit Products. To meet the credit needs of the businesses, farms, and residents in its assessment areas, the bank offers a variety of commercial, agricultural, residential real estate, and consumer loan products. The bank's loan products include conventional closed- and open-end loans and lines of credit.

In addition to conventional loan programs, the bank offers flexible loan and grant programs for mortgages, in coordination with other entities such as the VA, SDHDA, NDHFA, MHFA, and FHLB. For small businesses and small farms, the bank offers loans through the SBA, Farmer Mac, and FSA. For a list of programs the bank participates in and additional information, refer to the Innovative and Flexible Lending Practices later in this section of the report.

Offices. The bank operates a network of branches, ATMs, and drive-up facilities in South Dakota, North Dakota, and Minnesota. In addition to the bank's main office in Aberdeen, South Dakota, the bank currently operates 30 branches (20 in South Dakota, eight in North Dakota, and two in Minnesota) and three stand-alone drive-up facilities (two in South Dakota and one in Minnesota). The bank closed two branches since the previous evaluation. Refer to the Retail Banking Services discussion in the Service Test section for more details on the bank's retail delivery systems.

Assessment Areas. The bank had 16 assessment areas during the evaluation period. The bank has not added assessment areas since the previous evaluation. As shown in the Assessment Area Information table below, the bank has eight assessment areas in South Dakota, seven assessment areas in North Dakota, and one assessment area in Minnesota. Three of the bank's assessment areas include portions of MSAs in South Dakota and North Dakota. The table provides a general overview of each assessment area during the evaluation period. Additional details on assessment areas, branches, and ATMs are in the applicable assessment area sections of this evaluation.

Assessment Area Information		
<i>Assessment Area Name</i>	<i>Location and Number of Offices</i>	<i>Geographical Description</i>
State of South Dakota		
Watertown/Clark/Webster	Clark, Henry, Roslyn, Watertown, Webster, Willow Lake	Clark, Codington, and Day counties
Lemmon/Mobridge	Bison, Lemmon, Mobridge	Campbell, Corson, Dewey, Perkins, Walworth, and Ziebach counties
Aberdeen	Aberdeen ² (3)	Brown County and part of Edmunds County
Brookings	Brookings	Brookings, Deuel, and Moody counties
Faulkton	Faulkton ³	Faulk County
Rapid City MSA ⁴	Custer, Rapid City ⁵ (2)	Custer County and part of Pennington County
Sioux Falls MSA ⁶	Sioux Falls (4)	Minnehaha County and part of Lincoln County
Sisseton	New Effington, Sisseton	Roberts County
State of North Dakota		
Rolla	Rolla, Belcourt	Rolette and Towner counties
Valley City	Valley City	Barnes County
Bowbells	Bowbells	Burke County
Dickinson	Dickinson	Stark County
Hettinger ⁷	Hettinger	Adams, Grant, Hettinger, and Sioux counties
Jamestown	Jamestown	Stutsman County
Minot	Minot	Ward County
State of Minnesota		
Morris	Chokio, ⁸ Morris	Big Stone, Grant, Pope, Stevens, Swift, and Traverse counties

SCOPE OF EVALUATION

To understand the bank's CRA performance, examiners evaluated the bank's HMDA, small business, and small farm loans for 2017 and 2018. Examiners also evaluated the bank's community development loans from July 18, 2017, to December 31, 2018, and evaluated qualified investments and community development services from July 18, 2017, to December 31, 2019.

Examiners selected five of the bank's assessment areas for full-scope reviews after reviewing loan volume, deposit market share, branch size and location, and community development activity. For interstate banks, examiners must conduct a full-scope review of at least one assessment area from each

² One office is a drive-through facility.

³ The bank closed its Cresbard branch on December 15, 2017.

⁴ This assessment area includes part of the Rapid City, SD MSA.

⁵ One office is a drive-through facility.

⁶ This assessment area includes part of the Sioux Falls, SD MSA.

⁷ This assessment area includes part of the Bismarck, ND MSA. The bank closed its Regent branch on December 15, 2017.

⁸ This office is a drive-through facility.

state. A full-scope review requires examiners to evaluate the bank's quantitative and qualitative performance using the following criteria: lending activity, lending to borrowers of different income levels and to businesses and farms of different sizes, geographic distribution of loans throughout the assessment area, community development lending, flexible and/or innovative lending practices, qualified investments, retail services, and community development services. The other assessment areas receive limited-scope reviews in which examiners analyze quantitative data about the bank's lending, investments, and services.

The assessment areas selected for full-scope reviews represent 57.2% of the bank's lending activity by number of loans and 49.6% by dollar amount, according to loan data from January 1, 2017, to December 31, 2018. Examiners conducted full-scope reviews of the following assessment areas:

- Watertown/Clark/Webster, South Dakota, assessment area
- Lemmon/Mobridge, South Dakota, assessment area
- Valley City, North Dakota, assessment area
- Rolla, North Dakota, assessment area
- Morris, Minnesota, assessment area

In determining the overall CRA rating, examiners placed the greatest weight on the bank's activities in its South Dakota assessment areas because the majority of the bank's lending occurs in these assessment areas. In 2017 and 2018, the bank extended 73.0% of its small business, small farm, and HMDA loans, by number, in the South Dakota assessment areas.⁹ The comparative percentages for the North Dakota assessment areas and the Morris, Minnesota, assessment area are 23.9% and 3.1%, respectively. The bank's performance in Minnesota received the least weight overall, given the bank's small presence and volume of lending there. Examiners placed varying weight on the full-scope assessment areas when analyzing the bank's performance. In South Dakota, the Watertown/Clark/Webster assessment area received the most weight. In North Dakota, the Valley City assessment area received the most weight.

Because of the bank's size and its branches in MSAs, HMDA requires the bank to report home purchase, refinance, home improvement, and multifamily loan applications. Unless otherwise noted, the bank's Lending Test performance is based on the bank's 2017 and 2018 HMDA, small business, and small farm loans. The bank's Lending Test performance is also based on the bank's community development loans from July 18, 2017, through December 31, 2018. Examiners compared the bank's 2017 and 2018 HMDA and CRA lending performance to that of aggregate lenders that reported loans originated or purchased in the assessment areas in 2017 and 2018.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. For HMDA loans, examiners relied on demographic information, primarily from the 2010 U.S. Census or 2018 FFIEC adjusted census data, to understand the income levels and geographic locations of the families and housing units in the assessment areas.¹⁰ For small business and small farm loans, examiners used D&B data for 2017 and 2018. D&B collects and publishes this self-reported data concerning the revenues and locations of local businesses and farms. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, examiners reviewed the demographic data to provide a context for the

⁹ Based on the total number of small business, small farm, and HMDA loans extended inside the bank's assessment areas in 2017 and 2018.

¹⁰ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

bank's performance, along with the information obtained from bank management and community contacts.

As part of this evaluation, examiners had discussions with bank management and community contacts regarding local economic conditions, demographic characteristics, the performance of local financial institutions, and opportunities to participate in community development activities. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition. Examiners considered these factors and the size and financial condition of the bank when evaluating its performance. The community contacts did not identify any unmet credit needs in the bank's assessment areas.

The full-scope assessment area sections of this public evaluation describe each assessment area's unique performance context. The bank's assessment areas stretch across South Dakota and North Dakota and include one assessment area in Minnesota. Many assessment areas are rural, and a few are in metropolitan areas or include a more urban area within the assessment area. The economic characteristics of the assessment areas vary, which affects loan demand. Accordingly, examiners analyzed the lending performance in these assessment areas by generally focusing on the predominant loan types for each market; that is, small business, small farm, HMDA, or all three. The economic conditions of most markets were generally stable during the evaluation period; however, the agricultural industry experienced challenges, including low commodity prices and high input costs. In many of the assessment areas, including rural areas, the bank operates in a competitive banking environment.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's overall CRA rating is Outstanding, based on the ratings for the Lending, Investment, and Service Tests. Overall, the bank did an excellent job of serving the credit and community development needs of its assessment areas in South Dakota, North Dakota, and Minnesota.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity,
- Lending to borrowers of different income levels and to businesses and farms of different sizes,
- Geographic distribution of loans,
- Lending inside the bank's assessment areas,
- Community development lending, and
- Use of innovative and/or flexible lending practices.

To evaluate the bank's performance, examiners placed more weight on the criteria of borrower distribution and geographic distribution than on lending activity and lending inside the bank's assessment areas. Examiners generally assigned equal weight to lending to businesses and farms of different sizes and to borrowers of different income levels and the geographic distribution of loans, since all of the full-scope assessment areas included at least one low- or moderate-income census tract. Finally, the bank's use of flexible lending practices contributed to the Lending Test rating.

Examiners evaluated the bank's qualified investments and its retail and community development services under the Investment and Service Tests, respectively.

LENDING TEST

The bank's Lending Test rating is high satisfactory. Overall, the bank's lending to low- and moderate-income borrowers and to small businesses and small farms is excellent. The geographic distribution and dispersion of loans is good. The bank makes a relatively high level of community development loans, and it uses flexible lending practices. The bank's lending activity demonstrates excellent responsiveness to local credit and community development needs. Finally, the bank made a substantial majority of its loans inside its assessment areas.

The bank is an interstate bank that operates in three states. Regulation BB requires a separate analysis for each state and the analysis must include at least one assessment area from each state. However, examiners evaluate the overall lending activity and the comparison of lending inside and outside the assessment areas at the institution level, not the assessment area level. The discussion of lending activity and assessment area concentration follows. For a detailed discussion of other Lending Test criteria, see the individual assessment area sections of this evaluation. For the limited-scope assessment areas, please see Appendix D for tables displaying the borrower and geographic distributions as well as demographic and aggregate lender information.

Lending Activity

The bank's lending activity demonstrates excellent responsiveness to the credit needs of the assessment areas. The tables below show the bank's lending activity considered in this performance evaluation for 2017 and 2018.

Summary of 2017 Lending Activity

Loan Type	#	%	\$(000s)	%
Home Improvement	83	1.7%	\$3,178	0.5%
Home Purchase	267	5.6%	\$41,517	6.5%
Multi-Family Housing	23	0.5%	\$25,966	4.1%
Refinancing	234	4.9%	\$61,455	9.7%
Total HMDA	607	12.8%	\$132,116	20.8%
Total Small Business	1,541	32.4%	\$189,602	29.9%
Total Small Farm	2,608	54.8%	\$312,199	49.2%
TOTAL LOANS	4,756	100.0%	\$633,917	100.0%

Summary of 2018 Lending Activity

Loan Type	#	%	\$(000s)	%
Home Improvement	43	0.9%	\$2,101	0.3%
Home Purchase	273	5.9%	\$45,551	7.3%
Multi-Family Housing	31	0.7%	\$37,514	6.0%
Refinancing	155	3.3%	\$20,585	3.3%
Other Purpose Closed-End	26	0.6%	\$1,500	0.2%
Total HMDA	528	11.4%	\$107,251	17.2%
Total Small Business related	1,531	32.9%	\$200,737	32.2%
Total Small Farm related	2,591	55.7%	\$315,689	50.6%
TOTAL LOANS	4,650	100.0%	\$623,677	100.0%

During the evaluation period, the largest products by number and dollar amount are small farm loans, followed by small business loans and HMDA loans.

The bank's lending varies in different assessment areas, depending on the market and economic factors. For example, the bank predominantly extends small farm loans in certain rural assessment areas, and in some markets the bank originates few HMDA loans. In most of the assessment areas, the bank is among the top 10 HMDA and CRA lenders, based on aggregate data. Further, in several of the assessment areas, the bank is the CRA market leader. In addition, in certain assessment areas, the bank is the HMDA market leader. In some assessment areas, such as Rapid City and Sioux Falls, the bank ranks well below the top 10 lenders for HMDA; however, this is reasonable given the strong competition and the bank's limited market share and presence in these assessment areas. The bank's lending activity shows excellent responsiveness to the credit needs in the bank's assessment areas. For detailed information regarding the bank's lending activity, refer to the individual assessment area sections.

Assessment Area Concentration

The bank extended a substantial majority of its small business, small farm, and HMDA loans inside its assessment areas. The tables below show the bank's concentrations of lending inside and outside the assessment areas for 2017 and 2018.

Lending Inside and Outside the Assessment Areas – 2017

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	81	97.6%	\$2,874	90.4%	2	2.4%	\$304	9.6%
Home Purchase - Conventional	186	86.5%	\$30,115	87.2%	29	13.5%	\$4,412	12.8%
Home Purchase - FHA	40	93.0%	\$4,739	94.4%	3	7.0%	\$282	5.6%
Home Purchase - VA	7	77.8%	\$1,615	82.0%	2	22.2%	\$354	18.0%
Multi-Family Housing	19	82.6%	\$13,416	51.7%	4	17.4%	\$12,550	48.3%
Refinancing	206	88.0%	\$55,943	91.0%	28	12.0%	\$5,512	9.0%
Total HMDA	539	88.8%	\$108,702	82.3%	68	11.2%	\$23,414	17.7%
Total Small Business	1,313	85.2%	\$161,408	85.1%	228	14.8%	\$28,194	14.9%
Total Small Farm	2,148	82.4%	\$251,637	80.6%	460	17.6%	\$60,562	19.4%
TOTAL LOANS	4,000	84.1%	\$521,747	82.3%	756	15.9%	\$112,170	17.7%

Lending Inside and Outside the Assessment Areas – 2018

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	42	97.7%	\$2,082	99.1%	1	2.3%	\$19	0.9%
Home Purchase - Conventional	185	86.0%	\$31,931	85.5%	30	14.0%	\$5,423	14.5%
Home Purchase - FHA	35	87.5%	\$4,119	88.4%	5	12.5%	\$540	11.6%
Home Purchase - VA	10	55.6%	\$1,803	51.0%	8	44.4%	\$1,735	49.0%
Multi-Family Housing	24	77.4%	\$27,550	73.4%	7	22.6%	\$9,964	26.6%
Other Purpose Closed-End	20	76.9%	\$837	55.8%	6	23.1%	\$663	44.2%
Refinancing	138	89.0%	\$17,669	85.8%	17	11.0%	\$2,916	14.2%
Total HMDA	454	86.0%	\$85,991	80.2%	74	14.0%	\$21,260	19.8%
Total Small Business	1,246	81.4%	\$166,318	82.9%	285	18.6%	\$34,419	17.1%
Total Small Farm	2,139	82.6%	\$255,490	80.9%	452	17.4%	\$60,199	19.1%
TOTAL LOANS	3,839	82.6%	\$507,799	81.4%	811	17.4%	\$115,878	18.6%

In 2017, the bank extended 84.1% of all loans by number and 82.3% by dollar amount within its assessment areas. In 2018, the bank extended 82.6% of all loans by number and 81.4% by dollar amount within its assessment areas. The bank's performance by product type varies but is generally similar. By number, the bank's strongest performance is for HMDA lending in 2017 and 2018. Among HMDA loan types, by number, the bank's strongest performance is for home improvement loans. Many of the loans made outside the bank's assessment areas are in nearby counties. This is reasonable, given the bank's large footprint across South Dakota and North Dakota as well as the west-central portion of Minnesota.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among low- and moderate-income borrowers and among businesses and farms of different sizes is excellent. The bank actively originates HMDA loans to low- and moderate-income borrowers. The bank also actively lends to farms and businesses of different sizes in its assessment areas.

Geographically, the bank's performance in low- and moderate-income census tracts is good overall. The bank extends loans to borrowers in low- and moderate-income census tracts within the assessment areas. The bank's lending patterns do not reveal any unexplained gaps in any of the assessment areas.

Innovative and Flexible Lending Practices

The bank uses flexible lending programs to help meet the credit needs of residents, businesses, and farms. The bank is particularly active in housing programs that focus on low- and moderate-income homebuyers. During the evaluation period, the bank participated in the following programs:

- *South Dakota Housing Development Authority*. SDHDA offers a variety of programs, such as the Community Home Improvement Program, that assist low- and moderate-income borrowers in South Dakota. SDHDA offers low-interest-rate mortgages, closing cost and down payment assistance, and home improvement loans. Eligible borrowers must meet income limits.
- *Homes Are Possible, Inc.* HAPI programs provides grant money to help lower the cost of purchasing a home. Income eligibility requirements apply.
- *Federal Home Loan Bank*.
 - *Home\$tart*. This program helps first-time homebuyers earning up to 80.0% of their area's median family income purchase a home. Borrowers use Home\$tart grants for down payments and closing cost assistance.
 - *Native American Homeownership Initiative*. This program provides grants for down payment and closing cost assistance to first-time homebuyers.
- *Federal Agricultural Mortgage Corporation*. The bank is an approved lender, allowing it to offer more competitive terms and long-term fixed-rate loans through this program, as well as revolving lines of credit.
- *Farm Service Agency*. FSA loans have flexible underwriting criteria and are often extended to farmers who cannot qualify for conventional financing.
- *Small Business Administration*. SBA loans have flexible underwriting criteria for small businesses and often are extended to businesses that cannot qualify for conventional financing.
- *VA Home Loans*. VA home loans help eligible borrowers purchase a home at a competitive interest rate, often without requiring a down payment or private mortgage insurance. Cash-Out Refinance loans allow eligible borrowers to cash out home equity to take care of concerns like paying off debt, funding school, or making home improvements.

Community Development Lending

The bank makes a relatively high level of community development loans. During the evaluation period, the bank originated 44 loans totaling approximately \$10.8 million that benefit its assessment areas or larger regional or statewide areas that include its assessment areas. By number of loans, the bank extended 34.1% and 15.9% of its community development loans in the Brookings and Rolla assessment areas, respectively. By dollar amount of loans, the bank's community development lending was primarily in these same assessment areas, plus the Faulkton and Watertown/Clark/Webster assessment areas.

Community Development Loans by Assessment Area, Regional Area, or Statewide Area		
<i>Assessment Area</i>	#	\$
Watertown/Clark/Webster	1	\$991,000
Lemmon/Mobridge	4	\$227,520
Aberdeen	2	\$743,295
Brookings	15	\$1,800,000
Faulkton	3	\$2,341,551
Rapid City MSA	1	\$834,673
Sisseton	5	\$665,470
Rolla	7	\$1,581,891
Valley City	1	\$300,000
Bowbells	2	\$750,000
Morris	1	\$175,000
Statewide South Dakota	1	\$50,000
Regional North Dakota	1	\$300,000
Total	44	\$10,760,399

The bank did not make community development loans in five assessment areas: Sioux Falls MSA, Dickinson, Hettinger, Jamestown, and Minot. Several factors contribute to the bank's level of community development lending. Community development opportunities are reasonably available in some areas but limited in others. In some of the bank's assessment areas, the bank has a small presence and competes with other large financial institutions for community development opportunities. Overall, the bank made community development loans in the majority of its assessment areas. Given the available opportunities and competitive markets, the bank made a relatively high level of community development loans.

Because the bank was responsive in meeting the credit and community development needs of its assessment areas, examiners also considered two community development loans totaling \$549,600 that benefited areas in South Dakota outside of the bank's assessment areas.

INVESTMENT TEST

The bank's Investment Test rating is outstanding because of the excellent level of qualified investments in the form of securities and donations. During the evaluation, qualified investment securities and donations benefiting the bank's assessment areas or larger regional areas that included the assessment areas totaled \$37.0 million. This figure includes \$36.1 million in securities and \$899,748 in donations. Qualified investments in the form of securities include \$18.2 million in prior-period investments and \$17.9 million in new investments. The majority of the bank's new investments focus on the revitalization or stabilization of distressed and/or underserved middle-income tracts in its assessment areas. The qualified investments demonstrate excellent responsiveness to credit and community development needs.

Qualified Investment Securities by Assessment Area, Regional Area, or Statewide or Multistate Area		
<i>Assessment Area</i>	#	\$
Watertown/Clark/Webster	11	\$1,410,000
Lemmon/Mobridge	19	\$9,185,291
Aberdeen	7	\$3,486,840
Brookings	2	\$280,056
Faulkton	13	\$7,074,090
Rapid City MSA	5	\$3,475,988
Sioux Falls MSA	2	\$710,547
Sisseton	2	\$200,000
Rolla	2	\$403,062
Hettinger	5	\$2,125,965
Minot	2	\$383,104
Morris	15	\$2,012,604
Regional South Dakota	3	\$580,021
Statewide South Dakota	17	\$2,989,495
Regional North Dakota	2	\$270,000
Statewide North Dakota	6	\$1,505,000
Multistate	2	\$43,516
Total	115	\$36,135,578

While the bank did not purchase new investments in every assessment area, the overall level of investments is excellent. As with community development loans, the qualified community development investment opportunities are limited in certain assessment areas. In addition, the bank competes with other banks in various assessment areas for opportunities to purchase qualified investments. The bank's performance is strongest in South Dakota, where it has the largest footprint.

Because the bank was responsive to community development and credit needs in its assessment areas, examiners also considered the activity outside of its assessment areas. The bank holds 21 investments (including one new investment) in South Dakota, North Dakota, and Minnesota that are outside of the bank's assessment areas and total \$4.6 million. These investments support affordable housing and revitalization or stabilization of low- and moderate-income census tracts or distressed and/or underserved tracts.

Donations. The bank made an excellent level of qualified investments in the form of donations that directly benefited the bank's assessment areas as well as regional, statewide, and multistate areas that include the bank's assessment areas. These donations totaled \$899,748, as shown in the Qualified Investment Donations table at right.

The donations primarily focus on community services to low- and moderate-income individuals as well as the revitalization and/or stabilization of moderate-income census tracts or underserved and/or distressed middle-income tracts. These charitable contributions show excellent responsiveness to community development needs throughout the bank's assessment areas. In addition to the donations shown in the table above, the

Qualified Investment Donations		
<i>Purpose</i>	#	\$
Affordable Housing	33	\$23,100
Community Services	289	\$325,798
Economic Development	42	\$192,500
Revitalize or Stabilize*	137	\$358,350
Total	501	\$899,748
*Includes donations in low-or moderate-income areas, or distressed and/or underserved areas.		

bank also made four donations totaling \$800 that benefit areas outside of the bank's assessment areas in South Dakota. Additional details are presented in the analysis of each state and the full-scope assessment areas.

SERVICE TEST

The bank's Service Test rating is outstanding, based on its performance in the full-scope assessment areas. Delivery systems generally are readily accessible throughout its assessment areas, and services do not vary in a way that inconveniences low- or moderate-income areas or individuals. The bank closed two branches since the previous evaluation; however, the closures did not adversely affect the accessibility of services. Finally, the bank is a leader in providing community development services.

Retail Banking Services

Delivery systems generally are readily accessible to low- and moderate-income individuals and geographies in the bank's assessment areas. The bank provides retail services through its main office and network of 30 branches, drive-up facilities, and ATMs. The bank closed two branches (one in Cresbard, South Dakota, and one in Regent, North Dakota) in December 2017. The branches were located in middle-income census tracts. The branch closures do not adversely affect the accessibility of the bank's delivery systems in these geographies. Hours of operation are reasonable and do not vary widely by branch; many branches and drive-up facilities offer extended weekday and/or Saturday hours to accommodate residents in the assessment areas.

Of the bank's offices, 18.2% are located in moderate-income tracts, 75.8% are in middle-income tracts, and 6.1% are in upper-income tracts. ATMs represent similar percentages, as the majority are located at branches. The distribution of the bank's branches and ATMs is good. The majority of the bank's branches are in middle-income tracts, which is reasonable because 59.0% of all tracts in the bank's assessment areas are middle income. In addition, 18.2% of the bank's branches are in moderate-income tracts, which is comparable to the percentage of moderate-income tracts in the assessment areas (20.2%). Although the bank does not have branches in low-income tracts, this is reasonable given that only three tracts, or 1.7%, in the assessment areas are low-income. For information on the branching structure, refer to the Assessment Area Information table in the Description of Institution section earlier in this report, Retail Banking Services in the various state sections, or the relevant full-scope and limited-scope assessment area sections of this evaluation.

The bank also provides alternative delivery systems that include remote deposit capture, night deposit, telephone banking, online banking, and mobile banking. The bank also offers person-to-person payments through its online and mobile banking platforms, as well as bill payment through the use of its debit cards. The bank offers standardized products and services throughout its assessment areas; the only differences relate to home loan programs administered by state agencies.

Finally, the bank continues to participate with a local nonprofit organization in South Dakota by administering deposit accounts for low-income people through the Dakota Dream matched savings program. For every dollar up to \$2,000 that the accountholder saves, the organization deposits \$3. Accountholders can use the funds to purchase a home. During the evaluation period, the bank opened five accounts.

Community Development Services

Overall, the bank is a leader in providing community development services throughout its assessment areas. As shown in the Community Development Services table, during the evaluation period the bank provided 281 community development services that benefited its assessment areas and regional and statewide areas. Of these 281 services, 70 had a regional or statewide focus that includes the bank's assessment areas. Bank officers and employees provided assistance to numerous nonprofit organizations that help low- and moderate-income individuals; economic development organizations; organizations that help revitalize and stabilize local areas; and organizations that promote affordable housing. Employees served in various capacities, including leadership roles such as serving as board and committee members. In addition, employees served as instructors of financial literacy classes. The bank provided its highest number of services in its Aberdeen assessment area.

Community Development Services	
<i>Purpose</i>	<i>#</i>
Affordable Housing	39
Community Services	117
Economic Development	81
Revitalize or Stabilize*	44
Total	281
*Includes services that benefit low- or moderate-income areas, or distressed and/or underserved areas.	

The State of South Dakota, State of North Dakota, and State of Minnesota sections and full-scope assessment area sections include more details about the bank's Service Test performance. The bank is most active in South Dakota, which is reasonable given the large footprint and number of employees.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act, Regulation C – Home Mortgage Disclosure Act, and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.

SOUTH DAKOTA

CRA RATING FOR South Dakota: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the rating include the following:

- The bank's lending activity in the South Dakota assessment areas shows excellent responsiveness to local credit needs.
- Overall, the lending to low- and moderate-income borrowers and to farms and businesses of different sizes is excellent.
- Overall, the distribution and dispersion of the bank's small farm, small business, and HMDA loans throughout the assessment areas is good.
- Overall, the bank makes a relatively high level of community development loans in its South Dakota assessment areas.
- The bank uses flexible loan programs in its South Dakota assessment areas.
- The bank has an excellent level of qualified investments in the form of securities and donations, by number and dollar amount. Overall, the bank's qualified investments show excellent responsiveness to credit and community development needs.
- Bank retail services generally are readily accessible to farms, businesses, and residents throughout the assessment areas, and overall, the bank is a leader in providing community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for South Dakota is consistent with the scope for the overall institution as described earlier in the Institution section. Examiners completed a full-scope review of the Watertown/Clark/Webster and Lemmon/Mobridge assessment areas in South Dakota. Examiners weighted these assessment areas differently, based on the percentage of total offices in the assessment areas and loan volume during 2017 and 2018. The Watertown/Clark/Webster assessment area received the most weight, followed by the Lemmon/Mobridge assessment area.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Rapid City MSA, Sioux Falls MSA, Aberdeen, Brookings, Faulkton, and Sisseton assessment areas in South Dakota. Examiners evaluated whether the bank's performance in the limited-scope assessment areas was consistent with its performance in the full-scope assessment areas. The nonmetropolitan limited-scope assessment areas were compared to the nonmetropolitan full-scope assessment area. The limited-scope MSA assessment areas were compared to the overall state rating.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA

Assessment Area Characteristics. During the evaluation period, the bank had eight assessment areas in South Dakota. The bank has not added or modified any assessment areas since the previous evaluation.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranked fifth among the 84 FDIC-insured institutions in South Dakota, with 0.3% of the state's deposits. Two large national banks hold 51.7% and 44.1% of the state's deposits. The bank has \$1.5 billion in deposits in South Dakota, which represents 73.6% of the bank's total deposits.

Based on 2018 FFIEC adjusted census data, the South Dakota assessment areas include a total of 117 census tracts: one low-, 30 moderate-, 62 middle-, and 24 upper-income.¹¹ The assessment areas do not include unknown-income census tracts. For 2018, 13 of the nonmetropolitan middle-income census tracts are classified as underserved, and five are classified as underserved and distressed.

Some of the South Dakota assessment areas include American Indian reservations, in their entirety or a portion of them. The Cheyenne River Indian Reservation and a portion of the Standing Rock Indian Reservation, as well as parcels of Turtle Mountain Indian Reservation trust lands are in the Lemmon/Mobridge assessment area. A large portion of the Lake Traverse Indian Reservation is in the Sisseton assessment area, and a smaller portion is in the Watertown/Clark/Webster assessment area.

Population Characteristics. According to 2018 FFIEC adjusted census data, the total population of the assessment areas in South Dakota is 476, 061, or 56.5% of state's population.

General Economic and Housing Characteristics. During the evaluation period, economic conditions were generally stable. However, agriculture throughout the state experienced challenges, including low commodity prices and high input costs. Agriculture is a significant sector of the economy in many of the bank's assessment areas. According to 2019 data from the USDA National Agricultural Statistics Service, 29,600 farm operations are located in the state and 43.2 million acres of land throughout the state are part of those operations. According to 2018 D&B data, 97.8% of the farms in the bank's South Dakota assessment areas are small farms. The major crops in the assessment area are sunflowers, spring and winter wheat, corn, and soybeans. The state also has some livestock operations.

South Dakota has a relatively diverse economy, with industries that vary across the state. Bank management and community contacts noted manufacturing, government, health care, education, and tourism (including outdoor recreation) as some of the main nonagricultural industries. Small businesses are also prevalent throughout the state; according to 2018 D&B data, 88.7% of the businesses in the bank's South Dakota assessment areas are small businesses. The state's 2018 annual average non-seasonally adjusted unemployment rate remains low at 3.0%.

The housing market is generally stable but varies in different areas of the state. In some areas, homes are available at an affordable price, and in others, availability is limited in certain price ranges. Housing affordability is an issue in some areas, and in some cases homes that would be affordable are older and need repairs. According to 2018 FFIEC adjusted census data, the median home value in the South Dakota assessment areas was \$154,538, with the highest value in the Rapid City MSA.

The state of South Dakota has a competitive banking environment. Numerous financial institutions, including many large national and regional banks as well as credit unions, operate throughout the state.

¹¹ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Accordingly, competition for deposits, loans, and community development activities is strong in various assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

Examiners rated the bank's CRA performance in South Dakota based on full-scope reviews of the Watertown/Clark/Webster and Lemmon/Mobridge assessment areas and limited-scope reviews of the remaining South Dakota assessment areas. A detailed discussion of the bank's performance in the full-scope assessment areas and a shorter discussion of the limited-scope reviews follow this section. For the limited-scope assessment areas, Appendix D provides borrower and geographic distribution information.

The overall CRA rating for South Dakota is outstanding, based on the bank's performance under the Lending, Investment, and Service Tests.

The Lending Test rating is high satisfactory. The bank's lending activity shows excellent responsiveness to credit needs throughout the South Dakota assessment areas. Overall, the bank's distribution of HMDA loans by income level of borrowers and the distribution of small farm and small business loans by revenue size of borrowers is excellent. The geographic distribution of loans is good. In addition, the bank made a relatively high level of community development loans. Finally, the bank uses flexible loan programs in its South Dakota assessment areas.

The Investment Test rating is outstanding. The bank made an excellent level of qualified investments by number and dollar amount, showing excellent responsiveness to credit and community development needs.

The Service Test rating is outstanding. In general, delivery systems are readily accessible to all portions of the South Dakota assessment areas. The bank closed one branch during the evaluation period; the closure does not adversely affect the accessibility of the bank's delivery systems in low- and moderate-income geographies. Overall, the bank is a leader in providing community development services. Bank officers and employees use their financial expertise to support community development initiatives in the bank's assessment areas.

LENDING TEST

The Lending Test rating for South Dakota is high satisfactory.

Lending Activity

The bank's lending levels reflect excellent responsiveness to its South Dakota assessment areas' credit needs. The tables below show the bank's lending in its South Dakota assessment areas by product type for 2017 and 2018.

**Statewide Summary of Lending Activity
Assessment Areas Located in
State of SD 2017**

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	189	6.5%	\$29,848	7.6%
HMDA Refinance	157	5.4%	\$43,762	11.2%
HMDA Home Improvement	58	2.0%	\$2,186	0.6%
HMDA Multi-Family	12	0.4%	\$6,587	1.7%
Total HMDA	416	14.2%	\$82,383	21.1%
Total Small Business	987	33.7%	\$128,351	32.8%
Total Farm	1,525	52.1%	\$180,171	46.1%
TOTAL LOANS	2,928	100.0%	\$390,905	100.0%

Originations and Purchases

**Statewide Summary of Lending Activity
Assessment Areas Located in
State of SD 2018**

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	185	6.6%	\$30,408	8.1%
HMDA Refinance	97	3.5%	\$13,683	3.7%
HMDA Home Improvement	40	1.4%	\$1,996	0.5%
HMDA Multi-Family	17	0.6%	\$11,700	3.1%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	18	0.6%	\$744	0.2%
Loan Purpose Not Applicable	0	0.0%	\$0	0.0%
Total HMDA	357	12.8%	\$58,531	15.6%
Total Small Business	916	32.8%	\$136,115	36.4%
Total Farm	1,520	54.4%	\$179,731	48.0%
TOTAL LOANS	2,793	100.0%	\$374,377	100.0%

Originations and Purchases

The majority of the bank's lending during the evaluation period (72.9%) occurred in the South Dakota assessment areas. HMDA and small business loan volume declined slightly between 2017 and 2018, while small farm loan volume remained stable.

In the areas it serves, the bank is typically among the leading lenders for small business, small farm, and HMDA loans. For small business and small farm loans, the bank was among the top 10 lenders for each year during the evaluation, and in many cases the bank was ranked first among those lenders. Similarly, for HMDA loans, the bank was typically among the top 10 lenders for each year in the evaluation period in its assessment areas; however, for several assessment areas, the bank had relatively limited HMDA loan volume. In the Rapid City and Sioux Falls assessment areas, the bank ranked well below the top 10 lenders for HMDA; however, this is reasonable given the strong competition and the bank's limited market share and presence in these assessment areas.

The bank uses flexible and innovative lending programs, particularly home mortgage loan programs for low- and moderate-income borrowers and FSA loans for small farms. Refer to the Innovative and Flexible Lending Practices described earlier in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to low- and moderate-income borrowers and to small farms and small businesses throughout the assessment areas. In addition, the geographic distribution and dispersion of loans is good and does not reveal any unexplained gaps or patterns. The bank extends loans in most census tracts, including low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Watertown/Clark/Webster and Lemmon/Mobridge assessment areas. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope assessment areas.

Community Development Loans

The bank made a relatively high level of community development loans in the South Dakota assessment areas. As shown in the table below, the bank originated or renewed 31 community development loans totaling approximately \$7.6 million that directly benefited its South Dakota assessment areas. The majority of the bank's lending supported affordable housing and the revitalization or stabilization of distressed and/or underserved middle-income tracts in several assessment areas; several of the loans helped finance essential infrastructure.

By number of loans, the bank's community development lending was concentrated in the Brookings (48.4%), Sisseton (16.1%), and Lemmon/Mobridge (12.9%) assessment areas. By dollar amount of loans, the bank's community development loans were concentrated in the Brookings (23.7%), Faulkton (30.8%), and Watertown/Clark/Webster (13.0%) assessment areas. The bank also originated community development loans in its Aberdeen and Rapid City assessment areas. In addition to the community development loans that directly benefit the South Dakota assessment areas, the bank originated a \$50,000 community development loan that benefited a statewide economic development organization.

South Dakota Community Development Loans		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Affordable Housing	19	\$3,768,088
Community Services	4	\$275,350
Revitalize or Stabilize Distressed and/or Underserved Areas	8	\$3,560,070
Total	31	\$7,603,508

The bank's community development lending is responsive to the needs of the assessment areas. Most of the loans benefit affordable housing and revitalization or stabilization of distressed and/or underserved tracts; these are critical needs across the bank's assessment areas. The bank also made loans that support economic development and community services for low- and moderate-income individuals.

In three limited-scope assessment areas (Brookings, Faulkton, and Sisseton), the bank's community development lending is noteworthy. In these assessment areas, the bank's lending activities supported revitalization and stabilization of distressed and underserved census tracts, community services for low- and moderate-income individuals, and affordable housing. The lending activity supported efforts such as provision of health care, construction of new housing, and provision of tribal services.

Because the bank's community development lending activities were responsive to community development needs in its South Dakota assessment areas, examiners also considered the bank's qualified community development loans that are outside the bank's assessment areas. The bank originated two loans totaling \$549,600, outside of the South Dakota assessment areas, that support revitalization and/or stabilization of distressed or underserved middle-income census tracts and support affordable housing. The table above does not include these loans.

INVESTMENT TEST

The bank's Investment Test rating for South Dakota is outstanding. Overall, the bank has an excellent level of qualified investments in the form of securities and donations that show excellent responsiveness to credit and community development needs.

During the evaluation period, in its South Dakota assessment areas the bank held 81 qualified investments that totaled approximately \$29.4 million. Those 81 investments included 30 newly acquired investments totaling \$17.0 million. The bank's new investment activity represented 57.8%, by dollar volume, of the bank's total investments; the remaining 42.2% was investments the bank continued to hold from the prior evaluation period. These new investments benefit the Aberdeen, Faulkton, Lemmon/Mobridge, Sioux Falls, Sisseton, and Watertown/Clark/Webster assessment areas. Nearly all of the new investments support revitalization or stabilization of moderate-income and distressed and underserved middle-income census tracts. The bank made noteworthy investments for that purpose in its Faulkton (13 new investments totaling \$7.0 million) and Lemmon/Mobridge (12 new investments totaling \$6.8 million) assessment areas. Most of the prior-period investments are bonds that revitalize or stabilize distressed, underserved, and moderate-income census tracts and support affordable housing. Of the prior-period investments, 20 are qualified investments benefiting broader regional and statewide areas that include the bank's assessment areas, totaling \$3.6 million. These investments support affordable housing, economic development, and revitalization or stabilization of distressed or underserved tracts.

Investment opportunities in some of the bank's assessment areas are limited and competitive. As noted above, the majority of the bank's new qualified investments support revitalization or stabilization efforts in qualified tracts. Those opportunities primarily occur in the bank's rural assessment areas with distressed and/or underserved middle-income tracts. The investments are responsive, given the need to attract and retain residents in those areas.

In addition, the bank holds 16 investments totaling \$3.8 million that benefit areas in South Dakota outside of the bank's assessment areas, including one new investment for \$395,968. These investments support revitalization or stabilization efforts in distressed and/or underserved tracts, as well as affordable housing.

Donations. The bank's level of donations during the evaluation period is excellent. The bank donated \$584,035 that directly benefits its assessment areas and donated \$204,083 that benefits regional and statewide areas that include its assessment areas. In addition, the bank donated \$800 that benefits an area in the state of South Dakota outside of its assessment areas. The South Dakota Qualified Investment Donations table shows the distribution of the donations by assessment area as well as by regional and statewide areas.

South Dakota Qualified Investment Donations		
<i>Assessment Area</i>	<i>#</i>	<i>\$</i>
Watertown/Clark/Webster	75	\$127,500
Lemmon/Mobridge	49	\$157,617
Aberdeen	80	\$169,593
Brookings	15	\$30,750
Faulkton	14	\$17,300
Sisseton	24	\$13,750
Rapid City MSA	23	\$34,925
Sioux Falls MSA	40	\$32,600
Subtotal	320	\$584,035
<i>Regional and Statewide Areas</i>	<i>#</i>	<i>\$</i>
Regional Areas	63	\$71,050
Statewide Area	20	\$133,033
Subtotal	83	\$204,083
Grand Total	403	\$788,118

The bank's donations supported numerous organizations throughout its South Dakota assessment areas, including organizations that provide community services to low- and moderate-income individuals and support economic development and affordable housing initiatives. In addition, the donations helped revitalize and stabilize underserved and distressed areas and low- and/or moderate-income areas. In several areas, the bank made significant donations that were very responsive to area needs. For example, the bank made large donations supporting health care in distressed and/or underserved areas in the Aberdeen and Lemmon/Mobridge assessment areas and large donations supporting youth mentorship and economic development in the Watertown/Clark/Webster assessment area. The bank's donations to regional and statewide organizations primarily supported economic development and the provision of community services to low- and moderate-income individuals.

The bank made the majority of its donations in the Aberdeen, Lemmon/Mobridge, and Watertown/Clark/Webster assessment areas, as well as in a broader statewide area. The bank made qualified donations in each South Dakota assessment area and at the regional and statewide level, as well as some donations impacting an area in South Dakota outside of the bank's assessment areas.

In conclusion, the bank's Investment Test rating is outstanding for South Dakota. The bank made an excellent level and amount of qualified investments in the form of securities and donations, which show excellent responsiveness to credit and community needs.

SERVICE TEST

The Service Test rating for South Dakota is outstanding. The bank's delivery systems generally are readily accessible to all portions of the South Dakota assessment areas. The minimal changes to the delivery systems have not adversely affected accessibility for low- and moderate-income geographies or individuals. Branch hours are reasonable and do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank is a leader in providing community development services to various organizations in the South Dakota assessment areas.

Retail Banking Services

Generally, the bank's delivery systems are readily accessible to all portions of the South Dakota assessment areas, and services do not vary in a way that inconveniences certain areas or individuals. The bank currently operates its main office, 20 branches, two stand-alone drive-up facilities, and 18 ATMs in the state. Since the previous evaluation, the bank closed one branch in Cresbard, in the Faulkton assessment area. This change did not adversely affect the accessibility to low- and moderate-income geographies in the assessment area; the Faulkton assessment area consists of only one middle-income tract. The table below shows branch and ATM locations by census tract income level for all South Dakota assessment areas as of year-end 2018.

Geographic Distribution of Branches & ATMS

Assessment Area: Assessment Group(s): State of SD 2018

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thrus	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed					
#	%	#	#	#	#	#	#	%	#	%	#	#	#	%	#	#	#	%	%	%		
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	0.9%	0.1%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	5	21.7%	0	0	4	4	3	Total	4	22.2%	4	25.0%	0	0	0	0.0%	0	0	30	25.6%	24.8%	26.9%
DTO	1		0	0				SA	0		0		0	0	0		0	0				
Middle	16	69.6%	0	1	12	5	10	Total	12	66.7%	10	62.5%	0	0	2	100.0%	0	0	62	53.0%	52.1%	49.7%
DTO	1		0	0				SA	1		1		0	0	0		0	0				
Upper	2	8.7%	0	0	2	2	2	Total	2	11.1%	2	12.5%	0	0	0	0.0%	0	0	24	20.5%	23.0%	23.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	23	100.0%	0	1	18	11	15	Total	18	100.0%	16	100.0%	0	0	2	100.0%	0	0	117	100.0%	100.0%	100.0%
DTO	2		0	0				SA	1		1		0	0	0		0	0				

2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

The branches are readily accessible to all portions of the assessment areas. The bank has 21.7% of its branches in moderate-income census tracts. This percentage is reasonable, given that moderate-income census tracts represent 25.6% of the census tracts in the South Dakota assessment areas. The bank does not have locations in a low-income tract; however, this is reasonable given that the bank's assessment areas only include one low-income tract. The low-income tract, which includes a portion of the Ellsworth Air Force Base, is located in the Rapid City assessment area, in the northeast corner of Pennington County. Ten other financial institutions have offices in Pennington County that compete to serve the area's residents and businesses, including large regional and national banks. Although the bank does not have branches in all moderate-income census tracts or the low-income tract, in some cases the branches near the moderate-income census tracts can reasonably serve residents, businesses, and farms in those tracts. In addition, there are other financial institutions throughout the assessment areas serving the moderate-income areas.

Many of the bank's locations have weekend and extended hours, night depositories, ATMs, and drive-up facilities. Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank also offers person-to-person payments through its online and mobile banking platforms, as well as bill payment through the use of its debit cards. The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours. The bank offers consistent products throughout its South Dakota assessment areas.

Community Development Services

Overall, the bank is a leader in providing community development services in its South Dakota assessment areas. The table shows the distribution of community development services by type of activity and geographical area.

South Dakota Community Development Services					
<i>Assessment Area/Other Geographical Area</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Revitalize and Stabilize</i>	<i>Total</i>
Watertown/Clark/Webster	17	12	9	12	50
Lemmon/Mobridge	3	0	7	11	21
Aberdeen	3	53	12	5	73
Brookings	0	3	5	0	8
Faulkton	0	0	3	0	3
Rapid City MSA	3	0	3	0	6
Sioux Falls MSA	0	7	0	0	7
Sisseton	0	3	2	5	10
Regional South Dakota	6	26	5	6	43
Statewide South Dakota	4	3	14	0	21
Total	36	107	60	39	242

Numerous bank employees provided their financial expertise and time to organizations that support various community development initiatives throughout the South Dakota assessment areas. During the evaluation period, bank employees provided services to organizations involved in economic development, community service, and affordable housing. In addition, employees provided their services to organizations that helped revitalize or stabilize underserved and/or distressed geographies, as well as low- and moderate-income areas. Employees often held leadership positions with these organizations, such as serving on the board of directors. The bank's employees provided community development services in all South Dakota assessment areas; the most services were provided in the Aberdeen and Watertown/Clark/Webster assessment areas. The bank also supported economic development, affordable housing, and the provision of community services to low- and moderate-income individuals at a regional and statewide level. In addition, the bank supported revitalization or stabilization of distressed and underserved areas at the statewide level.

In conclusion, the Service Test rating is outstanding for the bank's services in South Dakota. Delivery systems are readily accessible to all portions of the South Dakota assessment areas. The bank closed one branch in Cresbard, South Dakota, during the evaluation period; the branch was in a middle-income tract located only about 20 miles from the bank's Faulkton branch. The closure did not adversely impact the accessibility of services. The bank did not open any branches during the evaluation period. Branch hours and services are reasonable and do not vary in a way that would inconvenience low- or moderate-income individuals or areas. Finally, the bank is a leader in providing community development services, which are responsive to community development needs in its assessment areas.

NONMETROPOLITAN STATEWIDE AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WATERTOWN/CLARK/WEBSTER, SOUTH DAKOTA, ASSESSMENT AREA

Bank Information. The bank operates six offices in the Watertown/Clark/Webster assessment area. The full-service offices are located in Clark, Roslyn, Watertown, Webster, and Willow Lake; three of the offices have drive-up facilities. A limited-service office is located in Henry. In addition, the bank operates three ATMs in the assessment area; two are deposit-taking ATMs and one is a cash-dispensing-only ATM. The bank offers extended weekday hours at the Watertown office and weekend hours at the Watertown and Webster offices. The bank has 19.4% of its offices in this assessment area. See the Service Test section for more details on the bank's retail services.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranked second among 10 FDIC-insured institutions operating in the Watertown/Clark/Webster assessment area, with a 23.3% deposit market share. Based on that same data, the bank has 18.3% of its deposits in this assessment area.

Assessment Area Information. The Watertown/Clark/Webster assessment area consists of Clark, Codington, and Day counties in South Dakota. The assessment area borders on three other South Dakota assessment areas: Aberdeen, Brookings, and Sisseton. The bank has not changed this assessment area since the previous evaluation; however, the income classifications of some tracts changed based on 2017 FFIEC adjusted census data. In 2016, the assessment area included 10 middle-income and one upper-income tracts. The assessment area now includes one moderate-income, nine middle-income, and one upper-income tracts. Clark County's sole middle-income tract is classified as distressed and underserved for 2017 and 2018. Day County's three middle-income tracts also are classified as underserved for 2017 and 2018. A small portion of the Lake Traverse Indian Reservation is located in Codington and Day counties. The bank's Sisseton assessment area, which is adjacent to the Watertown/Clark/Webster assessment area, includes a large portion of the reservation.

The Combined Demographics Report on the following page provides demographic information for the bank's assessment area based on the 2018 FFIEC adjusted census data and 2018 D&B data.¹²

¹²The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Combined Demographics Report

Assessment Area(s): SD Watertown Clark Webster

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,757	18
Moderate-income	1	9.1	998	10.2	124	12.4	1,863	19.1
Middle-income	9	81.8	7,348	75.2	611	8.3	2,149	22.0
Upper-income	1	9.1	1,424	14.6	41	2.9	4,001	41.0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	11	100.0	9,770	100.0	776	7.9	9,770	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2,580	1,086	9.8	42.1	1,333	51.7	161	6.2
Middle-income	13,409	8,237	74.5	61.4	3,303	24.6	1,869	13.9
Upper-income	2,087	1,739	15.7	83.3	257	12.3	91	4.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	18,076	11,062	100.0	61.2	4,893	27.1	2,121	11.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	392	18.8	356	19.8	33	16.7	3	3.4
Middle-income	1,499	71.9	1,261	70	156	78.8	82	94.3
Upper-income	195	9.3	184	10.2	9	4.5	2	2.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,086	100.0	1,801	100.0	198	100.0	87	100.0
	Percentage of Total Businesses:			86.3		9.5		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.2	1	0.2	0	0	0	0
Middle-income	418	96.5	407	96.4	11	100	0	0
Upper-income	14	3.2	14	3.3	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	433	100.0	422	100.0	11	100.0	0	.0
	Percentage of Total Farms:			97.5		2.5		.0

2018 FFIEC Census Data and 2018 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for nonmetropolitan areas of South Dakota, for the year of loan origination. The table below shows the estimated median family income for each year and the income range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Statewide Non-Metropolitan--South Dakota**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2017	\$64,700	0	\$32,349	\$32,350	\$51,759	\$51,760	\$77,639	\$77,640	& above
2018	\$66,600	0	\$33,299	\$33,300	\$53,279	\$53,280	\$79,919	\$79,920	& above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for nonmetropolitan areas of South Dakota, which was \$60,961 for 2017 and 2018.

Population Characteristics. According to 2018 FFIEC adjusted census data, the population of the assessment area is 36,993. The most populous county in the assessment area is Codington, which has a population of 27,750 and includes the city of Watertown. The remainder of the assessment area consists of small, rural towns. The largest group by age in the assessment area is 25 to 64 years (50.5%), followed by 17 years and younger (23.9%), 65 and older (17.2%), and 18 to 24 years (8.4%).

Housing Characteristics. According to 2018 FFIEC adjusted census data, the assessment area has 18,076 housing units: 61.2% are owner occupied, 27.1% are rental, and 11.7% are vacant. The median age of the housing stock is 49 years, which is higher than the statewide median age of 40. The median housing value for the assessment area is \$123,423, and the affordability ratio is 38.3, compared to 36.3 for the state as a whole. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability. This ratio suggests that housing is slightly more affordable in this assessment area than in other areas in the state.

A community contact indicated that there is a lack of affordable housing options in the Watertown area. Home prices in Codington County are the highest in the assessment area. According to 2018 FFIEC adjusted census data, the median housing values are as follows: \$76,100 for Clark County, \$145,500 for Codington County, and \$81,100 for Day County. In Watertown, students at the technical college generally seek the most affordable places to live, which puts limitations on affordable housing options for nonstudents. In addition, according to bank management, investors have been buying single-family starter homes in Watertown for rental housing, which has limited the availability of these homes and is driving up home prices. Homes in Watertown under \$100,000 are sold quickly and may require some improvements. Individuals or families can buy a home outside of Watertown for a lower cost and commute to work. Webster has a general housing shortage. In Clark, homes are available for sale but there are few new homes; new construction typically occurs outside the city due to higher taxes within the city limits.

General Economic and Business Characteristics. Community contacts stated that the economy has been generally stable during the evaluation period, with some challenges in the agricultural and retail sectors.

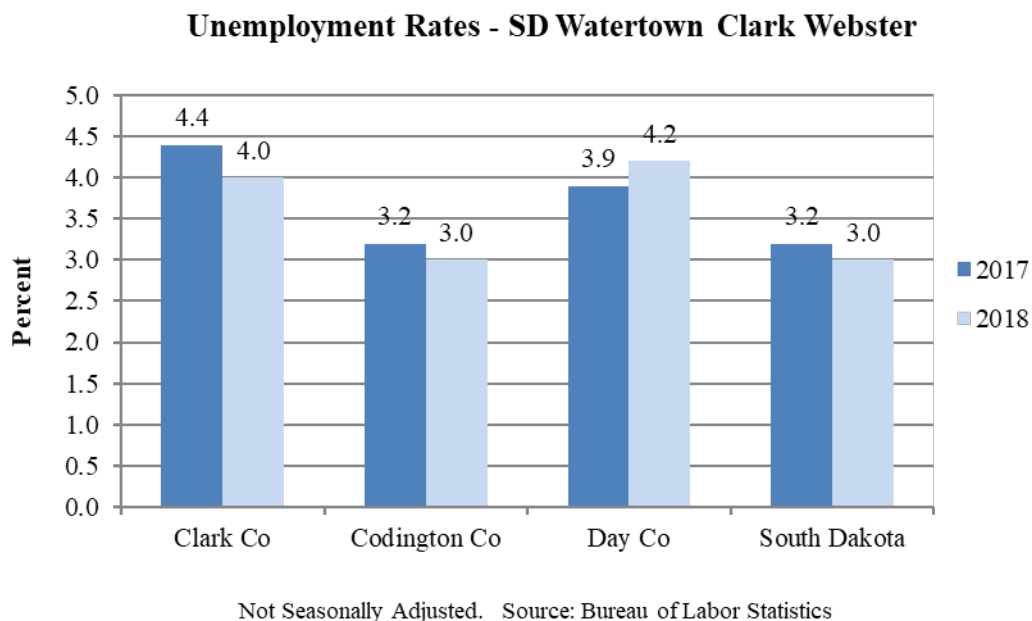
Agriculture is a significant economic sector throughout the assessment area. The agricultural economy has struggled in recent years and continues to face challenges. Low commodity prices have impacted profitability. According to a community contact, producers face decreased cash flows, and many producers operate on very tight margins; some have negative cash flows. In addition, weather variations, such as extreme winter conditions, dry conditions, and extremely wet conditions, have affected crops and livestock. Input costs and land lease and rental prices are high. Crop insurance and government incentive payments have helped farm operations survive the impact of these conditions. The major crops in the

assessment area are corn and soybeans. Cattle operations also are a major component of agriculture in the area.

In addition to farming and ranching, the main industries in the area include state and county government, manufacturing, and health care. Major employers include public school districts, manufacturers, hospitals and health-care systems, road construction-related companies, and some agriculture-related businesses. Generally, jobs are available in the assessment area. According to bank management, people may work outside of the area in which they live in order to find employment that includes health-care benefits.

Bank management stated that tourism also affects the local economy; tourism is largely tied to outdoor recreation and the lakes in the area. Lastly, according to bank management, retail has struggled in recent years. Small businesses find it hard to compete with online shopping.

The Unemployment Rates chart provides the annual average unemployment rate for Clark, Codington, and Day counties and for the state as a whole. As shown, the unemployment rate decreased during 2017 and 2018 except in Day County, where it increased slightly.



CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WATERTOWN/CLARK/WEBSTER ASSESSMENT AREA

The bank's Lending Test performance is good. Lending levels show excellent responsiveness to assessment area credit needs. The distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes. Overall, the geographic distribution of loans reflects good dispersion throughout the assessment area. The bank made a relatively high level of community development loans and also uses flexible loan programs to help meet credit needs of consumers and small farms. Examiners assigned the most weight to small farm loans, followed by small

business loans. Examiners assigned the least weight to HMDA loans.¹³ Examiners determined this weighting based on the total number and dollar volume of loans during the evaluation period.

The bank's Investment Test performance is excellent. Overall, the bank made an excellent level of qualified investments, which shows excellent responsiveness to credit and community development needs.

Finally, under the Service Test, retail services are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank is a leader in providing community development services in the assessment area.

LENDING TEST

The bank's Lending Test performance for the Watertown/Clark/Webster assessment area is good.

Lending Activity

The bank's lending activity reflects excellent responsiveness to the assessment area's credit needs. In 2017, the bank ranked first among 65 lenders reporting HMDA data, with a 12.6% market share. In 2018, the bank ranked second among 82 lenders reporting HMDA data, with a 10.1% market share. In 2017 and 2018, for small business and small farm loans, the bank ranked first among 42 lenders reporting CRA data, with a 50.3% market share in 2017 and a 48.4% market share in 2018. During the evaluation period, lending activity in this assessment area represented 24.8% by number and 22.8% by dollar amount of the bank's total lending. Within the bank's South Dakota assessment areas, the lending activity in the Watertown/Clark/Webster assessment area was 34.0% by number and 30.7% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses and Farms

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2017 and 2018. The tables also include the same information for aggregate lenders.

¹³ For 2018 HMDA loans, examiners did not evaluate the following categories of loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.

Borrower Distribution of HMDA Reportable Loans
Assessment Area: SD Watertown Clark Webster 2017

Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2017						Families by Family Income
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	4	11.4%	9.3%	\$282	4.6%	5.0%	18.0%
	Moderate	12	34.3%	20.3%	\$1,529	24.8%	15.6%	19.1%
	Middle	2	5.7%	20.3%	\$424	6.9%	19.8%	22.0%
	Upper	11	31.4%	27.6%	\$2,247	36.4%	35.5%	41.0%
	Unknown	6	17.1%	22.5%	\$1,693	27.4%	24.1%	0.0%
	Total	35	100.0%	100.0%	\$6,175	100.0%	100.0%	100.0%
Refinance	Low	5	6.7%	5.2%	\$297	1.6%	2.6%	18.0%
	Moderate	12	16.0%	15.6%	\$1,036	5.6%	9.0%	19.1%
	Middle	8	10.7%	17.0%	\$1,309	7.1%	11.3%	22.0%
	Upper	33	44.0%	39.5%	\$9,869	53.2%	49.5%	41.0%
	Unknown	17	22.7%	22.8%	\$6,053	32.6%	27.6%	0.0%
	Total	75	100.0%	100.0%	\$18,564	100.0	100.0	100.0%
Home Improvement	Low	1	5.9%	5.0%	\$7	1.1%	1.4%	18.0%
	Moderate	3	17.6%	23.3%	\$65	10.6%	18.5%	19.1%
	Middle	7	41.2%	31.7%	\$231	37.7%	22.6%	22.0%
	Upper	4	23.5%	33.3%	\$264	43.1%	49.9%	41.0%
	Unknown	2	11.8%	6.7%	\$45	7.4%	7.6%	0.0%
	Total	17	100.0%	100.0	\$612	100.0%	100.0%	100.0%
Multi-Family	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	18.0%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.1%
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	22.0%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	41.0%
	Unknown	6	100.0%	100.0%	\$2,190	100.0%	100.0%	0.0%
	Total	6	100.0%	100.0%	\$2,190	100.0%	100.0%	100.0%
HMDA Totals	Low	10	7.5%	7.6%	\$586	2.1%	3.9%	18.0%
	Moderate	27	20.3%	18.7%	\$2,630	9.5%	12.9%	19.1%
	Middle	17	12.8%	19.7%	\$1,964	7.1%	16.3%	22.0%
	Upper	48	36.1%	31.6%	\$12,380	45.0%	39.6%	41.0%
	Unknown	31	23.3%	22.4%	\$9,981	36.2%	27.3%	0.0%
	Total	133	100.0%	100.0%	\$27,541	100.0%	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Loans – Table 1 of 2

Assessment Area: SD Watertown Clark Webster 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	4	10.5%	\$305	6.2%	18.0%	4	10.5%	7.1%	\$305	6.2%	3.6%
	Moderate	11	28.9%	\$896	18.3%	19.1%	11	28.9%	24.4%	\$896	18.3%	17.1%
	Middle	9	23.7%	\$1,118	22.8%	22.0%	9	23.7%	21.3%	\$1,118	22.8%	20.7%
	Upper	12	31.6%	\$2,459	50.1%	41.0%	12	31.6%	37.5%	\$2,459	50.1%	49.3%
	Unknown	2	5.3%	\$126	2.6%	0.0%	2	5.3%	9.7%	\$126	2.6%	9.3%
	Total	38	100.0%	\$4,904	100.0%	100.0%	38	100.0%	100.0%	\$4,904	100.0%	100.0%
REFINANCE	Low	4	10.3%	\$230	5.5%	18.0%	4	10.3%	9.2%	\$230	5.5%	4.1%
	Moderate	11	28.2%	\$713	17.0%	19.1%	11	28.2%	23.2%	\$713	17.0%	17.4%
	Middle	10	25.6%	\$1,423	34.0%	22.0%	10	25.6%	23.5%	\$1,423	34.0%	24.2%
	Upper	13	33.3%	\$1,731	41.3%	41.0%	13	33.3%	35.2%	\$1,731	41.3%	44.5%
	Unknown	1	2.6%	\$91	2.2%	0.0%	1	2.6%	8.9%	\$91	2.2%	9.8%
	Total	39	100.0%	\$4,188	100.0%	100.0%	39	100.0%	100.0%	\$4,188	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	7.4%	\$0	0.0%	3.9%
	Moderate	2	20.0%	\$56	6.8%	19.1%	2	20.0%	13.0%	\$56	6.8%	9.2%
	Middle	3	30.0%	\$65	7.9%	22.0%	3	30.0%	31.5%	\$65	7.9%	20.1%
	Upper	4	40.0%	\$606	73.6%	41.0%	4	40.0%	38.9%	\$606	73.6%	54.4%
	Unknown	1	10.0%	\$96	11.7%	0.0%	1	10.0%	9.3%	\$96	11.7%	12.3%
	Total	10	100.0%	\$823	100.0%	100.0%	10	100.0%	100.0%	\$823	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	7.1%	\$0	0.0%	1.7%
	Unknown	8	100.0%	\$3,928	100.0%	0.0%	8	100.0%	92.9%	\$3,928	100.0%	98.3%
	Total	8	100.0%	\$3,928	100.0%	100.0%	8	100.0%	100.0%	\$3,928	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	14.3%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	28.6%	\$0	0.0%	19.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	42.9%	\$0	0.0%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.3%	\$0	0.0%	27.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans – Table 2 of 2

Assessment Area: SD Watertown Clark Webster 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	2	66.7%	\$100	80.0%	18.0%	2	66.7%	7.7%	\$100	80.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	3.8%	\$0	0.0%	1.3%
	Middle	1	33.3%	\$25	20.0%	22.0%	1	33.3%	26.9%	\$25	20.0%	20.2%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	61.5%	\$0	0.0%	72.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$125	100.0%	100.0%	3	100.0%	100.0%	\$125	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	10	10.2%	\$635	4.5%	18.0%	10	10.2%	7.6%	\$635	4.5%	3.5%
	Moderate	24	24.5%	\$1,665	11.9%	19.1%	24	24.5%	22.1%	\$1,665	11.9%	15.5%
	Middle	23	23.5%	\$2,631	18.8%	22.0%	23	23.5%	22.2%	\$2,631	18.8%	20.0%
	Upper	29	29.6%	\$4,796	34.3%	41.0%	29	29.6%	36.6%	\$4,796	34.3%	44.7%
	Unknown	12	12.2%	\$4,241	30.4%	0.0%	12	12.2%	11.5%	\$4,241	30.4%	16.3%
	Total	98	100.0%	\$13,968	100.0%	100.0%	98	100.0%	100.0%	\$13,968	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

In 2017, the bank extended 7.5% of HMDA loans to low-income borrowers and 20.3% to moderate-income borrowers in the assessment area. According to 2017 FFIEC adjusted census data, 18.0% of families are low income and 19.1% are moderate income. In 2017, aggregate lenders extended 7.6% and 18.7% of all HMDA loans to low- and moderate-income borrowers, respectively. The bank's lending to low-income borrowers is comparable to aggregate lender performance and below demographics. The bank's lending to moderate-income borrowers is comparable to aggregate lender performance as well as demographics. Notably, 34.3% of the bank's home purchase loans were extended to moderate-income borrowers; the bank's lending exceeded aggregate lending in this category, which was 20.3%. The bank's competition for mortgages is from another regional bank and a mortgage banking entity. The bank ranks first and second in 2017 and 2018, respectively, among aggregate lenders. However, the bank's lending represents only a 12.6% market share in 2017 and a 9.9% market share in 2018.

In 2017, 23.3% of the bank's HMDA loans were to borrowers with unknown incomes, with purchases, refinances, and multifamily categories having the highest percentage of such loans. The bank does significant agricultural lending. In 2017, the bank reported certain agriculture-related real estate loans as HMDA transactions, and such loans typically would not have reportable incomes. In 2018, HMDA

reporting requirements changed and no longer included reporting certain agriculture-related real estate loans as HMDA transactions.

In 2018, the bank extended 10.2% of HMDA loans to low-income borrowers and 24.5% to moderate-income borrowers. According to 2018 FFIEC census data, 18.0% of families are low income and 19.1% are moderate income. In 2018, aggregate lenders extended 7.6% and 22.1% of all HMDA loans to low- and moderate-income borrowers, respectively. The bank's overall lending to low- and moderate-income borrowers is comparable to aggregate lender performance and exceeds demographics. Notably, the bank's lending exceeded aggregate lender performance for purchase loans to low- and moderate-income borrowers as well as refinance and home improvement loans to moderate-income borrowers.

Based on information from management, the availability of reasonably priced homes varies by location in the assessment area. The Watertown area has an active real estate market and the highest-priced homes in the assessment area; affordable homes are limited and are quickly purchased by investors. Webster has a shortage of housing, while the Clark area has homes available. Using the assumption that borrowers can obtain a loan for approximately three times their annual income, applicants with the highest income in the low-income bracket (\$33,299) could generally afford a \$99,897 home, based on the 2018 FFIEC estimated median family income of \$66,600 for the nonmetropolitan areas of South Dakota. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$53,279), a borrower could afford a \$159,837 home. According to the 2018 FFIEC adjusted census data, the median housing value in the assessment area is \$123,423. This data suggests that homeownership would not be affordable for many low-income borrowers. Homeownership is generally more affordable for moderate-income borrowers, which is reflected in the bank's lending activity.

The bank makes use of flexible lending programs, including down payment and closing cost assistance programs, which help low- and moderate-income borrowers afford homeownership and make home improvements. In this assessment area, the bank used SDHDA, FHLB of Des Moines, and VA programs. The bank's use of these programs further demonstrates its willingness to meet the credit needs of low- and moderate-income borrowers. For more information on these lending programs, refer to the Institution section of this evaluation.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the bank's small business and small farm loans by revenue and loan size for the evaluation period, as well as aggregate lending data.

Small Business & Small Farm Lending By Revenue & Loan Size																			
Assessment Area: SD Watertown Clark Webster																			
Product Type		Bank Lending & Demographic Data Comparison 2018, 2017						Bank & Aggregate Lending Comparison											
								2017						2018					
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
#	%	\$ (000s)	\$ %	%	#	%													%
Small Business	Revenue	\$1 Million or Less	462	74.9%	\$32,917	55.4%	86.3%	234	72.7%	58.3%	\$16,381	54.3%	49.5%	228	77.3%	57.5%	\$16,536	56.6%	49.7%
		Over \$1 Million	112	18.2%	\$24,239	40.8%	9.5%	58	18.0%				54	18.3%					
		Total Rev. available	574	93.1%	\$57,156	96.2%	95.8%	292	90.7%				282	95.6%					
		Rev. Not Known	43	7.0%	\$2,244	3.8%	4.2%	30	9.3%				13	4.4%					
		Total	617	100.0%	\$59,400	100.0%	100.0%	322	100.0%				295	100.0%					
	Loan Size	\$100,000 or Less	461	74.7%	\$15,237	25.7%		239	74.2%	84.3%	\$7,535	25.0%	28.2%	222	75.3%	84.9%	\$7,702	26.4%	29.2%
		\$100,001 - \$250,000	97	15.7%	\$16,380	27.6%		53	16.5%	9.0%	\$9,009	29.8%	23.0%	44	14.9%	8.2%	\$7,371	25.2%	21.4%
		\$250,001 - \$1 Million	59	9.6%	\$27,783	46.8%		30	9.3%	6.7%	\$13,651	45.2%	48.8%	29	9.8%	6.9%	\$14,132	48.4%	49.4%
		Total	617	100.0%	\$59,400	100.0%		322	100.0%	100.0%	\$30,195	100.0%	100.0%	295	100.0%	100.0%	\$29,205	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	379	82.0%	\$11,687	35.5%													
		\$100,001 - \$250,000	57	12.3%	\$9,304	28.3%													
		\$250,001 - \$1 Million	26	5.6%	\$11,926	36.2%													
		Total	462	100.0%	\$32,917	100.0%													
Small Farm	Revenue	\$1 Million or Less	985	89.8%	\$114,297	85.4%	97.5%	511	89.8%	73.8%	\$60,787	85.4%	79.1%	474	89.8%	75.3%	\$53,510	85.5%	78.7%
		Over \$1 Million	80	7.3%	\$16,790	12.6%	2.5%	42	7.4%				38	7.2%					
		Total Rev. available	1,065	97.1%	\$131,087	98.0%	100.0%	553	97.2%				512	97.0%					
		Not Known	32	2.9%	\$2,683	2.0%	0.0%	16	2.8%				16	3.0%					
		Total	1,097	100.0%	\$133,770	100.0%	100.0%	569	100.0%				528	100.0%					
	Loan Size	\$100,000 or Less	687	62.6%	\$28,106	21.0%		349	61.3%	67.3%	\$14,329	20.1%	21.5%	338	64.0%	68.0%	\$13,777	22.0%	21.9%
		\$100,001 - \$250,000	244	22.2%	\$43,400	32.4%		129	22.7%	19.4%	\$22,958	32.3%	32.0%	115	21.8%	19.1%	\$20,442	32.6%	32.1%
		\$250,001 - \$500,000	166	15.1%	\$62,264	46.5%		91	16.0%	13.3%	\$33,862	47.6%	46.4%	75	14.2%	12.9%	\$28,402	45.4%	46.0%
		Total	1,097	100.0%	\$133,770	100.0%		569	100.0%	100.0%	\$71,149	100.0%	100.0%	528	100.0%	100.0%	\$62,621	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	633	64.3%	\$25,142	22.0%													
		\$100,001 - \$250,000	216	21.9%	\$38,530	33.7%													
		\$250,001 - \$500,000	136	13.8%	\$50,625	44.3%													
		Total	985	100.0%	\$114,297	100.0%													
Originations & Purchases																			
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																			
2018 FFIEC Census Data and 2018 D&B Information																			

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2018 FFIEC Census Data and 2018 D&B Information

In 2017, the bank originated 72.7% of its small business loans to small businesses (with gross annual revenues of \$1 million or less). According to 2017 D&B data, 85.0% of businesses had gross annual revenues of \$1 million or less. Aggregate lenders originated 58.3% of their small business loans to small businesses in 2017. While the bank's small business lending was below demographics, it significantly exceeded aggregate lending in 2017. For 2017 and 2018, the bank ranked first among aggregate lenders reporting small business loans in the assessment area and originated 36.7% and 33.5% of the loans reported, respectively.

In 2018, the bank originated 77.3% of its small business loans to small businesses. According to 2018 D&B data, 86.3% of businesses had gross annual revenues of \$1 million or less. Aggregate lenders originated 57.5% of their small business loans to small businesses in 2018. As in 2017, the bank's small business lending was below demographics but significantly exceeded aggregate lending.

Of the bank's loans to small businesses, 81.2% in 2017 and 82.9% in 2018 were for amounts of \$100,000 or less, which shows a willingness to meet the credit needs of small businesses. The bank operates in a competitive market for small business loans.

Small Farm. The distribution of small farm loans among farms of different sizes is excellent. In 2017, the bank originated 89.8% of its small farm loans to small farms (with revenues of \$1 million or less). According to 2017 D&B data, 97.8% of farms had gross annual revenues of \$1 million or less. Aggregate lenders originated 73.8% of their small farm loans to small farms in 2017. While the bank's small farm lending was below demographics, it significantly exceeded aggregate lending in 2017. The bank ranks first among aggregate lenders reporting small farm loans in the assessment area and originated 63.8% of the reported loans.

In 2018, the bank originated 89.8% of its small farm loans to small farms. According to 2018 D&B data, 97.5% of farms had gross annual revenues of \$1 million or less. Aggregate lenders originated 75.3% of their small farm loans to small farms in 2018. As in 2017, the bank's small farm lending is below demographics but exceeds aggregate lending. However, since the bank's lending represents 64.2% of the aggregate lending activity, the comparison of the bank's lending to aggregate lending data as shown in the table is not meaningful.

The analysis of aggregate small farm lending data which excludes the bank's data shows that the bank's performance significantly exceeds other small farm lenders. In 2017, other small farm lenders made 45.5% of loans to small farms. In 2018, other small farm lenders made 49.3% of loans to small farms. Bank management indicated that in this assessment area the bank faces strong competition for small farm loans from Farm Credit Services of America. Of the bank's loans to small farms, 63.0% in 2017 and 65.6% in 2018 were for amounts of \$100,000 or less, which indicates a willingness to serve the credit needs of small farms.

In addition, the bank makes use of flexible lending programs, which further demonstrates the bank's willingness to meet the needs of small farms in the area. Specifically, the bank originates loans using FSA and FarmerMac programs, which provide additional financing flexibility for small farms.

Geographic Distribution

The geographic distribution of HMDA, small business, and small farm loans in the Watertown/Clark/Webster assessment area is good, and there are no unexplained gaps in lending. In 2017 and 2018, the assessment area had one moderate-income tract, nine middle-income tracts, and one upper-income tract. The assessment area does not include any low-income tracts. The bank originated HMDA and small business loans in the moderate-income tract. The bank did not originate small farm loans in the moderate-income tract, which is reasonable because this tract only includes one reported small farm. Given the demographics of the tract, small farm loans are weighted the least for geographic distribution.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. The following tables show the bank's HMDA data by census tract income level and product type for 2017 and 2018. The tables also show the same information for aggregate lenders.

Geographic Distribution of HMDA Reportable Loans									
Assessment Area: SD Watertown Clark Webster 2017									
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units	
		2017							
		Count		Dollar					
		Bank	Agg	Bank	Agg				
#	%	%	\$ (000s)	\$ %	\$ %				
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	5	14.3%	13.4%	\$509	8.2%	8.8%	9.8%	
	Middle	26	74.3%	59.5%	\$4,968	80.5%	61.2%	74.5%	
	Upper	4	11.4%	27.1%	\$698	11.3%	30.0%	15.7%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	35	100.0%	100.0%	\$6,175	100.0%	100.0%	100.0%	
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	3	4.0%	10.4%	\$213	1.1%	5.3%	9.8%	
	Middle	70	93.3%	74.6%	\$18,025	97.1%	83.8%	74.5%	
	Upper	2	2.7%	15.0%	\$326	1.8%	11.0%	15.7%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	75	100.0%	100.0%	\$18,564	100.0%	100.0%	100.0%	
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	4	23.5%	16.7%	\$92	15.0%	9.9%	9.8%	
	Middle	11	64.7%	66.7%	\$464	75.8%	74.3%	74.5%	
	Upper	2	11.8%	16.7%	\$56	9.2%	15.7%	15.7%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	17	100.0%	100.0%	\$612	100.0%	100.0%	100.0%	
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	Multifamily 0.0%	
	Moderate	2	33.3%	30.0%	\$953	43.5%	17.1%		30.3%
	Middle	3	50.0%	60.0%	\$802	36.6%	75.7%		59.9%
	Upper	1	16.7%	10.0%	\$435	19.9%	7.2%		9.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%		0.0%
	Total	6	100.0%	100.0%	\$2,190	100.0%	100.0%		100.0%
HMDA Totals	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	14	10.5%	12.7%	\$1,767	6.4%	7.9%	9.8%	
	Middle	110	82.7%	64.9%	\$24,259	88.1%	69.9%	74.5%	
	Upper	9	6.8%	22.3%	\$1,515	5.5%	22.2%	15.7%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	133	100.0%	100.0%	\$27,541	100.0%	100.0%	100.0%	
Originations & Purchases									
2017 FFIEC Census Data									
Note: Percentages may not add to 100.0 percent due to rounding									

Geographic Distribution of HMDA Loans – Table 1 of 2

Assessment Area: SD Watertown Clark Webster 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	21.1%	\$822	16.8%	9.8%	8	21.1%	14.8%	\$822	16.8%	9.6%
	Middle	25	65.8%	\$3,226	65.8%	74.5%	25	65.8%	60.7%	\$3,226	65.8%	61.9%
	Upper	5	13.2%	\$856	17.5%	15.7%	5	13.2%	24.6%	\$856	17.5%	28.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	38	100.0%	\$4,904	100.0%	100.0%	38	100.0%	100.0%	\$4,904	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	12.8%	\$439	10.5%	9.8%	5	12.8%	15.3%	\$439	10.5%	9.4%
	Middle	33	84.6%	\$3,578	85.4%	74.5%	33	84.6%	71.3%	\$3,578	85.4%	75.6%
	Upper	1	2.6%	\$171	4.1%	15.7%	1	2.6%	13.1%	\$171	4.1%	14.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.5%
	Total	39	100.0%	\$4,188	100.0%	100.0%	39	100.0%	100.0%	\$4,188	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	20.0%	\$56	6.8%	9.8%	2	20.0%	9.3%	\$56	6.8%	8.2%
	Middle	7	70.0%	\$742	90.2%	74.5%	7	70.0%	72.2%	\$742	90.2%	77.2%
	Upper	1	10.0%	\$25	3.0%	15.7%	1	10.0%	18.5%	\$25	3.0%	14.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$823	100.0%	100.0%	10	100.0%	100.0%	\$823	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	12.5%	\$481	12.2%	30.3%	1	12.5%	28.6%	\$481	12.2%	11.6%
	Middle	7	87.5%	\$3,447	87.8%	59.9%	7	87.5%	71.4%	\$3,447	87.8%	88.4%
	Upper	0	0.0%	\$0	0.0%	9.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$3,928	100.0%	100.0%	8	100.0%	100.0%	\$3,928	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	74.5%	0	0.0%	85.7%	\$0	0.0%	95.4%
	Upper	0	0.0%	\$0	0.0%	15.7%	0	0.0%	14.3%	\$0	0.0%	4.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans – Table 2 of 2

Assessment Area: SD Watertown Clark Webster 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Count		Bank Dollar		Owner Occupied Units	Count			Dollar		
							Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.8%	0	0.0%	11.5%	\$0	0.0%	3.8%
	Middle	3	100.0%	\$125	100.0%	74.5%	3	100.0%	69.2%	\$125	100.0%	87.2%
	Upper	0	0.0%	\$0	0.0%	15.7%	0	0.0%	19.2%	\$0	0.0%	8.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$125	100.0%	100.0%	3	100.0%	100.0%	\$125	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.8%	0	0.0%	30.8%	\$0	0.0%	23.4%
	Middle	0	0.0%	\$0	0.0%	74.5%	0	0.0%	30.8%	\$0	0.0%	28.0%
	Upper	0	0.0%	\$0	0.0%	15.7%	0	0.0%	38.5%	\$0	0.0%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	16	16.3%	\$1,798	12.9%	9.8%	16	16.3%	14.8%	\$1,798	12.9%	9.7%
	Middle	75	76.5%	\$11,118	79.6%	74.5%	75	76.5%	64.9%	\$11,118	79.6%	67.7%
	Upper	7	7.1%	\$1,052	7.5%	15.7%	7	7.1%	20.1%	\$1,052	7.5%	22.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	98	100.0%	\$13,968	100.0%	100.0%	98	100.0%	100.0%	\$13,968	100.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

In 2017, the bank originated 10.5% of its HMDA loans in the moderate-income tract. According to 2017 FFIEC adjusted census data, 10.2% of families and 9.8% of owner-occupied housing units are located in the moderate-income tract. Aggregate lenders originated 12.7% of their HMDA loans to borrowers residing in the moderate-income tract. The bank's lending is consistent with the demographic characteristics of the moderate-income tracts as well as with aggregate lender performance.

In 2018, the bank originated 16.3% of its loans in the moderate-income tract. According to 2018 FFIEC adjusted census data, 10.2% of families and 9.8% of owner-occupied housing units are located in the moderate-income tract. Overall, the bank's lending performance is consistent with aggregate lender performance; however, the bank exceeded aggregate lender performance for purchase loans in 2018. The bank's performance exceeds the demographic characteristics of the moderate-income tract. According to bank management, the moderate-income tract is primarily residential and includes older homes that would be considered affordable.

Small Business. The geographic distribution of small business loans is good. The following table shows the geographic distribution of the bank's small business and small farm loans for 2017 and 2018, as well as aggregate lender data for both years.

Geographic Distribution of Small Business & Small Farm Loans																
Assessment Area: SD Watertown Clark Webster																
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2018, 2017					2017					2018				
		Count		Bank Dollar		Total Businesses	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	%	#	%	\$ 000s	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	79	12.8%	\$6,692	11.3%	18.8%	41	12.7%	15.7%	\$3,023	10.0%	20.1%	38	12.9%	13.1%	13.2%
	Middle	516	83.6%	\$51,001	85.9%	71.9%	272	84.5%	76.9%	\$26,425	87.5%	76.5%	244	82.7%	77.6%	82.4%
	Upper	22	3.6%	\$1,707	2.9%	9.3%	9	2.8%	6.0%	\$747	2.5%	2.8%	13	4.4%	7.6%	3.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.6%	0	0.0%	1.7%	0.7%
	Total	617	100.0%	\$59,400	100.0%	100.0%	322	100.0%	100.0%	\$30,195	100.0%	100.0%	295	100.0%	100.0%	100.0%
SMALL FARM	Total Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	0.4%
	Middle	1,094	99.7%	\$133,270	99.6%	96.5%	567	99.6%	99.0%	\$70,824	99.5%	99.2%	527	99.8%	99.1%	98.9%
	Upper	3	0.3%	\$500	0.4%	3.2%	2	0.4%	0.8%	\$325	0.5%	0.8%	1	0.2%	0.6%	0.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	1,097	100.0%	\$133,770	100.0%	100.0%	569	100.0%	100.0%	\$71,149	100.0%	100.0%	528	100.0%	100.0%	100.0%
Originations & Purchases 2018 FFIEC Census Data and 2018 D&B Information																

In 2017, the bank originated 12.7% of its small business loans to entities located in the moderate-income tract, which is below demographics. According to 2017 D&B data, 19.0% of the small business entities in the assessment area are located in the moderate-income tract. The bank's lending is consistent with aggregate lenders, which originated 15.7% of their small business loans to entities located in the moderate-income tract.

In 2018, the bank originated 12.9% of its small business loans to entities located in the moderate-income tract, which is below demographics. According to 2018 D&B data, 18.8% of the small businesses in the assessment area are located in the moderate-income tract. The bank's lending is consistent with aggregate lenders; those lenders originated 13.1% of their small business loans to entities located in the moderate-income tract. The bank's lending for both years is reasonable given the demographics and aggregate lenders' performance, as well as competitive factors. The moderate-income tract is located within the city limits of Watertown, and several other banks operate in or near the tract.

Small Farm. The geographic distribution of small farm loans is adequate. The bank did not originate small farm loans in the moderate-income tract in 2017 or 2018; however, this lack of lending is reasonable given the demographics. According to 2017 D&B data, no farms were located in the moderate-income tract. According to 2018 D&B data, only one farm is located in that tract. The moderate-income tract is located in the city of Watertown and does not include agricultural land, which explains the demographics. Aggregate lenders did not make any loans in this tract in 2017 and only made 0.2% of their loans, or two loans, in this tract in 2018.

Community Development Lending

The bank made a relatively high level of community development loans in the Watertown/Clark/Webster assessment area. During the evaluation period, the bank made one \$991,000 community development loan with the purpose of revitalizing and stabilizing an underserved middle-income census tract. The loan helped fund renovations to a building used to provide essential infrastructure and public safety. Although the bank made only one community development loan in this assessment area, the loan was responsive to

assessment area needs. During the evaluation period, qualified community development lending opportunities were limited in the Watertown/Clark/Webster assessment area.

INVESTMENT TEST

Overall, the bank made an excellent level of qualified investments and demonstrated excellent responsiveness to needs in the Watertown/Clark/Webster assessment area. During the evaluation period, the bank made two new qualified investments in the form of bonds totaling \$615,000. The bonds helped revitalize and/or stabilize distressed and underserved areas in the assessment area. One bond supported improvements to school buildings. The second bond funded a municipal swimming pool. Limited qualified investment opportunities were available during the evaluation period. The bank also continues to hold nine investments totaling \$795,000 that support community services for low- and moderate-income individuals and the revitalization and/or stabilization of distressed and underserved areas in the assessment area.

The bank made an excellent level of qualified investments in the form of donations in the assessment area. The bank donated \$127,500 during the evaluation period, primarily to organizations that provide community services to low- and moderate-income families and individuals. In addition, the bank made significant donations to organizations with an economic development focus and to organizations that help revitalize or stabilize distressed and/or underserved tracts. Of particular note, the bank made sizable contributions to two impactful organizations in the assessment area: one that focuses on youth mentorship, and one that focuses on economic development in Watertown.

Qualified Investment Donations in the Watertown/Clark/Webster Assessment Area		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Affordable Housing	9	\$7,300
Community Service	33	\$60,100
Economic Development	6	\$36,500
Revitalize or Stabilize Distressed and/or Underserved Tracts	27	\$23,600
Total	75	\$127,500

SERVICE TEST

The bank's delivery systems are readily accessible to residents, businesses, and farms throughout the assessment area. The bank did not close or open any offices or ATMs in the assessment area since the previous evaluation. The bank's services do not vary in a way that inconveniences particular individuals or areas. The bank is a leader in providing community development services in this assessment area.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank's geographies and to individuals of different income levels. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank operates six branches in the assessment area: five full-service branches in Clark, Roslyn, Watertown, Webster, and Willow Lake, and one limited-service branch in Henry. The branch offices are located in middle-income tracts, which is reasonable because the assessment area primarily consists of middle-income census tracts. The Watertown branch, while located in a middle-income tract, is directly adjacent to the only moderate-income tract in the assessment area. The bank did not open or close any branches in the assessment area during the evaluation period. Three branches provide drive-up facilities, two branches provide weekend hours, and one branch offers extended weekday hours. Finally, the bank operates a stand-alone deposit-taking ATM in Webster.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank also offers person-to-person payments through its online and mobile banking platforms, as well as bill payment through the use of debit cards. The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS
Assessment Area: Assessment Area(s): SD Watertown Clark Webster

Tract Category	Branches							ATMs										Demographics					
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs			Census Tracts		House holds	Total Businesses		
	#	%	Open	Closed				#	%	Open	Closed	#	%	Open	Closed								
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0					
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	9.1%	15.2%	15.6%	
DTO	0		0	0				SA	0		0		0	0	0		0	0					
Middle	6	100.0%	0	0	3	1	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	9	81.8%	72.3%	76.1%	
DTO	0		0	0				SA	1		1		0	0	0		0	0					
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	9.1%	12.5%	8.3%	
DTO	0		0	0				SA	0		0		0	0	0		0	0					
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0					
Total	6	100.0%	0	0	3	1	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	11	100.0%	100.0%	100.0%	
DTO	0		0	0				SA	1		1		0	0	0		0	0					

2018 FFIEC Census Data, 2018 D&B In/2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank is a leader in providing community development services in the Watertown/Clark/Webster assessment area. During the evaluation period, 14 bank employees provided 50 community development services for 19 organizations. Bank employees served organizations that promote economic development activities, provide community services to low- and moderate-income individuals and families, support economic development, and revitalize or stabilize distressed and/or underserved areas. In most cases, bank employees served in leadership roles for the organizations.

Community Development Services in the Watertown/Clark/Webster Assessment Area	
<i>Purpose</i>	<i>#</i>
Affordable Housing	17
Community Service	12
Economic Development	9
Revitalize or Stabilize Distressed and/or Underserved Tracts	12
Total	50

NONMETROPOLITAN STATEWIDE AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LEMMON/MOBRIDGE, SOUTH DAKOTA, ASSESSMENT AREA

Bank Information. The bank operates three offices with drive-up facilities in the Lemmon/Mobridge assessment area, located in the towns of Bison, Lemmon, and Mobridge. The Lemmon and Mobridge offices have deposit-taking ATMs, and the Bison office has a cash-dispensing-only ATM. The bank offers weekend hours at the Lemmon and Mobridge offices. The bank has 9.4% of its offices in this assessment area. See the Service Test section for more details on the bank's retail services.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranked second among 10 FDIC-insured institutions operating in the Lemmon/Mobridge assessment area, with a 21.4% deposit market share. Based on that same data, the bank has 10.8% of its deposits in this assessment area.

Assessment Area Information. The Lemmon/Mobridge assessment area consists of Campbell, Corson, Dewey, Perkins, Walworth, and Ziebach counties in South Dakota. The assessment area borders the bank's Hettinger, North Dakota, assessment area. The bank has not changed the Lemmon/Mobridge assessment area since the previous evaluation; however, the income classifications of some tracts changed based on 2017 FFIEC adjusted census data. In 2016, the assessment area included two low-income, two moderate-income, and five middle-income tracts. The assessment area now consists of four moderate-income and five middle-income tracts. Three of the middle-income tracts were classified as distressed and underserved and two were classified as underserved for 2017 and 2018.

A large portion of the Standing Rock Indian Reservation is located in Corson County. The bank's Hettinger, North Dakota, assessment area, which is adjacent to the Lemmon/Mobridge assessment area, includes the remainder of the reservation. The Cheyenne River Indian Reservation is located in Dewey and Ziebach counties. Small parcels of Turtle Mountain Indian Reservation's off-reservation trust lands are located in Perkins County.

The Combined Demographics Report on the following page provides demographic information for the bank's assessment area based on the 2018 FFIEC adjusted census data and 2018 D&B data.¹⁴

¹⁴The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Combined Demographics Report

Assessment Area(s): SD Lemmon Mobridge

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,636	30.6
Moderate-income	4	44.4	2,075	38.7	716	34.5	1,036	19.3
Middle-income	5	55.6	3,280	61.3	332	10.1	1,109	20.7
Upper-income	0	0	0	0	0	0	1,574	29.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	9	100.0	5,355	100.0	1,048	19.6	5,355	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3,377	1,407	27.7	41.7	1,366	40.5	604	17.9
Middle-income	6,909	3,672	72.3	53.1	1,612	23.3	1,625	23.5
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10,286	5,079	100.0	49.4	2,978	29.0	2,229	21.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	169	15.6	135	14.3	19	21.6	15	28.3
Middle-income	914	84.4	807	85.7	69	78.4	38	71.7
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,083	100.0	942	100.0	88	100.0	53	100.0
	Percentage of Total Businesses:			87.0		8.1		4.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	76	18.6	75	18.6	1	25	0	0
Middle-income	333	81.4	328	81.4	3	75	2	100
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	409	100.0	403	100.0	4	100.0	2	100.0
	Percentage of Total Farms:			98.5		1.0		.5

2018 FFIEC Census Data and 2018 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for nonmetropolitan areas of South Dakota, for the year of loan origination. The table below shows the estimated median family income for each year and the income range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Statewide Non-Metropolitan--South Dakota**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2017	\$64,700	0	- \$32,349	\$32,350	- \$51,759	\$51,760	- \$77,639	\$77,640	- & above
2018	\$66,600	0	- \$33,299	\$33,300	- \$53,279	\$53,280	- \$79,919	\$79,920	- & above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for nonmetropolitan areas of South Dakota, which was \$60,961 for 2017 and 2018.

Population Characteristics. According to 2018 FFIEC adjusted census data, the population of the assessment area is 22,585. Generally, all of the counties in the assessment area are rural and include small towns. The most populous counties are Dewey and Walworth, with populations of 5,579 and 5,495, respectively. The largest group by age is 25 to 64 years (46.8%), followed by 17 years and younger (29.2%), 65 and older (15.9%), and 18 to 24 years (8.1%).

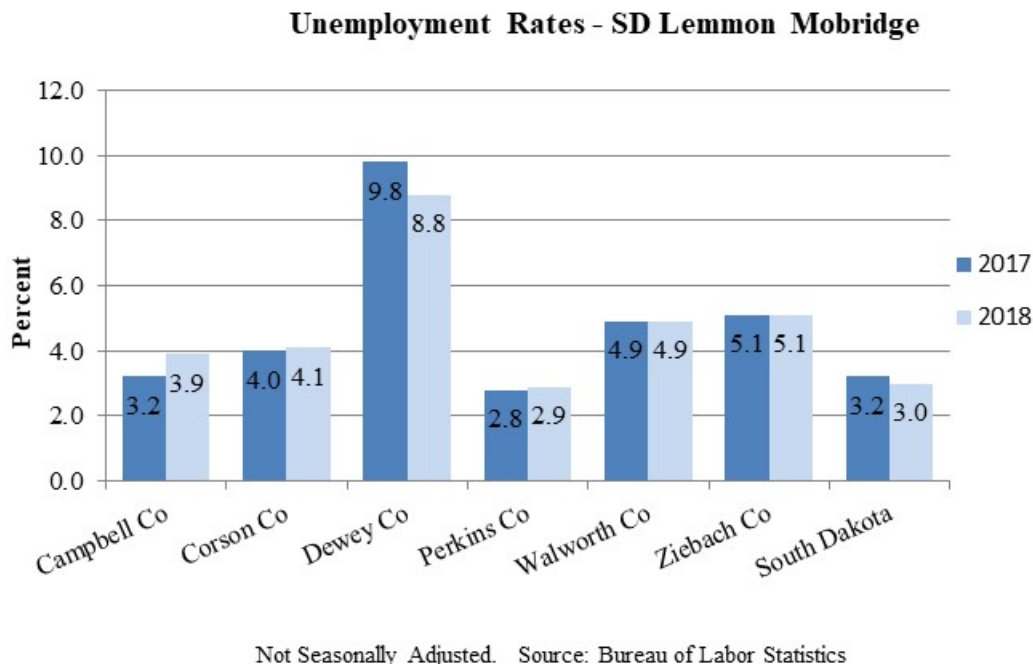
Housing Characteristics. According to 2018 FFIEC adjusted census data, the assessment area has 10,286 housing units: 49.4% are owner-occupied, 29.0% are rental, and 21.7% are vacant. The median age of the housing stock is 52 years, which is higher than the statewide median age of 40. The median housing value for the assessment area is \$66,970, and the affordability ratio is 58.7, compared to 36.3 for the state as a whole. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability. This ratio suggests that, overall, housing is more affordable in this assessment area than other areas in the state.

Based on information from management, homes are generally affordable in Lemmon. The housing market has been steady, and home values have increased slightly there. In Mobridge, the housing market has been stable, and homes have retained their value. A community contact noted that the inventory of homes for sale in Dewey County is low. The assessment area also has some apartments for rent; however, additional affordable housing is needed on the Standing Rock Indian Reservation.

General Economic and Business Characteristics. According to bank management, the economy in the Lemmon/Mobridge assessment area has been relatively stable. However, the agriculture sector has faced challenges. The economy in the assessment area is primarily based on ranching and farming. The major crops are sunflowers, spring and winter wheat, corn, and soybeans. Ranchers also raise cattle. Agricultural production has generally been good, but prices have been concerning. High input costs and low prices resulted in farmers and ranchers barely having enough revenue to cover costs. A community contact noted that in Dewey County, the cost of land leases and equipment increased in past years but has not fallen despite the decline in commodity prices and beef sales.

In addition to agriculture, the main industries in this largely rural assessment area include county government, education, health care, tourism, and utilities. Major employers include public school districts, utility companies, a jewelry manufacturer, hospitals and clinics, and a farm and home supply company. Other manufacturers and tribal entities, such as casinos and tribal government, also provide employment. In addition, Mobridge is a retail hub for the area and includes a variety of small businesses. Retail businesses in the assessment area are negatively impacted when agriculture is struggling. Bank management noted that tourism in the area supports local businesses. Outdoor recreation, including hunting, brings many people to the area.

The Unemployment Rates chart provides the annual average unemployment rate for the counties in the assessment area and for the state as a whole. As shown, the unemployment rates were relatively stable during 2017 and 2018 for all counties except Campbell, which increased slightly. According to ACS data, the poverty rate is 42.5% among reservation residents who identify as American Indian, and 35.4% among all residents, which is likely reflected in the unemployment rates in Dewey and Ziebach counties.



CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LEMMON/MOBRIDGE ASSESSMENT AREA

The bank's Lending Test performance is good. Lending levels show excellent responsiveness to assessment area credit needs. The distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes. Overall, the geographic distribution of loans reflects good dispersion throughout the assessment area. The bank made a relatively high level of community development loans and also uses flexible loan programs to help meet credit needs of consumers, small farms, and small businesses. Examiners assigned the most weight to small farm loans, followed by small business loans. Examiners assigned the least weight to HMDA loans.¹⁵ Examiners determined this weighting based on the total number and dollar volume of loans during the evaluation period.

The bank's Investment Test performance is excellent. The bank made an excellent level of qualified investments in the form of securities and donations, which shows excellent responsiveness to credit and community development needs.

¹⁵ For 2018 HMDA loans, examiners did not evaluate the following categories of loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.

Finally, under the Service Test, retail services are accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provides a relatively high level of community development services in the assessment area.

LENDING TEST

The bank's Lending Test performance for the Lemmon/Mobridge assessment area is good.

Lending Activity

The bank's lending activity reflects excellent responsiveness to assessment area credit needs. In 2017, the bank ranked first among 30 lenders reporting HMDA data, with a 37.1% market share. In 2018, the bank ranked first among 40 lenders reporting HMDA data, with a 19.6% market share. In 2017, for small business and small farm loans, the bank ranked first among 28 lenders reporting CRA data, with a 52.1% market share. In 2018, for small business and small farm loans, the bank ranked first among 27 lenders, with a 53.7% market share. The 2017 and 2018 lending activity in this assessment area represented 15.1% by number and 11.8% by dollar amount of the bank's total lending. Within the bank's South Dakota assessment areas, the lending activity in the Lemmon/Mobridge assessment area was 20.7% by number and 15.9% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses and Farms

The bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2017 and 2018. The tables also include the same information for aggregate lenders. At the loan product level, examiners did not evaluate multifamily loans because the bank did not originate this loan type in the assessment area during 2017 and 2018.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Lemmon Mobridge 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income
		2017						
		Count		Dollar		Agg		
		Bank #	%	Agg %	Bank \$(000s)	\$ %	Agg \$ %	%
Home Purchase	Low	3	13.6%	6.3%	\$178	6.9%	3.4%	30.6%
	Moderate	4	18.2%	20.3%	\$315	12.1%	20.2%	19.3%
	Middle	4	18.2%	29.7%	\$428	16.5%	24.6%	20.7%
	Upper	10	45.5%	32.8%	\$1,606	61.9%	41.9%	29.4%
	Unknown	1	4.5%	10.9%	\$66	2.5%	9.8%	0.0%
	Total	22	100.0%	100.0%	\$2,593	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	6.1%	\$0	0.0%	2.3%	30.6%
	Moderate	0	0.0%	10.2%	\$0	0.0%	3.1%	19.3%
	Middle	2	13.3%	18.4%	\$195	3.5%	13.9%	20.7%
	Upper	11	73.3%	49.0%	\$4,657	83.1%	67.7%	29.4%
	Unknown	2	13.3%	16.3%	\$749	13.4%	13.0%	0.0%
	Total	15	100.0%	100.0%	\$5,601	100.0%	100.0%	100.0%
Home Improvement	Low	1	8.3%	15.8%	\$3	1.0%	10.3%	30.6%
	Moderate	3	25.0%	21.1%	\$43	14.9%	7.4%	19.3%
	Middle	3	25.0%	31.6%	\$61	21.1%	40.3%	20.7%
	Upper	5	41.7%	31.6%	\$182	63.0%	42.1%	29.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	12	100.0%	100.0%	\$289	100.0%	100.0%	100.0%
Multi-Family	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	30.6%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.3%
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	20.7%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	29.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	0	0.0%	0.0%	\$0	0.0%	0.0%	100.0%
HMDA Totals	Low	4	8.2%	7.6%	\$181	2.1%	3.0%	30.6%
	Moderate	7	14.3%	16.7%	\$358	4.2%	10.3%	19.3%
	Middle	9	18.4%	25.8%	\$684	8.1%	19.3%	20.7%
	Upper	26	53.1%	38.6%	\$6,445	76.0%	56.1%	29.4%
	Unknown	3	6.1%	11.4%	\$815	9.6%	11.2%	0.0%
	Total	49	100.0%	100.0%	\$8,483	100.0%	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Lemmon Mobridge 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%					%	\$ (000s)
HOME PURCHASE	Low	3	23.1%	\$167	11.4%	30.6%	3	23.1%	8.8%	\$167	11.4%	5.1%
	Moderate	3	23.1%	\$221	15.1%	19.3%	3	23.1%	22.5%	\$221	15.1%	16.6%
	Middle	3	23.1%	\$398	27.3%	20.7%	3	23.1%	17.5%	\$398	27.3%	22.2%
	Upper	4	30.8%	\$673	46.1%	29.4%	4	30.8%	36.3%	\$673	46.1%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.0%	\$0	0.0%	20.1%
	Total	13	100.0%	\$1,459	100.0%	100.0%	13	100.0%	100.0%	\$1,459	100.0%	100.0%
REFINANCE	Low	2	20.0%	\$93	7.6%	30.6%	2	20.0%	15.2%	\$93	7.6%	9.1%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	13.0%	\$0	0.0%	10.7%
	Middle	2	20.0%	\$149	12.2%	20.7%	2	20.0%	8.7%	\$149	12.2%	6.4%
	Upper	5	50.0%	\$684	55.8%	29.4%	5	50.0%	45.7%	\$684	55.8%	51.4%
	Unknown	1	10.0%	\$300	24.5%	0.0%	1	10.0%	17.4%	\$300	24.5%	22.4%
	Total	10	100.0%	\$1,226	100.0%	100.0%	10	100.0%	100.0%	\$1,226	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	30.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$28	66.7%	19.3%	1	50.0%	25.0%	\$28	66.7%	18.1%
	Middle	1	50.0%	\$14	33.3%	20.7%	1	50.0%	25.0%	\$14	33.3%	15.4%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	50.0%	\$0	0.0%	66.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$42	100.0%	100.0%	2	100.0%	100.0%	\$42	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	30.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	30.6%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Lemmon Mobridge 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar		%		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	33.3%	\$161	74.2%	30.6%	1	33.3%	20.0%	\$161	74.2%	23.1%
	Moderate	1	33.3%	\$13	6.0%	19.3%	1	33.3%	20.0%	\$13	6.0%	1.9%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	1	33.3%	\$43	19.8%	29.4%	1	33.3%	60.0%	\$43	19.8%	75.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$217	100.0%	100.0%	3	100.0%	100.0%	\$217	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	30.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	29.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	21.4%	\$421	14.3%	30.6%	6	21.4%	11.2%	\$421	14.3%	7.7%
	Moderate	5	17.9%	\$262	8.9%	19.3%	5	17.9%	18.9%	\$262	8.9%	13.9%
	Middle	6	21.4%	\$561	19.1%	20.7%	6	21.4%	14.0%	\$561	19.1%	15.7%
	Upper	10	35.7%	\$1,400	47.6%	29.4%	10	35.7%	39.9%	\$1,400	47.6%	42.8%
	Unknown	1	3.6%	\$300	10.2%	0.0%	1	3.6%	16.1%	\$300	10.2%	19.9%
	Total	28	100.0%	\$2,944	100.0%	100.0%	28	100.0%	100.0%	\$2,944	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

In 2017, the bank extended 8.2% of HMDA loans to low-income borrowers and 14.3% to moderate-income borrowers. According to 2017 FFIEC adjusted census data, 30.6% of families are low income and 19.3% are moderate income. In 2017, aggregate lenders extended 7.6% and 16.7% of all HMDA loans to low- and moderate-income borrowers, respectively. The bank's lending to low-income and moderate-income borrowers is comparable to aggregate lender performance and below demographics.

In 2018, the bank extended 21.4% of HMDA loans to low-income borrowers and 17.9% to moderate-income borrowers. According to 2018 FFIEC census data, 30.6% of families are low income and 19.3% are moderate income. In 2018, aggregate lenders extended 11.2% and 18.9% of all HMDA loans to low- and moderate-income borrowers, respectively. The bank's lending to low-income borrowers exceeds aggregate lenders and is below demographics. The bank's lending to moderate-income borrowers is comparable to aggregate lender performance and demographics. While the bank ranked first among aggregate lenders in 2017 and 2018, the bank's loans did not represent the majority of reported loans. The bank faces competition from another regional bank operating in the area, as well as online lenders.

Based on information from management and a community contact, the housing market has been stable and homes are generally affordable; however, there is low inventory in certain areas. Using the assumption that borrowers can obtain a loan for approximately three times their annual income, applicants with the highest income in the low-income bracket (\$33,299) could generally afford a \$99,897 home; this estimate is based on the 2018 FFIEC estimated median family income of \$65,300 for the Lemmon/Mobridge assessment area. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$53,279), a borrower could afford a \$159,837 home. According to the 2018 FFIEC adjusted census data, the median housing value in the assessment area is \$66,970. This data suggests that homeownership is generally affordable for many low- and moderate-income borrowers.

The bank makes use of flexible lending programs, including down payment and closing cost assistance programs, which help low- and moderate-income borrowers afford homeownership and make home improvements. In this assessment area, the bank used SDHDA, FHLB, and VA programs. The bank's use of these programs further demonstrates the bank's willingness to meet the credit needs of low- and moderate-income borrowers. For more information on these lending programs, refer to the Institution section of this evaluation.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the bank's small business and small farm loans by revenue and loan size for 2017 and 2018, as well as aggregate lending data.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: SD Lemmon Mobridge

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2018, 2017					2017						2018						
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count	Dollar				Bank	Agg	Dollar		Bank	Agg	Dollar						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	156	68.1%	\$8,594	38.5%	87.0%	78	64.5%	56.9%	\$4,107	36.9%	37.9%	78	72.2%	62.2%	\$4,487	40.0%	37.9%
		Over \$1 Million	61	26.6%	\$12,822	57.4%	8.1%	33	27.3%				28	25.9%					
		Total Rev. available	217	94.7%	\$21,416	95.9%	95.1%	111	91.8%				106	98.1%					
		Rev. Not Known	12	5.2%	\$908	4.1%	4.9%	10	8.3%				2	1.9%					
		Total	229	100.0%	\$22,324	100.0%		121	100.0%				108	100.0%					
	Loan Size	\$100,000 or Less	173	75.5%	\$5,686	25.5%		91	75.2%	88.5%	\$3,017	27.1%	41.2%	82	75.9%	88.1%	\$2,669	23.8%	35.4%
		\$100,001 - \$250,000	35	15.3%	\$6,388	28.6%		20	16.5%	8.0%	\$3,505	31.5%	27.6%	15	13.9%	6.7%	\$2,883	25.7%	21.2%
		\$250,001 - \$1 Million	21	9.2%	\$10,250	45.9%		10	8.3%	3.5%	\$4,598	41.3%	31.2%	11	10.2%	5.2%	\$5,652	50.4%	43.4%
		Total	229	100.0%	\$22,324	100.0%		121	100.0%	100.0%	\$11,120	100.0%	100.0%	108	100.0%	100.0%	\$11,204	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	135	86.5%	\$3,980	46.3%													
		\$100,001 - \$250,000	16	10.3%	\$2,740	31.9%													
		\$250,001 - \$1 Million	5	3.2%	\$1,874	21.8%													
		Total	156	100.0%	\$8,594	100.0%													
Small Farm	Revenue	\$1 Million or Less	801	91.3%	\$77,934	89.0%	Total Farms 98.5%	375	90.1%	78.1%	\$35,579	86.3%	83.2%	426	92.4%	80.1%	\$42,355	91.5%	86.9%
		Over \$1 Million	42	4.8%	\$7,767	8.9%	1.0%	23	5.5%				19	4.1%					
		Total Rev. available	843	96.1%	\$85,701	97.9%	99.5%	398	95.6%				445	96.5%					
		Not Known	34	3.9%	\$1,837	2.1%	0.5%	18	4.3%				16	3.5%					
		Total	877	100.0%	\$87,538	100.0%	100.0%	416	100.0%				461	100.0%					
	Loan Size	\$100,000 or Less	602	68.6%	\$22,974	26.2%		286	68.8%	71.4%	\$10,611	25.7%	25.5%	316	68.5%	73.0%	\$12,363	26.7%	28.7%
		\$100,001 - \$250,000	185	21.1%	\$31,637	36.1%		90	21.6%	19.2%	\$15,749	38.2%	36.8%	95	20.6%	17.4%	\$15,888	34.3%	32.8%
		\$250,001 - \$500,000	90	10.3%	\$32,927	37.6%		40	9.6%	9.3%	\$14,875	36.1%	37.7%	50	10.8%	9.6%	\$18,052	39.0%	38.5%
		Total	877	100.0%	\$87,538	100.0%		416	100.0%	100.0%	\$41,235	100.0%	100.0%	461	100.0%	100.0%	\$46,303	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	555	69.3%	\$21,306	27.3%													
		\$100,001 - \$250,000	170	21.2%	\$28,827	37.0%													
		\$250,001 - \$500,000	76	9.5%	\$27,801	35.7%													
		Total	801	100.0%	\$77,934	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2018 FFIEC Census Data and 2018 D&B Information

In 2017, the bank originated 64.5% of its small business loans to small businesses. According to 2017 D&B data, 84.4% of businesses had gross annual revenues of \$1 million or less. Aggregate lenders originated 56.9% of their small business loans to small businesses in 2017. In 2018, the bank originated 72.2% of its small business loans to small businesses. According to 2018 D&B data, 87.0% of businesses had gross annual revenues of \$1 million or less. Aggregate lenders originated 62.2% of their small business loans to small businesses in 2018.

While the bank's small business lending was below demographics, it exceeded aggregate lending for both years. Although the bank ranks first among aggregate lenders reporting small business loans in the assessment area, the bank did not originate the majority of the loans reported. The bank reported 38.7% and 40.0% of the small business loans in this assessment area for 2017 and 2018, respectively. In this assessment area, the bank faces competition from other financial institutions, including two large regional banks that operate in Lemmon or Mobridge. Lastly, of the bank's loans to small businesses, 87.2% in 2017 and 85.9% in 2018 were for amounts of \$100,000 or less, which shows a willingness to meet the credit needs of small businesses.

Small Farm. The distribution of small farm loans among farms of different sizes is excellent. The bank originated 90.1% of its small farm loans to small farms in 2017. According to 2017 D&B data, 99.0% of farms had gross annual revenues of \$1 million or less. Aggregate lenders originated 78.1% of their small

farm loans to small farms in 2017. While the bank's small farm lending was below demographics, it greatly exceeded aggregate lending in 2017. The bank ranks first among aggregate lenders reporting small farm loans in the assessment area. The bank reported 58.0% and 58.4% of the small farm loans in this assessment area for 2017 and 2018, respectively.

In 2018, the bank originated 92.4% of its small farm loans to small farms. According to 2018 D&B data, 98.5% of farms had gross annual revenues of \$1 million or less. Aggregate lenders originated 80.1% of their small farm loans to small farms in 2018. Similar to 2017, the bank's small farm lending is below demographics but greatly exceeds aggregate lending in 2018. However, since the bank's lending represents the majority of the aggregate lending activity, the comparison of the bank's lending to aggregate lending data as shown in the table is not meaningful. The following analysis of aggregate small farm lending data that excludes the bank's data shows that the bank's performance greatly exceeds other small farm lenders for both years. In 2017, other small farm lenders made 61.5% of loans to small farms. In 2018, other small farm lenders made 62.8% of loans to small farms. Bank management indicated that in this assessment area the bank faces strong competition for small farm loans from Farm Credit Services of America. Of the bank's loans to small farms, 75.2% in 2017 and 68.8% in 2018 were for amounts of \$100,000 or less, which indicates a willingness to serve the credit needs of smaller farms.

In addition, the bank makes use of flexible lending programs, which further demonstrates the bank's willingness to meet the needs of small farms in the area. Specifically, the bank originates loans using FSA and FarmerMac programs, which provide additional financing flexibility for small farms.

Geographic Distribution

The geographic distribution of HMDA, small business, and small farm loans in the Lemmon/Mobridge assessment area is good, and there are no unexplained gaps in lending. In 2017 and 2018, the assessment area had four moderate-income and five middle-income tracts. The assessment area does not include any low-income tracts.

The bank did not originate HMDA, small business, or small farm loans in moderate-income tract 9415.00 in Dewey County. This tract includes a portion of Eagle Butte and North Eagle Butte and has offices of other financial institutions. From this tract, the distance to the nearest Dacotah Bank office in Mobridge is more than 50 miles. Given these factors, the bank's lack of loans in this tract is reasonable.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. The following tables show the bank's HMDA data by census tract income level and product type for 2017 and 2018. The tables also include the same information for aggregate lenders. At the loan product level, examiners did not evaluate the bank's multifamily loans because the bank did not originate this loan type during the evaluation period.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Lemmon Mobridge 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	%		
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	4.5%	10.9%	\$53	2.0%	6.1%	27.7%
	Middle	21	95.5%	89.1%	\$2,540	98.0%	93.9%	72.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	22	100.0%	100.0%	\$2,593	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	3	20.0%	16.3%	\$1,131	20.2%	16.2%	27.7%
	Middle	12	80.0%	83.7%	\$4,470	79.8%	83.8%	72.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	15	100.0%	100.0%	\$5,601	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	8.3%	21.1%	\$3	1.0%	4.7%	27.7%
	Middle	11	91.7%	78.9%	\$286	99.0%	95.3%	72.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	12	100.0%	100.0%	\$289	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	Multifamily 0.0%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	30.4%
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	69.6%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	0	0.0%	0.0%	\$0	0.0%	0.0%	100.0%
HMDA Totals	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	5	10.2%	14.4%	\$1,187	14.0%	11.6%	27.7%
	Middle	44	89.8%	85.6%	\$7,296	86.0%	88.4%	72.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Total	49	100.0%	100.0%	\$8,483	100.0%	100.0%	100.0%
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans – Table 1 of 2

Assessment Area: SD Lemmon Mobridge 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$ (000s)		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	7.7%	\$52	3.6%	27.7%	1	7.7%	10.0%	\$52	3.6%	7.8%
	Middle	12	92.3%	\$1,407	96.4%	72.3%	12	92.3%	90.0%	\$1,407	96.4%	92.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$1,459	100.0%	100.0%	13	100.0%	100.0%	\$1,459	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	10.0%	\$58	4.7%	27.7%	1	10.0%	10.9%	\$58	4.7%	12.4%
	Middle	9	90.0%	\$1,168	95.3%	72.3%	9	90.0%	89.1%	\$1,168	95.3%	87.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$1,226	100.0%	100.0%	10	100.0%	100.0%	\$1,226	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$14	33.3%	27.7%	1	50.0%	12.5%	\$14	33.3%	5.5%
	Middle	1	50.0%	\$28	66.7%	72.3%	1	50.0%	87.5%	\$28	66.7%	94.5%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$42	100.0%	100.0%	2	100.0%	100.0%	\$42	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	69.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	72.3%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Lemmon Mobridge 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						%	#
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$217	100.0%	72.3%	3	100.0%	100.0%	\$217	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$217	100.0%	100.0%	3	100.0%	100.0%	\$217	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	72.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	10.7%	\$124	4.2%	27.7%	3	10.7%	11.9%	\$124	4.2%	9.4%
	Middle	25	89.3%	\$2,820	95.8%	72.3%	25	89.3%	88.1%	\$2,820	95.8%	90.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$2,944	100.0%	100.0%	28	100.0%	100.0%	\$2,944	100.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

In 2017, the bank originated 10.2% of its HMDA loans in the moderate-income tracts. According to 2017 FFIEC adjusted census data, 38.7% of families and 21.7% of owner-occupied housing units are located in the moderate-income tracts. Aggregate lenders originated 14.4% of their HMDA loans to borrowers residing in the moderate-income tracts. The bank's lending is below the demographic characteristics of the moderate-income tracts as well as below aggregate lender performance.

In 2018, the bank originated 10.7% of its loans in the moderate-income tracts. According to 2018 FFIEC adjusted census data, 38.7% of families and 27.7% of owner-occupied housing units are located in the moderate-income tracts. Aggregate lenders originated 11.9% of their HMDA loans to borrowers residing in the moderate-income tracts. The bank's lending performance is consistent with aggregate lender performance and below the demographic characteristics of the moderate-income tracts. For 2017 and 2018 combined, the bank did not originate HMDA loans in the moderate-income tract in Dewey County, as previously explained; however, the bank made loans in all other tracts. As noted earlier, the bank also faces competition from another regional bank operating in the area, as well as online lenders. The bank's lending is reasonable given this performance context.

Small Business. The geographic distribution of small business loans is good. The following table shows the geographic distribution of the bank's small business and small farm loans for 2017 and 2018, as well as aggregate lender data for both years.

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: SD Lemmon Mobridge

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2018, 2017					2017					2018				
		Count		Dollar		Total	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	Businesses %	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	16	7.0%	\$1,038	4.6%	15.6%	5	4.1%	\$297	2.7%	6.4%	11	10.2%	\$741	6.6%	7.0%
	Middle	213	93.0%	\$21,286	95.4%	84.4%	116	95.9%	\$10,823	97.3%	91.5%	97	89.8%	\$10,463	93.4%	91.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	2.1%	0	0.0%	\$0	0.0%	1.8%
	Total	229	100.0%	\$22,324	100.0%	100.0%	121	100.0%	\$11,120	100.0%	100.0%	108	100.0%	\$11,204	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	276	31.5%	\$27,696	31.6%	18.6%	138	33.2%	\$14,583	35.4%	33.7%	138	29.9%	\$13,113	28.3%	30.7%
	Middle	601	68.5%	\$59,842	68.4%	81.4%	278	66.8%	\$26,652	64.6%	66.2%	323	70.1%	\$33,190	71.7%	69.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.3%
	Total	877	100.0%	\$87,538	100.0%	100.0%	416	100.0%	\$41,235	100.0%	100.0%	461	100.0%	\$46,303	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

In 2017, the bank originated 4.1% of its small business loans to entities located in the moderate-income tracts, which is below demographics as well as aggregate lender performance. According to 2017 D&B data, 13.8% of the small businesses in the assessment area are located in the moderate-income tracts. Aggregate lenders originated 9.3% of their small business loans to entities located in the moderate-income tracts.

In 2018, the bank originated 10.2% of its small business loans to entities located in the moderate-income tracts, which is below demographics. According to 2018 D&B data, 15.6% of the small businesses in the assessment area are located in the moderate-income tracts. The bank's lending is consistent with aggregate lenders; those lenders originated 9.3% of their small business loans to entities located in the moderate-income tracts. The bank did not originate small business loans in the moderate-income tract in Dewey County, as previously explained. The bank also did not originate small business loans in moderate-income tract 9411.00 in Corson County. According to D&B data, only 24 small businesses are located in that tract in 2017, compared to 27 small businesses in 2018. Bank management noted little commercial activity in that tract, with the exception of some tribal-owned businesses, which often seek out tribal resources first. In addition, businesses may utilize other banks that operate in the area, such as another regional bank with two offices in Corson County or banks in neighboring counties.

Small Farm. The geographic distribution of small farm loans is good. In 2017, the bank originated 33.2% of its small farm loans to farms located in the moderate-income tracts, which exceeds demographics. According to 2017 D&B data, 17.4% of the small farms in the assessment area are located in the moderate-income tracts. The bank's lending is consistent with aggregate lenders, which originated 32.2% of their small farm loans to farms located in the moderate-income tracts.

In 2018, the bank originated 29.9% of its small farm loans to farms located in the moderate-income tracts, which is above demographics. According to 2018 D&B data, 18.6% of the small farms in the assessment area are located in the moderate-income tracts. The bank's lending is consistent with aggregate lenders, which originated 30.8% of their small farm loans to farms located in the moderate-income tracts. However, since the bank's lending represents the majority of the aggregate lending activity, the comparison of the bank's lending to aggregate lending data as shown in the table is not meaningful. The following analysis of aggregate small farm lending data that excludes the bank's data shows that the bank's performance is consistent with other small farm lenders for both years. In 2017, other small farm lenders made 30.9% of small farm loans in the moderate-income tracts. In 2018, other small farm lenders made 28.2% of small farm loans in the moderate-income tracts. The bank did not originate small farm loans in the moderate-income tract in Dewey County, as previously explained; however, the bank made loans in all other tracts. As noted above, in addition to Dacotah Bank, other banks operate in the assessment area. Bank management indicated that the bank faces strong competition from Farm Credit Services of America, as previously mentioned.

Community Development Lending

The bank made a relatively high level of community development loans in the Lemmon/Mobridge assessment area. During the evaluation period, the bank made four community development loans totaling \$227,519 with the purpose of revitalizing or stabilizing distressed and/or underserved middle-income census tracts. The loans funded essential infrastructure, public safety, as well economic development initiatives, which are responsive to assessment area needs. Community development lending opportunities are limited in the Lemmon/Mobridge assessment area.

INVESTMENT TEST

The bank made an excellent level of qualified investments and demonstrated excellent responsiveness to needs in the Lemmon/Mobridge assessment area. During the evaluation period, the bank made 12 new qualified investments in the form of bonds totaling \$6.8 million. The bonds helped revitalize or stabilize distressed and/or underserved middle-income tracts in the assessment area. Ten of the bonds supported improvements to or construction of public school buildings. The remaining bonds funded the construction of a municipal swimming pool. The bank also continues to hold seven prior-period investments totaling \$2.4 million that support affordable housing and revitalization or stabilization of distressed and/or underserved middle-income tracts in the assessment area.

The bank made an excellent level of qualified investments in the form of donations in the assessment area. The bank donated approximately \$157,617 during the evaluation period, primarily to organizations that help revitalize or stabilize distressed and/or underserved tracts. In addition, the bank made donations to organizations that provide community services to low- and moderate-income individuals, support economic development, and revitalize or stabilize moderate-income tracts. Of particular note, the bank made sizable contributions to two organizations with a significant impact in the assessment area: one focuses on health care, and the other focuses on retaining and attracting residents by hosting community events.

Qualified Investment Donations in the Lemmon/Mobridge Assessment Area		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Community Service	6	\$1,500
Economic Development	2	\$1,000
Revitalize or Stabilize Distressed, Underserved and Moderate Tracts	41	\$155,117
Total	49	\$157,617

SERVICE TEST

The bank's delivery systems are accessible to residents, businesses, and farms throughout the assessment area. The bank did not close or open any offices or ATMs in the assessment area since the previous evaluation. The bank's services do not vary in a way that inconveniences particular individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the assessment area are accessible to the bank's geographies and to individuals of different income levels. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank operates three branches in the assessment area, located in Bison, Lemmon, and Mobridge. The branch offices are located in middle-income tracts. Two of the bank's branches are less than 10 miles from moderate-income tracts, which comprise 44.4% of the assessment area. As previously mentioned, the assessment area is generally rural. Other financial institutions also operate in various towns throughout the assessment area. The bank did not open or close any branches in this assessment area during the evaluation period. The three branches provide drive-up facilities, and two of them have weekend hours. Finally, the bank operates deposit-taking ATMs at the Lemmon and Mobridge branches and a cash-dispensing-only ATM at the Bison branch.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank also offers person-to-person payments through its online and mobile banking platforms, as well as bill payment through the use of its debit cards. The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of the bank's branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS
Assessment Area: Assessment Area(s): SD Lemmon Mobridge

Tract Category	Branches							ATMs									Demographics					
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts	House holds	Total Businesses	
			Open	Closed							Open	Closed			Open	Closed						
	#	%	#	#	#	#	#	#	%	#	%	#	#	#	%	#	#	#	%	%	%	
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	44.4%	34.4%	16.4%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Middle	3	100.0%	0	0	3	0	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	5	55.6%	65.6%	83.6%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Total	3	100.0%	0	0	3	0	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	9	100.0%	100.0%	100.0%
DTC	0		0	0				SA	0		0		0	0	0		0	0				

2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTC - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provided a relatively high level of community development services in the Lemmon/Mobridge assessment area. During the evaluation period, five bank employees provided 21 community development services for nine organizations. The bank provided community development services to organizations that promote economic development activities, provide community services, and provide revitalization or stabilization of distressed and/or underserved areas. For most services, bank employees served in leadership roles for the organizations.

Community Development Services in the Lemmon/Mobridge Assessment Area	
Purpose	#
Affordable Housing	3
Economic Development	7
Revitalize or Stabilize Distressed and/or Underserved Tracts	11
Total	21

METROPOLITAN AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RAPID CITY, SOUTH DAKOTA MSA 39660, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Rapid City, SD MSA, assessment area. They determined that the bank's lending and investment performance in this assessment area is consistent with the performance in the state. The bank's service performance in this assessment area is generally below the performance in the state, based on a lower level of community development services. However, this performance does not change the conclusion for the state. Examiners did not evaluate the bank's small farm lending, because it is not a major business line for this assessment area.

The bank's Rapid City assessment area consists of Custer County and a portion of Pennington County. The counties compose a portion of the Rapid City, SD MSA. The bank has not changed the assessment area since the previous evaluation, however, the income classification of one census tract changed based on 2017 FFIEC adjusted census data (an upper-income tract was reclassified as a middle-income tract). According to 2018 FFIEC adjusted census data, the population of the assessment area is 120,409.¹⁶

The bank operates two full-service branches in the assessment area, one in Rapid City and one in Custer, as well as a stand-alone drive-up facility in Rapid City. Each office has a drive-up facility and all three locations have deposit-taking ATMs. All offices offer Saturday and extended weekday hours.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Rapid City Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	1	4.3%	0.8%	19.9%
Moderate Income	6	26.1%	23.8%	19.0%
Middle Income	12	52.2%	54.3%	21.7%
Upper Income	4	17.4%	21.1%	39.4%
Total	23	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.¹⁷

¹⁶The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data; it also reflects the 2017 OMB revised MSA delineations.

¹⁷For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

Lending Activity in the Rapid City Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	122	116	238
Small Farm	2	3	5
HMDA	51	59	110
Total	175	178	353

By number of loans, the Rapid City assessment area accounts for 4.5% of the bank's total lending during the evaluation period and 6.2% of the bank's lending activity in the South Dakota assessment areas. In 2018, the bank ranked 18th among 129 financial institutions reporting HMDA loans in the assessment area. It extended 1.7% of all HMDA loans reported by aggregate lenders in the assessment area. The bank ranked seventh among 64 institutions reporting small business loans in the assessment area. It extended 5.6% of small business loans reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SIOUX FALLS, SOUTH DAKOTA MSA 43620

Examiners conducted a limited-scope review of the bank's CRA performance in the Sioux Falls, SD MSA, assessment area. They determined that the bank's investment performance in this assessment area is consistent with the performance in the state. The bank's lending performance is generally below the performance of the state primarily due to the lack of community development loans. In addition, the bank's service performance in this assessment area is generally below the performance in the state based on a lower level of community development services. However, this performance does not change the conclusion for the state.

The bank's assessment area consists of Minnehaha County and a portion of Lincoln County. The counties make up a portion of the Sioux Falls, SD MSA. The bank has not changed the assessment area since the previous evaluation; however, the income classification of seven census tracts changed based on 2017 FFIEC adjusted census data. Previously, the assessment area consisted of 14 moderate-, 24 middle-, and 12 upper-income tracts. Now the assessment area consists of 17 moderate-, 21 middle-, and 12 upper-income tracts. According to 2018 FFIEC adjusted census data, the population of the bank's assessment area is 217,252.

The bank operates four full-service branches with drive-ups in Sioux Falls. All branches offer extended weekday hours and three of them offer Saturday hours. All offices have deposit-taking ATMs. Two offices are located in moderate-income tracts and two are in upper-income tracts.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Sioux Falls, SD MSA, Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	19.1%
Moderate Income	17	34.0%	31.0%	17.8%
Middle Income	21	42.0%	44.9%	24.2%
Upper Income	12	24.0%	24.1%	39.0%
Total	50	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Sioux Falls, SD MSA, Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	150	129	279
Small Farm	30	28	58
HMDA	31	41	72
Total	211	198	409

By number of loans, the Sioux Falls, SD MSA, assessment area accounts for 5.2% of the bank's total lending during the evaluation period and 7.2% of the bank's lending activity in the South Dakota assessment areas. In 2018, the bank ranked 31st among 172 financial institutions reporting HMDA loans in the assessment area. It extended 0.4% of all HMDA loans reported by aggregate lenders in the assessment area. In 2018, the bank ranked 10th among 65 financial institutions reporting small business and farm loans in the assessment area. It extended 2.9% of small business and small farm loans reported by aggregate lenders in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF SOUTH DAKOTA

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section of the report shows the bank's community development lending and qualified investments in the form of securities for each assessment area. The South Dakota state section of the report shows qualified investments in the form of donations, and community development services, for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the state rating, are shown in the table below.

Performance in the Limited-Scope Review Metropolitan South Dakota Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Rapid City, SD Partial MSA	Consistent	Consistent	Is Below ¹⁸
Sioux Falls, SD Partial MSA	Is Below	Consistent	Is Below

¹⁸ Note that an "Is Below" performance does not equate to poor performance. It is a measurement against the performance in the full-scope assessment areas and state.

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ABERDEEN, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Aberdeen, SD, assessment area. They determined that the bank's lending, investment, and service performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area.

This assessment area consists of Brown County and a portion of Edmunds County. The assessment area is contiguous with the bank's Faulkton and Watertown/Clark/Webster assessment areas. The bank has not changed the assessment area since the previous evaluation; however, the income classification of six census tracts changed based on 2017 FFIEC adjusted census data. Previously, the assessment area consisted of only middle-income tracts. Now, the assessment area consists of one moderate-income tract as well as three middle-income and five upper-income tracts. According to 2018 FFIEC adjusted census data, the population of the assessment area is 40,319.

The bank operates its main office, one full-service branch with a drive-up, as well as a stand-alone drive-up location in Aberdeen. The branch and stand-alone drive-up facility have deposit-taking ATMs and offer extended weekday and Saturday hours. Finally, the main office and stand-alone drive-up are located in a moderate-income tract.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Aberdeen Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	14.4%
Moderate Income	1	11.1%	6.8%	15.2%
Middle Income	3	33.3%	36.3%	22.8%
Upper Income	5	55.6%	56.8%	47.6%
Total	9	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Aberdeen Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	126	143	269
Small Farm	175	173	348
HMDA	93	78	171
Total	394	394	788

By number of loans, this assessment area accounts for 10.1% of the bank's total lending during the evaluation period and 13.8% of the bank's lending activity in the South Dakota assessment areas. In 2018,

the bank ranked fifth among 76 financial institutions reporting HMDA loans in the assessment area. It extended 8.0% of all HMDA loans reported by aggregate lenders in the assessment area. In 2018, the bank ranked first among 44 institutions reporting small business and small farm loans in the assessment area. The bank extended 27.0% of the small business and small farm loans reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BROOKINGS, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Brookings, SD, assessment area. They determined that the bank's lending and investment performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment areas. The bank's service performance in this assessment area is generally below the performance in the full-scope nonmetropolitan assessment areas based on a lower level of community development services.

This assessment area consists of Brookings, Deuel, and Moody counties in eastern South Dakota, bordering Minnesota. This assessment area is adjacent to the bank's Watertown/Clark/Webster and Sioux Falls MSA assessment areas. The bank did not change the assessment area since the previous evaluation; however, the income classification of six census tracts changed based on 2017 FFIEC adjusted census data. Previously, the assessment area consisted of seven middle- and three upper-income tracts. Now, the assessment area includes one moderate-, seven middle-, and two upper-income tracts. The four middle-income tracts that make up Moody and Deuel counties (two in each) were classified as underserved in 2017 and 2018. According to 2018 FFIEC adjusted census data, the population of the assessment area is 43,826.

The bank operates one full-service branch in this assessment area in a middle-income tract. The branch has a drive-up facility and deposit-taking ATM, as well as extended weekday and Saturday hours.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Brookings Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	17.1%
Moderate Income	1	10.0%	12.8%	16.3%
Middle Income	7	70.0%	66.9%	23.1%
Upper Income	2	20.0%	20.3%	43.5%
Total	10	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Brookings Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	57	54	111
HMDA	37	32	69
Small Farm	46	33	79
Total	140	119	259

By number of loans, this assessment area accounts for 3.3% of the bank's total lending during the evaluation period and 4.5% of the bank's lending activity in the South Dakota assessment areas. In 2018, the bank ranked fourth among 42 institutions reporting small business and small farm loans in the assessment area. It extended 5.5% of small business and small farm loans reported by aggregate lenders in that year. The bank ranked sixth among 86 lenders reporting HMDA loans in the assessment area, with a market share of 3.7%.

The bank's community development lending in the Brookings assessment area is noteworthy. Specifically, the bank originated 15 loans totaling \$1.8 million that supported affordable housing.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAULKTON, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Faulkton, SD, assessment area. They determined that the bank's lending performance in this assessment area exceeds the performance in the full-scope nonmetropolitan assessment areas because of the level of community development lending. The bank's investment performance in this assessment area is consistent with the full-scope nonmetropolitan assessment areas. The bank's service performance is generally below the performance of the full-scope assessment areas due to a lower level of community development services and accessible retail services. However, this performance does not change the conclusion for the nonmetropolitan portion of the state. Examiners did not evaluate the bank's HMDA lending because it is not a major business line for this assessment area.

This assessment area consists of Faulk County and is adjacent to the bank's Aberdeen assessment area. The assessment area consists of one middle-income census tract, which was classified as distressed and underserved in 2017 and 2018. The bank operates one full-service branch in the assessment area. The branch has Saturday hours, as well as a drive-up facility and a deposit-taking ATM. Effective December 15, 2017, the bank closed its Cresbard office. According to 2018 FFIEC adjusted census data, the population of the assessment area is 2,359.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Faulkton Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	16.0%
Moderate Income	0	0.0%	0.0%	18.1%
Middle Income	1	100.0%	100.0%	18.7%
Upper Income	0	0.0%	0.0%	47.2%
Total	1	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Faulkton Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	29	26	55
Small Farm	96	121	217
HMDA	10	7	17
Total	135	154	289

By number of loans, this assessment area accounts for 3.7% of the bank's total lending during the evaluation period and 5.1% of the bank's lending activity in the South Dakota assessment areas. In 2018, the bank ranked first among the 19 institutions reporting small business and small farm loans in the assessment area. The bank extended 62.6% of the small business and small farm loans reported by aggregate lenders in the assessment area.

The bank's community development lending and qualified investments in the assessment area are noteworthy. Specifically, the bank originated three loans totaling \$2.3 million and acquired 13 new securities totaling \$7.1 million that help revitalize or stabilize distressed and underserved middle-income census tracts in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SISSETON, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Sisseton, SD, assessment area. They determined that the bank's lending and investment performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment areas. The bank's service performance is generally below the performance of the full-scope assessment areas due to a lower level of community development services and accessible retail services. This performance does not change the conclusion for the nonmetropolitan portion of the state. Examiners did not evaluate the bank's HMDA lending because it is not a major business line for this assessment area.

The assessment area consists of Roberts County, along the eastern South Dakota border. Roberts County includes four middle-income census tracts, which were classified as distressed and underserved for 2017 and underserved for 2018. This assessment area is adjacent to the bank's Watertown/Clark/Webster assessment area and the Morris, MN, assessment area. A large portion of the Lake Traverse Indian Reservation is located in this assessment area. The bank did not change this assessment area since the previous evaluation; however, the income classification of one census tract changed based on 2017 FFIEC adjusted census data (a moderate-income tract was reclassified as a middle-income tract). According to 2018 FFIEC adjusted census data, the population of the assessment area is 10,318.

The bank operates two branches in this assessment area; a full-service branch in Sisseton, and a limited-service branch in New Effington. The Sisseton branch has a deposit-taking ATM and a drive-up, and offers Saturday hours.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Sisseton Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	23.9%
Moderate Income	0	0.0%	0.0%	18.0%
Middle Income	4	100.0%	100.0%	21.6%
Upper Income	0	0.0%	0.0%	36.4%
Total	4	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Sisseton Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
Small Business	60	45	105
Small Farm	191	173	364
HMDA	12	14	26
Total	263	232	495

By number of loans, this assessment area accounts for 6.3% of the bank's total lending during the evaluation period and 8.7% of the bank's lending activity in the South Dakota assessment areas. In 2018, the bank ranked first among the 28 financial institutions reporting small business and small farm loans in the assessment area. It extended 48.8% of small business and small farm loans reported by aggregate lenders in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF SOUTH DAKOTA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section of the report shows the bank's community development lending and qualified investments in the form of securities for each assessment area. The South Dakota state section of the report shows qualified investments in the form of donations, and community development services, for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan South Dakota Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Aberdeen	Consistent	Consistent	Consistent
Brookings	Consistent	Consistent	Is Below
Faulkton	Exceeds	Consistent	Is Below
Sisseton	Consistent	Consistent	Is Below

NORTH DAKOTA

CRA RATING FOR North Dakota: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the North Dakota assessment areas shows excellent responsiveness to local credit needs.
- Overall, lending to farms and businesses of different sizes and to low- and moderate-income borrowers is excellent.
- The overall distribution of the bank's small farm, small business, and HMDA loans throughout the assessment areas is excellent.
- Overall, the bank made a relatively high level of community development loans in its North Dakota assessment areas.
- The bank makes use of flexible loan programs in its North Dakota assessment areas.
- The bank made an excellent level of donations and holds an adequate level of qualified investments in the form of securities. The qualified investment securities and donations show excellent responsiveness to credit and community development needs.
- Bank retail services are readily accessible to residents, businesses, and farms throughout the assessment areas. The bank also provides an adequate level of community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for North Dakota is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Valley City and Rolla, North Dakota, assessment areas. Examiners weighted the Valley City assessment area more than the Rolla assessment area, based on the loan volume during 2017 and 2018.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Bowbells, Dickinson, Hettinger, Jamestown, and Minot assessment areas in North Dakota. Examiners evaluated whether the bank's performance in the limited-scope assessment areas was consistent with its performance in the full-scope assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH DAKOTA

Assessment Area Information. During the evaluation period, the bank had seven assessment areas in North Dakota. None of the North Dakota assessment areas are MSAs. However, the Hettinger assessment area includes two MSA census tracts. The bank has not added or modified any assessment areas since the previous evaluation.

According to the FDIC June 30, 2018, Deposit Market Share Report, the bank ranked 16th out of 85 FDIC-insured institutions in North Dakota, with 1.9% of the state's deposits. One large regional bank

held 10.8% of the state's deposits, and the four other institutions in the top five held between 5.8% and 7.7% of the state's deposits. Approximately 24.4% of the bank's deposit portfolio was located in North Dakota.

Based on 2018 FFIEC adjusted census data, the North Dakota assessment areas include a total of 43 census tracts: two low-, five moderate-, 27 middle-, and nine upper-income census tracts.¹⁹ For 2018, three of the nonmetropolitan middle-income census tracts are classified as underserved and four are classified as distressed and underserved. The income classification of some census tracts changed since the previous evaluation, based on 2017 FFIEC adjusted census data; details are found in individual assessment area discussions.

Some of the North Dakota assessment areas include small to large portions of American Indian reservations. A large portion of the Turtle Mountain Indian Reservation is located in the Rolla assessment area while a very small portion is in the Bowbells assessment area. A portion of the Standing Rock Indian Reservation lies in the Hettinger assessment area. A very small portion of the Fort Berthold Indian Reservation is in the southwestern corner of the Minot assessment area.

Population. According to 2018 FFIEC adjusted census data, the total population of the assessment areas in North Dakota is 159,241 and the population of North Dakota is 721,640. The bank's North Dakota assessment areas include 22.1% of the state population.

General Economic and Housing Information. Bank management and community contacts stated economic conditions are good overall. Agriculture is the predominant industry, with wheat, soybeans, and corn as the primary crops. However, weather conditions and low commodity prices have been detrimental to farm operations. In addition, the downturn in agricultural conditions in the past few years has affected farming-related business. Ranching also contributes to the economy, but the number of cattle per herd has diminished over time. This change is attributed to cattle-raising operations growing more in western North Dakota than in the eastern portion of the state. However, the cattle processing centers are in the eastern portion of the state. Petroleum is the most valuable mining product in the western area of North Dakota known as the Bakken Formation. Private health centers are located throughout North Dakota as well as other service entities, such as retail and wholesale. While the unemployment rate is low for the state (2.6% in 2018), it tends to be high and persistent on American Indian reservations.

The housing market varies by assessment area. According to 2018 census estimates, the median housing value in the bank's North Dakota assessment areas was \$155,391, with the highest being in the Dickinson assessment area. The need for affordable housing persists in many areas of North Dakota given the building expense and lack of contractors or developers. The reservations lack sufficient housing stock; housing that is available tends to be in poor condition.

North Dakota has numerous financial institutions, including some large national and many regional banks, as well as credit unions. Accordingly, competition for deposits, loans, and community development activities is stronger in various assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH DAKOTA

Examiners based the bank's North Dakota performance on full-scope reviews of the Valley City and Rolla assessment areas and limited-scope reviews of the remaining North Dakota assessment areas. A detailed discussion of the bank's performance in the full-scope assessment areas and a shorter discussion

¹⁹ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

of the limited-scope assessment areas follow this section. For the limited-scope assessment areas, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for North Dakota is outstanding based on the bank's performance under the Lending, Investment, and Service Tests.

The Lending Test rating is outstanding. The bank's lending activity reflects excellent responsiveness to credit needs throughout the North Dakota assessment areas. The bank's distribution of small farm, small business, and HMDA loans by revenue size and income of borrowers is excellent. The geographic distribution of loans reflects excellent dispersion throughout all assessment areas. In addition, the bank made a good level of community development loans. Finally, the bank makes use of flexible loan programs in several of its assessment areas.

The Investment Test rating is outstanding. The bank holds an adequate level of qualified investments by number and dollar amount, but it made an excellent level of donations in its assessment areas. Both show excellent responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. Delivery systems are readily accessible to all portions of the North Dakota assessment areas. The bank has made some changes to branch and ATM locations during the evaluation period; however, these changes did not adversely affect the availability of retail services. The bank provides an adequate level of community development services. Bank officers and employees support organizations dedicated to community development initiatives.

LENDING TEST

The Lending Test rating for North Dakota is outstanding.

Lending Activity

The bank's lending levels reflect excellent responsiveness to its North Dakota assessment area credit needs. The table below shows the bank's lending in its North Dakota assessment areas by product type for the evaluation period.

**Statewide Summary of Lending Activity
Assessment Areas Located in
State of ND 2017**

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	40	4.2%	\$6,381	5.4%
HMDA Refinance	43	4.5%	\$11,491	9.8%
HMDA Home Improvement	18	1.9%	\$602	0.5%
HMDA Multifamily	7	0.7%	\$6,829	5.8%
Total HMDA	108	11.3%	\$25,303	21.6%
Total Small Business	290	30.3%	\$30,172	25.8%
Total Farm	558	58.4%	\$61,687	52.7%
TOTAL LOANS	956	100.0%	\$117,162	100.0%

Originations and Purchases

**Statewide Summary of Lending Activity
Assessment Areas Located in
State of ND 2018**

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	35	3.8%	\$6,576	5.7%
HMDA Refinance	37	4.0%	\$3,787	3.3%
HMDA Home Improvement	1	0.1%	\$30	0.0%
HMDA Multifamily	7	0.8%	\$15,850	13.7%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	2	0.2%	\$93	0.1%
Loan Purpose Not Applicable	0	0.0%	\$0	0.0%
Total HMDA	82	8.9%	\$26,336	22.7%
Total Small Business	295	32.1%	\$28,283	24.4%
Total Farm	543	59.0%	\$61,423	52.9%
TOTAL LOANS	920	100.0%	\$116,042	100.0%

Originations and Purchases

The North Dakota assessment areas contain 23.9% of the bank's lending activity. Lending levels remained relatively stable throughout the evaluation period for HMDA, small business, and small farm loans, with slight fluctuations within some HMDA loan products.

In the areas served by the bank, it was typically among the leading lenders for HMDA, small business, and small farm loans during the evaluation period. The bank was typically among the top 10 lenders; however, there were variances based on loan category for a few assessment areas. For all assessment areas, the bank was among the top 10 lenders for small business and small farm loans. The bank was not a leading HMDA lender in the Dickinson, Jamestown, or Minot assessment areas. However, this is reasonable given competition and the bank's limited market share in these areas.

The bank uses flexible and innovative lending programs in the North Dakota assessment areas. Refer to the Innovative or Flexible Lending Practices in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to small businesses, small farms, and low- and moderate-income borrowers throughout the assessment areas. In addition, the geographic distribution and dispersion of loans is excellent. The bank extends loans in almost all census tracts, including the low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Valley City and Rolla assessment areas. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope assessment areas.

Community Development Loans

The bank made a relatively high level of community development loans in the North Dakota assessment areas. The table to the right provides the number and dollar amounts of loans made, categorized by loan purpose. The bank's community development lending tended to be concentrated in certain assessment areas. By number and dollar amounts, respectively, the bank's concentrations were as follows: 9.1% and 10.2% in the Valley City assessment area,

North Dakota Community Development Loans		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Community Services	3	\$480,187
Revitalize or Stabilize	1	\$300,000
Revitalize or Stabilize Distressed and/or Underserved Areas	7	\$2,151,704
Total	11	\$2,931,891

63.6% and 54.0% in the Rolla assessment area, and 18.2% and 25.6% in the Bowbells assessment. The bank also originated a community development loan that served a larger regional area. The bank did not originate any community development loans in the other four North Dakota assessment areas, which is reasonable given the limited opportunities. These assessment areas have few low- or moderate-income tracts, and no distressed or underserved middle-income tracts in which revitalization and stabilization opportunities would apply. As shown in the table, the majority of loans supported necessary revitalization and stabilization efforts in the appropriate assessment areas. The community lending activity was very responsive to the needs of the assessment areas.

INVESTMENT TEST

The bank's Investment Test rating is outstanding for North Dakota. The bank has an adequate level of qualified investments in the form of securities and an excellent level of donations that show excellent responsiveness to credit and community development needs.

During the evaluation period, the bank held 17 qualified investments, totaling approximately \$4.7 million, which benefited the North Dakota assessment areas or a broader regional or statewide area that includes the assessment areas. These investments include three new purchases totaling \$895,203 and \$3,791,928 in prior-period investments. By number, 47.1% of the investments benefited regional and statewide areas; by dollar amount, 45.4% benefited the Hettinger assessment area. These investments support affordable housing initiatives as well as revitalization and stabilization efforts. Investments are responsive to the needs of the areas.

Because the bank's investment activities address community development needs in its North Dakota assessment areas, examiners also considered the qualified investments that are outside its North Dakota assessment areas. The bank continues to hold three prior-period qualified investments totaling \$550,041 that benefit areas outside of the North Dakota assessment areas. These investments also helped revitalize and stabilize distressed and underserved areas by funding public infrastructure and school improvements.

Donations. The bank's level of donations made during the evaluation period is excellent. The bank made donations totaling \$88,930 that directly benefit its assessment areas and donations totaling \$17,033 that benefit regional areas which include assessment areas and the state of North Dakota. The following North Dakota Qualified Investment Donations table shows the distribution of the donations by assessment area and by larger regional and statewide area.

North Dakota Qualified Investment Donations		
<i>Assessment Area</i>	#	\$
Valley City	10	\$22,850
Rolla	30	\$11,025
Bowbells	3	\$2,200
Dickinson	12	\$19,450
Hettinger	4	\$1,400
Jamestown	8	\$24,000
Minot	13	\$8,005
Subtotal	80	\$88,930
Larger Regional Benefit		
State of North Dakota/Regional	7	\$17,533
Grand Total	87	\$106,463

By number, the majority of the bank's donations occurred in the Rolla assessment area. By dollar amount, the bank made the majority of its donations in the Valley City, Dickinson, and Jamestown assessment areas, followed by regional areas of North Dakota that include the bank's assessment areas. The majority of funds donated helped organizations that provide health, social, and education services for low- and moderate-income families. Other notable donations helped to revitalize and stabilize areas that are distressed, underserved, or in moderate-income tracts.

SERVICE TEST

The Service Test rating is high satisfactory for North Dakota. Delivery systems are readily accessible to all portions of the North Dakota assessment areas. The hours of operations and retail services are reasonable and do not vary in a way that inconveniences certain people or areas. The slight changes made to the bank's branch network did not adversely affect the accessibility of the delivery systems. Bank officers and employees provided an adequate number of services to organizations in the North Dakota assessment areas.

Retail Banking Services

The bank's delivery systems are readily accessible to all portions of the North Dakota assessment areas, and services do not vary in a way that inconveniences certain areas or individuals. During the evaluation period, the bank operated seven full-service branch offices (six of which have drive-up facilities), two limited-service facilities, four deposit-taking ATMs, and six cash-dispensing ATMs. The bank closed a limited-service facility located in Regent in 2017, which decreased the number of branches to eight. The Regent branch was located in an underserved middle-income tract in the Hettinger assessment area. Overall, the branch closure did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals. The following table shows the bank's distribution of branch offices, drive-up facilities, and ATMs as of December 2018.

Geographic Distribution of Branches & ATMS
Assessment Area: Assessment Group(s): State of ND 2018

Tract Category	Branches							ATMs										Demographics				
	Total Branches				Drive thrus	Extend- ed Hours	Week- end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed					
	#	%	#	#	#	#	#	#	%	#	%	#	#	#	%	#	%	%	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	4.7%	1.7%	1.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	12.5%	0	0	1	0	1	Total	3	30.0%	0	0.0%	0	0	3	50.0%	0	0	5	11.6%	11.5%	5.1%
DTO	0		0	0				SA	2		0		0	0	2		0	0				
Middle	7	87.5%	0	1	6	4	6	Total	7	70.0%	4	100.0%	0	0	3	50.0%	0	0	27	62.8%	64.7%	68.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	9	20.9%	22.0%	25.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	0	1	7	4	7	Total	10	100.0%	4	100.0%	0	0	6	100.0%	0	0	43	100.0%	100.0%	100.0%
DTO	0		0	0				SA	2		0		0	0	2		0	0				

2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

The branches are readily accessible to all portions of its assessment areas. The bank has 12.5% of its branches in moderate-income census tracts. This percentage is reasonable given that moderate-income census tracts represent 11.6% of the census tracts in the North Dakota assessment areas. In the Rolla assessment area, the Belcourt branch is in a moderate-income tract, and the Rolla branch (in a middle-income tract) is less than 10 miles from all three of the assessment area's moderate-income tracts. In the Valley City assessment area, the branch is less than a quarter-mile from the moderate-income census tract, in which the bank also has two cash-dispensing ATMs. In the Minot assessment area, the moderate-income tract consists of the Minot Air Force Base, and the branch can reasonably serve residents there. Overall, the branch offices can readily serve the residents in the moderate-income tracts.

The bank does not have any branches in the North Dakota assessment areas' two low-income census tracts. The low-income tracts represent 4.7% of the census tracts in the assessment areas and are located in Sioux County in the Hettinger assessment area. The bank still reasonably serves residents in the low-income census tracts, as lending data shows that the bank originated loans in both tracts.

The bank offers the same products and services at each of its North Dakota locations with the exception of the limited-service branch in Belcourt. All but one location have drive-up facilities with extended and/or Saturday hours. Hours of operation at each branch are reasonable and do not vary in a way that inconveniences individuals or areas. In addition to the branches and ATMs, the bank offers telephone, online, and mobile banking services. Telephone banking allow customers to obtain deposit and loan account information, transfer funds, and make loan payments. The online and mobile services provide a vast array of options for residents and businesses to conduct banking electronically. Finally, the bank has a program where customers can make bill payments with a debit card.

Community Development Services

The bank provides an adequate level of community development services in the North Dakota assessment areas. This rating primarily reflects the bank's performance in the full-scope assessment areas, but also recognizes the high level of services in the Hettinger and Minot assessment areas. While the bank did not provide services in all of its North Dakota assessment areas at the local level, it did provide some services

that benefited a regional area which includes some of the assessment areas. The table below shows the distribution of community development services by type of activity and geographical area.

North Dakota Community Development Services					
<i>Assessment Area/Region/State</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Revitalization and Stabilization</i>	<i>Total</i>
Valley City	0	7	3	0	10
Rolla	0	0	3	0	3
Hettinger	0	0	3	5	8
Minot	3	0	3	0	6
Regional North Dakota	0	3	3	0	6
Totals	3	10	15	5	33

The majority of services were geared toward organizations that focus on economic development (45.5%) and community services pertaining to health and social services (30.3%). Twelve of thirteen employees held leadership positions by serving on boards or committees. Another employee provided a new service by presenting financial education to residents, which helped stabilize an underserved area. These services are responsive to the needs of the assessment areas in the state.

NONMETROPOLITAN STATEWIDE AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE VALLEY CITY, NORTH DAKOTA, ASSESSMENT AREA

Bank Information. The bank operates one full-service branch in the Valley City assessment area. The branch has a deposit-taking ATM and a drive-through facility that offers Saturday hours. The bank also operates two cash-dispensing-only ATMs in the assessment area. By number, the bank has 3.2% of its branches in this assessment area. See the Service Test section for more details on the bank's retail services.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranks first among five financial institutions operating in the Valley City assessment area, with 45.8% of the market's deposits. The assessment area ranks fifth for the bank's total deposits as of June 30, 2018.

Assessment Area Information. The assessment area consists of Barnes County located in east-central North Dakota. It is contiguous to the Jamestown assessment area. The bank has not changed this assessment area since the previous evaluation; however, the income classification of one census tract changed based on 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted only of middle-income tracts. Now the assessment area consists of one moderate- and three middle-income tracts. Two ATMs are located in the moderate-income tract, and the branch office is located in a middle-income tract. None of the middle-income tracts are classified as distressed or underserved.

The following Combined Demographics Report provides demographic information for this assessment area, based on 2018 FFIEC adjusted census data and 2018 D&B data.²⁰

²⁰ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Combined Demographics Report

Assessment Area(s): ND Valley City 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	582	18.9
Moderate-income	1	25	769	25	25	3.3	601	19.6
Middle-income	3	75	2,305	75	119	5.2	709	23.1
Upper-income	0	0	0	0	0	0	1,182	38.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4	100.0	3,074	100.0	144	4.7	3,074	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,479	704	20.3	47.6	691	46.7	84	5.7
Middle-income	4,244	2,769	79.7	65.2	892	21	583	13.7
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,723	3,473	100.0	60.7	1,583	27.7	667	11.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	240	33.9	207	32.6	32	56.1	1	5.9
Middle-income	469	66.1	428	67.4	25	43.9	16	94.1
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	709	100.0	635	100.0	57	100.0	17	100.0
	Percentage of Total Businesses:			89.6		8.0		2.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	8	4	7	3.6	1	25	0	0
Middle-income	190	96	187	96.4	3	75	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	198	100.0	194	100.0	4	100.0	0	.0
	Percentage of Total Farms:			98.0		2.0		.0

2018 FFIEC Census Data and 2018 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of North Dakota for the year of loan origination. The table

below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels
Statewide Non-Metropolitan--North Dakota

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2017	\$78,800	0	- \$39,399	\$39,400	- \$63,039	\$63,040	- \$94,559	\$94,560	- & above
2018	\$82,900	0	- \$41,449	\$41,450	- \$66,319	\$66,320	- \$99,479	\$99,480	- & above

For purposes of classifying census tracts by income level, this evaluation uses the FFIEC adjusted census data median family income for nonmetropolitan areas of North Dakota, which is \$72,620 for both years.

Population. According to 2018 adjusted census data, the assessment area population is 11,097. According to 2018 Census Bureau estimates, 57.5% of the assessment area population resides in Valley City. Barnes County experienced miniscule population growth since the 2010 census. The majority of the assessment area population (50.4%) is between the ages of 25 to 64 years. The remaining population by age is as follows: 19.8% are 17 years and younger, 19.8% are 65 and over, and 10.0% are 18 to 24 years.

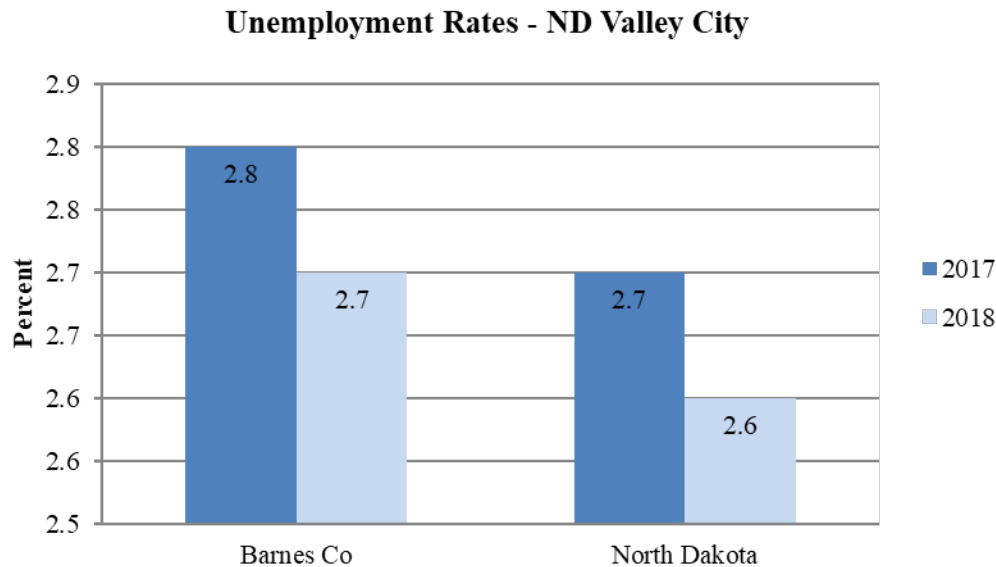
Housing Information. According to 2018 adjusted census data, this assessment area has 5,723 housing units: 60.7% are owner occupied, 27.7% are rental units, and 11.6% vacant. The median age of the housing stock is 59 years, which is somewhat higher than the median housing age of 44 years for all nonmetropolitan areas of North Dakota. The median housing value is \$97,612 and the affordability ratio is 54.5. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability.

Bank management stated that affordable housing stock is available for moderate-income borrowers and the rental market has a vacancy rate of 5.0%. Bank management indicated typical home prices range from \$100,000 to \$150,000. However, a community contact indicated the cost and availability of housing remains a persistent issue for the community. Despite the increase in good-paying, skilled jobs in the area, the wages have not adequately kept up with the cost of housing. Single-family homes may be expensive to purchase and new home construction includes other costs that drive down purchasing power. For example, it costs around \$50,000 to have gas and water hookups installed in any new lot prior to new home construction. The cost of these infrastructure additions lowers the overall purchasing ability for most lower-income borrowers. A community contact indicated that despite these challenges, homes in the community sell well; the average price of a well-built three-bedroom home ranges from \$275,000 to \$350,000.

General Economic and Business Information. Community contacts and bank management stated that the economy was stable in 2017 and 2018 but downturns started to occur in the agriculture sector. Agriculture is a predominant industry in the assessment area. Most of the crop farming operations consist of corn, soybeans, and wheat. The commercial community includes several agriculture-related operations and retail businesses. With decreased crop prices and increased inputs, farm operators became more budget conscious, which negatively affects the retail businesses. The area benefits from a number of large employers, including John Deere, Catholic Health Initiatives, county and city governments, and Valley City State University. John Deere hired 75 people in the fall of 2019. In 2018, a Texas-based medical company moved to Valley City, providing additional jobs. The new company and additional job hires are signs of a stronger economy. The number of skilled laborers with advanced degrees has increased in the

area as well. Management and a community contact stated the university has been experiencing record enrollment and increased demand exists for technology and skilled manufacturing jobs in the area.

The Unemployment Rates chart shows the annual average unemployment for Barnes County and the state as a whole. The unemployment rate in the assessment area is comparable to the unemployment rate in North Dakota for both years. For 2017 North Dakota ranked second along with two other states for the lowest unemployment rate in the United States; it ranked third in 2018.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE VALLEY CITY ASSESSMENT AREA

The Lending Test performance in the Valley City assessment area is excellent. The overall distribution of the bank's loans by borrower income and business revenue size is excellent, and the bank's lending shows excellent distribution throughout the assessment area. The bank makes an adequate level of community development loans. The overall lending demonstrates sufficient responsiveness to the community development credit needs in the assessment area. Examiners assigned the most weight to small farm loans followed by small business loans for distribution by revenue size; small farm loans received minimal weight for geographic distribution. Examiners gave the least weight to HMDA loans based on the number and dollar volume.²¹

The Investment Test performance in this assessment area is excellent. While the bank was not able to purchase investments, it made an excellent level of donations that support and benefit local community development efforts.

The Service Test performance is good. Delivery systems are readily accessible to all portions of the assessment area. Services do not vary in a way that inconveniences particular individuals or areas. Bank officers and employees provide a relatively high level of community development services.

²¹ For 2018 HMDA loans, examiners did not evaluate the following categories of loans: other purpose, other purpose lines of credit, and loans with a purpose not applicable.

LENDING TEST

The Lending Test performance in this assessment area is excellent.

Lending Activity

Lending activity reflects an excellent level of responsiveness to assessment area credit needs. The bank is a leading lender in the assessment as further discussed. For HMDA loans, the bank ranked second among 45 reporters in 2017 and third among 41 reporters in 2018. The bank's market share averaged 13.3% for both years. The bank's HMDA market share is similar for both years but slightly higher in 2017. The bank ranked first among 27 reporters for small business loans in 2017 and first among 23 reporters in 2018, with a 52.7% average market share. The bank ranked the same for small farm loans, with a 69.9% average market share. During the evaluation period, lending activity represented 9.8% by number and 8.4% by dollar amount of the bank's total lending. Within the North Dakota assessment areas, the lending activity for this assessment area was 40.8% by number and 37.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Business and Farm

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and among businesses and farms of different sizes.

Residential Real Estate. The bank's overall HMDA lending to low- and moderate-income borrowers is good. The following tables illustrate the bank's HMDA loan data by borrower income and product type for 2017 and 2018. Aggregate lending information is included for both years.

Examiners did not separately evaluate home improvement and multifamily loans at the product level for both years because of the limited lending activity.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Valley City 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0%	7.8%	\$0	0.0%	4.9%	18.9%
	Moderate	3	30.0%	36.2%	\$319	17.8%	29.4%	19.6%
	Middle	2	20.0%	26.7%	\$311	17.3%	26.7%	23.1%
	Upper	5	50.0%	20.7%	\$1,163	64.9%	31.7%	38.5%
	Unknown	0	0.0%	8.6%	\$0	0.0%	7.3%	0.0%
	Total	10	100.0%	100.0%	\$1,793	100.0%	100.0%	100.0%
Refinance	Low	2	9.1%	10.5%	\$275	4.6%	5.3%	18.9%
	Moderate	0	0.0%	15.1%	\$0	0.0%	8.5%	19.6%
	Middle	10	45.5%	23.3%	\$942	15.9%	14.5%	23.1%
	Upper	3	13.6%	23.3%	\$2,509	42.3%	38.9%	38.5%
	Unknown	7	31.8%	27.9%	\$2,204	37.2%	32.9%	0.0%
	Total	22	100.0%	100.0%	\$5,930	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	19.1%	\$0	0.0%	15.0%	18.9%
	Moderate	0	0.0%	17.0%	\$0	0.0%	18.4%	19.6%
	Middle	1	33.3%	34.0%	\$4	5.4%	32.5%	23.1%
	Upper	2	66.7%	23.4%	\$70	94.6%	27.7%	38.5%
	Unknown	0	0.0%	6.4%	\$0	0.0%	6.4%	0.0%
	Total	3	100.0%	100.0%	\$74	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	18.9%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.6%
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	23.1%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	38.5%
	Unknown	4	100.0%	100.0%	\$2,537	100.0%	100.0%	0.0%
	Total	4	100.0%	100.0%	\$2,537	100.0%	100.0%	100.0%
HMDA Totals	Low	2	5.1%	10.5%	\$275	2.7%	5.0%	18.9%
	Moderate	3	7.7%	24.5%	\$319	3.1%	16.2%	19.6%
	Middle	13	33.3%	26.1%	\$1,257	12.2%	18.3%	23.1%
	Upper	10	25.6%	21.4%	\$3,742	36.2%	28.7%	38.5%
	Unknown	11	28.2%	17.5%	\$4,741	45.9%	31.9%	0.0%
	Total	39	100.0%	100.0%	\$10,334	100.0%	100.0%	100.0%
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

In 2017, the bank's overall performance was below demographics and aggregate lenders for low- and moderate-income borrowers. The bank originated 12.8% of HMDA loans to low- and moderate-income borrowers, which was below aggregate lenders (at 35.0%) and demographics (at 38.5%). However, the

bank's performance was above demographics for home purchase loans to moderate-income borrowers (30.0% compared to 19.6%), and comparable to aggregate lenders for refinance loans to low-income borrowers (9.1% compared to 10.5%).

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Valley City 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	42.9%	\$240	32.2%	18.9%	3	42.9%	18.8%	\$240	32.2%	10.8%
	Moderate	2	28.6%	\$215	28.8%	19.6%	2	28.6%	30.1%	\$215	28.8%	25.7%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	16.5%	\$0	0.0%	20.1%
	Upper	1	14.3%	\$134	18.0%	38.5%	1	14.3%	18.0%	\$134	18.0%	27.4%
	Unknown	1	14.3%	\$157	21.0%	0.0%	1	14.3%	16.5%	\$157	21.0%	16.0%
	Total	7	100.0%	\$746	100.0%	100.0%	7	100.0%	100.0%	\$746	100.0%	100.0%
REFINANCE	Low	1	5.6%	\$74	4.5%	18.9%	1	5.6%	12.2%	\$74	4.5%	6.9%
	Moderate	5	27.8%	\$504	30.3%	19.6%	5	27.8%	23.3%	\$504	30.3%	16.6%
	Middle	3	16.7%	\$285	17.2%	23.1%	3	16.7%	17.8%	\$285	17.2%	18.7%
	Upper	2	11.1%	\$204	12.3%	38.5%	2	11.1%	23.3%	\$204	12.3%	28.9%
	Unknown	7	38.9%	\$594	35.8%	0.0%	7	38.9%	23.3%	\$594	35.8%	28.9%
	Total	18	100.0%	\$1,661	100.0%	100.0%	18	100.0%	100.0%	\$1,661	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.6%	0	0.0%	26.7%	\$0	0.0%	20.6%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	20.0%	\$0	0.0%	35.4%
	Upper	0	0.0%	\$0	0.0%	38.5%	0	0.0%	46.7%	\$0	0.0%	32.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	11.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$799	100.0%	0.0%	3	100.0%	100.0%	\$799	100.0%	100.0%
	Total	3	100.0%	\$799	100.0%	100.0%	3	100.0%	100.0%	\$799	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	33.3%	\$0	0.0%	7.4%
	Moderate	0	0.0%	\$0	0.0%	19.6%	0	0.0%	33.3%	\$0	0.0%	74.5%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.5%	0	0.0%	33.3%	\$0	0.0%	18.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Valley City 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	10.0%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	19.6%	0	0.0%	10.0%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	40.0%	\$0	0.0%	53.6%
	Upper	1	100.0%	\$43	100.0%	38.5%	1	100.0%	30.0%	\$43	100.0%	20.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	12.3%
	Total	1	100.0%	\$43	100.0%	100.0%	1	100.0%	100.0%	\$43	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.5%	0	0.0%	33.3%	\$0	0.0%	2.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	66.7%	\$0	0.0%	97.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	13.8%	\$314	9.7%	18.9%	4	13.8%	14.4%	\$314	9.7%	7.5%
	Moderate	7	24.1%	\$719	22.1%	19.6%	7	24.1%	25.4%	\$719	22.1%	18.7%
	Middle	3	10.3%	\$285	8.8%	23.1%	3	10.3%	17.0%	\$285	8.8%	17.4%
	Upper	4	13.8%	\$381	11.7%	38.5%	4	13.8%	21.6%	\$381	11.7%	23.4%
	Unknown	11	37.9%	\$1,550	47.7%	0.0%	11	37.9%	21.6%	\$1,550	47.7%	33.0%
	Total	29	100.0%	\$3,249	100.0%	100.0%	29	100.0%	100.0%	\$3,249	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

In 2018, the bank's overall performance was consistent with aggregate lenders when lending to low- and moderate-income borrowers. The bank originated 37.9% of HMDA loans to low- and moderate-income borrowers, compared to aggregate lenders at 39.8%. The bank's lending was above demographics when lending to moderate-income borrowers (24.1% compared to 19.6%), but was below demographics when lending to low-income borrowers (13.8% compared to 18.9%). However, its performance greatly exceeded demographics and aggregate lenders when lending to low-income borrowers for purchase loans (42.9% compared to 18.9% and 18.8%). The bank was consistent with aggregate lenders and above demographics when extending home purchase loans to moderate-income borrowers (28.6% compared to 30.1% and 19.6%). For refinance loans, it was below aggregate lenders and demographics when lending to low-income borrowers (5.6% compared to 12.2% and 18.9%), but was above aggregate lenders and demographics when lending to moderate-income borrowers (27.8% compared to 23.3% and 19.6%).

Overall, the bank's percentage of lending to low- and moderate-income borrowers improved from 2017 to 2018. Although the bank ranked second and third among HMDA reporters in 2017 and 2018, respectively, it captured only 13.5% of all HMDA loans reported. The bank faces competition for HMDA loans from several lenders in the assessment area. The bank's overall lending performance was below aggregate lenders and demographics in 2017. However, the bank's lending to low- and moderate-income

borrowers was consistent with aggregate lenders and exceeded demographics for moderate-income borrowers in 2018. The bank's overall performance is good.

A community contact stated that affordable housing is in short supply for this assessment area but there are no unmet credit needs. The bank makes use of flexible lending programs, including down payment and closing cost assistance programs, which help low- and moderate-income borrowers afford homeownership. In this assessment area, the bank uses RD, VA, and NDHFA programs. The use of these programs demonstrates the bank's willingness to meet the credit needs of low- and moderate-income borrowers.

Small Business. The bank exhibits excellent performance with its small business lending. The following tables show the small business and small farm loan data by revenue and loan size for 2017 and 2018, respectively. Aggregate lending information is included for both years.

Small Business & Small Farm Lending By Revenue & Loan Size																			
Assessment Area: ND Valley City																			
Product Type	Bank Lending & Demographic Data Comparison 2018, 2017						Bank & Aggregate Lending Comparison												
	Bank					Total Businesses	2017					2018							
	Count		Dollar		Count		Dollar			Count		Dollar							
	#	%	\$ (000s)	\$ %	%		Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	172	63.0%	\$9,321	39.0%	89.6%	91	64.1%	59.2%	\$5,105	42.4%	40.3%	81	61.8%	58.2%	\$4,216	35.6%	35.4%
		Over \$1 Million	53	19.4%	\$12,616	52.8%	8.0%	23	16.2%				30	22.9%					
		Total Rev. available	225	82.4%	\$21,937	91.8%	97.6%	114	80.3%				111	84.7%					
		Rev. Not Known	48	17.6%	\$1,963	8.2%	2.4%	28	19.7%				20	15.3%					
		Total	273	100.0%	\$23,900	100.0%	100.0%	142	100.0%				131	100.0%					
	Loan Size	\$100,000 or Less	215	78.8%	\$6,798	28.4%		111	78.2%	86.0%	\$3,454	28.7%	33.9%	104	79.4%	88.8%	\$3,344	28.2%	34.7%
		\$100,001 - \$250,000	37	13.6%	\$6,657	27.9%		22	15.5%	9.6%	\$3,929	32.6%	28.9%	15	11.5%	6.0%	\$2,728	23.0%	20.0%
		\$250,001 - \$1 Million	21	7.7%	\$10,445	43.7%		9	6.3%	4.4%	\$4,665	38.7%	37.2%	12	9.2%	5.2%	\$5,780	48.8%	45.2%
		Total	273	100.0%	\$23,900	100.0%		142	100.0%	100.0%	\$12,048	100.0%	100.0%	131	100.0%	100.0%	\$11,852	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	151	87.8%	\$4,403	47.2%													
		\$100,001 - \$250,000	17	9.9%	\$3,063	32.9%													
		\$250,001 - \$1 Million	4	2.3%	\$1,855	19.9%													
		Total	172	100.0%	\$9,321	100.0%													
Small Farm	Revenue	\$1 Million or Less	288	67.8%	\$32,286	65.6%	Total Farms	154	70.6%	55.2%	\$16,999	72.0%	69.9%	134	64.7%	52.9%	\$15,287	59.6%	59.5%
		Over \$1 Million	44	10.4%	\$10,855	22.0%	2.0%	19	8.7%				25	12.1%					
		Total Rev. available	332	78.2%	\$43,141	87.6%	100.0%	173	79.3%				159	76.8%					
		Not Known	93	21.9%	\$6,103	12.4%	0.0%	45	20.6%				48	23.2%					
		Total	425	100.0%	\$49,244	100.0%	100.0%	218	100.0%				207	100.0%					
	Loan Size	\$100,000 or Less	274	64.5%	\$9,865	20.0%		146	67.0%	72.4%	\$5,187	22.0%	21.7%	128	61.8%	68.3%	\$4,678	18.2%	19.5%
		\$100,001 - \$250,000	85	20.0%	\$14,615	29.7%		41	18.8%	15.9%	\$7,071	30.0%	30.5%	44	21.3%	17.7%	\$7,544	29.4%	29.2%
		\$250,001 - \$500,000	66	15.5%	\$24,764	50.3%		31	14.2%	11.7%	\$11,346	48.1%	47.8%	35	16.9%	14.0%	\$13,418	52.3%	51.3%
		Total	425	100.0%	\$49,244	100.0%		218	100.0%	100.0%	\$23,604	100.0%	100.0%	207	100.0%	100.0%	\$25,640	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	190	66.0%	\$7,071	21.9%													
		\$100,001 - \$250,000	54	18.8%	\$9,204	28.5%													
		\$250,001 - \$500,000	44	15.3%	\$16,011	49.6%													
		Total	288	100.0%	\$32,286	100.0%													
Originations & Purchases																			
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																			
2018 FFIEC Census Data and 2018 D&B Information																			

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2018 FFIEC Census Data and 2018 D&B Information

The bank originated 64.1% and 61.8% of its small business loans to small business entities in 2017 and 2018, respectively. According to D&B data, 87.2% of businesses had gross annual revenues of \$1 million or less in 2017, with 89.6% in 2018. While the bank's lending was below demographics, its performance was higher than aggregate lenders by number and consistent with aggregate lenders by dollar amount. The bank did not report revenues for 19.7% of small business loans in 2017 and 15.3% in 2018. For both years, the bank averaged 87.8% of its small business loans to small entities in amounts of \$100,000 or

less. This shows a willingness to meet the credit needs of small businesses, since smaller organizations tend to request smaller-dollar loans.

Small Farm. The bank exhibits excellent performance with its small farm lending. The bank originated 70.6% and 64.7% of its loans to small farms in 2017 and 2018, respectively. According to D&B data, 98.1 of farms had gross annual revenues of \$1 million or less for 2017 and 2018. While the bank's lending was below demographics, its lending performance exceeded aggregate lenders by number. By dollar amount, the bank was consistent with aggregate lenders in 2017 and 2018. Similar to small business lending, the bank did not report revenues for 20.6% of small farm loans in 2017 and 23.2% in 2018. For both years, the bank averaged 66.0% of its small farm loans to small entities in amounts of \$100,000 or less. This shows a willingness to meet the credit needs of small farms, since smaller operators tend to request smaller-dollar loans.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's HMDA, small business, and small farm loans in the Valley City assessment area is excellent. The assessment area consists of one moderate-income tract and three middle-income tracts. As stated previously, the bank has a branch in a middle-income tract that is located near the moderate-income tract. The moderate-income tract includes part of the Valley City business district, which includes a university and a few large parks, as well as a rural area west of the city. Small business lending was excellent compared to small farm and HMDA lending in the moderate-income tract, which is reasonable. The majority of small farm and HMDA lending occurs in the middle-income tracts.

The bank originated loans in every census tract for both years with two exceptions. In 2017, the bank did not extend any small farm loans in the moderate-income tract, which is reasonable given a large portion of the tract is within Valley City. In 2018, the bank did not make any HMDA loans in middle-income tract 9679.00. This is reasonable given that the tract is rural and has only 16.1% of the assessment area population; bank management indicated the bank serves mainly agricultural borrowers in this tract. The bank's lending does not reveal any unexplained gaps in lending.

Residential Real Estate. The geographic distribution and dispersion of the bank's HMDA loans is good. Examiners did not evaluate the bank's home improvement or multifamily loans because of low volume for both years. The following tables show HMDA data by tract level and product type for 2017 and 2018 lending for the bank. Aggregate lending data is included for both years.

Geographic Distribution of HMDA Reportable Loans									
Assessment Area: ND Valley City 2017									
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units	
		2017							
		Count		Agg %	Dollar		Agg %		
		Bank			Bank				
#	%		\$ (000s)	\$ %	\$ %				
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	2	20.0%	23.3%	\$284	15.8%	20.6%	20.3%	
	Middle	8	80.0%	76.7%	\$1,509	84.2%	79.4%	79.7%	
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	10	100.0%	100.0%	\$1,793	100.0%	100.0%	100.0%	
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	6	27.3%	25.6%	\$262	4.4%	13.7%	20.3%	
	Middle	16	72.7%	74.4%	\$5,668	95.6%	86.3%	79.7%	
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	22	100.0%	100.0%	\$5,930	100.0%	100.0%	100.0%	
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	1	33.3%	14.9%	\$4	5.4%	11.7%	20.3%	
	Middle	2	66.7%	85.1%	\$70	94.6%	88.3%	79.7%	
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	3	100.0%	100.0%	\$74	100.0%	100.0%	100.0%	
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	Multifamily 0.0%	
	Moderate	1	25.0%	50.0%	\$85	3.4%	64.2%		38.4%
	Middle	3	75.0%	50.0%	\$2,452	96.6%	35.8%		61.6%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%		0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%		0.0%
	Total	4	100.0%	100.0%	\$2,537	100.0%	100.0%		100.0%
HMDA Totals	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Moderate	10	25.6%	23.3%	\$635	6.1%	24.8%	20.3%	
	Middle	29	74.4%	76.7%	\$9,699	93.9%	75.2%	79.7%	
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%	
	Total	39	100.0%	100.0%	\$10,334	100.0%	100.0%	100.0%	
Originations & Purchases									
2017 FFIEC Census Data									
Note: Percentages may not add to 100.0 percent due to rounding									

In 2017, the bank's overall HMDA lending was consistent with aggregate lenders and demographics in the moderate-income tract. The bank originated 25.6% of HMDA loans in the moderate-income tract, compared to aggregate at 23.3%, and demographics, at 20.3%. For home purchase loans, the bank was consistent with demographics and slightly below aggregate lenders (20.0% compared to 20.3% and

23.3%). For refinance transactions, the bank was consistent with aggregate lenders and exceeded demographics (27.3% compared to 25.6% and 20.3%).

According to 2017 census data, 20.3% of housing units are owner-occupied, 46.7% are rental properties and 5.7% are vacant. Finally, 25.0% of the assessment area families reside in the moderate-income tract. The overall lending in the moderate-income tract is good, given that it includes downtown Valley City, which is predominantly a business area, as well as a rural area east of the city. The majority of owner-occupied housing units are located in middle-income tracts.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Valley City 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner- Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	14.3%	\$36	4.8%	20.3%	1	14.3%	24.8%	\$36	4.8%	21.0%
	Middle	6	85.7%	\$710	95.2%	79.7%	6	85.7%	75.2%	\$710	95.2%	79.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$746	100.0%	100.0%	7	100.0%	100.0%	\$746	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	11.1%	\$203	12.2%	20.3%	2	11.1%	21.1%	\$203	12.2%	14.3%
	Middle	16	88.9%	\$1,458	87.8%	79.7%	16	88.9%	78.9%	\$1,458	87.8%	85.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$1,661	100.0%	100.0%	18	100.0%	100.0%	\$1,661	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	40.0%	\$0	0.0%	37.3%
	Middle	0	0.0%	\$0	0.0%	79.7%	0	0.0%	60.0%	\$0	0.0%	62.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	38.4%	0	0.0%	20.0%	\$0	0.0%	9.5%
	Middle	3	100.0%	\$799	100.0%	61.6%	3	100.0%	80.0%	\$799	100.0%	90.5%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$799	100.0%	100.0%	3	100.0%	100.0%	\$799	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	33.3%	\$0	0.0%	18.1%
	Middle	0	0.0%	\$0	0.0%	79.7%	0	0.0%	66.7%	\$0	0.0%	81.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Valley City 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner- Occupied Units	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$43	100.0%	20.3%	1	100.0%	20.0%	\$43	100.0%	20.1%
	Middle	0	0.0%	\$0	0.0%	79.7%	0	0.0%	80.0%	\$0	0.0%	79.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$43	100.0%	100.0%	1	100.0%	100.0%	\$43	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	33.3%	\$0	0.0%	64.8%
	Middle	0	0.0%	\$0	0.0%	79.7%	0	0.0%	66.7%	\$0	0.0%	35.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	13.8%	\$282	8.7%	20.3%	4	13.8%	24.2%	\$282	8.7%	18.1%
	Middle	25	86.2%	\$2,967	91.3%	79.7%	25	86.2%	75.8%	\$2,967	91.3%	81.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	29	100.0%	\$3,249	100.0%	100.0%	29	100.0%	100.0%	\$3,249	100.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

In 2018, the bank's overall HMDA lending was below aggregate lenders and demographics in the moderate-income tract. The bank originated 13.8% of HMDA loans in the moderate-income tract, compared to aggregate at 24.2%, and demographics at 18.1%. The bank's lending volume decreased by 25.6% from 2017 to 2018, which could be a factor in lower lending volume in the moderate-income tract. Since the moderate-income tract includes the downtown business area and a rural area west of the city, the HMDA lending is adequate.

Small Business. The geographic distribution of small business loans is excellent. The following table show the geographic distribution of the bank's small business and small farm loan data for 2017 and 2018 lending. Aggregate lending data is included for both years.

In 2017, the bank made 39.4% of its small business loans in the moderate-income tract. For 2018, the bank made 38.2% of its small business loans in the moderate-income tract. According to D&B data, 31.3% of small business entities are in the moderate-income tract for 2017 and 32.6% for 2018. The bank's geographic distribution of small business loans in the moderate-income tract is above demographics and aggregate lenders for both years.

Geographic Distribution of Small Business & Small Farm Loans																		
Assessment Area: ND Valley City																		
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2017					2017					2018						
		Count		Bank Dollar		Total Businesses	Count		Dollar		Agg	Count		Dollar		Agg		
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	106	38.8%	\$12,048	50.4%	33.9%	56	39.4%	36.4%	\$6,863	57.0%	50.8%	50	38.2%	34.7%	\$5,185	43.7%	42.9%
	Middle	167	61.2%	\$11,852	49.6%	66.1%	86	60.6%	63.2%	\$5,185	43.0%	48.7%	81	61.8%	64.9%	\$6,667	56.3%	56.8%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	0.5%	0	0.0%	0.4%	\$0	0.0%	0.3%
	Total	273	100.0%	\$23,900	100.0%	100.0%	142	100.0%	100.0%	\$12,048	100.0%	100.0%	131	100.0%	100.0%	\$11,852	100.0%	100.0%
SMALL FARM					Total Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	0.2%	\$126	0.3%	4.0%	0	0.0%	1.3%	\$0	0.0%	0.2%	1	0.5%	0.3%	\$126	0.5%	0.4%
	Middle	424	99.8%	\$49,118	99.7%	96.0%	218	100.0%	98.7%	\$23,604	100.0%	99.8%	206	99.5%	99.0%	\$25,514	99.5%	99.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.7%	\$0	0.0%	0.0%
Total	425	100.0%	\$49,244	100.0%	100.0%	218	100.0%	100.0%	\$23,604	100.0%	100.0%	207	100.0%	100.0%	\$23,640	100.0%	100.0%	
Originations & Purchases 2018 FFIEC Census Data and 2018 D&B Information																		

Small Farm. The geographic distribution of small farm loans is adequate. In 2017, the bank did not make any small farm loans in the moderate-income tract. In 2018, the bank made 0.5% of its small farm loans in the moderate-income tract. According to D&B data, 3.8% of small farm entities are in the moderate-income tract for 2017 and 3.6% for 2018. The bank's lending in the moderate-income tract is slightly below aggregate lenders in 2017 and consistent with aggregate lenders in 2018. It is somewhat below demographics for both years. This is reasonable given the moderate-income tract mainly consists of part of the downtown business area of Valley City, which has a large city park and a university, as well as a rural area west of the city. In addition, the majority of farm operations are located in the middle-income tracts, where the bank was above demographics and consistent with aggregate lenders.

Community Development Lending

The bank makes an adequate level of community development loans in this assessment area. During the evaluation period, the bank extended a \$300,000 loan that helped revitalize and stabilize the moderate-income tract by retaining and attracting new residents to the area. Competition continues to exist given the number of financial institutions in the area. The bank has only one moderate-income tract, which also limits opportunities. The overall level of community development lending is adequate.

INVESTMENT TEST

Overall, the bank made an excellent level of qualified investments in the assessment area. The bank did not acquire or hold any qualified investments in the form of a security for this assessment area during the evaluation. However, the bank's level of community development donations in this assessment area is excellent.

The table to the right shows the types and totals of the donations. Several donations were made to an organization that provides essential community services geared toward low- and moderate-income people. One large donation was made to help revitalize and stabilize the moderate-income tract in order to retain or attract residents. All donations are responsive given 43.7% of households are at low- and moderate-income levels.

Qualified Investment Donations in the Valley City Assessment Area		
<i>Purpose</i>	<i>\$</i>	<i>#</i>
Community Services	\$2,850	9
Revitalize / Stabilize	\$20,000	1
Total	\$22,850	10

It is reasonable the bank did not make any qualified investments in the form of a security because opportunities were limited for this evaluation period and competition was strong. The bank made an extensive level of qualified investments in the form of donations. The donations show excellent responsiveness to community development needs. Therefore, the overall investment test performance is excellent.

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the assessment area. Services do not vary in a way that inconveniences particular individuals or areas. Finally, bank officers and employees provide a relatively high level of community development services.

Retail Services

Retail services are readily accessible to residents, farms, and businesses in the assessment area. As stated previously, the bank operates one full-service office in the Valley City community. The office also has a deposit-taking ATM and drive-up facility. The drive-up facility has Saturday hours. The bank also operates two cash-dispensing ATMs that are located in the moderate-income tract. The branch office is located in a middle-income tract and is less than two blocks from the moderate-income tract.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank also offers person-to-person payments through its online and mobile banking platforms, as well as bill payment through the use of debit cards. The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS																						
Assessment Area: Assessment Area(s): ND Valley City																						
Tract Category	Branches							ATMs								Demographics						
	Total Branches			Drive thrus	Extend- ed Hours	Week- end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	Open	Closed							Open	Closed			Open	Closed								
	#	%	#	#	#	#	#	%	#	%	#	%	#	%	#	%	#	%				
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	2	66.7%	0	0.0%	0	0	2	100.0%	0	0	1	25.0%	27.6%	27.3%
DTO	0		0	0				SA	2		0		0	0	2		0	0				
Middle	1	100.0%	0	0	1	0	1	Total	1	33.3%	1	100.0%	0	0	0	0.0%	0	0	3	75.0%	72.4%	72.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	1	100.0%	0	0	1	0	1	Total	3	100.0%	1	100.0%	0	0	2	100.0%	0	0	4	100.0%	100.0%	100.0%
DTO	0		0	0				SA	2		0		0	0	2		0	0				
2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data																						
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.																						
DTO - Drive thru only is a subset of total branches																						
SA = Stand Alone ATM is a subset of total ATMs																						

Community Development Services

The bank provides a relatively high level of community development services as shown in the table to the right. Three employees volunteered at two organizations that primarily serve low- and moderate-income people and provide essential community services. These individuals served as board members or in another financial capacity. Another employee continues to serve as a board member for an economic development organization. This organization has several initiatives to achieve economic vitality. All services are responsive to the community development needs of the assessment area.

Community Development Services in the Valley City Assessment Area	
Purpose	#
Community Services	7
Economic Development	3
Total	10

NONMETROPOLITAN STATEWIDE AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ROLLA, NORTH DAKOTA, ASSESSMENT AREA

Bank Information. The bank operates a full-service and a limited-service branch in the Rolla assessment area. The full-service office is located in Rolla, and the limited-service office is located in Belcourt. Both branches have lobby and drive-up facilities and a cash-dispensing ATM. Both offer drive-up Saturday hours, and the Rolla branch drive-up has extended weekday hours. By number, the bank has 6.3% of its branches in this assessment area. See the Retail Services Test for more details.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranks first among seven financial institutions operating in the Rolla assessment area, with 31.7% of the market's deposits. The assessment area ranks eighth for the bank's total deposits as of June 30, 2018.

Assessment Area Information. The Rolla assessment area consists of Rolette and Towner counties, in the north-central portion of the state and borders Canada. The bank has not changed this assessment area since the previous evaluation; however, the income classification of two census tracts changed based on 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted of one low-, one moderate-, and three middle-income tracts. Now the assessment area consists of three moderate- and two middle-income tracts; the middle-income tracts are classified as distressed and underserved. The Turtle Mountain Indian Reservation is located in a portion of Rolette County. The Belcourt office is located in a moderate-income tract and on the reservation, and the Rolla office is located in a middle-income tract; both are in Rolette County. The Combined Demographics Report on the following page provides demographic information for this assessment area, based on 2018 FFIEC adjusted census data and 2018 D&B data.²²

²²The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Combined Demographics Report

Assessment Area(s): ND Rolla 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,698	41.4
Moderate-income	3	60	3,057	74.6	1,042	34.1	735	17.9
Middle-income	2	40	1,041	25.4	168	16.1	671	16.4
Upper-income	0	0	0	0	0	0	994	24.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5	100.0	4,098	100.0	1,210	29.5	4,098	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	4,828	2,883	71.8	59.7	1,316	27.3	629	13
Middle-income	2,030	1,132	28.2	55.8	446	22	452	22.3
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	6,858	4,015	100.0	58.5	1,762	25.7	1,081	15.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	192	45.1	153	43.2	29	58	10	45.5
Middle-income	234	54.9	201	56.8	21	42	12	54.5
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	426	100.0	354	100.0	50	100.0	22	100.0
	Percentage of Total Businesses:			83.1		11.7		5.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	35	27.8	35	27.8	0	0	0	0
Middle-income	91	72.2	91	72.2	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	126	100.0	126	100.0	0	.0	0	.0
	Percentage of Total Farms:			100.0		.0		.0

2018 FFIEC Census Data and 2018 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of North Dakota for the year of loan origination. The table

below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Statewide Non-Metropolitan--North Dakota													
FFIEC Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$78,800	0	-	\$39,399	\$39,400	-	\$63,039	\$63,040	-	\$94,559	\$94,560	-	& above
2018	\$82,900	0	-	\$41,449	\$41,450	-	\$66,319	\$66,320	-	\$99,479	\$99,480	-	& above

For purposes of classifying census tracts by income level, this evaluation uses the FFIEC adjusted census data median family income for nonmetropolitan areas of North Dakota, which is \$72,620 for both years.

Population. According to 2018 adjusted census data, the assessment area population is 16,792. Almost half of the population (46.6%) is between the ages of 25 to 64 years. The remaining population by age is as follows: 32.4% are 17 years and younger, 12.0% are 65 and over, and 9.0% are 18 to 24 years. Rolla is the county seat of Rolette County.

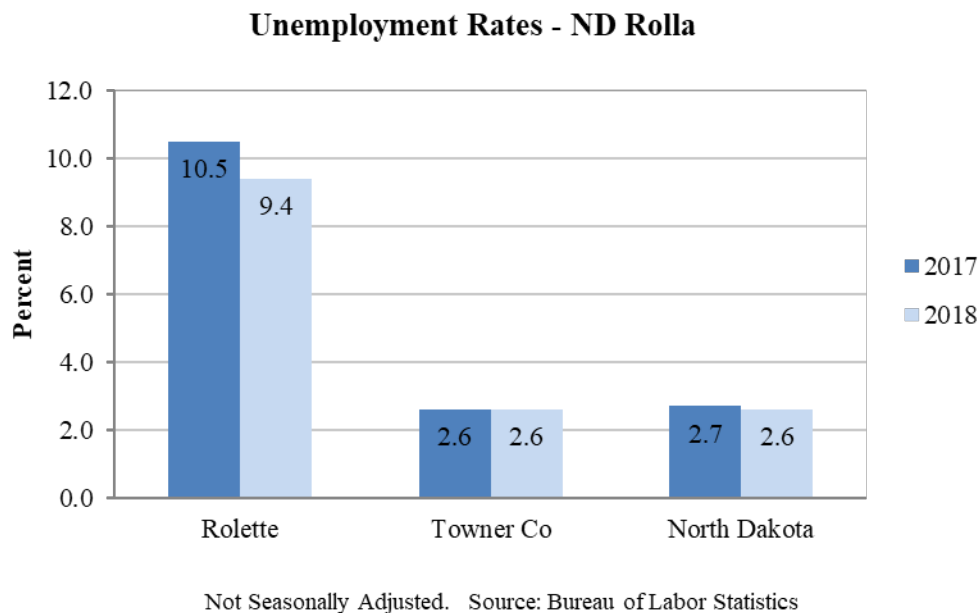
Housing Information. According to 2018 adjusted census data, this assessment area has 6,858 housing units: 58.5% are owner occupied, 25.7% are rental units, and 15.8% are vacant. The median age of the housing stock is 46 years, which is consistent with the median housing age of 44 years for all nonmetropolitan areas of North Dakota. The median housing value is \$69,260 and the affordability ratio is 54.2. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability.

A community contact stated the assessment area lacks affordable housing. New home construction is expensive and there is a lack of builders. There is short supply of housing stock with three or more bedrooms. Home ownership on the Turtle Mountain Indian Reservation is challenging because existing housing stock is in poor condition, wages are low, and unemployment is high. As such, many tribal members rent rather than own. Most of the members receive rent subsidies to cover all or part of the rent.

General Economic and Business Information. Community contacts and bank management stated that the local economy is primarily based on agriculture, except for the population that resides on the Turtle Mountain Indian Reservation. Most farmers in the county have diversified farming operations with crop and livestock production. Primary crops grown include soybeans, barley, canola, corn, wheat, and peas. Crop yields were good in 2018, but farm income was down due to lower commodity prices as the result of trade issues. Land values and rental rates continue to be high despite the lower commodity prices. Livestock and off-farm income have allowed these farming operations to keep going. Since agriculture is a predominant industry, any downturns have a ripple effect on the local business economy in general.

The reservation faces economic challenges. The school district and the casino are the largest employers on the reservation, and unemployment is high. Grant wages are higher than most jobs but may vary from year to year, based on available grant money. Many tribal members earn minimum wage by working service-related jobs. Other major employers in the assessment area include agricultural-related businesses, health-care facilities, nursing homes, area schools, and banks. There are minimal manufacturing jobs; many jobs in the area are retail and service-related jobs resulting in lower wages.

As shown in the Unemployment Rates chart, the economy differs by county. The unemployment rates in Rolette County are higher than the state unemployment rates for both years, while the unemployment rates in Towner County are similar to state levels. The reason for the higher unemployment rate in Rolette County is that it contains the Turtle Mountain Indian Reservation.



CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ROLLA ASSESSMENT AREA

Lending Test performance in the Rolla assessment area is excellent. The distribution of the bank's loans by revenue size is excellent, and the bank's lending shows excellent geographic distribution throughout the assessment area. The bank is a leading lender among aggregate CRA reporters. The bank is also a leader in originating community development loans, which demonstrates excellent responsiveness to the community development credit needs in the assessment area. Examiners assigned the most weight to small farm loans, followed by small business loans, given it is an agricultural-based economy. Examiners did not review HMDA loans because of the low volume.

The Investment Test performance in this assessment area is excellent. Qualified investments show excellent responsiveness to community credit needs.

The Service Test performance is good. Delivery systems are readily accessible to all portions of the assessment area. Services do not vary in a way that inconveniences particular individuals or areas. Bank officers and employees provide an adequate level of community development services.

LENDING TEST

The bank's Lending Test performance in this assessment area is excellent.

Lending Activity

The bank's lending activity reflects excellent responsiveness to assessment area credit needs. In 2017, the bank ranked first among 22 lenders reporting CRA small business and small farm loans. In 2018, the bank ranked first among 26 lenders reporting CRA small business and small farm loans. For the two-year period, the bank averaged 56.7% of the market share for small farm loans, and 24.2% for small business loans. During the evaluation period, lending activity in this assessment area represented 4.5% by number and 3.6% by dollar amount of the bank's overall lending. Within North Dakota assessment areas, the lending activity in the Rolla assessment area was 18.6% by number and 15.8% by dollar amount.

Distribution by Size of Business and Farm

Overall, the bank's distribution of loans reflects excellent dispersion among businesses and farms of different sizes. The following table shows the small business and small farm loan data by revenue and loan size for 2017 and 2018 respectively. Aggregate lending information is included for both years.

Small Business & Small Farm Lending By Revenue & Loan Size																			
Assessment Area: ND Rolla																			
Product Type	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison												
	2017, 2018						2017						2018						
	Bank				Total Businesses	Count			Dollar			Count			Dollar				
	Count	Dollar				Bank	Agg	Dollar		Bank	Agg	Count	Dollar		Bank	Agg			
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	%	#	%	%	\$ 000s	\$ %	%		
Small Business	Revenue	\$1 Million or Less	21	41.2%	\$2,079	34.4%	83.1%	7	31.8%	41.4%	\$560	19.0%	23.6%	14	48.3%	57.1%	\$1,519	49.2%	50.4%
		Over \$1 Million	20	39.2%	\$3,672	60.8%	11.7%	12	54.5%				8	27.6%					
		Total Rev. available	41	80.4%	\$5,751	95.2%	94.8%	19	86.3%				22	75.9%					
		Rev. Not Known	10	19.6%	\$288	4.8%	5.2%	3	13.6%				7	24.1%					
		Total	51	100.0%	\$6,039	100.0%	100.0%	22	100.0%				29	100.0%					
	Loan Size	\$100,000 or Less	34	66.7%	\$1,371	22.7%		12	54.5%	89.9%	\$481	16.3%	33.6%	22	75.9%	93.8%	\$890	28.8%	47.3%
		\$100,001 - \$250,000	14	27.5%	\$3,008	49.8%		9	40.9%	9.1%	\$1,998	67.6%	53.6%	5	17.2%	4.5%	\$1,010	32.7%	24.2%
		\$250,001 - \$1 Million	3	5.9%	\$1,660	27.5%		1	4.5%	1.0%	\$475	16.1%	12.7%	2	6.9%	1.8%	\$1,185	38.4%	28.4%
		Total	51	100.0%	\$6,039	100.0%		22	100.0%	100.0%	\$2,954	100.0%	100.0%	29	100.0%	100.0%	\$3,085	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	16	76.2%	\$663	31.9%													
		\$100,001 - \$250,000	4	19.0%	\$691	33.2%													
		\$250,001 - \$1 Million	1	4.8%	\$725	34.9%													
		Total	21	100.0%	\$2,079	100.0%													
Small Farm	Revenue	\$1 Million or Less	199	72.4%	\$24,836	86.0%	100.0%	100	72.5%	57.8%	\$12,818	88.4%	84.2%	99	72.3%	56.4%	\$12,018	83.7%	77.5%
		Over \$1 Million	9	3.3%	\$2,267	7.9%	0.0%	2	1.4%				7	5.1%					
		Total Rev. available	208	75.7%	\$27,103	93.9%	100.0%	102	73.9%				106	77.4%					
		Not Known	67	24.4%	\$1,764	6.1%	0.0%	36	26.1%				31	22.6%					
		Total	275	100.0%	\$28,867	100.0%	100.0%	138	100.0%				137	100.0%					
	Loan Size	\$100,000 or Less	185	67.3%	\$6,046	20.9%		93	67.4%	71.7%	\$3,069	21.2%	22.8%	92	67.2%	72.2%	\$2,977	20.7%	21.5%
		\$100,001 - \$250,000	52	18.9%	\$9,199	31.9%		26	18.8%	18.4%	\$4,824	33.3%	38.4%	26	19.0%	15.8%	\$4,375	30.5%	30.0%
		\$250,001 - \$500,000	38	13.8%	\$13,622	47.2%		19	13.8%	9.8%	\$6,615	45.6%	38.8%	19	13.9%	12.0%	\$7,007	48.8%	48.6%
		Total	275	100.0%	\$28,867	100.0%		138	100.0%	100.0%	\$14,508	100.0%	100.0%	137	100.0%	100.0%	\$14,359	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	120	60.3%	\$4,640	18.7%													
		\$100,001 - \$250,000	44	22.1%	\$7,794	31.4%													
		\$250,001 - \$500,000	35	17.6%	\$12,402	49.9%													
		Total	199	100.0%	\$24,836	100.0%													
Originations & Purchases																			
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																			
2018 FFIEC Census Data and 2018 D&B Information																			

Small Business. The distribution of small business loans among businesses of different sizes is adequate. The bank originated 31.8% and 48.3% of its loans to small businesses in 2017 and 2018, respectively. According to D&B data, 82.7% of businesses had gross annual revenues of \$1 million or less for 2017 and 83.1% in 2018. The bank's lending was below aggregate lenders and far below demographics for

both years. Aggregate lenders were also far below demographics for both years. Bank management stated several small business owners have operated with minimal lending demand in past years. A community contact and bank management described minimal small business growth during the evaluation period. However, the bank averaged 76.2% of its small business loans to small entities in amounts of \$100,000 or less for both years. This shows a willingness to meet the credit needs of small businesses.

Small Farm. The bank exhibits excellent performance with its small farm lending. The bank originated 72.5% and 72.3% of its loans to small farms in 2017 and 2018, respectively. According to D&B data, 98.1 of farms had gross annual revenues of \$1 million or less for 2017 and 100.0% in 2018. While the bank's lending was below demographics, its lending performance exceeded aggregate lenders by number and dollar amount. Aggregate lenders were far below demographics for both years compared to the bank. The bank averaged 60.3% of its small farm loans to small entities in amounts of \$100,000 or less for both years. This shows a willingness to meet the credit needs of small farms.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's small business and small farm loans in the Rolla assessment area is excellent. The assessment area consists of three moderate- and two middle-income tracts. Both middle-income tracts are distressed and underserved. The bank has a branch in moderate-income tract 9418.00 and one in middle-income tract 9516.00, both in Rolette County. The bank originated loans in every census tract for both years. The bank's lending does not reveal any unexplained gaps in lending.

The following table shows the geographic distribution of the bank's small business and small farm loans for both years. Aggregate lending data is included for both years.

Geographic Distribution of Small Business & Small Farm Loans																
Assessment Area: ND Rolla																
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2017, 2018					2017					2018				
		Count		Bank		Total	Count		Dollar		Agg	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	%	#	%	\$ 000s	\$ %	%
SMALL BUSINESS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	25	49.0%	\$3,031	50.2%	45.1%	13	59.1%	48.5%	\$1,668	56.5%	53.9%	12	41.4%	42.9%	42.5%
	Middle	26	51.0%	\$3,008	49.8%	54.9%	9	40.9%	43.4%	\$1,286	43.5%	42.9%	17	58.6%	52.7%	54.4%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	3.2%	0	0.0%	4.5%	3.1%
Total		51	100.0%	\$6,039	100.0%	100.0%	22	100.0%	100.0%	\$2,954	100.0%	100.0%	29	100.0%	100.0%	100.0%
SMALL FARM	Total Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	178	64.7%	\$13,164	45.6%	27.8%	96	69.6%	50.4%	\$7,346	50.6%	41.4%	82	59.9%	43.2%	33.7%
	Middle	97	35.3%	\$15,703	54.4%	72.2%	42	30.4%	49.6%	\$7,162	49.4%	58.6%	55	40.1%	56.4%	66.3%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Total		275	100.0%	\$28,867	100.0%	100.0%	138	100.0%	100.0%	\$14,508	100.0%	100.0%	137	100.0%	100.0%	100.0%
Originations & Purchases 2018 FFIEC Census Data and 2018 D&B Information																

Small Business. The geographic distribution of small business loans is excellent. In 2017, the bank made 59.1% of its small business loans in moderate-income tracts. For 2018, the bank made 41.4% of its small business loans in moderate-income tracts. According to D&B data, 44.0% and 45.1% of small business entities were in moderate-income tracts for 2017 and 2018, respectively. In 2017, the bank's lending in

moderate-income tracts exceeded demographics and aggregate lenders. In 2018, the bank's lending in moderate-income census tracts was slightly below demographics but consistent with aggregate lenders.

Small Farm. The geographic distribution of small farm loans is excellent. In 2017, the bank made 69.6% of its small farm loans in moderate-income tracts. In 2018, the bank made 59.9% of its small farm loans in moderate-income census tracts. According to D&B data, 21.8% and 27.8% of small farm entities were in moderate-income tracts for 2017 and 2018, respectively. The bank's lending in the moderate-income tract exceeded demographics and aggregate lenders for both years.

Community Development Lending

The bank is a leader in making community development loans in this assessment area. The table to the right shows the origination activity during the evaluation period. The bank extended loans to organizations that provide community services to low- and moderate-income residents. Five other loans helped stabilize the area by funding activities that help retain residents and businesses, including improvements to a hospital in a distressed and underserved area. The bank's community development lending demonstrates excellent responsiveness to the credit needs of the assessment area.

Community Development Lending in the Rolla Assessment Area		
<i>Purpose</i>	<i>\$</i>	<i>#</i>
Community Service	\$180,187	2
Revitalize or Stabilize Distressed and/or Underserved Tracts	\$1,401,704	5
Total	\$1,581,891	7

INVESTMENT TEST

The bank made an excellent level of qualified investments and grants, which exhibits excellent responsiveness to the credit and community needs of the assessment area. The bank's qualified investments in the form of securities is excellent. The bank purchased two new bonds for \$403,062. These bonds help to revitalize and stabilize a moderate-income tract by funding school improvements. The school is an essential infrastructure for education. As such, it can attract and retain residents in the assessment area.

The bank also made an excellent level of qualified investments in the form of donations as shown in the table to the right. The donations were to organizations focusing on community services targeted to low- and moderate-income individuals, as well as organizations that help revitalize and stabilize moderate-income tracts and distressed and underserved tracts. The organizations that are targeted to low- and moderate-income individuals provide educational services. The organizations that help revitalize and stabilize the area include schools and public service entities.

Qualified Investment Donations in the Rolla Assessment Area		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Community Service	14	\$7,475
Revitalize or Stabilize	4	\$850
Revitalize or Stabilize Distressed and/or Underserved Tracts	12	\$2,700
Total	30	\$11,025

SERVICE TEST

The bank's delivery systems are readily accessible to residents, businesses, and farms throughout the assessment area. Services do not vary in a way that inconveniences particular individuals or areas. Finally, bank officers and employees provide an adequate level of community development services.

Retail Services

Retail services are readily accessible to residents and businesses in the assessment area. As stated previously, the bank operates a full-service branch and a limited-service branch in the Rolla assessment area. The full-service office is located in Rolla and the limited-service office is located in Belcourt. Both branches have lobby and drive-up facilities and a cash-dispensing ATM. The Rolla branch drive-up offers extended weekday and Saturday hours; Belcourt's drive-up also offers Saturday hours. The Rolla office is located in a distressed and underserved middle-income tract, and the Belcourt office is located in a moderate-income tract on the Turtle Lake Indian Reservation. The bank did not close any branches during the evaluation period.

Additional delivery services include telephone, online, and mobile banking. The bank offers numerous online and mobile banking options that provide reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMs																						
Assessment Area: Assessment Area(s): ND Rolla																						
Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
			Open	Closed							Open	Closed		Open	Closed							
	#	%	#	#	#	#	#	#	%	#	%	#	#	#	%	#	#	#	%	%	%	
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	50.0%	0	0	1	0	1	Total	1	50.0%	0	0.0%	0	0	1	50.0%	0	0	3	60.0%	72.7%	41.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	1	50.0%	0	0	1	1	1	Total	1	50.0%	0	0.0%	0	0	1	50.0%	0	0	2	40.0%	27.3%	58.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	2	100.0%	0	0	2	1	2	Total	2	100.0%	0	0.0%	0	0	2	100.0%	0	0	5	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data																						
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.																						
DTO - Drive thru only is a subset of total branches																						
SA = Stand Alone ATM is a subset of total ATMs																						

Community Development Services

The bank provides an adequate level of community development services in the assessment area. A bank employee continues to serve as a board member for an organization that provides economic development opportunities for local businesses. The organization's objectives include job recruitment, retention, and business expansion.

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BOWBELLS, NORTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Bowbells assessment area. They determined the bank's lending performance in this assessment area is consistent with the performance in the full-scope assessment areas. Its investments and services performance levels are generally below the full-scope assessment areas, primarily because the bank did not have any qualified investment securities and did not provide any community development services in this assessment area. This performance does not change the conclusion for the state. Examiners did not include the bank's HMDA and small business loans in the analysis because they are not major business lines for this assessment area.

This assessment area consists of Burke County in the northwestern portion of the state and is next to the Canadian border. It is contiguous with the Minot assessment area. The assessment area consists of one middle-income tract that is classified as distressed and underserved during the evaluation period. According to 2018 FFIEC adjusted census data, the population of the assessment area is 2,208.²³ The bank operates one full-service branch, with a cash-dispensing-only ATM. The branch offers extended Friday hours.

The following table provides information regarding the demographic characteristics of the assessment area based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Bowbells Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	18.0%
Moderate Income	0	0.0%	0.0%	19.2%
Middle Income	1	100.0%	100.0%	16.1%
Upper Income	0	0.0%	0.0%	46.8%
Total	1	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.²⁴

Lending Activity in the Bowbells Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
HMDA	3	4	7
Small Business	6	5	11
Small Farm	60	43	103
Total	69	52	121

By number, the Bowbells assessment area accounts for 1.5% of the bank's overall lending during the

²³ The FFIEC adjusted census data is based on the U. S. Census data and the ACS five-year estimate data; it also reflects changes from the 2017 OMB revised MSA delineations.

²⁴ For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

evaluation period and 6.5% of the bank's lending activity in the North Dakota assessment areas. In 2018, the bank ranked first for small farm loans reported by aggregate lenders in the assessment area. It extended 58.9% of small farm loans reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DICKINSON, NORTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Dickinson assessment area. They determined the bank's lending and investments in this assessment area are consistent with the performance in the full-scope assessment areas. Its service performance is generally below the full-scope assessment areas because the bank did not provide any community development services. This performance does not change the conclusion for the state. Examiners did not evaluate the bank's small farm lending because it is not a material product line for this assessment area.

This assessment area consists of Stark County in southwestern North Dakota. It is contiguous with the Hettinger assessment area. The bank has not changed this assessment area since the previous evaluation; however, the income classification of five census tracts changed based on 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted only of middle-income tracts. Now the assessment area consists of three middle- and five upper-income census tracts. The middle-income tracts were not classified as distressed or underserved during the evaluation period. According to 2018 FFIEC adjusted census data, the population of the assessment area is 28,628. The bank operates one full-service branch with a drive-up facility and deposit-taking ATM that is located in a middle-income census tract. The drive-up facility has extended and weekend hours.

The following table provides information regarding the demographic characteristics of the assessment area based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Dickinson Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0%	0.0%	12.8%
Moderate Income	0	0.0%	0.0%	14.2%
Middle Income	3	37.5%	30.7%	23.7%
Upper Income	5	62.5%	69.3%	49.4%
Total	8	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Dickinson Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
HMDA	21	24	45
Small Business	31	37	68
Small Farm	6	10	16
Total	58	71	129

By number, the Dickinson assessment area accounts for 1.7% of the bank's overall lending during the evaluation period and 6.9% of the bank's lending activity in the North Dakota assessment areas. For HMDA loans, the bank ranked 12th of 92 reporters in 2018 and extended 2.1% of HMDA loans reported by aggregate lenders in the assessment area. For small business loans, the bank ranked seventh among 48

reporters in 2018 and extended 4.9% of small business reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HETTINGER, NORTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Hettinger assessment area. They determined the bank's lending, investments, and services in this assessment area are consistent with the performance in the full-scope nonmetropolitan assessment areas. Examiners did not evaluate the bank's HMDA lending because it is not a material product line for this assessment area.

The assessment area consists of Adams, Grant, Hettinger, and Sioux counties in the southwestern area of the state. It includes a portion of the Standing Rock Indian Reservation that is located in Sioux County. The assessment area is contiguous with the Dickinson assessment area in North Dakota as well as the Lemmon/Mobridge assessment in South Dakota. The assessment area includes two low- and four middle-income census tracts. Three middle-income tracts were classified as underserved and one as distressed and underserved. According to 2018 FFIEC adjusted census data, the population of the assessment area is 11,704. The bank operates one full-service branch with a drive-up facility and cash-dispensing ATM in Hettinger that is located in an underserved middle-income census tract. The drive-up has weekend hours. On December 15, 2017, the bank closed a limited-service branch without an ATM in Regent.

The following table provides information regarding the demographic characteristics of the assessment area based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Hettinger Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Population by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	2	33.3%	37.4%	31.2%
Moderate Income	0	0.0%	0.0%	20.9%
Middle Income	4	66.7%	62.6%	19.1%
Upper Income	0	0.0%	0.0%	28.8%
Total	6	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Hettinger Assessment Area			
<i>Loan Type</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
HMDA	11	5	16
Small Business	28	22	50
Small Farm	83	92	175
Total	122	119	241

By number, the Hettinger assessment area accounts for 3.1% of the bank's overall lending during the evaluation period and 12.9% of the bank's lending activity in the North Dakota assessment areas. In 2018, the bank ranked second among 33 reporters in for small business and small farm lending. It extended 13.5% of small business and 25.0% of small farm loans reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JAMESTOWN, NORTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Jamestown assessment area. They determined the bank's lending and investments in this assessment area are consistent with the performance in the full-scope assessment areas. Its service performance is generally below the full-scope assessment areas because the bank did not provide any community development services. This performance does not change the conclusion for the state. Examiners did not evaluate the bank's HMDA lending because it is not a material product line for this assessment area.

This assessment area consists of Stutsman County in the central portion of the state. The assessment area is contiguous with the Valley City assessment area. The bank has not changed this assessment area since the previous evaluation; however, the income classification of one census tract changed based on 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted only of middle-income tracts. Now, the assessment area includes five middle- and one upper-income census tracts. None of the middle-income tracts were considered distressed or underserved during the evaluation period. According to 2018 FFIEC adjusted census data, the population of the assessment area is 21,076. The bank operates one full-service branch with a drive-up facility and deposit-taking ATM, located in a middle-income census tract. The drive-up facility has weekend hours. The following table provides information regarding the demographic characteristics of the assessment area based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Jamestown Assessment Area				
Income Category	Tract Distribution		Percentage of Population by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0%	0.0%	19.9%
Moderate Income	0	0.0%	0.0%	19.5%
Middle Income	5	83.3%	87.3%	23.0%
Upper Income	1	16.7%	12.7%	37.6%
Total	6	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Jamestown Assessment Area			
Loan Type	2017	2018	Total
HMDA	2	2	4
Small Business	21	38	59
Small Farm	28	27	55
Total	51	67	118

By number, the Jamestown assessment area accounts for 1.5% of the bank's overall lending during the evaluation period and 6.3% of the bank's lending activity in the North Dakota assessment areas. In 2018, the bank ranked second out of 41 reporters for small business and small farm lending. It extended 12.2% of small business and 13.7% of small farm loans reported by aggregate lenders in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MINOT, NORTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Minot assessment area. They determined the bank's lending, investments, and services in this assessment area are consistent with the performance in the full-scope nonmetropolitan assessment areas. Examiners did not evaluate the bank's HMDA lending because it is not a material product line for this assessment area.

This assessment area consists of Ward County in the northwestern portion of North Dakota that is close to the Canadian border. It is contiguous with the Bowbells assessment area. The bank has not changed this assessment area since the previous evaluation; however, the income classification of six census tracts changed based on 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted of two moderate-, nine middle, and two upper-income tracts. Now, the assessment area includes one moderate-, nine middle- and three upper-income census tracts. None of the middle-income tracts were classified as distressed or underserved during the evaluation period. According to 2018 FFIEC adjusted census data, the population of the assessment area is 67,736.

The bank operates one full-service branch with a drive-up facility and a deposit-taking ATM, located in a middle-income census tract. The drive-up facility has extended and weekend hours. The following table provides information regarding the demographic characteristics of the assessment area based on 2018 FFIEC adjusted census data.

Assessment Area Demographics – Minot Assessment Area				
Income Category	Tract Distribution		Percentage of Population by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0%	0.0%	17.1%
Moderate Income	1	7.7%	8.7%	18.9%
Middle Income	9	69.2%	71.3%	23.2%
Upper Income	3	23.1%	20.0%	40.8%
Total	13	100.0%	100.0%	100.0%

The following table shows the bank's 2017 and 2018 lending activity in the assessment area.

Lending Activity in the Minot Assessment Area			
Loan Type	2017	2018	Total
HMDA	14	13	27
Small Business	40	33	73
Small Farm	25	27	52
Total	79	73	152

By number, the Minot assessment area accounts for 1.9% of the bank's overall lending during the evaluation period and 8.1% of the bank's lending activity in the North Dakota assessment areas. In 2018, the bank ranked ninth out of 52 reporters for small business and small farm lending. It extended 2.8% of small business loans and 11.9% of small farm loans reported by the aggregate lenders in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF NORTH DAKOTA

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each assessment area. The North Dakota state section of the report also shows qualified investments in the form of donations and community development services for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan North Dakota Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Bowbells	Consistent	Below	Below
Dickinson	Consistent	Consistent	Below
Hettinger	Consistent	Consistent	Consistent
Jamestown	Consistent	Consistent	Below
Minot	Consistent	Consistent	Consistent

MINNESOTA NONMETROPOLITAN AREA – FULL-SCOPE REVIEW

CRA RATING FOR Minnesota: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activities reflect excellent responsiveness to local credit needs in the Morris, Minnesota assessment area.
- Overall, the lending to businesses and farms of different sizes is excellent.
- Overall, the geographic distribution and dispersion of the bank's small business and small farm loans throughout the assessment area is adequate.
- The bank makes a relatively high number of community development loans in the assessment area.
- The bank uses flexible loan programs in the assessment area.
- The bank has a significant level of qualified investments in the form of securities and donations by number and dollar amount. Overall, the bank's qualified investments show good responsiveness to credit and community development needs.
- The bank's retail services are accessible to businesses and farms throughout the assessment area, and overall, the bank provides a relatively high level of community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for the state of Minnesota is consistent with the scope for the overall institution described earlier in the Description of Institution section. Examiners completed a full-scope review for the Morris assessment area, which is the bank's only assessment area in Minnesota. Since there is only one assessment area, examiners discuss statewide performance concurrently with the Morris assessment area.

To complete the full-scope review, examiners used the following criteria: lending activity, lending to businesses and farms of different sizes, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MORRIS, MINNESOTA, ASSESSMENT AREA

Bank Information. The bank operates two branches and two ATMs in the Morris assessment area. The Morris branch is a full-service office with extended weekday hours at the drive-up, and a deposit-taking ATM. The Chokio branch is a limited-service office. There is a cash-dispensing-only ATM located in a nearby convenience store in Chokio. See the Service Test section for this assessment area for more details on the bank's retail services.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank ranked 12th among 25 FDIC-insured institutions operating in the Morris assessment area, with 3.0% of the deposit market share

and \$40.5 million in deposits. The bank has 6.7% of its offices and 2.0% of its deposits in the Morris assessment area.

Assessment Area Information. The bank defines the assessment area as Grant, Traverse, Stevens, Pope, Big Stone, and Swift counties in west-central Minnesota. The bank has not changed its assessment area since the previous evaluation. However, the income classification of two census tracts changed based on the 2017 FFIEC adjusted census data. Previously, the bank's assessment area consisted only of middle-income census tracts. Now the assessment area consists of one moderate-, 16 middle-, and one upper-income census tracts. The assessment area is located on the western border of Minnesota and is generally rural with towns scattered throughout. The assessment area is adjacent to and directly east of the bank's Sisseton, South Dakota, assessment area.

The Combined Demographics Report on the following page provides demographic information for the Morris assessment area based on 2018 FFIEC adjusted census data and 2018 D&B data.²⁵

²⁵ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB revised MSA delineations.

Combined Demographics Report

Assessment Area(s): MN Morris

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income			
	#	%	#	%	#	%	#	%		
Low-income	0	0	0	0	0	0	2,174	17.7		
Moderate-income	1	5.6	646	5.3	72	11.1	2,195	17.9		
Middle-income	16	88.9	11,147	90.7	777	7	2,906	23.6		
Upper-income	1	5.6	496	4	24	4.8	5,014	40.8		
Unknown-income	0	0	0	0	0	0	0	0		
Total Assessment Area	18	100.0	12,289	100.0	873	7.1	12,289	100.0		
	Housing Units by Tract	Housing Types by Tract								
		Owner-Occupied			Rental		Vacant			
		#	%	%	#	%	#	%		
Low-income	0	0	0	0	0	0	0	0		
Moderate-income	1,254	717	4.9	57.2	338	27	199	15.9		
Middle-income	21,947	13,175	90.9	60	4,138	18.9	4,634	21.1		
Upper-income	747	595	4.1	79.7	81	10.8	71	9.5		
Unknown-income	0	0	0	0	0	0	0	0		
Total Assessment Area	23,948	14,487	100.0	60.5	4,557	19.0	4,904	20.5		
	Total Businesses by Tract		Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%		
Low-income	0	0	0	0	0	0	0	0		
Moderate-income	118	4.6	111	5	4	1.8	3	2.9		
Middle-income	2,365	92.5	2,060	92.3	207	92.8	98	96.1		
Upper-income	73	2.9	60	2.7	12	5.4	1	1		
Unknown-income	0	0	0	0	0	0	0	0		
Total Assessment Area	2,556	100.0	2,231	100.0	223	100.0	102	100.0		
	Percentage of Total Businesses:			87.3			8.7			4.0
	Total Farms by Tract		Farms by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%		
Low-income	0	0	0	0	0	0	0	0		
Moderate-income	54	6	54	6.1	0	0	0	0		
Middle-income	784	87.5	772	87.3	12	100	0	0		
Upper-income	58	6.5	58	6.6	0	0	0	0		
Unknown-income	0	0	0	0	0	0	0	0		
Total Assessment Area	896	100.0	884	100.0	12	100.0	0	.0		
	Percentage of Total Farms:			98.7			1.3			.0

2018 FFIEC Census Data and 2018 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Morris assessment area, for the year of loan origination. The table below shows the estimated median family income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Statewide Non-Metropolitan--Minnesota**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2017	\$65,300	0	- \$32,649	\$32,650	- \$52,239	\$52,240	- \$78,359	\$78,360	- & above
2018	\$69,500	0	- \$34,749	\$34,750	- \$55,599	\$55,600	- \$83,399	\$83,400	- & above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for the nonmetropolitan areas of Minnesota, which was \$63,182 for both years.

Population Characteristics. According to the 2018 FFIEC adjusted census data, the population of the assessment area is 44,768. Pope County is the most populous, with 10,948 people, followed by Stevens County, with 9,771. According to demographic data, most of the population is 25 to 64 years of age (47.5%). The remaining population by age is as follows: 21.6% are 65 years and over, 21.3% are 17 years and younger, and 9.6% are between 18 and 24. Community contacts indicated that the assessment area population is aging; young people move out of the area for school and do not return. Despite having a post-secondary school in Morris, students often leave for jobs in larger cities. In addition, even though some farms are consolidating into larger operations, fewer people are needed to manage them.

Housing Characteristics. According to bank management, affordable housing is not a major concern in the assessment area. Single-family homes of average condition continue to be available in the assessment area. In addition, several multifamily apartment complexes have been constructed in the last three years.

According to 2018 FFIEC adjusted census data, this assessment area has 23,948 housing units: 60.5% are owner-occupied, 19.0% are rentals, and 20.5% are vacant. The median age of the housing stock is 59 years, which is older than the statewide median age of 40 years in Minnesota. The median housing value for the assessment area is \$111,849 and the affordability ratio is 45.4, compared to 33.0 for the state of Minnesota as a whole. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability. This ratio suggests that housing is more affordable in this assessment area than other areas of Minnesota.

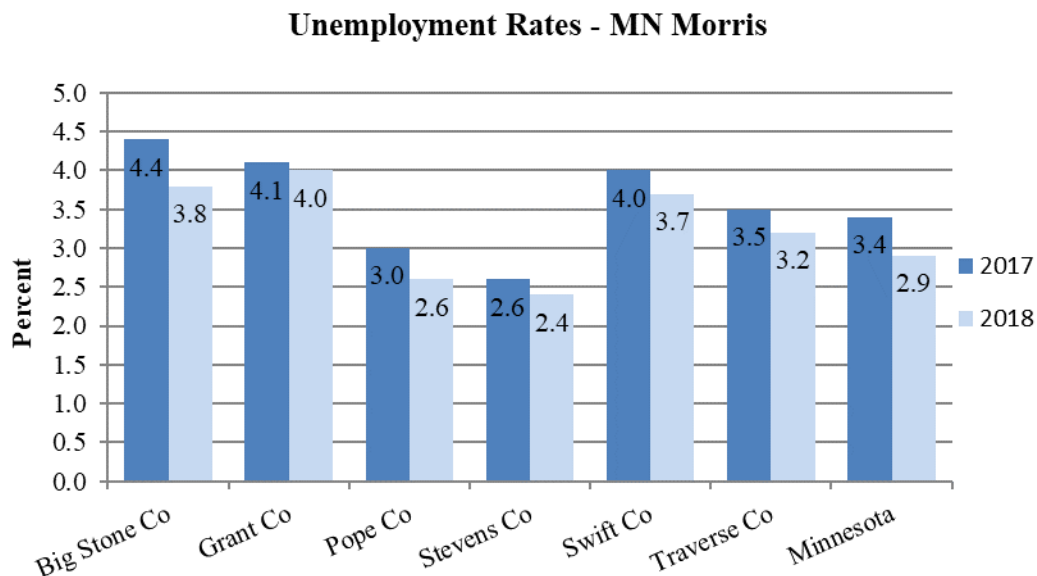
General Economic and Business Characteristics. According to community contacts and bank management, the economy is stable. The economy is highly dependent on agriculture, which is an industry that has declined some due to lower commodity prices. This decline has adversely impacted interrelated businesses, such as implement dealers. The primary crops in the area are soybeans and corn, followed by wheat, sunflowers, and sugar beets. Livestock is not a main focus in the area; however, a larger dairy operation recently opened and another dairy/hog operation will open soon in Traverse County. Contacts stated that the average age of farmers continues to increase as younger people leave the area. In addition, the high start-up costs for new farmers is often a barrier for prospective farmers with no family connections. More often, farms stay within the family or are taken over by larger corporate operations.

In addition to agriculture, other major industries in the area include medical, industrial, construction, and education. The city of Glenwood in Pope County is the site of a large military machinery facility. The city of Morris in Stevens County is the home of a University of Minnesota campus as well as a center for agricultural and mining research and production. Contacts and bank management stated that small businesses in the area are relatively stable. Many individuals who reside in smaller rural communities

commute to larger cities for employment. Contacts and bank management indicated that lack of available workers has been the primary road block to greater economic expansion in the area. The struggle to find qualified workers affects all sectors, from entry-level service jobs to skilled medical professionals. As a result, the unemployment rate has been very low.

Bank management noted that the banking environment in the assessment area is competitive, especially related to agricultural lending. A number of regional banks and a specialized agricultural lender operate in the assessment area.

The Unemployment Rates chart provides the annual average unemployment rate for each county in the assessment area as a whole. As shown, the unemployment rate decreased during the evaluation period across the Morris assessment area.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MORRIS ASSESSMENT AREA

The Lending Test performance in the Morris assessment area is good. Lending levels show excellent responsiveness to assessment area credit needs. The distribution of loans reflects excellent dispersion among farms and businesses of different sizes. Overall, the geographic distribution of loans reflects adequate dispersion throughout the assessment area. The bank makes a relatively high level of community development loans, and it also uses flexible loan programs to help meet credit needs. By product, examiners gave the most weight to the bank's small farm lending. Examiners did not include the bank's HMDA loans in the analysis because this is not a major product for this assessment area.

The Investment Test performance in the Morris assessment area is significant. Overall, the bank made a significant level of qualified investments and donations, which shows good responsiveness to credit and community development needs.

Finally, under the Service Test, retail services are accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provides a relatively high level of community development services.

LENDING TEST

The bank's Lending Test performance for the Morris assessment area is good.

Lending Activity

The bank's lending activity reflects excellent responsiveness to assessment area credit needs. The tables below show the bank's lending in its Minnesota assessment area by product for 2017 and 2018.

**Statewide Summary of Lending Activity
Assessment Area Located in
State of MN 2017**

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	4	3.4%	\$240	1.8%
HMDA Refinance	6	5.2%	\$690	5.0%
HMDA Home Improvement	5	4.3%	\$86	0.6%
HMDA Multi-Family	0	0.0%	\$0	0.0%
Total HMDA	15	12.9%	\$1,016	7.4%
Total Small Business	36	31.0%	\$2,885	21.1%
Total Farm	65	56.0%	\$9,779	71.5%
TOTAL LOANS	116	100.0%	\$13,680	100.0%

Originations and Purchases

**Statewide Summary of Lending Activity
Assessment Area Located in
State of MN 2018**

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	10	7.9%	\$869	5.0%
HMDA Refinance	4	3.2%	\$199	1.1%
HMDA Home Improvement	1	0.8%	\$56	0.3%
HMDA Multi-Family	0	0.0%	\$0	0.0%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	0	0.0%	\$0	0.0%
Loan Purpose Not Applicable	0	0.0%	\$0	0.0%
Total HMDA	15	11.9%	\$1,124	6.5%
Total Small Business	35	27.8%	\$1,920	11.0%
Total Farm	76	60.3%	\$14,336	82.5%
TOTAL LOANS	126	100.0%	\$17,380	100.0%

Originations and Purchases

The bank ranked fifth among 49 lenders reporting CRA data, with 7.3% of the small business and small farm loan market share in 2018. During the evaluation period, lending activity in this assessment area represented 3.1% by number and 3.0% by dollar amount of the bank's total lending. Because this is the only assessment area in the state of Minnesota, the lending activity for the Morris assessment area represents 100.0% of the bank's lending by number and dollar amount in the state.

Distribution by Size of Farms and Businesses

The bank's distribution of loans reflects excellent dispersion among farms and businesses of different sizes. The following table shows the bank's small farm and small business loans by revenue and loan size for 2018 and 2017. Aggregate lending information is also included for each year.

Small Business & Small Farm Lending By Revenue & Loan Size																			
Assessment Area: MN Morris																			
Product Type	Bank Lending & Demographic Data Comparison 2017, 2018					Bank & Aggregate Lending Comparison													
						2017						2018							
	Bank		Total Businesses	Count		Dollar		Count		Dollar									
	Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg								
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	60	84.5%	\$3,379	70.3%	87.3%	30	83.3%	54.4%	\$1,981	68.7%	37.4%	30	85.7%	50.3%	\$1,398	72.8%	32.9%
		Over \$1 Million	8	11.3%	\$1,379	28.7%	8.7%	6	16.7%				2	5.7%					
		Total Rev. available	68	95.8%	\$4,758	99.0%	96.0%	36	100.0%				32	91.4%					
		Rev. Not Known	3	4.2%	\$47	1.0%	4.0%	0	0.0%				3	8.6%					
		Total	71	100.0%	\$4,805	100.0%	100.0%	36	100.0%				35	100.0%					
	Loan Size	\$100,000 or Less	57	80.3%	\$1,669	34.7%		27	75.0%	91.1%	\$730	25.3%	33.0%	30	85.7%	92.9%	\$939	48.9%	39.0%
		\$100,001 - \$250,000	9	12.7%	\$1,381	28.7%		6	16.7%	5.1%	\$980	34.0%	18.7%	3	8.6%	3.6%	\$401	20.9%	15.6%
		\$250,001 - \$1 Million	5	7.0%	\$1,755	36.5%		3	8.3%	3.9%	\$1,175	40.7%	48.3%	2	5.7%	3.5%	\$580	30.2%	45.3%
		Total	71	100.0%	\$4,805	100.0%		36	100.0%	100.0%	\$2,885	100.0%	100.0%	35	100.0%	100.0%	\$1,920	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	52	86.7%	\$1,543	45.7%													
		\$100,001 - \$250,000	5	8.3%	\$731	21.6%													
		\$250,001 - \$1 Million	3	5.0%	\$1,105	32.7%													
		Total	60	100.0%	\$3,379	100.0%													
Small Farm	Revenue	\$1 Million or Less	125	88.7%	\$21,647	89.8%	98.7%	59	90.8%	48.8%	\$9,192	94.0%	65.9%	66	86.8%	58.6%	\$12,455	86.9%	72.2%
		Over \$1 Million	9	6.4%	\$2,337	9.7%	1.3%	3	4.6%				6	7.9%					
		Total Rev. available	134	95.1%	\$23,984	99.5%	100.0%	62	95.4%				72	94.7%					
		Not Known	7	5.0%	\$131	0.5%	0.0%	3	4.6%				4	5.3%					
		Total	141	100.0%	\$24,115	100.0%	100.0%	65	100.0%				76	100.0%					
	Loan Size	\$100,000 or Less	66	46.8%	\$3,094	12.8%		33	50.8%	70.8%	\$1,632	16.7%	20.2%	33	43.4%	68.5%	\$1,462	10.2%	18.6%
		\$100,001 - \$250,000	36	25.5%	\$6,467	26.8%		19	29.2%	17.4%	\$3,472	35.5%	32.7%	17	22.4%	16.9%	\$2,995	20.9%	28.5%
		\$250,001 - \$500,000	39	27.7%	\$14,554	60.4%		13	20.0%	11.8%	\$4,675	47.8%	47.1%	26	34.2%	14.6%	\$9,879	68.9%	52.9%
		Total	141	100.0%	\$24,115	100.0%		65	100.0%	100.0%	\$9,779	100.0%	100.0%	76	100.0%	100.0%	\$14,336	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	56	44.8%	\$2,712	12.5%													
		\$100,001 - \$250,000	35	28.0%	\$6,302	29.1%													
		\$250,001 - \$500,000	34	27.2%	\$12,633	58.4%													
		Total	125	100.0%	\$21,647	100.0%													
Originations & Purchases																			
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																			
2018 FFIEC Census Data and 2018 D&B Information																			

Small Farm. The distribution of small farm loans among farms of different size is excellent. The bank originated 86.8% of its small farm loans to small entities in 2018 and 90.8% in 2017. According to D&B data, 98.7% of farms in the assessment area had gross annual revenues of \$1 million or less in 2018 and 2017. While the bank's lending is slightly below demographics, its lending greatly exceeded aggregate lenders in both years. Aggregate lenders originated 58.6% and 48.8% of their loans to small farms in 2018 and 2017, respectively. The bank is among the top aggregate reporters for small farm loans; the three larger reporters include two regional banks and an implements dealer. Competition for small farm loans is strong, given the number of financial institutions operating in the area. The bank also competes with a specialized agricultural lender for small farm loans. The bank originated 40.9% in 2018 and 49.2% in 2017 of its small farm loans to small farms for amounts of \$100,000 or less. This indicates a willingness to serve farms of all sizes, as small farms often request smaller dollar loans.

Finally, the bank makes use of flexible loan programs in this assessment area, which enhances its small farm lending performance. Specifically, the bank originates FSA guaranty loans; these loan programs provide flexibility to lend to small farms and help meet the needs of the small farms in the area. During the evaluation period, the bank originated one FSA loan in the Morris assessment area.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The bank originated 85.7% of its small business loans in 2018 and 83.3% in 2017. According to D&B data, in 2018, 87.3% of businesses in the assessment area had gross annual revenues of \$1 million or less, and in 2017 the figure was 86.7%. The bank's lending performance is slightly below demographic data for both years. However, the bank's lending performance greatly exceeded aggregate lenders in both years. Aggregate lenders originated 50.3% and 54.4% of its loans to small businesses in 2018 and 2017, respectively. Although the bank is one of the leading aggregate reporters, a regional bank has the larger market share in the Morris assessment area. According to bank management, most of the businesses in the assessment area would be considered small businesses. The bank's focus is on servicing small businesses, which is demonstrated by its lending of small dollar amounts. The majority of the bank's small business loans to small businesses were for amounts of \$100,000 or less (90.0% and 83.3% in 2018 and 2017, respectively). This indicates a willingness to meet the credit needs of all businesses as smaller businesses tend to request smaller dollar loans.

As mentioned, the bank makes use of flexible loan programs in this assessment area. Specifically, the bank originates SBA guaranty loans; these loan programs provide flexible lending practices that help meet the needs of the small businesses in the area. Using flexible loan programs enhances the bank's small business lending performance. During the evaluation period, the bank originated two SBA loans in the Morris assessment area.

Geographic Distribution

Overall, the geographic distribution of small business and small farm loans in the Morris assessment area is adequate, and there are no unexplained gaps in lending. The assessment area has one moderate-income, 16 middle-income, and one upper-income census tracts. Both of the bank's branches in the assessment area, as well as the stand-alone ATM, are located in middle-income census tracts in Stevens County.

Although the bank did not originate small farm loans in 10 of 16 middle-income tracts, small business loans in nine of the middle-income tracts, or any loans in the upper-income tract for 2017 and 2018, the lending is explained. The bank faces competition throughout the assessment area, including from a specialized agricultural lender, as well as a national bank and several larger regional banks. Finally, the bank's lending is concentrated in Stevens County, where it has branches. Borrowers outside of Stevens County likely have more convenient banking options in closer communities.

The following table shows the geographic distribution of the bank's small business and small farm loans for 2018 and 2017. Aggregate lending information is also included for each year.

Geographic Distribution of Small Business & Small Farm Loans																		
Assessment Area: MN Morris																		
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017, 2018					2017					2018						
		Count		Bank		Total Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	5.6%	\$500	10.4%	4.6%	2	5.6%	5.1%	\$330	11.4%	2.5%	2	5.7%	11.1%	\$170	8.9%	2.7%
	Middle	67	94.4%	\$4,305	89.6%	92.5%	34	94.4%	91.1%	\$2,555	88.6%	95.2%	33	94.3%	84.9%	\$1,750	91.1%	92.8%
	Upper	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.0%	\$0	0.0%	1.9%	0	0.0%	2.3%	\$0	0.0%	2.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.5%	0	0.0%	1.7%	\$0	0.0%	1.7%
	Total	71	100.0%	\$4,805	100.0%	100.0%	36	100.0%	100.0%	\$2,885	100.0%	100.0%	35	100.0%	100.0%	\$1,920	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.0%	0	0.0%	7.7%	\$0	0.0%	8.5%	0	0.0%	8.1%	\$0	0.0%	6.4%
	Middle	141	100.0%	\$24,115	100.0%	87.5%	65	100.0%	82.7%	\$9,779	100.0%	82.4%	76	100.0%	83.1%	\$14,336	100.0%	85.2%
	Upper	0	0.0%	\$0	0.0%	6.5%	0	0.0%	9.3%	\$0	0.0%	9.1%	0	0.0%	8.3%	\$0	0.0%	8.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%
Total	141	100.0%	\$24,115	100.0%	100.0%	65	100.0%	100.0%	\$9,779	100.0%	100.0%	76	100.0%	100.0%	\$14,336	100.0%	100.0%	
Originations & Purchases																		
2018 FFIEC Census Data and 2018 D&B Information																		

Small Farm. The geographic distribution of small farm loans is adequate. In 2018 and 2017, the bank did not originate any small farm loans in the moderate-income census tract, located in Swift County. Aggregate lenders originated 8.1% and 7.7% of their small farm loans in the moderate-income census tract in 2018 and 2017, respectively. According to Dun and Bradstreet data, 6.0% and 6.2% of small farms were located in the moderate-income census tract in 2018 and 2017, respectively.

The bank's performance is adequate, despite not lending in the moderate-income tract or in the middle- and upper-income tracts as mentioned above. According to bank management, borrowers in the assessment area often obtain financing from financial institutions that are closest to them. As noted above, there are other financial institutions, including the specialized agricultural lender, located throughout the assessment area.

Small Business. The geographic distribution of small business loans is good. In 2018, the bank originated 5.7% of its small business loans in the moderate-income tract. According to 2018 D&B data, 4.6% of small businesses are located in the moderate-income tract, and aggregate lenders originated 11.1% of their loans in the tract. In 2017, the bank originated 5.6% of its small business loans in the moderate-income tract, and aggregate lenders originated 5.1%. According to 2017 D&B data, 5.2% of small businesses are located in the moderate-income tract.

The bank's lending was slightly above demographics in 2018 and slightly above demographics and the performance of aggregate lenders in 2017. The bank's performance is good considering other financial institutions are located more conveniently in the moderate-income census tract and there is significant competition in the assessment area. Finally, despite not lending in the middle- and upper-income tracts noted above, the bank's performance is good.

Community Development Lending

The bank made a relatively high level of community development loans in the Morris assessment area. During the evaluation period, the bank originated one community development loan for \$175,000, which

financed affordable housing efforts. This loan benefitted the local housing authority by funding projects that advance its mission.

The bank's community development lending increased from zero at the previous evaluation. According to bank management, there are limited opportunities for community development lending in the assessment area. In addition, competition for loans includes larger regional and national banks, which overall, capture a larger share of the general banking market; the bank's market presence is small.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments in the Morris assessment area.

The bank's level of qualified investments in the form of securities is significant. The bank did not purchase any new investments during the evaluation period; however, it continues to hold 15 qualified investments in the form of securities that directly benefitted the Morris assessment area for \$2.0 million. Most of the census tracts in the assessment area are distressed, underserved, or both. These investments are responsive to the assessment area needs because they support revitalization and stabilization activities that help attract and retain residents and businesses, such as school district funding and essential infrastructure improvements. Because the bank meets the investment needs of the Morris assessment area, examiners can also consider the bank's qualified Minnesota investments that are outside of this assessment area. The bank continues to hold two prior period securities totaling \$290,000 that helped revitalize/stabilize moderate-income census tracts outside the bank's Minnesota assessment area by funding improvements to school district buildings.

The bank made an adequate level of qualified investments in the form of donations, totaling \$2,950, during the evaluation period. The bank's level of donation is consistent with the previous evaluation. As shown in the Qualified Investment Donations table, the bank's donations primarily benefit organizations that revitalize or stabilize the Morris assessment area, including organizations that provide basic needs for students in the area and the local fire department. One noteworthy donation was made to help construct an enhanced learning environment for a school located in an underserved census tract. These donations show good responsiveness to community needs given the number of distressed and underserved census tracts in the assessment area. In addition, the bank continues to support organizations that provide affordable housing.

Qualified Investment Donations in the Morris Assessment Area		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Revitalize or Stabilize Distressed and/or Underserved Areas	5	\$2,700
Affordable Housing	2	\$200
Total	8	\$2,900

SERVICE TEST

The bank's delivery systems are accessible to the farms and businesses throughout the assessment area. Services and hours do not vary in a way that inconveniences certain individuals or areas. The changes made to the bank's branch and ATM network during the evaluation period did not adversely affect the accessibility of its delivery systems. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the assessment area are accessible to the bank's geographies and to the farms and businesses throughout the assessment area. The bank's services do not vary in a way that inconveniences certain individuals or areas. As discussed, the bank operates one full-service branch and one limited-

service branch in the assessment area. The full-service branch in Morris is located in a middle-income census tract and has a deposit-taking ATM. It also has extended hours on weekdays. In addition, there is a cash-dispensing-only ATM in Chokio at a nearby convenience store.

The bank did make changes to the hours and availability of its office in Chokio since the previous evaluation. In September 2017, the bank closed the lobby of the Chokio branch and reduced the number of days the drive-up is open from three to two days a week. The drive-up has limited hours of 9 a.m. to 2 p.m. The Chokio branch is in a middle-income census tract. The Chokio office is limited-service and does not have lenders; however, lenders from the Morris office are willing to meet with customers in Chokio if it would be more convenient as well as meet them at their homes, farms, or businesses. Overall, these changes did not adversely affect the accessibility of its delivery systems.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture and a night depository. The bank provides reasonable service hours and reasonable means for customers to complete many types of banking activities outside of normal service hours. The following table shows the geographic distribution of the bank's branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMs																					
Assessment Area: Assessment Group(s): State of MN 2018																					
Tract Category	Branches							ATMs								Demographics					
	Total Branches		Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%		
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0			
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	5.6%	5.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0			5.0%
Middle	2	100.0%	0	0	2	1	0	Total	2	100.0%	1	100.0%	0	0	1	100.0%	0	0	16	88.9%	90.9%
DTO	1		0	0				SA	1		0		0	0	1		0	0			91.2%
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	5.6%	3.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0			3.8%
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0			
Total	2	100.0%	0	0	2	1	0	Total	2	100.0%	1	100.0%	0	0	1	100.0%	0	0	18	100.0%	100.0%
DTO	1		0	0				SA	1		0		0	0	1		0	0			

2018 FFIEC Census Data, 2018 D&B Info, and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides a relatively high level of community development services in the Morris assessment area. The bank supported economic development organizations. Two bank employees provided six community development services for two organizations during the evaluation period. This is consistent with the bank's performance at the previous evaluation. Employees provided financial expertise as board members to organizations that support economic development in the assessment area. Providing support to businesses is responsive to community needs given that economic development activities can often help revitalize and stabilize underserved and/or distressed communities.

CRA APPENDIX A

Scope of Evaluation

SCOPE OF EVALUATION FOR LENDING ACTIVITY January 1, 2017, through December 31, 2018	
<i>FINANCIAL INSTITUTION</i>	<i>PRODUCTS REVIEWED</i>
Dacotah Bank	Small business loans Small farm loans HMDA loans
<i>AFFILIATES</i>	<i>PRODUCTS REVIEWED</i>
Not applicable	Not applicable
SCOPE OF EVALUATION FOR COMMUNITY DEVELOPMENT ACTIVITY July 17, 2017, through December 31, 2019	
Examiners reviewed the bank's community development loans from July 17, 2017, through December 31, 2018, since the loans were a component of the Lending Test.	

LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EVALUATION</i>	<i>BRANCHES VISITED*</i>	<i>OTHER INFORMATION</i>
Watertown/Clark/Webster, South Dakota	Full scope	None	
Lemmon/Mobridge, South Dakota	Full scope	None	
Valley City, North Dakota	Full scope	None	
Rolla, North Dakota	Full scope	None	
Morris, Minnesota	Full scope	None	
Rapid City Partial MSA, South Dakota	Limited scope	None	
Sioux Falls Partial MSA, South Dakota	Limited scope	None	
Aberdeen, South Dakota	Limited scope	None	
Brookings, South Dakota	Limited scope	None	
Faulkton, South Dakota	Limited scope	None	
Sisseton, South Dakota	Limited scope	None	
Bowbells, North Dakota	Limited scope	None	
Dickinson, North Dakota	Limited scope	None	
Hettinger, North Dakota	Limited scope	None	
Jamestown, North Dakota	Limited scope	None	
Minot, North Dakota	Limited scope	None	
*There is a statutory requirement that the written evaluation of a multi-state institution's performance must list the individual branches examined in each state. "Branches visited" indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Examination section of the report.			

CRA APPENDIX B
Summary of State Ratings

<i>State Name</i>	<i>Lending Test Rating</i>	<i>Investment Test Rating</i>	<i>Service Test Rating</i>	<i>Overall State Rating</i>
South Dakota	High Satisfactory	Outstanding	Outstanding	Outstanding
North Dakota	Outstanding	Outstanding	High Satisfactory	Outstanding
Minnesota	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

CRA APPENDIX C

Glossary of Common CRA Terms

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 statistical area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

Consumer loan: A loan to one or more individuals for household, family, or other personal expenditures. It 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.

Distressed nonmetropolitan middle-income census tract: A middle-income, nonmetropolitan census tract 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 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% 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 nonrelatives 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 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., 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 data such as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (i.e., approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

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

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

Metropolitan statistical area (MSA): An area, defined by the Office of Management and Budget, based on the concept of a core area with at least one urbanized area that has a population of at least 50,000. The MSA 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 as measured through commuting.

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

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

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

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

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

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

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

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

Small loan to farm: 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 classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate 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 more than 120 percent of the area median income or a median family income that is more than 120 percent, in the case of geography.

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 228.12.)

CRA APPENDIX D

Lending and Demographic Tables for Limited-Scope Reviews

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Aberdeen 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	1.6	3.6	45	0.4	2.4	3.5
	Middle	25	40.3	37.3	4,075	40.5	35.3	32.9
	Upper	36	58.1	59.1	5,944	59.1	62.4	63.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	62	100.0	100.0	10,064	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	4.4	0	0.0	2.0	3.5
	Middle	10	52.6	28.9	950	11.8	19.7	32.9
	Upper	9	47.4	66.7	7,106	88.2	78.2	63.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	19	100.0	100.0	8,056	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	10.0	8.7	23	7.6	10.3	3.5
	Middle	4	40.0	31.9	105	34.5	25.3	32.9
	Upper	5	50.0	59.4	176	57.9	64.5	63.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	10	100.0	100.0	304	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0 15.9 51.2 32.9 0.0 100.0
	Moderate	1	50.0	16.7	400	15.2	3.6	
	Middle	1	50.0	75.0	2,225	84.8	59.0	
	Upper	0	0.0	8.3	0	0.0	37.4	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	Total	2	100.0	100.0	2,625	100.0	100.0	
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	3	3.2	4.3	468	2.2	2.6	3.5
	Middle	40	43.0	35.3	7,355	34.9	32.6	32.9
	Upper	50	53.8	60.3	13,226	62.8	64.8	63.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	93	100.0	100.0	21,049	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Aberdeen 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison					
							2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	2.2%	\$115	1.5%	3.5%	1	2.2%	3.2%	\$115	1.5%	2.1%
	Middle	17	37.8%	\$2,666	33.7%	32.9%	17	37.8%	40.6%	\$2,666	33.7%	38.0%
	Upper	27	60.0%	\$5,137	64.9%	63.5%	27	60.0%	56.2%	\$5,137	64.9%	59.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	45	100.0%	\$7,918	100.0%	100.0%	45	100.0%	100.0%	\$7,918	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.5%	0	0.0%	4.4%	\$0	0.0%	2.2%
	Middle	7	43.8%	\$896	36.6%	32.9%	7	43.8%	31.5%	\$896	36.6%	28.0%
	Upper	9	56.3%	\$1,550	63.4%	63.5%	9	56.3%	64.1%	\$1,550	63.4%	69.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$2,446	100.0%	100.0%	16	100.0%	100.0%	\$2,446	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	18.2%	\$71	17.8%	3.5%	2	18.2%	3.7%	\$71	17.8%	2.1%
	Middle	3	27.3%	\$78	19.5%	32.9%	3	27.3%	50.0%	\$78	19.5%	40.4%
	Upper	6	54.5%	\$251	62.8%	63.5%	6	54.5%	46.3%	\$251	62.8%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$400	100.0%	100.0%	11	100.0%	100.0%	\$400	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$115	100.0%	15.9%	1	100.0%	19.0%	\$115	100.0%	9.8%
	Middle	0	0.0%	\$0	0.0%	51.2%	0	0.0%	57.1%	\$0	0.0%	67.5%
	Upper	0	0.0%	\$0	0.0%	32.9%	0	0.0%	23.8%	\$0	0.0%	22.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$115	100.0%	100.0%	1	100.0%	100.0%	\$115	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	22.2%	\$0	0.0%	14.6%
	Upper	0	0.0%	\$0	0.0%	63.5%	0	0.0%	77.8%	\$0	0.0%	85.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Aberdeen 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Count		Bank Dollar		Owner Occupied Units	Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	3.5%	0	0.0%	\$0	0.0%	0.0%	
	Middle	1	20.0%	\$15	12.9%	32.9%	1	20.0%	\$15	12.9%	21.4%	
	Upper	4	80.0%	\$101	87.1%	63.5%	4	80.0%	\$101	87.1%	78.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	5	100.0%	\$116	100.0%	100.0%	5	100.0%	\$116	100.0%	100.0%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	3.5%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	\$0	0.0%	46.8%	
	Upper	0	0.0%	\$0	0.0%	63.5%	0	0.0%	\$0	0.0%	53.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	4	5.1%	\$301	2.7%	3.5%	4	5.1%	\$301	2.7%	2.6%	
	Middle	28	35.9%	\$3,655	33.2%	32.9%	28	35.9%	\$3,655	33.2%	37.4%	
	Upper	46	59.0%	\$7,039	64.0%	63.5%	46	59.0%	\$7,039	64.0%	60.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	78	100.0%	\$10,995	100.0%	100.0%	78	100.0%	\$10,995	100.0%	100.0%	

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: SD Aberdeen

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2017, 2018					2017					2018				
		Count		Bank Dollar		Total Businesses	Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %		#	%	\$ 000s	\$ %	
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	50	18.6%	\$8,331	16.4%	18.8%	21	16.7%	\$3,199	13.8%	16.5%	29	20.3%	\$5,132	18.6%	16.0%
	Middle	81	30.1%	\$13,894	27.4%	27.2%	41	32.5%	\$8,720	37.6%	30.7%	40	28.0%	\$5,174	18.8%	28.4%
	Upper	138	51.3%	\$28,554	56.2%	54.1%	64	50.8%	\$11,268	48.6%	52.2%	74	51.7%	\$17,286	62.6%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.6%	0	0.0%	\$0	0.0%	0.5%
	Total	269	100.0%	\$50,779	100.0%	100.0%	126	100.0%	\$23,187	100.0%	100.0%	143	100.0%	\$27,592	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	2	0.6%	\$507	0.9%	1.8%	1	0.6%	\$500	1.7%	3.0%	1	0.6%	\$7	0.0%	0.9%
	Middle	34	9.8%	\$3,311	5.9%	3.9%	19	10.9%	\$1,671	5.7%	5.0%	15	8.7%	\$1,640	6.0%	4.6%
	Upper	312	89.7%	\$52,505	93.2%	94.3%	155	88.6%	\$26,907	92.5%	92.0%	157	90.8%	\$25,598	94.0%	94.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	348	100.0%	\$56,323	100.0%	100.0%	175	100.0%	\$29,078	100.0%	100.0%	173	100.0%	\$27,245	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Aberdeen 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank	Agg	Bank	Agg			
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	9	14.5	7.3	715	7.1	4.0	14.4
	Moderate	9	14.5	17.1	994	9.9	13.0	15.2
	Middle	10	16.1	15.7	1,453	14.4	13.7	22.8
	Upper	19	30.6	32.3	4,220	41.9	41.7	47.6
	Unknown	15	24.2	27.6	2,682	26.6	27.6	0.0
	Total	62	100.0	100.0	10,064	100.0	100.0	100.0
Refinance	Low	0	0.0	5.3	0	0.0	1.5	14.4
	Moderate	5	26.3	12.7	548	6.8	5.7	15.2
	Middle	0	0.0	19.7	0	0.0	13.7	22.8
	Upper	9	47.4	31.1	1,394	17.3	31.5	47.6
	Unknown	5	26.3	31.1	6,114	75.9	47.6	0.0
	Total	19	100.0	100.0	8,056	100.0	100.0	100.0
Home Improvement	Low	1	10.0	10.1	23	7.6	6.7	14.4
	Moderate	1	10.0	15.9	15	4.9	18.6	15.2
	Middle	2	20.0	21.7	70	23.0	25.1	22.8
	Upper	4	40.0	43.5	141	46.4	41.7	47.6
	Unknown	2	20.0	8.7	55	18.1	7.9	0.0
	Total	10	100.0	100.0	304	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	14.4
	Moderate	0	0.0	0.0	0	0.0	0.0	15.2
	Middle	0	0.0	0.0	0	0.0	0.0	22.8
	Upper	0	0.0	0.0	0	0.0	0.0	47.6
	Unknown	2	100.0	100.0	2,625	100.0	100.0	0.0
	Total	2	100.0	100.0	2,625	100.0	100.0	100.0
HMDA Totals	Low	10	10.8	6.9	738	3.5	3.1	14.4
	Moderate	15	16.1	15.7	1,557	7.4	10.3	15.2
	Middle	12	12.9	16.9	1,523	7.2	13.1	22.8
	Upper	32	34.4	32.4	5,755	27.3	36.0	47.6
	Unknown	24	25.8	28.0	11,476	54.5	37.5	0.0
	Total	93	100.0	100.0	21,049	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Aberdeen 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	3	6.7%	\$322	4.1%	14.4%	3	6.7%	7.0%	\$322	4.1%	3.9%
	Moderate	13	28.9%	\$1,744	22.0%	15.2%	13	28.9%	24.0%	\$1,744	22.0%	18.7%
	Middle	8	17.8%	\$1,381	17.4%	22.8%	8	17.8%	22.1%	\$1,381	17.4%	22.4%
	Upper	12	26.7%	\$3,020	38.1%	47.6%	12	26.7%	30.5%	\$3,020	38.1%	40.1%
	Unknown	9	20.0%	\$1,451	18.3%	0.0%	9	20.0%	16.4%	\$1,451	18.3%	15.0%
	Total	45	100.0%	\$7,918	100.0%	100.0%	45	100.0%	100.0%	\$7,918	100.0%	100.0%
REFINANCE	Low	1	6.3%	\$25	1.0%	14.4%	1	6.3%	6.9%	\$25	1.0%	3.5%
	Moderate	2	12.5%	\$129	5.3%	15.2%	2	12.5%	15.3%	\$129	5.3%	9.9%
	Middle	6	37.5%	\$851	34.8%	22.8%	6	37.5%	29.0%	\$851	34.8%	27.2%
	Upper	4	25.0%	\$1,022	41.8%	47.6%	4	25.0%	37.9%	\$1,022	41.8%	48.1%
	Unknown	3	18.8%	\$419	17.1%	0.0%	3	18.8%	10.9%	\$419	17.1%	11.3%
	Total	16	100.0%	\$2,446	100.0%	100.0%	16	100.0%	100.0%	\$2,446	100.0%	100.0%
HOME IMPROVEMENT	Low	4	36.4%	\$103	25.8%	14.4%	4	36.4%	13.0%	\$103	25.8%	6.1%
	Moderate	2	18.2%	\$135	33.8%	15.2%	2	18.2%	7.4%	\$135	33.8%	4.5%
	Middle	1	9.1%	\$35	8.8%	22.8%	1	9.1%	16.7%	\$35	8.8%	9.4%
	Upper	3	27.3%	\$91	22.8%	47.6%	3	27.3%	50.0%	\$91	22.8%	59.4%
	Unknown	1	9.1%	\$36	9.0%	0.0%	1	9.1%	13.0%	\$36	9.0%	20.6%
	Total	11	100.0%	\$400	100.0%	100.0%	11	100.0%	100.0%	\$400	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	14.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.6%	0	0.0%	4.8%	\$0	0.0%	0.6%
	Unknown	1	100.0%	\$115	100.0%	0.0%	1	100.0%	95.2%	\$115	100.0%	99.4%
	Total	1	100.0%	\$115	100.0%	100.0%	1	100.0%	100.0%	\$115	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	14.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	5.6%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.6%	0	0.0%	88.9%	\$0	0.0%	86.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	9.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Aberdeen 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	14.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	20.0%	\$36	31.0%	15.2%	1	20.0%	14.3%	\$36	31.0%	6.5%
	Middle	3	60.0%	\$65	56.0%	22.8%	3	60.0%	42.9%	\$65	56.0%	21.1%
	Upper	1	20.0%	\$15	12.9%	47.6%	1	20.0%	42.9%	\$15	12.9%	72.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$116	100.0%	100.0%	5	100.0%	100.0%	\$116	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	14.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	10.3%	\$450	4.1%	14.4%	8	10.3%	6.8%	\$450	4.1%	3.5%
	Moderate	18	23.1%	\$2,044	18.6%	15.2%	18	23.1%	19.5%	\$2,044	18.6%	14.6%
	Middle	18	23.1%	\$2,332	21.2%	22.8%	18	23.1%	22.6%	\$2,332	21.2%	21.3%
	Upper	20	25.6%	\$4,148	37.7%	47.6%	20	25.6%	33.6%	\$4,148	37.7%	40.0%
	Unknown	14	17.9%	\$2,021	18.4%	0.0%	14	17.9%	17.5%	\$2,021	18.4%	20.6%
	Total	78	100.0%	\$10,995	100.0%	100.0%	78	100.0%	100.0%	\$10,995	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: SD Aberdeen

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
			2017, 2018					2017						2018					
			Bank				Total Businesses	Count			Dollar			Count			Dollar		
			Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	145	53.9%	\$20,131	39.6%	87.2%	73	57.9%	53.4%	\$10,339	44.6%	37.9%	72	50.3%	50.6%	\$9,792	35.5%	36.8%
		Over \$1 Million	92	34.2%	\$27,569	54.3%	10.3%	36	28.6%				56	39.2%					
		Total Rev. available	237	88.1%	\$47,700	93.9%	97.5%	109	86.5%				128	89.5%					
		Rev. Not Known	32	11.9%	\$3,079	6.1%	2.5%	17	13.5%				15	10.5%					
		Total	269	100.0%	\$50,779	100.0%	100.0%	126	100.0%				143	100.0%					
	Loan Size	\$100,000 or Less	155	57.6%	\$6,052	11.9%		69	54.8%	80.4%	\$2,389	10.3%	19.1%	86	60.1%	80.4%	\$3,663	13.3%	18.9%
		\$100,001 - \$250,000	54	20.1%	\$10,078	19.8%		28	22.2%	10.1%	\$5,387	23.2%	22.5%	26	18.2%	9.9%	\$4,691	17.0%	20.4%
		\$250,001 - \$1 Million	60	22.3%	\$34,649	68.2%		29	23.0%	9.5%	\$15,411	66.5%	58.4%	31	21.7%	9.7%	\$19,238	69.7%	60.7%
		Total	269	100.0%	\$50,779	100.0%		126	100.0%	100.0%	\$23,187	100.0%	100.0%	143	100.0%	100.0%	\$27,592	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	101	69.7%	\$3,909	19.4%													
		\$100,001 - \$250,000	22	15.2%	\$3,830	19.0%													
		\$250,001 - \$1 Million	22	15.2%	\$12,392	61.6%													
		Total	145	100.0%	\$20,131	100.0%													
Small Farm	Revenue	\$1 Million or Less	289	83.0%	\$41,090	73.0%	Total Farms 97.7%	148	84.6%	58.5%	\$20,904	71.9%	65.2%	141	81.5%	60.4%	\$20,186	74.1%	68.8%
		Over \$1 Million	47	13.5%	\$14,501	25.7%	2.3%	25	14.3%				22	12.7%					
		Total Rev. available	336	96.5%	\$55,591	98.7%	100.0%	173	98.9%				163	94.2%					
		Not Known	12	3.4%	\$732	1.3%	0.0%	2	1.1%				10	5.8%					
		Total	348	100.0%	\$56,323	100.0%	100.0%	175	100.0%				173	100.0%					
	Loan Size	\$100,000 or Less	172	49.4%	\$7,239	12.9%		88	50.3%	62.0%	\$3,587	12.3%	14.5%	84	48.6%	60.2%	\$3,652	13.4%	14.2%
		\$100,001 - \$250,000	99	28.4%	\$17,743	31.5%		45	25.7%	18.5%	\$8,096	27.8%	25.3%	54	31.2%	22.3%	\$9,647	35.4%	31.5%
		\$250,001 - \$500,000	77	22.1%	\$31,341	55.6%		42	24.0%	19.5%	\$17,395	59.8%	60.3%	35	20.2%	17.5%	\$13,946	51.2%	54.3%
		Total	348	100.0%	\$56,323	100.0%		175	100.0%	100.0%	\$29,078	100.0%	100.0%	173	100.0%	100.0%	\$27,245	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	157	54.3%	\$6,608	16.1%													
		\$100,001 - \$250,000	81	28.0%	\$14,724	35.8%													
		\$250,001 - \$500,000	51	17.6%	\$19,758	48.1%													
		Total	289	100.0%	\$41,090	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Brookings 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	4.8	0	0.0	4.0	8.5
	Middle	9	60.0	61.9	1,250	61.5	57.9	66.6
	Upper	6	40.0	33.3	783	38.5	38.1	24.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	15	100.0	100.0	2,033	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	4	25.0	5.6	891	21.8	6.2	8.5
	Middle	10	62.5	77.9	2,945	71.9	75.9	66.6
	Upper	2	12.5	16.5	260	6.3	17.9	24.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	16	100.0	100.0	4,096	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	20.0	2.9	37	11.6	1.3	8.5
	Middle	1	20.0	82.9	10	3.1	81.0	66.6
	Upper	3	60.0	14.3	271	85.2	17.7	24.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	5	100.0	100.0	318	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0 23.5 70.6 5.9 0.0
	Moderate	0	0.0	25.0	0	0.0	14.9	
	Middle	1	100.0	75.0	365	100.0	85.1	
	Upper	0	0.0	0.0	0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	Total	1	100.0	100.0	365	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	5	13.5	5.1	928	13.6	5.0	8.5
	Middle	21	56.8	69.1	4,570	67.1	65.9	66.6
	Upper	11	29.7	25.8	1,314	19.3	29.1	24.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	37	100.0	100.0	6,812	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Brookings 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	7.1%	\$104	4.2%	8.5%	1	7.1%	9.1%	\$104	4.2%	7.8%
	Middle	10	71.4%	\$1,896	76.7%	66.6%	10	71.4%	55.2%	\$1,896	76.7%	51.8%
	Upper	3	21.4%	\$472	19.1%	24.9%	3	21.4%	35.1%	\$472	19.1%	40.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Total	14	100.0%	\$2,472	100.0%	100.0%	14	100.0%	100.0%	\$2,472	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	9.1%	\$26	2.6%	8.5%	1	9.1%	10.9%	\$26	2.6%	8.2%
	Middle	8	72.7%	\$647	64.9%	66.6%	8	72.7%	66.5%	\$647	64.9%	65.3%
	Upper	2	18.2%	\$324	32.5%	24.9%	2	18.2%	22.6%	\$324	32.5%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$997	100.0%	100.0%	11	100.0%	100.0%	\$997	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	50.0%	\$39	18.5%	66.6%	1	50.0%	62.9%	\$39	18.5%	49.7%
	Upper	1	50.0%	\$172	81.5%	24.9%	1	50.0%	37.1%	\$172	81.5%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$211	100.0%	100.0%	2	100.0%	100.0%	\$211	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	23.5%	0	0.0%	36.4%	\$0	0.0%	21.4%
	Middle	2	100.0%	\$2,682	100.0%	70.6%	2	100.0%	54.5%	\$2,682	100.0%	77.5%
	Upper	0	0.0%	\$0	0.0%	5.9%	0	0.0%	9.1%	\$0	0.0%	1.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$2,682	100.0%	100.0%	2	100.0%	100.0%	\$2,682	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	66.6%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	24.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Brookings 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018						
		Bank				Owner Occupied Units	Count			Dollar			
		Count		Dollar			Bank		Agg		Bank		Agg
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	4.0%	\$0	0.0%	1.4%	
	Middle	3	100.0%	\$98	100.0%	66.6%	3	100.0%	76.0%	\$98	100.0%	76.5%	
	Upper	0	0.0%	\$0	0.0%	24.9%	0	0.0%	20.0%	\$0	0.0%	22.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	3	100.0%	\$98	100.0%	100.0%	3	100.0%	100.0%	\$98	100.0%	100.0%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	66.6%	0	0.0%	81.3%	\$0	0.0%	70.6%	
	Upper	0	0.0%	\$0	0.0%	24.9%	0	0.0%	18.8%	\$0	0.0%	29.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	2	6.3%	\$130	2.0%	8.5%	2	6.3%	9.2%	\$130	2.0%	9.2%	
	Middle	24	75.0%	\$5,362	83.0%	66.6%	24	75.0%	60.0%	\$5,362	83.0%	58.4%	
	Upper	6	18.8%	\$968	15.0%	24.9%	6	18.8%	30.4%	\$968	15.0%	32.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	
	Total	32	100.0%	\$6,460	100.0%	100.0%	32	100.0%	100.0%	\$6,460	100.0%	100.0%	

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: SD Brookings

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2017					2017						2018					
		Count		Bank Dollar		Total Businesses	Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %		
		#	%	\$ (000s)	\$ %		%	#	%	\$ 000s		\$ %	#	%	\$ 000s		\$ %	
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	18	16.2%	\$1,726	12.7%	22.1%	14	24.6%	23.4%	\$1,443	20.8%	25.8%	4	7.4%	21.5%	\$283	4.2%	21.7%
	Middle	68	61.3%	\$7,295	53.5%	56.4%	31	54.4%	50.0%	\$3,221	46.5%	41.6%	37	68.5%	51.2%	\$4,074	60.8%	43.9%
	Upper	25	22.5%	\$4,606	33.8%	21.5%	12	21.1%	25.2%	\$2,265	32.7%	31.9%	13	24.1%	25.6%	\$2,341	35.0%	34.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.6%	0	0.0%	1.8%	\$0	0.0%	0.4%
	Total	111	100.0%	\$13,627	100.0%	100.0%	57	100.0%	100.0%	\$6,929	100.0%	100.0%	54	100.0%	100.0%	\$6,698	100.0%	100.0%
SMALL FARM				Total Farms														
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.0%	\$0	0.0%	1.3%	0	0.0%	0.9%	\$0	0.0%	1.2%
	Middle	57	72.2%	\$9,609	77.8%	73.7%	30	65.2%	69.5%	\$4,500	69.3%	70.3%	27	81.8%	70.2%	\$5,109	87.2%	71.6%
	Upper	22	27.8%	\$2,737	22.2%	25.2%	16	34.8%	29.5%	\$1,990	30.7%	28.4%	6	18.2%	28.6%	\$747	12.8%	26.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.9%
Total	79	100.0%	\$12,346	100.0%	100.0%	46	100.0%	100.0%	\$6,490	100.0%	100.0%	33	100.0%	100.0%	\$5,856	100.0%	100.0%	

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Brookings 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %			
Home Purchase	Low	1	6.7	2.8	95	4.7	1.4	17.1
	Moderate	4	26.7	17.1	354	17.4	12.5	16.3
	Middle	5	33.3	23.5	865	42.5	21.9	23.1
	Upper	4	26.7	40.1	609	30.0	49.1	43.5
	Unknown	1	6.7	16.5	110	5.4	15.0	0.0
	Total	15	100.0	100.0	2,033	100.0	100.0	100.0
Refinance	Low	0	0.0	5.6	0	0.0	2.6	17.1
	Moderate	2	12.5	13.4	268	6.5	7.2	16.3
	Middle	2	12.5	18.2	222	5.4	12.5	23.1
	Upper	8	50.0	46.3	2,715	66.3	57.7	43.5
	Unknown	4	25.0	16.5	891	21.8	20.0	0.0
	Total	16	100.0	100.0	4,096	100.0	100.0	100.0
Home Improvement	Low	0	0.0	2.9	0	0.0	0.2	17.1
	Moderate	1	20.0	22.9	14	4.4	14.1	16.3
	Middle	2	40.0	28.6	257	80.8	23.5	23.1
	Upper	2	40.0	37.1	47	14.8	48.6	43.5
	Unknown	0	0.0	8.6	0	0.0	13.6	0.0
	Total	5	100.0	100.0	318	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	17.1
	Moderate	0	0.0	0.0	0	0.0	0.0	16.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.1
	Upper	0	0.0	0.0	0	0.0	0.0	43.5
	Unknown	1	100.0	100.0	365	100.0	100.0	0.0
	Total	1	100.0	100.0	365	100.0	100.0	100.0
HMDA Totals	Low	1	2.7	3.8	95	1.4	1.9	17.1
	Moderate	7	18.9	15.9	636	9.3	10.3	16.3
	Middle	9	24.3	21.7	1,344	19.7	17.9	23.1
	Upper	14	37.8	41.9	3,371	49.5	51.8	43.5
	Unknown	6	16.2	16.6	1,366	20.1	18.2	0.0
	Total	37	100.0	100.0	6,812	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Brookings 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	3.9%	\$0	0.0%	1.6%
	Moderate	1	7.1%	\$156	6.3%	16.3%	1	7.1%	18.1%	\$156	6.3%	14.5%
	Middle	5	35.7%	\$906	36.7%	23.1%	5	35.7%	25.7%	\$906	36.7%	23.4%
	Upper	7	50.0%	\$1,306	52.8%	43.5%	7	50.0%	41.4%	\$1,306	52.8%	49.0%
	Unknown	1	7.1%	\$104	4.2%	0.0%	1	7.1%	10.8%	\$104	4.2%	11.5%
	Total	14	100.0%	\$2,472	100.0%	100.0%	14	100.0%	100.0%	\$2,472	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	4.0%	\$0	0.0%	2.5%
	Moderate	3	27.3%	\$335	33.6%	16.3%	3	27.3%	15.7%	\$335	33.6%	10.7%
	Middle	2	18.2%	\$65	6.5%	23.1%	2	18.2%	19.8%	\$65	6.5%	15.6%
	Upper	5	45.5%	\$571	57.3%	43.5%	5	45.5%	50.8%	\$571	57.3%	59.2%
	Unknown	1	9.1%	\$26	2.6%	0.0%	1	9.1%	9.7%	\$26	2.6%	11.9%
	Total	11	100.0%	\$997	100.0%	100.0%	11	100.0%	100.0%	\$997	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	5.7%	\$0	0.0%	1.4%
	Moderate	1	50.0%	\$39	18.5%	16.3%	1	50.0%	8.6%	\$39	18.5%	12.3%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	25.7%	\$0	0.0%	28.9%
	Upper	1	50.0%	\$172	81.5%	43.5%	1	50.0%	60.0%	\$172	81.5%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$211	100.0%	100.0%	2	100.0%	100.0%	\$211	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$2,682	100.0%	0.0%	2	100.0%	100.0%	\$2,682	100.0%	100.0%
	Total	2	100.0%	\$2,682	100.0%	100.0%	2	100.0%	100.0%	\$2,682	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	20.0%	\$0	0.0%	5.4%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	20.0%	\$0	0.0%	30.0%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	60.0%	\$0	0.0%	64.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Brookings 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	33.3%	\$14	14.3%	17.1%	1	33.3%	4.0%	\$14	14.3%	1.3%
	Moderate	1	33.3%	\$4	4.1%	16.3%	1	33.3%	20.0%	\$4	4.1%	25.6%
	Middle	1	33.3%	\$80	81.6%	23.1%	1	33.3%	28.0%	\$80	81.6%	20.1%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	44.0%	\$0	0.0%	49.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	3.4%
	Total	3	100.0%	\$98	100.0%	100.0%	3	100.0%	100.0%	\$98	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	3.1%	\$14	0.2%	17.1%	1	3.1%	3.9%	\$14	0.2%	1.6%
	Moderate	6	18.8%	\$534	8.3%	16.3%	6	18.8%	16.6%	\$534	8.3%	11.8%
	Middle	8	25.0%	\$1,051	16.3%	23.1%	8	25.0%	23.3%	\$1,051	16.3%	18.8%
	Upper	13	40.6%	\$2,049	31.7%	43.5%	13	40.6%	43.7%	\$2,049	31.7%	45.6%
	Unknown	4	12.5%	\$2,812	43.5%	0.0%	4	12.5%	12.6%	\$2,812	43.5%	22.1%
	Total	32	100.0%	\$6,460	100.0%	100.0%	32	100.0%	100.0%	\$6,460	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size																				
Assessment Area: SD Brookings																				
Product Type			Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
			2018, 2017						2017						2018					
			Bank				Total Businesses	Count			Dollar			Count			Dollar			
			Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
Small Business	Revenue	\$1 Million or Less	80	72.1%	\$5,880	43.1%	89.3%	42	73.7%	61.0%	\$2,854	41.2%	43.5%	38	70.4%	56.1%	\$3,026	45.2%	41.6%	
		Over \$1 Million	29	26.1%	\$7,639	56.1%	7.8%	14	24.6%				15	27.8%						
		Total Rev. available	109	98.2%	\$13,519	99.2%	97.1%	56	98.3%				53	98.2%						
		Rev. Not Known	2	1.8%	\$108	0.8%	2.9%	1	1.8%				1	1.9%						
		Total	111	100.0%	\$13,627	100.0%	100.0%	57	100.0%				54	100.0%						
	Loan Size	\$100,000 or Less	77	69.4%	\$2,889	21.2%		39	68.4%	83.7%	\$1,392	20.1%	29.2%	38	70.4%	84.6%	\$1,497	22.3%	26.7%	
		\$100,001 - \$250,000	20	18.0%	\$3,450	25.3%		11	19.3%	10.4%	\$1,952	28.2%	26.5%	9	16.7%	7.4%	\$1,498	22.4%	16.3%	
		\$250,001 - \$1 Million	14	12.6%	\$7,288	53.5%		7	12.3%	5.9%	\$3,585	51.7%	44.3%	7	13.0%	8.0%	\$3,703	55.3%	57.1%	
		Total	111	100.0%	\$13,627	100.0%		57	100.0%	100.0%	\$6,929	100.0%	100.0%	54	100.0%	100.0%	\$6,698	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	61	76.3%	\$1,908	32.4%														
		\$100,001 - \$250,000	14	17.5%	\$2,281	38.8%														
		\$250,001 - \$1 Million	5	6.3%	\$1,691	28.8%														
		Total	80	100.0%	\$5,880	100.0%														
Small Farm	Revenue	\$1 Million or Less	56	70.9%	\$6,647	53.8%	98.1%	33	71.7%	72.0%	\$3,681	56.7%	74.5%	23	69.7%	69.1%	\$2,966	50.6%	71.3%	
		Over \$1 Million	22	27.8%	\$5,691	46.1%	1.7%	12	26.1%				10	30.3%						
		Total Rev. available	78	98.7%	\$12,338	99.9%	99.8%	45	97.8%				33	100.0%						
		Not Known	1	1.3%	\$8	0.1%	0.2%	1	2.2%				0	0.0%						
		Total	79	100.0%	\$12,346	100.0%	100.0%	46	100.0%				33	100.0%						
	Loan Size	\$100,000 or Less	38	48.1%	\$1,283	10.4%		23	50.0%	69.2%	\$701	10.8%	22.9%	15	45.5%	66.7%	\$582	9.9%	21.6%	
		\$100,001 - \$250,000	21	26.6%	\$3,367	27.3%		13	28.3%	19.4%	\$2,118	32.6%	34.6%	8	24.2%	20.2%	\$1,249	21.3%	32.4%	
		\$250,001 - \$500,000	20	25.3%	\$7,696	62.3%		10	21.7%	11.3%	\$3,671	56.6%	42.5%	10	30.3%	13.1%	\$4,025	68.7%	46.0%	
		Total	79	100.0%	\$12,346	100.0%		46	100.0%	100.0%	\$6,490	100.0%	100.0%	33	100.0%	100.0%	\$5,856	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	33	58.9%	\$1,055	15.9%														
		\$100,001 - \$250,000	13	23.2%	\$1,964	29.5%														
		\$250,001 - \$500,000	10	17.9%	\$3,628	54.6%														
		Total	56	100.0%	\$6,647	100.0%														
Originations & Purchases																				
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																				
2018 FFIEC Census Data and 2018 D&B Information																				

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Faulkton 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	100.0	367	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	367	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	100.0	295	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	295	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	100.0	63	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	63	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	
	Middle	0	0.0	0.0	0	0.0	0.0	
	Upper	0	0.0	0.0	0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	10	100.0	100.0	725	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	10	100.0	100.0	725	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Faulkton 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$199	100.0%	100.0%	3	100.0%	100.0%	\$199	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$199	100.0%	100.0%	3	100.0%	100.0%	\$199	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$117	100.0%	100.0%	3	100.0%	100.0%	\$117	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$117	100.0%	100.0%	3	100.0%	100.0%	\$117	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: SD Faulkton 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Count		Bank Dollar		Owner Occupied Units	Count			Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$25</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	7	100.0%	\$341	100.0%	100.0%	7	100.0%	100.0%	\$341	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$341</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$341</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: SD Faulkton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017, 2018					2017						2018					
		Bank		Dollar		Total Businesses	Count		Dollar		Count	Dollar						
		Count					Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	55	100.0%	\$4,225	100.0%	100.0%	29	100.0%	100.0%	\$2,180	100.0%	100.0%	26	100.0%	98.4%	\$2,045	100.0%	99.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	0.1%
	Total	55	100.0%	\$4,225	100.0%	100.0%	29	100.0%	100.0%	\$2,180	100.0%	100.0%	26	100.0%	100.0%	\$2,045	100.0%	100.0%
SMALL FARM					Total Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	217	100.0%	\$30,409	100.0%	100.0%	96	100.0%	100.0%	\$13,373	100.0%	100.0%	121	100.0%	100.0%	\$17,036	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	217	100.0%	\$30,409	100.0%	100.0%	96	100.0%	100.0%	\$13,373	100.0%	100.0%	121	100.0%	100.0%	\$17,036	100.0%	100.0%	

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Faulkton 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %			
Home Purchase	Low	2	50.0	21.4	187	51.0	12.9	16.0
	Moderate	1	25.0	21.4	52	14.2	15.1	18.1
	Middle	1	25.0	28.6	128	34.9	24.7	18.7
	Upper	0	0.0	21.4	0	0.0	41.3	47.2
	Unknown	0	0.0	7.1	0	0.0	6.0	0.0
	Total	4	100.0	100.0	367	100.0	100.0	100.0
Refinance	Low	0	0.0	12.5	0	0.0	5.1	16.0
	Moderate	2	50.0	37.5	95	32.2	21.2	18.1
	Middle	1	25.0	12.5	83	28.1	8.4	18.7
	Upper	1	25.0	25.0	117	39.7	63.9	47.2
	Unknown	0	0.0	12.5	0	0.0	1.5	0.0
	Total	4	100.0	100.0	295	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	16.0
	Moderate	1	50.0	33.3	32	50.8	16.1	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	18.7
	Upper	0	0.0	33.3	0	0.0	68.3	47.2
	Unknown	1	50.0	33.3	31	49.2	15.6	0.0
	Total	2	100.0	100.0	63	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	16.0
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	18.7
	Upper	0	0.0	0.0	0	0.0	0.0	47.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	2	20.0	16.0	187	25.8	9.4	16.0
	Moderate	4	40.0	28.0	179	24.7	17.2	18.1
	Middle	2	20.0	20.0	211	29.1	17.6	18.7
	Upper	1	10.0	24.0	117	16.1	50.6	47.2
	Unknown	1	10.0	12.0	31	4.3	5.2	0.0
	Total	10	100.0	100.0	725	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Faulkton 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	1	33.3%	\$48	24.1%	16.0%	1	33.3%	7.7%	\$48	24.1%	3.2%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	23.1%	\$0	0.0%	16.9%
	Middle	1	33.3%	\$54	27.1%	18.7%	1	33.3%	30.8%	\$54	27.1%	26.5%
	Upper	1	33.3%	\$97	48.7%	47.2%	1	33.3%	30.8%	\$97	48.7%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.7%	\$0	0.0%	6.5%
	Total	3	100.0%	\$199	100.0%	100.0%	3	100.0%	100.0%	\$199	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	33.3%	\$48	41.0%	18.1%	1	33.3%	14.3%	\$48	41.0%	5.6%
	Middle	2	66.7%	\$69	59.0%	18.7%	2	66.7%	57.1%	\$69	59.0%	47.6%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	28.6%	\$0	0.0%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$117	100.0%	100.0%	3	100.0%	100.0%	\$117	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Faulkton 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	100.0%	\$25	100.0%	16.0%	1	100.0%	50.0%	\$25	100.0%	55.6%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	50.0%	\$0	0.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	2	28.6%	\$73	21.4%	16.0%	2	28.6%	9.1%	\$73	21.4%	3.0%
	Moderate	1	14.3%	\$48	14.1%	18.1%	1	14.3%	18.2%	\$48	14.1%	12.5%
	Middle	3	42.9%	\$123	36.1%	18.7%	3	42.9%	36.4%	\$123	36.1%	33.6%
	Upper	1	14.3%	\$97	28.4%	47.2%	1	14.3%	31.8%	\$97	28.4%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.5%	\$0	0.0%	4.0%
	Total	7	100.0%	\$341	100.0%	100.0%	7	100.0%	100.0%	\$341	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: SD Faulkton

Product Type		Bank Lending & Demographic Data Comparison 2017, 2018					Bank & Aggregate Lending Comparison													
							2017						2018							
		Bank				Total Businesses	Count			Dollar			Count			Dollar				
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
Small Business	Revenue	\$1 Million or Less	37	67.3%	\$1,283	30.4%	78.9%	19	65.5%	58.2%	\$661	30.3%	30.5%	18	69.2%	54.7%	\$622	30.4%	31.8%	
		Over \$1 Million	16	29.1%	\$2,897	68.6%	8.6%	9	31.0%				7	26.9%						
		Total Rev. available	53	96.4%	\$4,180	99.0%	87.5%	28	96.5%				25	96.1%						
		Rev. Not Known	2	3.6%	\$45	1.1%	12.5%	1	3.4%				1	3.8%						
		Total	55	100.0%	\$4,225	100.0%	100.0%	29	100.0%				26	100.0%						
	Loan Size	\$100,000 or Less	43	78.2%	\$1,548	36.6%		23	79.3%	87.3%	\$832	38.2%	40.1%	20	76.9%	90.6%	\$716	35.0%	50.7%	
		\$100,001 - \$250,000	8	14.5%	\$1,525	36.1%		4	13.8%	9.1%	\$775	35.6%	38.1%	4	15.4%	6.3%	\$750	36.7%	27.8%	
		\$250,001 - \$1 Million	4	7.3%	\$1,152	27.3%		2	6.9%	3.6%	\$573	26.3%	21.8%	2	7.7%	3.1%	\$579	28.3%	21.5%	
		Total	55	100.0%	\$4,225	100.0%		29	100.0%	100.0%	\$2,180	100.0%	100.0%	26	100.0%	100.0%	\$2,045	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	37	100.0%	\$1,283	100.0%														
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%														
		\$250,001 - \$1 Million	0	0.0%	\$0	0.0%														
		Total	37	100.0%	\$1,283	100.0%														
	Small Farm	Revenue	\$1 Million or Less	195	89.9%	\$25,900	85.2%	95.2%	89	92.7%	71.9%	\$11,816	88.4%	81.8%	106	87.6%	70.2%	\$14,084	82.7%	80.0%
			Over \$1 Million	19	8.8%	\$4,297	14.1%	4.8%	6	6.3%				13	10.7%					
			Total Rev. available	214	98.7%	\$30,197	99.3%	100.0%	95	99.0%				119	98.3%					
Not Known			3	1.4%	\$212	0.7%	0.0%	1	1.0%				2	1.7%						
Total			217	100.0%	\$30,409	100.0%	100.0%	96	100.0%				121	100.0%						
Loan Size			\$100,000 or Less	113	52.1%	\$4,639	15.3%		51	53.1%	60.0%	\$2,240	16.8%	17.0%	62	51.2%	61.4%	\$2,399	14.1%	16.6%
		\$100,001 - \$250,000	68	31.3%	\$12,709	41.8%		30	31.3%	25.9%	\$5,808	43.4%	41.0%	38	31.4%	25.1%	\$6,901	40.5%	39.7%	
		\$250,001 - \$500,000	36	16.6%	\$13,061	43.0%		15	15.6%	14.1%	\$5,325	39.8%	42.0%	21	17.4%	13.5%	\$7,736	45.4%	43.8%	
		Total	217	100.0%	\$30,409	100.0%		96	100.0%	100.0%	\$13,373	100.0%	100.0%	121	100.0%	100.0%	\$17,036	100.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	110	56.4%	\$4,527	17.5%														
		\$100,001 - \$250,000	53	27.2%	\$9,862	38.1%														
		\$250,001 - \$500,000	32	16.4%	\$11,511	44.4%														
		Total	195	100.0%	\$25,900	100.0%														

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Rapid City MSA 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.1	0	0.0	0.1	0.1
	Moderate	8	28.6	18.2	624	13.3	12.2	16.7
	Middle	15	53.6	60.6	2,905	61.7	60.5	56.4
	Upper	5	17.9	21.0	1,180	25.1	27.1	26.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	28	100.0	100.0	4,709	100.0	100.0	100.0
Refinance	Low	0	0.0	0.1	0	0.0	0.1	0.1
	Moderate	3	20.0	15.6	354	10.4	9.6	16.7
	Middle	8	53.3	54.9	1,479	43.3	50.3	56.4
	Upper	4	26.7	29.4	1,585	46.4	39.9	26.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	15	100.0	100.0	3,418	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.1
	Moderate	2	33.3	13.6	12	2.6	8.6	16.7
	Middle	3	50.0	64.1	62	13.6	61.7	56.4
	Upper	1	16.7	22.2	382	83.8	29.7	26.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	6	100.0	100.0	456	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 1.2
	Moderate	1	50.0	46.2	185	14.6	65.3	33.6
	Middle	1	50.0	50.0	1,081	85.4	34.4	48.9
	Upper	0	0.0	3.8	0	0.0	0.3	16.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	1,266	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.1	0	0.0	0.1	0.1
	Moderate	14	27.5	17.5	1,175	11.9	14.0	16.7
	Middle	27	52.9	59.3	5,527	56.1	56.9	56.4
	Upper	10	19.6	23.1	3,147	32.0	29.0	26.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	51	100.0	100.0	9,849	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Rapid City MSA 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
							2018					
		Bank				Owner Occupied Units	Count		Dollar			
		Count		Dollar			Bank		Agg		Bank	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	4	9.5%	\$418	5.3%	16.7%	4	9.5%	16.1%	\$418	5.3%	10.8%
	Middle	30	71.4%	\$5,379	68.2%	56.4%	30	71.4%	61.1%	\$5,379	68.2%	59.8%
	Upper	8	19.0%	\$2,087	26.5%	26.8%	8	19.0%	22.7%	\$2,087	26.5%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	42	100.0%	\$7,884	100.0%	100.0%	42	100.0%	100.0%	\$7,884	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	12.5%	\$101	7.7%	16.7%	1	12.5%	15.5%	\$101	7.7%	9.5%
	Middle	4	50.0%	\$703	53.8%	56.4%	4	50.0%	56.3%	\$703	53.8%	51.0%
	Upper	3	37.5%	\$503	38.5%	26.8%	3	37.5%	28.2%	\$503	38.5%	39.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$1,307	100.0%	100.0%	8	100.0%	100.0%	\$1,307	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	80.0%	\$92	94.8%	16.7%	4	80.0%	15.4%	\$92	94.8%	13.0%
	Middle	0	0.0%	\$0	0.0%	56.4%	0	0.0%	55.2%	\$0	0.0%	57.9%
	Upper	1	20.0%	\$5	5.2%	26.8%	1	20.0%	29.4%	\$5	5.2%	29.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$97	100.0%	100.0%	5	100.0%	100.0%	\$97	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	33.6%	0	0.0%	37.5%	\$0	0.0%	19.8%
	Middle	4	100.0%	\$4,436	100.0%	48.9%	4	100.0%	58.3%	\$4,436	100.0%	79.2%
	Upper	0	0.0%	\$0	0.0%	16.4%	0	0.0%	4.2%	\$0	0.0%	1.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$4,436	100.0%	100.0%	4	100.0%	100.0%	\$4,436	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	8.1%	\$0	0.0%	3.1%
	Middle	0	0.0%	\$0	0.0%	56.4%	0	0.0%	40.3%	\$0	0.0%	34.2%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	51.6%	\$0	0.0%	62.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Rapid City MSA 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	13.6%	\$0	0.0%	4.4%
	Middle	0	0.0%	\$0	0.0%	56.4%	0	0.0%	56.8%	\$0	0.0%	53.3%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	29.5%	\$0	0.0%	42.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	23.5%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	56.4%	0	0.0%	66.7%	\$0	0.0%	76.0%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	9.8%	\$0	0.0%	12.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	9	15.3%	\$611	4.5%	16.7%	9	15.3%	16.0%	\$611	4.5%	10.6%
	Middle	38	64.4%	\$10,518	76.6%	56.4%	38	64.4%	59.3%	\$10,518	76.6%	58.0%
	Upper	12	20.3%	\$2,595	18.9%	26.8%	12	20.3%	24.6%	\$2,595	18.9%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>59</i>	<i>100.0%</i>	<i>\$13,724</i>	<i>100.0%</i>	<i>100.0%</i>	<i>59</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,724</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans																		
Assessment Area: SD Rapid City MSA																		
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017, 2018					2017						2018					
		Bank		Dollar		Total Businesses	Count		Dollar		Count		Dollar					
		Count					Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	52	21.8%	\$14,306	27.9%	26.6%	25	20.5%	21.1%	\$6,414	25.0%	19.2%	27	23.3%	24.0%	\$7,892	30.9%	26.0%
	Middle	144	60.5%	\$25,613	50.0%	55.2%	77	63.1%	56.0%	\$13,669	53.2%	59.0%	67	57.8%	54.2%	\$11,944	46.7%	53.6%
	Upper	42	17.6%	\$11,313	22.1%	17.7%	20	16.4%	22.4%	\$5,591	21.8%	21.4%	22	19.0%	20.8%	\$5,722	22.4%	20.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Total	238	100.0%	\$51,232	100.0%	100.0%	122	100.0%	100.0%	\$25,674	100.0%	100.0%	116	100.0%	100.0%	\$25,558	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	1.3%	\$0	0.0%	13.5%	0	0.0%	6.2%	\$0	0.0%	19.7%
	Middle	5	100.0%	\$341	100.0%	71.2%	2	100.0%	87.2%	\$96	100.0%	81.8%	3	100.0%	81.4%	\$245	100.0%	68.2%
	Upper	0	0.0%	\$0	0.0%	20.5%	0	0.0%	10.3%	\$0	0.0%	4.6%	0	0.0%	10.3%	\$0	0.0%	11.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	0.4%
Total	5	100.0%	\$341	100.0%	100.0%	2	100.0%	100.0%	\$96	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%	
Originations & Purchases																		
2018 FFIEC Census Data and 2018 D&B Information																		

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Rapid City MSA 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %			
Home Purchase	Low	2	7.1	5.0	128	2.7	2.7	19.9
	Moderate	4	14.3	21.8	667	14.2	17.1	19.0
	Middle	4	14.3	22.4	639	13.6	21.8	21.7
	Upper	10	35.7	29.3	2,123	45.1	37.2	39.4
	Unknown	8	28.6	21.5	1,152	24.5	21.2	0.0
	Total	28	100.0	100.0	4,709	100.0	100.0	100.0
Refinance	Low	0	0.0	6.3	0	0.0	3.4	19.9
	Moderate	1	6.7	15.8	146	4.3	10.6	19.0
	Middle	1	6.7	16.5	130	3.8	15.1	21.7
	Upper	9	60.0	31.6	1,492	43.7	39.9	39.4
	Unknown	4	26.7	29.8	1,650	48.3	31.0	0.0
	Total	15	100.0	100.0	3,418	100.0	100.0	100.0
Home Improvement	Low	0	0.0	5.1	0	0.0	3.3	19.9
	Moderate	4	66.7	20.7	39	8.6	14.1	19.0
	Middle	1	16.7	25.3	35	7.7	20.7	21.7
	Upper	1	16.7	45.5	382	83.8	57.8	39.4
	Unknown	0	0.0	3.5	0	0.0	4.2	0.0
	Total	6	100.0	100.0	456	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.9
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.7
	Upper	0	0.0	0.0	0	0.0	0.0	39.4
	Unknown	2	100.0	100.0	1,266	100.0	100.0	0.0
	Total	2	100.0	100.0	1,266	100.0	100.0	100.0
HMDA Totals	Low	2	3.9	5.3	128	1.3	2.7	19.9
	Moderate	9	17.6	20.0	852	8.7	14.7	19.0
	Middle	6	11.8	20.9	804	8.2	19.2	21.7
	Upper	20	39.2	30.5	3,997	40.6	36.8	39.4
	Unknown	14	27.5	23.3	4,068	41.3	26.6	0.0
	Total	51	100.0	100.0	9,849	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Rapid City MSA 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	4	9.5%	\$403	5.1%	19.9%	4	9.5%	7.0%	\$403	5.1%	4.0%
	Moderate	9	21.4%	\$1,526	19.4%	19.0%	9	21.4%	24.0%	\$1,526	19.4%	18.9%
	Middle	2	4.8%	\$169	2.1%	21.7%	2	4.8%	23.0%	\$169	2.1%	22.2%
	Upper	14	33.3%	\$3,680	46.7%	39.4%	14	33.3%	30.1%	\$3,680	46.7%	38.5%
	Unknown	13	31.0%	\$2,106	26.7%	0.0%	13	31.0%	15.8%	\$2,106	26.7%	16.3%
	<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>\$7,884</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,884</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	9.3%	\$0	0.0%	5.1%
	Moderate	3	37.5%	\$433	33.1%	19.0%	3	37.5%	19.3%	\$433	33.1%	13.9%
	Middle	3	37.5%	\$501	38.3%	21.7%	3	37.5%	22.9%	\$501	38.3%	19.9%
	Upper	1	12.5%	\$159	12.2%	39.4%	1	12.5%	32.0%	\$159	12.2%	42.8%
	Unknown	1	12.5%	\$214	16.4%	0.0%	1	12.5%	16.5%	\$214	16.4%	18.4%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$1,307</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,307</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	20.0%	\$16	16.5%	19.9%	1	20.0%	10.5%	\$16	16.5%	8.4%
	Moderate	2	40.0%	\$46	47.4%	19.0%	2	40.0%	11.9%	\$46	47.4%	10.3%
	Middle	1	20.0%	\$5	5.2%	21.7%	1	20.0%	28.7%	\$5	5.2%	26.9%
	Upper	1	20.0%	\$30	30.9%	39.4%	1	20.0%	44.8%	\$30	30.9%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	7.4%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$97</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$97</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.7%	0	0.0%	12.5%	\$0	0.0%	3.2%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	4.2%	\$0	0.0%	1.6%
	Unknown	4	100.0%	\$4,436	100.0%	0.0%	4	100.0%	83.3%	\$4,436	100.0%	95.2%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$4,436</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,436</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	6.5%	\$0	0.0%	4.9%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	6.5%	\$0	0.0%	3.9%
	Middle	0	0.0%	\$0	0.0%	21.7%	0	0.0%	22.6%	\$0	0.0%	13.4%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	62.9%	\$0	0.0%	77.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	0.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Rapid City MSA 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	9.1%	\$0	0.0%	7.6%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	13.6%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	21.7%	0	0.0%	11.4%	\$0	0.0%	10.2%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	50.0%	\$0	0.0%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.9%	\$0	0.0%	29.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.7%	0	0.0%	5.9%	\$0	0.0%	2.1%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	7.8%	\$0	0.0%	22.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	86.3%	\$0	0.0%	75.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	8.5%	\$419	3.1%	19.9%	5	8.5%	7.6%	\$419	3.1%	4.2%
	Moderate	14	23.7%	\$2,005	14.6%	19.0%	14	23.7%	21.4%	\$2,005	14.6%	16.7%
	Middle	6	10.2%	\$675	4.9%	21.7%	6	10.2%	22.7%	\$675	4.9%	20.9%
	Upper	16	27.1%	\$3,869	28.2%	39.4%	16	27.1%	31.5%	\$3,869	28.2%	39.1%
	Unknown	18	30.5%	\$6,756	49.2%	0.0%	18	30.5%	16.7%	\$6,756	49.2%	19.0%
	Total	59	100.0%	\$13,724	100.0%	100.0%	59	100.0%	100.0%	\$13,724	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: SD Rapid City MSA

Product Type			Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
			2017, 2018					2017						2018					
			Bank				Total Businesses	Count			Dollar			Count			Dollar		
			Count		Dollar			Bank	Agg	%	Bank	Agg	%	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%											\$ 000s	\$ %
Small Business	Revenue	\$1 Million or Less	152	63.9%	\$25,309	49.4%	89.7%	76	62.3%	48.5%	\$12,057	47.0%	37.2%	76	65.5%	45.8%	\$13,252	51.9%	40.2%
		Over \$1 Million	72	30.3%	\$23,483	45.8%	9.5%	37	30.3%				35	30.2%					
		Total Rev. available	224	94.2%	\$48,792	95.2%	99.2%	113	92.6%				111	95.7%					
		Rev. Not Known	14	5.9%	\$2,440	4.8%	0.8%	9	7.4%				5	4.3%					
		Total	238	100.0%	\$51,232	100.0%	100.0%	122	100.0%				116	100.0%					
	Loan Size	\$100,000 or Less	118	49.6%	\$5,382	10.5%		64	52.5%	87.5%	\$2,577	10.0%	22.3%	54	46.6%	87.2%	\$2,805	11.0%	24.1%
		\$100,001 - \$250,000	54	22.7%	\$9,947	19.4%		26	21.3%	5.5%	\$5,057	19.7%	16.1%	28	24.1%	6.1%	\$4,890	19.1%	17.5%
		\$250,001 - \$1 Million	66	27.7%	\$35,903	70.1%		32	26.2%	7.0%	\$18,040	70.3%	61.6%	34	29.3%	6.7%	\$17,863	69.9%	58.4%
		Total	238	100.0%	\$51,232	100.0%		122	100.0%	100.0%	\$25,674	100.0%	100.0%	116	100.0%	100.0%	\$25,558	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	87	57.2%	\$3,688	14.6%													
		\$100,001 - \$250,000	33	21.7%	\$5,974	23.6%													
		\$250,001 - \$1 Million	32	21.1%	\$15,647	61.8%													
		Total	152	100.0%	\$25,309	100.0%													
Small Farm	Revenue	\$1 Million or Less	3	60.0%	\$190	55.7%	98.5%	1	50.0%	76.9%	\$25	26.0%	77.0%	2	66.7%	73.2%	\$165	67.3%	64.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	1.5%	0	0.0%				0	0.0%					
		Total Rev. available	3	60.0%	\$190	55.7%	100.0%	1	50.0%				2	66.7%					
		Not Known	2	40.0%	\$151	44.3%	0.0%	1	50.0%				1	33.3%					
		Total	5	100.0%	\$341	100.0%	100.0%	2	100.0%				3	100.0%					
	Loan Size	\$100,000 or Less	4	80.0%	\$181	53.1%		2	100.0%	89.7%	\$96	100.0%	47.5%	2	66.7%	88.7%	\$85	34.7%	43.7%
		\$100,001 - \$250,000	1	20.0%	\$160	46.9%		0	0.0%	7.7%	\$0	0.0%	29.9%	1	33.3%	7.2%	\$160	65.3%	23.9%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	22.5%	0	0.0%	4.1%	\$0	0.0%	32.4%
		Total	5	100.0%	\$341	100.0%		2	100.0%	100.0%	\$96	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	66.7%	\$30	15.8%													
		\$100,001 - \$250,000	1	33.3%	\$160	84.2%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	3	100.0%	\$190	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: SD Sioux Falls MSA 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	5.9	16.7	112	3.3	10.8	22.7
	Middle	9	52.9	47.4	1,591	47.2	45.0	49.1
	Upper	7	41.2	35.9	1,668	49.5	44.2	28.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	17	100.0	100.0	3,371	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	11.1	18.5	65	3.6	11.5	22.7
	Middle	5	55.6	53.1	713	39.0	50.3	49.1
	Upper	3	33.3	28.4	1,052	57.5	38.2	28.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	9	100.0	100.0	1,830	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	4	80.0	20.7	118	85.5	10.9	22.7
	Middle	0	0.0	48.5	0	0.0	48.0	49.1
	Upper	1	20.0	30.8	20	14.5	41.1	28.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	5	100.0	100.0	138	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	64.4	0	0.0	49.8	
	Middle	0	0.0	26.0	0	0.0	39.1	31.5
	Upper	0	0.0	9.6	0	0.0	11.1	14.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	6	19.4	17.8	295	5.5	13.9	22.7
	Middle	14	45.2	49.0	2,304	43.2	45.9	49.1
	Upper	11	35.5	33.3	2,740	51.3	40.1	28.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	31	100.0	100.0	5,339	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Sioux Falls MSA 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison					
							2018					
		Bank				Owner Occupied Units	Count		Dollar			
		Count		Dollar			Bank		Agg		Bank	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	40.0%	\$1,226	27.6%	22.7%	8	40.0%	17.8%	\$1,226	27.6%	11.5%
	Middle	10	50.0%	\$2,310	51.9%	49.1%	10	50.0%	46.4%	\$2,310	51.9%	44.5%
	Upper	2	10.0%	\$911	20.5%	28.2%	2	10.0%	35.8%	\$911	20.5%	44.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	20	100.0%	\$4,447	100.0%	100.0%	20	100.0%	100.0%	\$4,447	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	19.4%	\$0	0.0%	11.7%
	Middle	5	62.5%	\$1,856	59.0%	49.1%	5	62.5%	49.1%	\$1,856	59.0%	46.4%
	Upper	3	37.5%	\$1,292	41.0%	28.2%	3	37.5%	31.5%	\$1,292	41.0%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$3,148	100.0%	100.0%	8	100.0%	100.0%	\$3,148	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	11.1%	\$35	8.8%	22.7%	1	11.1%	13.7%	\$35	8.8%	8.2%
	Middle	7	77.8%	\$297	74.8%	49.1%	7	77.8%	52.4%	\$297	74.8%	46.3%
	Upper	1	11.1%	\$65	16.4%	28.2%	1	11.1%	33.9%	\$65	16.4%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$397	100.0%	100.0%	9	100.0%	100.0%	\$397	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$161	100.0%	54.3%	1	100.0%	53.7%	\$161	100.0%	61.9%
	Middle	0	0.0%	\$0	0.0%	31.5%	0	0.0%	38.8%	\$0	0.0%	32.3%
	Upper	0	0.0%	\$0	0.0%	14.2%	0	0.0%	7.5%	\$0	0.0%	5.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$161	100.0%	100.0%	1	100.0%	100.0%	\$161	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	9.4%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	49.1%	0	0.0%	50.3%	\$0	0.0%	38.8%
	Upper	0	0.0%	\$0	0.0%	28.2%	0	0.0%	40.3%	\$0	0.0%	55.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Sioux Falls MSA 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	11.3%	\$0	0.0%	5.8%
	Middle	1	33.3%	\$24	14.7%	49.1%	1	33.3%	53.9%	\$24	14.7%	45.5%
	Upper	2	66.7%	\$139	85.3%	28.2%	2	66.7%	34.8%	\$139	85.3%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$163	100.0%	100.0%	3	100.0%	100.0%	\$163	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	23.9%	\$0	0.0%	16.7%
	Middle	0	0.0%	\$0	0.0%	49.1%	0	0.0%	51.7%	\$0	0.0%	49.2%
	Upper	0	0.0%	\$0	0.0%	28.2%	0	0.0%	24.4%	\$0	0.0%	34.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	10	24.4%	\$1,422	17.1%	22.7%	10	24.4%	18.1%	\$1,422	17.1%	13.6%
	Middle	23	56.1%	\$4,487	54.0%	49.1%	23	56.1%	47.6%	\$4,487	54.0%	44.5%
	Upper	8	19.5%	\$2,407	28.9%	28.2%	8	19.5%	34.3%	\$2,407	28.9%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	41	100.0%	\$8,316	100.0%	100.0%	41	100.0%	100.0%	\$8,316	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: SD Sioux Falls MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2018, 2017					2017					2018				
		Bank		Total			Count		Dollar			Count		Dollar		
		Count	Dollar	Businesses	%		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	%	#	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	173	62.0%	\$29,448	53.3%	38.8%	103	68.7%	\$14,726	59.2%	49.0%	70	54.3%	\$14,722	48.5%	47.7%
	Middle	59	21.1%	\$10,616	19.2%	35.3%	30	20.0%	\$4,591	18.4%	23.7%	29	22.5%	\$6,025	19.8%	26.3%
	Upper	47	16.8%	\$15,186	27.5%	25.9%	17	11.3%	\$5,577	22.4%	26.6%	30	23.3%	\$9,609	31.7%	25.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.7%	0	0.0%	\$0	0.0%	0.6%
	Total	279	100.0%	\$55,250	100.0%	100.0%	150	100.0%	\$24,894	100.0%	100.0%	129	100.0%	\$30,356	100.0%	100.0%
SMALL FARM	Total Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Moderate	1	1.7%	\$65	0.6%	4.7%	1	3.3%	\$65	1.3%	1.7%	0	0.0%	\$0	0.0%	0.7%
	Middle	32	55.2%	\$6,762	61.9%	64.0%	15	50.0%	\$2,875	56.2%	66.6%	17	60.7%	\$3,887	67.0%	75.0%
	Upper	25	43.1%	\$4,089	37.5%	31.4%	14	46.7%	\$2,172	42.5%	31.7%	11	39.3%	\$1,917	33.0%	24.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.0%
	Total	58	100.0%	\$10,916	100.0%	100.0%	30	100.0%	\$5,112	100.0%	100.0%	28	100.0%	\$5,804	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Sioux Falls MSA 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income
					2017			
		Count			Dollar			
		Bank		Agg	Bank	Agg		
#	%	%	\$(000s)	\$ %	\$ %	%		
Home Purchase	Low	2	11.8	8.9	236	7.0	5.3	19.1
	Moderate	2	11.8	21.2	244	7.2	16.6	17.8
	Middle	4	23.5	21.7	560	16.6	20.8	24.2
	Upper	4	23.5	27.6	1,390	41.2	36.6	39.0
	Unknown	5	29.4	20.7	941	27.9	20.8	0.0
	Total	17	100.0	100.0	3,371	100.0	100.0	100.0
Refinance	Low	0	0.0	7.7	0	0.0	4.2	19.1
	Moderate	1	11.1	17.7	120	6.6	13.0	17.8
	Middle	3	33.3	21.4	239	13.1	19.5	24.2
	Upper	3	33.3	27.7	1,066	58.3	37.3	39.0
	Unknown	2	22.2	25.5	405	22.1	26.2	0.0
	Total	9	100.0	100.0	1,830	100.0	100.0	100.0
Home Improvement	Low	1	20.0	7.7	28	20.3	4.2	19.1
	Moderate	2	40.0	18.1	9	6.5	11.5	17.8
	Middle	1	20.0	25.4	20	14.5	18.3	24.2
	Upper	0	0.0	39.8	0	0.0	54.7	39.0
	Unknown	1	20.0	8.9	81	58.7	11.3	0.0
	Total	5	100.0	100.0	138	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	17.8
	Middle	0	0.0	0.0	0	0.0	0.0	24.2
	Upper	0	0.0	0.0	0	0.0	0.0	39.0
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	3	9.7	8.4	264	4.9	4.6	19.1
	Moderate	5	16.1	19.8	373	7.0	14.3	17.8
	Middle	8	25.8	21.6	819	15.3	18.8	24.2
	Upper	7	22.6	28.1	2,456	46.0	34.4	39.0
	Unknown	8	25.8	22.1	1,427	26.7	27.8	0.0
	Total	31	100.0	100.0	5,339	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Sioux Falls MSA 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	4	20.0%	\$461	10.4%	19.1%	4	20.0%	8.8%	\$461	10.4%	5.0%
	Moderate	2	10.0%	\$222	5.0%	17.8%	2	10.0%	23.5%	\$222	5.0%	18.1%
	Middle	4	20.0%	\$752	16.9%	24.2%	4	20.0%	25.1%	\$752	16.9%	23.8%
	Upper	7	35.0%	\$2,182	49.1%	39.0%	7	35.0%	31.4%	\$2,182	49.1%	41.6%
	Unknown	3	15.0%	\$830	18.7%	0.0%	3	15.0%	11.2%	\$830	18.7%	11.5%
	<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>\$4,447</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,447</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	10.2%	\$0	0.0%	5.7%
	Moderate	1	12.5%	\$150	4.8%	17.8%	1	12.5%	22.0%	\$150	4.8%	16.7%
	Middle	0	0.0%	\$0	0.0%	24.2%	0	0.0%	23.2%	\$0	0.0%	19.7%
	Upper	6	75.0%	\$2,876	91.4%	39.0%	6	75.0%	33.7%	\$2,876	91.4%	46.0%
	Unknown	1	12.5%	\$122	3.9%	0.0%	1	12.5%	10.9%	\$122	3.9%	11.9%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$3,148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,148</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	11.1%	\$18	4.5%	19.1%	1	11.1%	4.9%	\$18	4.5%	2.4%
	Moderate	3	33.3%	\$150	37.8%	17.8%	3	33.3%	14.1%	\$150	37.8%	10.8%
	Middle	3	33.3%	\$120	30.2%	24.2%	3	33.3%	28.3%	\$120	30.2%	21.0%
	Upper	1	11.1%	\$65	16.4%	39.0%	1	11.1%	44.6%	\$65	16.4%	51.8%
	Unknown	1	11.1%	\$44	11.1%	0.0%	1	11.1%	8.0%	\$44	11.1%	14.0%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$397</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$397</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	3.0%	\$0	0.0%	1.1%
	Middle	0	0.0%	\$0	0.0%	24.2%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	1.5%	\$0	0.0%	0.3%
	Unknown	1	100.0%	\$161	100.0%	0.0%	1	100.0%	94.0%	\$161	100.0%	98.1%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$161</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$161</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	6.3%	\$0	0.0%	4.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	16.4%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	24.2%	0	0.0%	22.6%	\$0	0.0%	19.9%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	49.1%	\$0	0.0%	59.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.7%	\$0	0.0%	6.1%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Sioux Falls MSA 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	7.4%	\$0	0.0%	5.3%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	17.2%	\$0	0.0%	11.5%
	Middle	2	66.7%	\$95	58.3%	24.2%	2	66.7%	25.0%	\$95	58.3%	16.1%
	Upper	1	33.3%	\$68	41.7%	39.0%	1	33.3%	44.1%	\$68	41.7%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.4%	\$0	0.0%	16.6%
	Total	3	100.0%	\$163	100.0%	100.0%	3	100.0%	100.0%	\$163	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	2.8%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Middle	0	0.0%	\$0	0.0%	24.2%	0	0.0%	1.1%	\$0	0.0%	0.1%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	1.7%	\$0	0.0%	1.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	93.2%	\$0	0.0%	95.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	12.2%	\$479	5.8%	19.1%	5	12.2%	8.7%	\$479	5.8%	4.9%
	Moderate	6	14.6%	\$522	6.3%	17.8%	6	14.6%	21.9%	\$522	6.3%	16.7%
	Middle	9	22.0%	\$967	11.6%	24.2%	9	22.0%	24.1%	\$967	11.6%	21.5%
	Upper	15	36.6%	\$5,191	62.4%	39.0%	15	36.6%	32.3%	\$5,191	62.4%	40.7%
	Unknown	6	14.6%	\$1,157	13.9%	0.0%	6	14.6%	12.9%	\$1,157	13.9%	16.2%
	Total	41	100.0%	\$8,316	100.0%	100.0%	41	100.0%	100.0%	\$8,316	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size																				
Assessment Area: SD Sioux Falls MSA																				
Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
		2018, 2017					2017						2018							
		Bank				Total Businesses	Count			Dollar			Count		Dollar			Agg		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
Small Business	Revenue	\$1 Million or Less	125	44.8%	\$23,557	42.6%	89.3%	61	40.7%	53.5%	\$9,254	37.2%	39.9%	64	49.6%	51.2%	\$14,303	47.1%	38.8%	
		Over \$1 Million	145	52.0%	\$31,273	56.6%	9.9%	86	57.3%				59	45.7%						
		Total Rev. available	270	96.8%	\$54,830	99.2%	99.2%	147	98.0%				123	95.3%						
		Rev. Not Known	9	3.2%	\$420	0.8%	0.9%	3	2.0%				6	4.7%						
		Total	279	100.0%	\$55,250	100.0%	100.0%	150	100.0%				129	100.0%						
	Loan Size	\$100,000 or Less	167	59.9%	\$5,764	10.4%		100	66.7%	84.6%	\$3,197	12.8%	24.5%	67	51.9%	82.8%	\$2,567	8.5%	21.8%	
		\$100,001 - \$250,000	41	14.7%	\$7,054	12.8%		19	12.7%	7.0%	\$3,408	13.7%	15.5%	22	17.1%	8.3%	\$3,646	12.0%	17.4%	
		\$250,001 - \$1 Million	71	25.4%	\$42,432	76.8%		31	20.7%	8.4%	\$18,289	73.5%	60.1%	40	31.0%	8.9%	\$24,143	79.5%	60.8%	
		Total	279	100.0%	\$55,250	100.0%		150	100.0%	100.0%	\$24,894	100.0%	100.0%	129	100.0%	100.0%	\$30,356	100.0%	100.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	69	55.2%	\$2,412	10.2%														
		\$100,001 - \$250,000	24	19.2%	\$3,812	16.2%														
		\$250,001 - \$1 Million	32	25.6%	\$17,333	73.6%														
		Total	125	100.0%	\$23,557	100.0%														
	Small Farm	Revenue	\$1 Million or Less	55	94.8%	\$10,227	93.7%	97.6%	30	100.0%	71.1%	\$5,112	100.0%	70.4%	25	89.3%	68.1%	\$5,115	88.1%	70.4%
			Over \$1 Million	3	5.2%	\$689	6.3%	1.6%	0	0.0%				3	10.7%					
			Total Rev. available	58	100.0%	\$10,916	100.0%	99.2%	30	100.0%				28	100.0%					
Not Known			0	0.0%	\$0	0.0%	0.8%	0	0.0%				0	0.0%						
Total			58	100.0%	\$10,916	100.0%	100.0%	30	100.0%				28	100.0%						
Loan Size		\$100,000 or Less	27	46.6%	\$1,474	13.5%		16	53.3%	57.1%	\$931	18.2%	15.6%	11	39.3%	60.1%	\$543	9.4%	16.4%	
		\$100,001 - \$250,000	13	22.4%	\$2,191	20.1%		6	20.0%	22.7%	\$1,066	20.9%	29.2%	7	25.0%	18.4%	\$1,125	19.4%	24.1%	
		\$250,001 - \$500,000	18	31.0%	\$7,251	66.4%		8	26.7%	20.3%	\$3,115	60.9%	55.2%	10	35.7%	21.6%	\$4,136	71.3%	59.5%	
		Total	58	100.0%	\$10,916	100.0%		30	100.0%	100.0%	\$5,112	100.0%	100.0%	28	100.0%	100.0%	\$5,804	100.0%	100.0%	
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	27	49.1%	\$1,474	14.4%														
		\$100,001 - \$250,000	11	20.0%	\$1,856	18.1%														
		\$250,001 - \$500,000	17	30.9%	\$6,897	67.4%														
		Total	55	100.0%	\$10,227	100.0%														
Originations & Purchases																				
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.																				
2018 FFIEC Census Data and 2018 D&B Information																				

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: SD Sisseton 2017							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2017					
		Count		Dollar			
		Bank	Agg	Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	6	100.0	100.0	536	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	6	100.0	100.0	536	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	4	100.0	100.0	1,902	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	4	100.0	100.0	1,902	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	1	100.0	100.0	6	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	6	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	
	Middle	1	100.0	100.0	141	100.0	
	Upper	0	0.0	0.0	0	0.0	
	Unknown	0	0.0	0.0	0	0.0	
	Total	1	100.0	100.0	141	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	12	100.0	100.0	2,585	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	12	100.0	100.0	2,585	100.0	100.0
Originations & Purchases							
2017 FFIEC Census Data							
Note: Percentages may not add to 100.0 percent due to rounding							

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Sisseton 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	10	100.0%	\$1,125	100.0%	100.0%	10	100.0%	100.0%	\$1,125	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$1,125	100.0%	100.0%	10	100.0%	100.0%	\$1,125	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$254	100.0%	100.0%	2	100.0%	100.0%	\$254	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$254	100.0%	100.0%	2	100.0%	100.0%	\$254	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$26	100.0%	100.0%	1	100.0%	100.0%	\$26	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$26	100.0%	100.0%	1	100.0%	100.0%	\$26	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$378	100.0%	100.0%	1	100.0%	100.0%	\$378	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$378	100.0%	100.0%	1	100.0%	100.0%	\$378	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Sisseton 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Count		Bank Dollar		Owner Occupied Units	Count		Agg	Dollar		
		#	%	\$ (000s)	\$ %		#	%		Bank \$ (000s)	\$ %	Agg \$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	14	100.0%	\$1,783	100.0%	100.0%	14	100.0%	100.0%	\$1,783	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,783	100.0%	100.0%	14	100.0%	100.0%	\$1,783	100.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans																		
Assessment Area: SD Sisseton																		
PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017, 2018					2017						2018					
		Bank		Dollar		Total Businesses	Count			Dollar			Count		Dollar			
		Count						Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	105	100.0%	\$7,629	100.0%	100.0%	60	100.0%	97.3%	\$4,172	100.0%	99.9%	45	100.0%	98.6%	\$3,457	100.0%	99.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	0.1%	0	0.0%	1.4%	\$0	0.0%	0.1%
	Total	105	100.0%	\$7,629	100.0%	100.0%	60	100.0%	100.0%	\$4,172	100.0%	100.0%	45	100.0%	100.0%	\$3,457	100.0%	100.0%
SMALL FARM	Total Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	364	100.0%	\$28,259	100.0%	100.0%	191	100.0%	100.0%	\$13,638	100.0%	100.0%	173	100.0%	100.0%	\$14,621	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	364	100.0%	\$28,259	100.0%	100.0%	191	100.0%	100.0%	\$13,638	100.0%	100.0%	173	100.0%	100.0%	\$14,621	100.0%	100.0%	
Originations & Purchases																		
2018 FFIEC Census Data and 2018 D&B Information																		

Originations & Purchases

2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: SD Sisseton 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Agg	Dollar		Agg	
		Bank #	%	%	Bank \$(000s)	\$ %	\$ %	
Home Purchase	Low	2	33.3	7.9	68	12.7	2.2	23.9
	Moderate	2	33.3	13.2	96	17.9	5.8	18.0
	Middle	1	16.7	21.1	247	46.1	15.5	21.6
	Upper	1	16.7	44.7	125	23.3	67.3	36.4
	Unknown	0	0.0	13.2	0	0.0	9.2	0.0
	Total	6	100.0	100.0	536	100.0	100.0	100.0
Refinance	Low	1	25.0	6.7	225	11.8	4.0	23.9
	Moderate	0	0.0	6.7	0	0.0	3.5	18.0
	Middle	1	25.0	20.0	114	6.0	8.3	21.6
	Upper	2	50.0	56.7	1,563	82.2	76.7	36.4
	Unknown	0	0.0	10.0	0	0.0	7.4	0.0
	Total	4	100.0	100.0	1,902	100.0	100.0	100.0
Home Improvement	Low	0	0.0	11.1	0	0.0	3.6	23.9
	Moderate	1	100.0	33.3	6	100.0	11.4	18.0
	Middle	0	0.0	11.1	0	0.0	30.5	21.6
	Upper	0	0.0	33.3	0	0.0	36.6	36.4
	Unknown	0	0.0	11.1	0	0.0	17.9	0.0
	Total	1	100.0	100.0	6	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	23.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.6
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	1	100.0	100.0	141	100.0	100.0	0.0
	Total	1	100.0	100.0	141	100.0	100.0	100.0
HMDA Totals	Low	3	25.0	7.7	293	11.3	3.2	23.9
	Moderate	3	25.0	12.8	102	3.9	4.9	18.0
	Middle	2	16.7	19.2	361	14.0	12.5	21.6
	Upper	3	25.0	47.4	1,688	65.3	69.7	36.4
	Unknown	1	8.3	12.8	141	5.5	9.7	0.0
	Total	12	100.0	100.0	2,585	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: SD Sisseton 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	11.5%	\$0	0.0%	6.0%
	Moderate	3	30.0%	\$300	26.7%	18.0%	3	30.0%	25.0%	\$300	26.7%	19.8%
	Middle	1	10.0%	\$80	7.1%	21.6%	1	10.0%	7.7%	\$80	7.1%	7.2%
	Upper	5	50.0%	\$613	54.5%	36.4%	5	50.0%	48.1%	\$613	54.5%	58.1%
	Unknown	1	10.0%	\$132	11.7%	0.0%	1	10.0%	7.7%	\$132	11.7%	9.0%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$1,125</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,125</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	5.7%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	11.4%	\$0	0.0%	8.5%
	Middle	1	50.0%	\$124	48.8%	21.6%	1	50.0%	22.9%	\$124	48.8%	19.6%
	Upper	1	50.0%	\$130	51.2%	36.4%	1	50.0%	57.1%	\$130	51.2%	65.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	4.5%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$254</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$254</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$26	100.0%	18.0%	1	100.0%	50.0%	\$26	100.0%	30.6%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	50.0%	\$0	0.0%	69.4%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$378	100.0%	0.0%	1	100.0%	100.0%	\$378	100.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$378</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$378</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: SD Sisseton 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	9.3%	\$0	0.0%	4.0%
	Moderate	4	28.6%	\$326	18.3%	18.0%	4	28.6%	19.6%	\$326	18.3%	13.9%
	Middle	2	14.3%	\$204	11.4%	21.6%	2	14.3%	14.4%	\$204	11.4%	13.2%
	Upper	6	42.9%	\$743	41.7%	36.4%	6	42.9%	48.5%	\$743	41.7%	58.4%
	Unknown	2	14.3%	\$510	28.6%	0.0%	2	14.3%	8.2%	\$510	28.6%	10.5%
	Total	14	100.0%	\$1,783	100.0%	100.0%	14	100.0%	100.0%	\$1,783	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size																			
Assessment Area: SD Sisseton																			
Product Type		Bank Lending & Demographic Data Comparison 2017, 2018						Bank & Aggregate Lending Comparison											
								2017						2018					
		Bank				Total Businesses	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	69	65.7%	\$3,920	51.4%	83.2%	42	70.0%	62.8%	\$1,912	45.8%	45.9%	27	60.0%	59.6%	\$2,008	58.1%	41.5%
		Over \$1 Million	21	20.0%	\$3,472	45.5%	8.7%	9	15.0%				12	26.7%					
		Total Rev. available	90	85.7%	\$7,392	96.9%	91.9%	51	85.0%				39	86.7%					
		Rev. Not Known	15	14.3%	\$237	3.1%	8.1%	9	15.0%				6	13.3%					
		Total	105	100.0%	\$7,629	100.0%	100.0%	60	100.0%				45	100.0%					
	Loan Size	\$100,000 or Less	94	89.5%	\$2,888	37.9%		54	90.0%	89.2%	\$1,604	38.4%	32.3%	40	88.9%	86.5%	\$1,284	37.1%	30.6%
		\$100,001 - \$250,000	3	2.9%	\$560	7.3%		2	3.3%	4.1%	\$365	8.7%	10.2%	1	2.2%	5.0%	\$195	5.6%	11.8%
		\$250,001 - \$1 Million	8	7.6%	\$4,181	54.8%		4	6.7%	6.8%	\$2,203	52.8%	57.4%	4	8.9%	8.5%	\$1,978	57.2%	57.5%
		Total	105	100.0%	\$7,629	100.0%		60	100.0%	100.0%	\$4,172	100.0%	100.0%	45	100.0%	100.0%	\$3,457	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	63	91.3%	\$1,764	45.0%													
		\$100,001 - \$250,000	2	2.9%	\$365	9.3%													
		\$250,001 - \$1 Million	4	5.8%	\$1,791	45.7%													
		Total	69	100.0%	\$3,920	100.0%													
Small Farm	Revenue	\$1 Million or Less	323	88.7%	\$24,149	85.5%	Total Farms 97.7%	168	88.0%	78.8%	\$11,920	87.4%	82.7%	155	89.6%	78.4%	\$12,229	83.6%	83.1%
		Over \$1 Million	18	4.9%	\$3,224	11.4%	1.7%	9	4.7%				9	5.2%					
		Total Rev. available	341	93.6%	\$27,373	96.9%	99.4%	177	92.7%				164	94.8%					
		Not Known	23	6.3%	\$886	3.1%	0.6%	14	7.3%				9	5.2%					
		Total	364	100.0%	\$28,259	100.0%	100.0%	191	100.0%				173	100.0%					
	Loan Size	\$100,000 or Less	279	76.6%	\$9,849	34.9%		150	78.5%	78.8%	\$4,766	34.9%	31.2%	129	74.6%	76.5%	\$5,083	34.8%	32.7%
		\$100,001 - \$250,000	70	19.2%	\$12,839	45.4%		33	17.3%	14.9%	\$5,997	44.0%	36.6%	37	21.4%	17.0%	\$6,842	46.8%	38.1%
		\$250,001 - \$500,000	15	4.1%	\$5,571	19.7%		8	4.2%	6.3%	\$2,875	21.1%	32.2%	7	4.0%	6.5%	\$2,696	18.4%	29.2%
		Total	364	100.0%	\$28,259	100.0%		191	100.0%	100.0%	\$13,638	100.0%	100.0%	173	100.0%	100.0%	\$14,621	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	253	78.3%	\$8,992	37.2%													
		\$100,001 - \$250,000	58	18.0%	\$10,739	44.5%													
		\$250,001 - \$500,000	12	3.7%	\$4,418	18.3%													
		Total	323	100.0%	\$24,149	100.0%													
Originations & Purchases Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2018 FFIEC Census Data and 2018 D&B Information																			

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: ND Bowbells 2017							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					
		2017					
		Count		Agg %	Dollar		Owner Occupied % of Units
		Bank #	%		Bank \$ (000s)	Agg \$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	1	100.0	100.0	70	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	70	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	1	100.0	100.0	126	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	126	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	1	100.0	100.0	450	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	450	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	3	100.0	100.0	646	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	3	100.0	100.0	646	100.0	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Bowbells 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$240	100.0%	100.0%	1	100.0%	100.0%	\$240	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$240	100.0%	100.0%	1	100.0%	100.0%	\$240	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$209	100.0%	100.0%	2	100.0%	100.0%	\$209	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$209	100.0%	100.0%	2	100.0%	100.0%	\$209	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$300	100.0%	100.0%	1	100.0%	100.0%	\$300	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$300	100.0%	100.0%	1	100.0%	100.0%	\$300	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: ND Bowbells 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Count		Bank Dollar		Owner Occupied Units	Count		Dollar			Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	4	100.0%	\$749	100.0%	100.0%	4	100.0%	100.0%	\$749	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$749</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$749</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: ND Bowbells

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2018, 2017					2017					2018				
		Count		Bank Dollar		Total Businesses	Count		Dollar		Agg \$ %	Count		Dollar		Agg \$ %
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %		#	%	\$ 000s	\$ %	
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	11	100.0%	\$388	100.0%	100.0%	6	100.0%	97.1%	\$317	100.0%	5	100.0%	96.9%	\$71	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	0	0.0%	3.1%	\$0	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$388</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$317</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$71</i>	<i>100.0%</i>
SMALL FARM	Total Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	103	100.0%	\$13,211	100.0%	100.0%	60	100.0%	100.0%	\$7,638	100.0%	43	100.0%	100.0%	\$5,573	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0	0.0%	0.0%	\$0	0.0%
	<i>Total</i>	<i>103</i>	<i>100.0%</i>	<i>\$13,211</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,638</i>	<i>100.0%</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,573</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Bowbells 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income
					2017			
		Count			Dollar			
		Bank	Agg		Bank	Agg		
#	%	%	\$(000s)	\$ %	\$ %	%		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	18.0
	Moderate	1	100.0	54.5	70	100.0	49.7	19.2
	Middle	0	0.0	9.1	0	0.0	5.4	16.1
	Upper	0	0.0	9.1	0	0.0	17.3	46.8
	Unknown	0	0.0	27.3	0	0.0	27.6	0.0
	Total	1	100.0	100.0	70	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	18.0
	Moderate	0	0.0	37.5	0	0.0	50.1	19.2
	Middle	1	100.0	50.0	126	100.0	31.7	16.1
	Upper	0	0.0	0.0	0	0.0	0.0	46.8
	Unknown	0	0.0	12.5	0	0.0	18.1	0.0
	Total	1	100.0	100.0	126	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	18.0
	Moderate	0	0.0	0.0	0	0.0	0.0	19.2
	Middle	0	0.0	50.0	0	0.0	51.7	16.1
	Upper	0	0.0	50.0	0	0.0	48.3	46.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	18.0
	Moderate	0	0.0	0.0	0	0.0	0.0	19.2
	Middle	0	0.0	0.0	0	0.0	0.0	16.1
	Upper	0	0.0	0.0	0	0.0	0.0	46.8
	Unknown	1	100.0	100.0	450	100.0	100.0	0.0
	Total	1	100.0	100.0	450	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	18.0
	Moderate	1	33.3	40.9	70	10.8	42.0	19.2
	Middle	1	33.3	27.3	126	19.5	17.5	16.1
	Upper	0	0.0	9.1	0	0.0	8.1	46.8
	Unknown	1	33.3	22.7	450	69.7	32.3	0.0
	Total	3	100.0	100.0	646	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Bowbells 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	23.5%	\$0	0.0%	29.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	29.4%	\$0	0.0%	25.9%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	23.5%	\$0	0.0%	17.2%
	Upper	1	100.0%	\$240	100.0%	46.8%	1	100.0%	11.8%	\$240	100.0%	16.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	11.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$240</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$240</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	50.0%	\$80	38.3%	18.0%	1	50.0%	41.7%	\$80	38.3%	21.9%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	16.7%	\$0	0.0%	27.0%
	Middle	1	50.0%	\$129	61.7%	16.1%	1	50.0%	33.3%	\$129	61.7%	36.1%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	8.3%	\$0	0.0%	15.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$209</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$209</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	50.0%	\$0	0.0%	35.7%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	50.0%	\$0	0.0%	64.3%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$300	100.0%	0.0%	1	100.0%	100.0%	\$300	100.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$300</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$300</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Bowbells 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	1	25.0%	\$80	10.7%	18.0%	1	25.0%	30.3%	\$80	10.7%	23.9%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	24.2%	\$0	0.0%	24.4%
	Middle	1	25.0%	\$129	17.2%	16.1%	1	25.0%	24.2%	\$129	17.2%	21.7%
	Upper	1	25.0%	\$240	32.0%	46.8%	1	25.0%	12.1%	\$240	32.0%	15.0%
	Unknown	1	25.0%	\$300	40.1%	0.0%	1	25.0%	9.1%	\$300	40.1%	14.9%
	Total	4	100.0%	\$749	100.0%	100.0%	4	100.0%	100.0%	\$749	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: ND Bowbells

Product Type	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
	2018, 2017					2017						2018							
	Bank				Total Businesses	Count			Dollar			Count			Dollar				
	Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	7	63.6%	\$83	21.4%	86.2%	4	66.7%	58.8%	\$41	12.9%	53.4%	3	60.0%	34.4%	\$42	59.2%	49.3%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.0%	0	0.0%				0	0.0%					
		Total Rev. available	7	63.6%	\$83	21.4%	91.2%	4	66.7%				3	60.0%					
		Rev. Not Known	4	36.4%	\$305	78.6%	8.8%	2	33.3%				2	40.0%					
		Total	11	100.0%	\$388	100.0%	100.0%	6	100.0%				5	100.0%					
	Loan Size	\$100,000 or Less	10	90.9%	\$115	29.6%		5	83.3%	91.2%	\$44	13.9%	32.1%	5	100.0%	100.0%	\$71	100.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	11.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$1 Million	1	9.1%	\$273	70.4%		1	16.7%	5.9%	\$273	86.1%	56.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
		Total	11	100.0%	\$388	100.0%		6	100.0%	100.0%	\$317	100.0%	100.0%	5	100.0%	100.0%	\$71	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	7	100.0%	\$83	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$1 Million	0	0.0%	\$0	0.0%													
		Total	7	100.0%	\$83	100.0%													
Small Farm	Revenue	\$1 Million or Less	86	83.5%	\$10,608	80.3%	Total Farms	49	81.7%	55.2%	\$6,193	81.1%	76.9%	37	86.0%	58.9%	\$4,415	79.2%	74.4%
		Over \$1 Million	7	6.8%	\$1,928	14.6%		3	5.0%				4	9.3%					
		Total Rev. available	93	90.3%	\$12,536	94.9%		52	86.7%				41	95.3%					
		Not Known	10	9.7%	\$675	5.1%		8	13.3%				2	4.7%					
		Total	103	100.0%	\$13,211	100.0%		60	100.0%				43	100.0%					
	Loan Size	\$100,000 or Less	55	53.4%	\$2,005	15.2%		33	55.0%	69.8%	\$1,304	17.1%	20.8%	22	51.2%	68.5%	\$701	12.6%	18.2%
		\$100,001 - \$250,000	33	32.0%	\$6,354	48.1%		19	31.7%	20.8%	\$3,672	48.1%	44.2%	14	32.6%	20.5%	\$2,682	48.1%	43.4%
		\$250,001 - \$500,000	15	14.6%	\$4,852	36.7%		8	13.3%	9.4%	\$2,662	34.9%	35.0%	7	16.3%	11.0%	\$2,190	39.3%	38.4%
		Total	103	100.0%	\$13,211	100.0%		60	100.0%	100.0%	\$7,638	100.0%	100.0%	43	100.0%	100.0%	\$5,573	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	48	55.8%	\$1,780	16.8%													
		\$100,001 - \$250,000	27	31.4%	\$5,169	48.7%													
		\$250,001 - \$500,000	11	12.8%	\$3,659	34.5%													
		Total	86	100.0%	\$10,608	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans									
Assessment Area: ND Dickinson 2017									
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units	
		2017							
		Count		Agg %	Dollar		Agg \$ %		
		Bank #	%		Bank \$ (000s)	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0	
	Middle	1	9.1	23.3	160	10.7	17.6	28.8	
	Upper	10	90.9	76.7	1,336	89.3	82.4	71.2	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	Total	11	100.0	100.0	1,496	100.0	100.0	100.0	
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0	
	Middle	2	28.6	23.9	337	26.5	19.7	28.8	
	Upper	5	71.4	76.1	935	73.5	80.3	71.2	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	Total	7	100.0	100.0	1,272	100.0	100.0	100.0	
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0	
	Middle	1	50.0	33.3	160	56.7	36.2	28.8	
	Upper	1	50.0	66.7	122	43.3	63.8	71.2	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	Total	2	100.0	100.0	282	100.0	100.0	100.0	
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0	
	Moderate	0	0.0	0.0	0	0.0	0.0		0.0
	Middle	0	0.0	33.3	0	0.0	83.0		32.9
	Upper	1	100.0	66.7	503	100.0	17.0		67.1
	Unknown	0	0.0	0.0	0	0.0	0.0		0.0
	Total	1	100.0	100.0	503	100.0	100.0		100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0	
	Middle	4	19.0	24.2	657	18.5	23.0	28.8	
	Upper	17	81.0	75.8	2,896	81.5	77.0	71.2	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	Total	21	100.0	100.0	3,553	100.0	100.0	100.0	
Originations & Purchases									
2017 FFIEC Census Data									
Note: Percentages may not add to 100.0 percent due to rounding									

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Dickinson 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison					
							2018					
		Bank				Owner Occupied Units	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$ (000s)		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	20.0%	\$517	14.3%	28.8%	3	20.0%	21.4%	\$517	14.3%	16.7%
	Upper	12	80.0%	\$3,095	85.7%	71.2%	12	80.0%	78.6%	\$3,095	85.7%	83.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$3,612	100.0%	100.0%	15	100.0%	100.0%	\$3,612	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	14.3%	\$97	17.4%	28.8%	1	14.3%	18.0%	\$97	17.4%	14.6%
	Upper	6	85.7%	\$461	82.6%	71.2%	6	85.7%	82.0%	\$461	82.6%	85.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$558	100.0%	100.0%	7	100.0%	100.0%	\$558	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	28.8%	0	0.0%	27.0%	\$0	0.0%	21.1%
	Upper	0	0.0%	\$0	0.0%	71.2%	0	0.0%	73.0%	\$0	0.0%	78.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	27.3%	\$0	0.0%	2.9%
	Upper	2	100.0%	\$14,491	100.0%	67.1%	2	100.0%	72.7%	\$14,491	100.0%	97.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$14,491	100.0%	100.0%	2	100.0%	100.0%	\$14,491	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	28.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	71.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Dickinson 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2018					2018						
		Count		Bank Dollar		Owner Occupied Units	Count			Dollar			
		#	%	\$ (000s)	\$ %		%	Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	28.8%	0	0.0%	25.0%	\$0	0.0%	18.2%	
	Upper	0	0.0%	\$0	0.0%	71.2%	0	0.0%	75.0%	\$0	0.0%	81.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	28.8%	0	0.0%	30.8%	\$0	0.0%	26.0%	
	Upper	0	0.0%	\$0	0.0%	71.2%	0	0.0%	69.2%	\$0	0.0%	74.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	4	16.7%	\$614	3.3%	28.8%	4	16.7%	21.0%	\$614	3.3%	14.8%	
	Upper	20	83.3%	\$18,047	96.7%	71.2%	20	83.3%	79.0%	\$18,047	96.7%	85.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	24	100.0%	\$18,661	100.0%	100.0%	24	100.0%	100.0%	\$18,661	100.0%	100.0%	

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: ND Dickinson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2017, 2018					2017					2018				
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		#	%	Bank	Agg	\$ %	#	%	Bank	Agg	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	16	23.5%	\$2,530	21.6%	33.5%	8	25.8%	26.8%	\$860	15.6%	19.4%	8	21.6%	24.5%	\$1,670 26.9% 22.5%
	Upper	52	76.5%	\$9,184	78.4%	66.5%	23	74.2%	71.0%	\$4,637	84.4%	80.1%	29	78.4%	73.0%	\$4,547 73.1% 77.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	0.5%	0	0.0%	2.5%	\$0 0.0% 0.4%
	<i>Total</i>	<i>68</i>	<i>100.0%</i>	<i>\$11,714</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,497</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,217 100.0% 100.0%</i>
SMALL FARM	Total Farms															
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	1	6.3%	\$230	13.8%	30.2%	1	16.7%	25.9%	\$230	32.4%	32.8%	0	0.0%	20.1%	\$0 0.0% 20.1%
	Upper	15	93.8%	\$1,435	86.2%	69.8%	5	83.3%	74.1%	\$479	67.6%	67.2%	10	100.0%	79.9%	\$956 100.0% 79.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$1,665</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$709</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$956 100.0% 100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Dickinson 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income
		2017						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
#	%	%	\$(000s)	\$ %	\$ %	%		
Home Purchase	Low	1	9.1	3.7	160	10.7	1.9	12.8
	Moderate	5	45.5	21.1	521	34.8	17.4	14.2
	Middle	3	27.3	24.5	644	43.0	23.7	23.7
	Upper	1	9.1	30.0	60	4.0	36.7	49.4
	Unknown	1	9.1	20.7	111	7.4	20.2	0.0
	Total	11	100.0	100.0	1,496	100.0	100.0	100.0
Refinance	Low	0	0.0	8.3	0	0.0	3.6	12.8
	Moderate	2	28.6	15.3	353	27.8	11.9	14.2
	Middle	2	28.6	20.9	366	28.8	17.6	23.7
	Upper	2	28.6	31.6	432	34.0	38.1	49.4
	Unknown	1	14.3	23.9	121	9.5	28.8	0.0
	Total	7	100.0	100.0	1,272	100.0	100.0	100.0
Home Improvement	Low	0	0.0	7.0	0	0.0	3.2	12.8
	Moderate	0	0.0	21.1	0	0.0	20.7	14.2
	Middle	0	0.0	15.8	0	0.0	7.1	23.7
	Upper	1	50.0	45.6	122	43.3	48.1	49.4
	Unknown	1	50.0	10.5	160	56.7	21.0	0.0
	Total	2	100.0	100.0	282	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	12.8
	Moderate	0	0.0	0.0	0	0.0	0.0	14.2
	Middle	0	0.0	0.0	0	0.0	0.0	23.7
	Upper	0	0.0	0.0	0	0.0	0.0	49.4
	Unknown	1	100.0	100.0	503	100.0	100.0	0.0
	Total	1	100.0	100.0	503	100.0	100.0	100.0
HMDA Totals	Low	1	4.8	5.2	160	4.5	2.3	12.8
	Moderate	7	33.3	19.1	874	24.6	14.7	14.2
	Middle	5	23.8	22.7	1,010	28.4	20.0	23.7
	Upper	4	19.0	31.0	614	17.3	34.9	49.4
	Unknown	4	19.0	22.0	895	25.2	28.1	0.0
	Total	21	100.0	100.0	3,553	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Dickinson 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	4.6%	\$0	0.0%	2.4%
	Moderate	1	6.7%	\$55	1.5%	14.2%	1	6.7%	20.0%	\$55	1.5%	14.9%
	Middle	4	26.7%	\$729	20.2%	23.7%	4	26.7%	29.0%	\$729	20.2%	28.0%
	Upper	10	66.7%	\$2,828	78.3%	49.4%	10	66.7%	31.4%	\$2,828	78.3%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	15.6%
	Total	15	100.0%	\$3,612	100.0%	100.0%	15	100.0%	100.0%	\$3,612	100.0%	100.0%
REFINANCE	Low	1	14.3%	\$97	17.4%	12.8%	1	14.3%	6.5%	\$97	17.4%	3.3%
	Moderate	3	42.9%	\$137	24.6%	14.2%	3	42.9%	13.4%	\$137	24.6%	8.9%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	24.5%	\$0	0.0%	23.6%
	Upper	2	28.6%	\$222	39.8%	49.4%	2	28.6%	40.6%	\$222	39.8%	47.9%
	Unknown	1	14.3%	\$102	18.3%	0.0%	1	14.3%	14.9%	\$102	18.3%	16.3%
	Total	7	100.0%	\$558	100.0%	100.0%	7	100.0%	100.0%	\$558	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	10.8%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	8.1%	\$0	0.0%	6.0%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	18.9%	\$0	0.0%	8.4%
	Upper	0	0.0%	\$0	0.0%	49.4%	0	0.0%	54.1%	\$0	0.0%	71.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	9.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$14,491	100.0%	0.0%	2	100.0%	100.0%	\$14,491	100.0%	100.0%
	Total	2	100.0%	\$14,491	100.0%	100.0%	2	100.0%	100.0%	\$14,491	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	49.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Dickinson 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	5.0%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	15.0%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	10.0%	\$0	0.0%	6.8%
	Upper	0	0.0%	\$0	0.0%	49.4%	0	0.0%	60.0%	\$0	0.0%	74.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	9.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	7.7%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	92.3%	\$0	0.0%	99.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	4.2%	\$97	0.5%	12.8%	1	4.2%	5.2%	\$97	0.5%	2.3%
	Moderate	4	16.7%	\$192	1.0%	14.2%	4	16.7%	17.6%	\$192	1.0%	11.7%
	Middle	4	16.7%	\$729	3.9%	23.7%	4	16.7%	26.6%	\$729	3.9%	23.3%
	Upper	12	50.0%	\$3,050	16.3%	49.4%	12	50.0%	34.2%	\$3,050	16.3%	36.8%
	Unknown	3	12.5%	\$14,593	78.2%	0.0%	3	12.5%	16.4%	\$14,593	78.2%	26.0%
	Total	24	100.0%	\$18,661	100.0%	100.0%	24	100.0%	100.0%	\$18,661	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: ND Dickinson

Product Type	Bank Lending & Demographic Data Comparison 2017, 2018					Bank & Aggregate Lending Comparison													
						2017						2018							
	Bank				Total Businesses	Count			Dollar			Count			Dollar				
	Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg			
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	41	60.3%	\$5,081	43.4%	91.1%	17	54.8%	49.5%	\$1,654	30.1%	43.3%	24	64.9%	45.7%	\$3,427	55.1%	41.4%
		Over \$1 Million	26	38.2%	\$6,594	56.3%	8.1%	14	45.2%				12	32.4%					
		Total Rev. available	67	98.5%	\$11,675	99.7%	99.2%	31	100.0%				36	97.3%					
		Rev. Not Known	1	1.5%	\$39	0.3%	0.9%	0	0.0%				1	2.7%					
		Total	68	100.0%	\$11,714	100.0%	100.0%	31	100.0%				37	100.0%					
	Loan Size	\$100,000 or Less	38	55.9%	\$1,634	13.9%		19	61.3%	88.3%	\$857	15.6%	31.9%	19	51.4%	87.2%	\$777	12.5%	27.6%
		\$100,001 - \$250,000	15	22.1%	\$2,777	23.7%		5	16.1%	6.6%	\$896	16.3%	20.7%	10	27.0%	6.2%	\$1,881	30.3%	17.3%
		\$250,001 - \$1 Million	15	22.1%	\$7,303	62.3%		7	22.6%	5.1%	\$3,744	68.1%	47.4%	8	21.6%	6.6%	\$3,559	57.2%	55.0%
		Total	68	100.0%	\$11,714	100.0%		31	100.0%	100.0%	\$5,497	100.0%	100.0%	37	100.0%	100.0%	\$6,217	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	26	63.4%	\$888	17.5%													
		\$100,001 - \$250,000	9	22.0%	\$1,640	32.3%													
		\$250,001 - \$1 Million	6	14.6%	\$2,553	50.2%													
		Total	41	100.0%	\$5,081	100.0%													
Small Farm	Revenue	\$1 Million or Less	12	75.0%	\$1,111	66.7%	99.2%	6	100.0%	81.1%	\$709	100.0%	90.7%	6	60.0%	76.9%	\$402	42.1%	82.0%
		Over \$1 Million	1	6.3%	\$330	19.8%	0.8%	0	0.0%				1	10.0%					
		Total Rev. available	13	81.3%	\$1,441	86.5%	100.0%	6	100.0%				7	70.0%					
		Not Known	3	18.8%	\$224	13.5%	0.0%	0	0.0%				3	30.0%					
		Total	16	100.0%	\$1,665	100.0%	100.0%	6	100.0%				10	100.0%					
	Loan Size	\$100,000 or Less	10	62.5%	\$441	26.5%		3	50.0%	57.3%	\$117	16.5%	17.8%	7	70.0%	63.3%	\$324	33.9%	20.5%
		\$100,001 - \$250,000	5	31.3%	\$894	53.7%		3	50.0%	29.2%	\$592	83.5%	43.9%	2	20.0%	23.7%	\$302	31.6%	36.9%
		\$250,001 - \$500,000	1	6.3%	\$330	19.8%		0	0.0%	13.5%	\$0	0.0%	38.3%	1	10.0%	13.0%	\$330	34.5%	42.6%
		Total	16	100.0%	\$1,665	100.0%		6	100.0%	100.0%	\$709	100.0%	100.0%	10	100.0%	100.0%	\$956	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	66.7%	\$352	31.7%													
		\$100,001 - \$250,000	4	33.3%	\$759	68.3%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	12	100.0%	\$1,111	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: ND Hettinger 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Dollar				
		Bank	Agg	Bank	Agg			
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	2.9	0	0.0	3.0	14.8
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	4	100.0	97.1	868	100.0	97.0	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	4	100.0	100.0	868	100.0	100.0	100.0
Refinance	Low	1	14.3	14.3	850	25.7	51.2	14.8
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	6	85.7	85.7	2,461	74.3	48.8	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	7	100.0	100.0	3,311	100.0	100.0	100.0
Home Improvement	Low	0	0.0	12.5	0	0.0	0.7	14.8
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	87.5	0	0.0	99.3	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 13.6
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	86.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	1	9.1	7.5	850	20.3	33.8	14.8
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	10	90.9	92.5	3,329	79.7	66.2	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	11	100.0	100.0	4,179	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Hettinger 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	2.3%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$337	100.0%	85.2%	2	100.0%	97.7%	\$337	100.0%	98.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$337	100.0%	100.0%	2	100.0%	100.0%	\$337	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	6.5%	\$0	0.0%	5.9%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	3	100.0%	\$262	100.0%	85.2%	3	100.0%	93.5%	\$262	100.0%	94.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$262	100.0%	100.0%	3	100.0%	100.0%	\$262	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	85.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	13.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	86.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	85.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: ND Hettinger 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	85.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	85.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	14.8%	0	0.0%	3.6%	\$0	0.0%	3.3%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	5	100.0%	\$599	100.0%	85.2%	5	100.0%	96.4%	\$599	100.0%	96.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$599</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: ND Hettinger

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2017					2017					2018						
		Bank				Total Businesses	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	2	4.0%	\$35	1.1%	12.0%	1	3.6%	5.4%	\$20	1.1%	1.1%	1	4.5%	8.6%	\$15	1.1%	1.9%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	48	96.0%	\$3,192	98.9%	88.0%	27	96.4%	91.8%	\$1,828	98.9%	98.4%	21	95.5%	89.6%	\$1,364	98.9%	97.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	0.5%	0	0.0%	1.8%	\$0	0.0%	0.2%
	Total	50	100.0%	\$3,227	100.0%	100.0%	28	100.0%	100.0%	\$1,848	100.0%	100.0%	22	100.0%	100.0%	\$1,379	100.0%	100.0%
SMALL FARM		Total Farms																
	Low	24	13.7%	\$2,781	14.8%	9.5%	12	14.5%	7.8%	\$1,337	13.9%	6.9%	12	13.0%	7.9%	\$1,444	15.6%	5.7%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	151	86.3%	\$16,064	85.2%	90.5%	71	85.5%	91.4%	\$8,267	86.1%	92.8%	80	87.0%	91.3%	\$7,797	84.4%	94.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.3%	0	0.0%	0.8%	\$0	0.0%	0.3%
Total	175	100.0%	\$18,845	100.0%	100.0%	83	100.0%	100.0%	\$9,604	100.0%	100.0%	92	100.0%	100.0%	\$9,241	100.0%	100.0%	

Originations & Purchases

2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Hettinger 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %			
Home Purchase	Low	0	0.0	17.1	0	0.0	9.4	31.2
	Moderate	0	0.0	22.9	0	0.0	21.4	20.9
	Middle	1	25.0	20.0	215	24.8	23.7	19.1
	Upper	2	50.0	15.7	383	44.1	20.9	28.8
	Unknown	1	25.0	24.3	270	31.1	24.6	0.0
	Total	4	100.0	100.0	868	100.0	100.0	100.0
Refinance	Low	1	14.3	9.5	14	0.4	0.9	31.2
	Moderate	0	0.0	11.9	0	0.0	2.3	20.9
	Middle	0	0.0	23.8	0	0.0	8.1	19.1
	Upper	6	85.7	31.0	3,297	99.6	29.1	28.8
	Unknown	0	0.0	23.8	0	0.0	59.6	0.0
	Total	7	100.0	100.0	3,311	100.0	100.0	100.0
Home Improvement	Low	0	0.0	37.5	0	0.0	16.7	31.2
	Moderate	0	0.0	0.0	0	0.0	0.0	20.9
	Middle	0	0.0	12.5	0	0.0	2.3	19.1
	Upper	0	0.0	37.5	0	0.0	65.0	28.8
	Unknown	0	0.0	12.5	0	0.0	16.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	31.2
	Moderate	0	0.0	0.0	0	0.0	0.0	20.9
	Middle	0	0.0	0.0	0	0.0	0.0	19.1
	Upper	0	0.0	0.0	0	0.0	0.0	28.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
HMDA Totals	Low	1	9.1	15.8	14	0.3	4.1	31.2
	Moderate	0	0.0	17.5	0	0.0	8.9	20.9
	Middle	1	9.1	20.8	215	5.1	13.4	19.1
	Upper	8	72.7	22.5	3,680	88.1	26.8	28.8
	Unknown	1	9.1	23.3	270	6.5	46.8	0.0
	Total	11	100.0	100.0	4,179	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Hettinger 2018

ODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	30.2%	\$0	0.0%	23.2%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	20.9%	\$0	0.0%	14.7%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	11.6%	\$0	0.0%	20.4%
	Upper	1	50.0%	\$274	81.3%	28.8%	1	50.0%	25.6%	\$274	81.3%	28.8%
	Unknown	1	50.0%	\$63	18.7%	0.0%	1	50.0%	11.6%	\$63	18.7%	12.8%
	Total	2	100.0%	\$337	100.0%	100.0%	2	100.0%	100.0%	\$337	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	9.7%	\$0	0.0%	8.9%
	Moderate	1	33.3%	\$89	34.0%	20.9%	1	33.3%	19.4%	\$89	34.0%	20.7%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	19.4%	\$0	0.0%	19.8%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	32.3%	\$0	0.0%	35.9%
	Unknown	2	66.7%	\$173	66.0%	0.0%	2	66.7%	19.4%	\$173	66.0%	14.7%
	Total	3	100.0%	\$262	100.0%	100.0%	3	100.0%	100.0%	\$262	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	25.0%	\$0	0.0%	13.7%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	50.0%	\$0	0.0%	11.9%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	25.0%	\$0	0.0%	74.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Hettinger 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	50.0%	\$0	0.0%	42.9%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	50.0%	\$0	0.0%	57.1%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	31.2%	0	0.0%	20.5%	\$0	0.0%	15.7%
	Moderate	1	20.0%	\$89	14.9%	20.9%	1	20.0%	19.3%	\$89	14.9%	16.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	16.9%	\$0	0.0%	19.1%
	Upper	1	20.0%	\$274	45.7%	28.8%	1	20.0%	26.5%	\$274	45.7%	31.0%
	Unknown	3	60.0%	\$236	39.4%	0.0%	3	60.0%	16.9%	\$236	39.4%	18.2%
	Total	5	100.0%	\$599	100.0%	100.0%	5	100.0%	100.0%	\$599	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: ND Hettinger

Product Type	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
	2018, 2017					2017						2018							
	Bank				Total Businesses	Count			Dollar			Count			Dollar				
	Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
	#	%	\$ (000s)	\$ %										%	\$ 000s	\$ %	%	\$ 000s	\$ %
Small Business	Revenue	\$1 Million or Less	32	64.0%	\$991	30.7%	88.2%	20	71.4%	62.5%	\$650	35.2%	36.7%	12	54.5%	56.4%	\$341	24.7%	38.3%
		Over \$1 Million	10	20.0%	\$1,258	39.0%	7.1%	4	14.3%				6	27.3%					
		Total Rev. available	42	84.0%	\$2,249	69.7%	95.3%	24	85.7%				18	81.8%					
		Rev. Not Known	8	16.0%	\$978	30.3%	4.7%	4	14.3%				4	18.2%					
		Total	50	100.0%	\$3,227	100.0%	100.0%	28	100.0%				22	100.0%					
	Loan Size	\$100,000 or Less	44	88.0%	\$1,602	49.6%		24	85.7%	83.2%	\$947	51.2%	19.8%	20	90.9%	87.7%	\$655	47.5%	30.5%
		\$100,001 - \$250,000	3	6.0%	\$601	18.6%		3	10.7%	9.2%	\$601	32.5%	19.3%	0	0.0%	6.7%	\$0	0.0%	18.1%
		\$250,001 - \$1 Million	3	6.0%	\$1,024	31.7%		1	3.6%	7.6%	\$300	16.2%	60.9%	2	9.1%	5.5%	\$724	52.5%	51.3%
		Total	50	100.0%	\$3,227	100.0%		28	100.0%	100.0%	\$1,848	100.0%	100.0%	22	100.0%	100.0%	\$1,379	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	32	100.0%	\$991	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$1 Million	0	0.0%	\$0	0.0%													
		Total	32	100.0%	\$991	100.0%													
Small Farm	Revenue	\$1 Million or Less	155	88.6%	\$16,788	89.1%	Total Farms	70	84.3%	75.3%	\$7,931	82.6%	86.3%	85	92.4%	72.8%	\$8,857	95.8%	79.2%
		Over \$1 Million	7	4.0%	\$1,461	7.8%	0.4%	5	6.0%				2	2.2%					
		Total Rev. available	162	92.6%	\$18,249	96.9%	99.6%	75	90.3%				87	94.6%					
		Not Known	13	7.4%	\$596	3.2%	0.4%	8	9.6%				5	5.4%					
		Total	175	100.0%	\$18,845	100.0%	100.0%	83	100.0%				92	100.0%					
	Loan Size	\$100,000 or Less	108	61.7%	\$4,183	22.2%		49	59.0%	73.2%	\$1,945	20.3%	27.0%	59	64.1%	75.0%	\$2,238	24.2%	28.6%
		\$100,001 - \$250,000	49	28.0%	\$8,355	44.3%		23	27.7%	19.0%	\$3,980	41.4%	39.8%	26	28.3%	17.1%	\$4,375	47.3%	37.0%
		\$250,001 - \$500,000	18	10.3%	\$6,307	33.5%		11	13.3%	7.8%	\$3,679	38.3%	33.2%	7	7.6%	7.9%	\$2,628	28.4%	34.5%
		Total	175	100.0%	\$18,845	100.0%		83	100.0%	100.0%	\$9,604	100.0%	100.0%	92	100.0%	100.0%	\$9,241	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	96	61.9%	\$3,811	22.7%													
		\$100,001 - \$250,000	44	28.4%	\$7,596	45.2%													
		\$250,001 - \$500,000	15	9.7%	\$5,381	32.1%													
		Total	155	100.0%	\$16,788	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: ND Jamestown 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count			Dollar			
		Bank		Agg	Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	89.6	0	0.0	85.1	84.2
	Upper	0	0.0	10.4	0	0.0	14.9	15.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	85.4	90	100.0	79.0	84.2
	Upper	0	0.0	14.6	0	0.0	21.0	15.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	90	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	84.2	6	100.0	72.8	84.2
	Upper	0	0.0	15.8	0	0.0	27.2	15.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	6	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	
	Middle	0	0.0	100.0	0	0.0	100.0	
	Upper	0	0.0	0.0	0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	2	100.0	87.3	96	100.0	82.9	84.2
	Upper	0	0.0	12.7	0	0.0	17.1	15.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	96	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Jamestown 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$283	100.0%	84.2%	2	100.0%	93.0%	\$283	100.0%	92.7%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	7.0%	\$0	0.0%	7.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$283	100.0%	100.0%	2	100.0%	100.0%	\$283	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	84.2%	0	0.0%	87.0%	\$0	0.0%	79.1%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	13.0%	\$0	0.0%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	84.2%	0	0.0%	84.6%	\$0	0.0%	79.8%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	15.4%	\$0	0.0%	20.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	99.8%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	84.2%	0	0.0%	50.0%	\$0	0.0%	47.9%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	50.0%	\$0	0.0%	52.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: ND Jamestown 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Count		Bank Dollar		Owner Occupied Units %	Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	84.2%	0	0.0%	77.8%	\$0	0.0%	41.5%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	22.2%	\$0	0.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	84.2%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$283	100.0%	84.2%	2	100.0%	88.8%	\$283	100.0%	86.5%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	11.2%	\$0	0.0%	13.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$283</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$283</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: ND Jamestown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2017, 2018					2017					2018				
		Count		Bank Dollar		Total Businesses %	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		#	%	Bank \$ 000s	Agg \$ %	Agg \$ %	#	%	Bank \$ 000s	Bank \$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	58	98.3%	\$5,644	98.6%	87.9%	21	100.0%	87.0%	\$2,834	100.0%	96.3%	37	97.4%	81.7%	91.1%
	Upper	1	1.7%	\$80	1.4%	12.1%	0	0.0%	10.3%	\$0	0.0%	2.7%	1	2.6%	14.8%	8.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	1.1%	0	0.0%	3.5%	0.9%
	<i>Total</i>	<i>59</i>	<i>100.0%</i>	<i>\$5,724</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,834</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	28	50.9%	\$3,926	67.6%	55.6%	13	46.4%	44.9%	\$1,739	66.6%	34.0%	15	55.6%	43.7%	38.6%
	Upper	27	49.1%	\$1,884	32.4%	44.4%	15	53.6%	55.1%	\$874	33.4%	66.0%	12	44.4%	56.3%	61.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>\$5,810</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,613</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Jamestown 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank	Agg	Bank		Agg		
#	%	%	\$(000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	11.5	0	0.0	6.3	19.9
	Moderate	0	0.0	28.1	0	0.0	25.2	19.5
	Middle	0	0.0	22.2	0	0.0	23.5	23.0
	Upper	0	0.0	23.0	0	0.0	30.9	37.6
	Unknown	0	0.0	15.2	0	0.0	14.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance	Low	0	0.0	7.6	0	0.0	4.7	19.9
	Moderate	0	0.0	19.9	0	0.0	12.4	19.5
	Middle	0	0.0	22.8	0	0.0	23.5	23.0
	Upper	1	100.0	28.1	90	100.0	35.6	37.6
	Unknown	0	0.0	21.6	0	0.0	23.8	0.0
	Total	1	100.0	100.0	90	100.0	100.0	100.0
Home Improvement	Low	0	0.0	9.2	0	0.0	5.4	19.9
	Moderate	1	100.0	20.8	6	100.0	18.0	19.5
	Middle	0	0.0	32.5	0	0.0	29.3	23.0
	Upper	0	0.0	34.2	0	0.0	45.6	37.6
	Unknown	0	0.0	3.3	0	0.0	1.7	0.0
	Total	1	100.0	100.0	6	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.9
	Moderate	0	0.0	0.0	0	0.0	0.0	19.5
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	0.0	0	0.0	0.0	37.6
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	9.7	0	0.0	5.3	19.9
	Moderate	1	50.0	23.9	6	6.3	18.7	19.5
	Middle	0	0.0	24.4	0	0.0	22.5	23.0
	Upper	1	50.0	26.7	90	93.8	31.8	37.6
	Unknown	0	0.0	15.4	0	0.0	21.7	0.0
	Total	2	100.0	100.0	96	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Jamestown 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	1	50.0%	\$53	18.7%	19.9%	1	50.0%	17.4%	\$53	18.7%	11.1%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	26.4%	\$0	0.0%	23.9%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	21.3%	\$0	0.0%	24.7%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	16.3%	\$0	0.0%	20.7%
	Unknown	1	50.0%	\$230	81.3%	0.0%	1	50.0%	18.6%	\$230	81.3%	19.5%
	<i>Total</i>	2	100.0%	\$283	100.0%	100.0%	2	100.0%	100.0%	\$283	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	12.0%	\$0	0.0%	8.0%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	24.5%	\$0	0.0%	19.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	23.4%	\$0	0.0%	22.9%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	23.9%	\$0	0.0%	32.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	17.2%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	5.8%	\$0	0.0%	5.5%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	13.5%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	30.8%	\$0	0.0%	25.0%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	48.1%	\$0	0.0%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.8%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	33.3%	\$0	0.0%	24.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	66.7%	\$0	0.0%	75.5%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	10.0%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	10.0%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	30.0%	\$0	0.0%	41.0%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	50.0%	\$0	0.0%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Jamestown 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	5.6%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	11.1%	\$0	0.0%	3.9%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	27.8%	\$0	0.0%	9.5%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	44.4%	\$0	0.0%	76.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.1%	\$0	0.0%	8.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	50.0%	\$53	18.7%	19.9%	1	50.0%	13.6%	\$53	18.7%	9.4%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	23.3%	\$0	0.0%	20.8%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	23.1%	\$0	0.0%	23.4%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	23.7%	\$0	0.0%	27.5%
	Unknown	1	50.0%	\$230	81.3%	0.0%	1	50.0%	16.3%	\$230	81.3%	18.9%
	Total	2	100.0%	\$283	100.0%	100.0%	2	100.0%	100.0%	\$283	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: ND Jamestown

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
							2017, 2018					2017					2018		
		Bank		Total Businesses	Count		Dollar		Count		Dollar								
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg							
		#	%		\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	32	54.2%	\$2,593	45.3%	90.2%	12	57.1%	49.3%	\$1,201	42.4%	29.8%	20	52.6%	49.5%	\$1,392	48.2%	36.1%
		Over \$1 Million	17	28.8%	\$1,871	32.7%	8.0%	6	28.6%				11	28.9%					
		Total Rev. available	49	83.0%	\$4,464	78.0%	98.2%	18	85.7%				31	81.5%					
		Rev. Not Known	10	16.9%	\$1,260	22.0%	1.7%	3	14.3%				7	18.4%					
		Total	59	100.0%	\$5,724	100.0%	100.0%	21	100.0%				38	100.0%					
	Loan Size	\$100,000 or Less	43	72.9%	\$1,565	27.3%		14	66.7%	86.6%	\$532	18.8%	21.3%	29	76.3%	88.7%	\$1,033	35.7%	24.4%
		\$100,001 - \$250,000	10	16.9%	\$1,477	25.8%		4	19.0%	7.5%	\$626	22.1%	24.3%	6	15.8%	5.5%	\$851	29.4%	18.4%
		\$250,001 - \$1 Million	6	10.2%	\$2,682	46.9%		3	14.3%	5.8%	\$1,676	59.1%	54.4%	3	7.9%	5.8%	\$1,006	34.8%	57.2%
		Total	59	100.0%	\$5,724	100.0%		21	100.0%	100.0%	\$2,834	100.0%	100.0%	38	100.0%	100.0%	\$2,890	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	25	78.1%	\$870	33.6%													
		\$100,001 - \$250,000	5	15.6%	\$697	26.9%													
		\$250,001 - \$1 Million	2	6.3%	\$1,026	39.6%													
		Total	32	100.0%	\$2,593	100.0%													
Small Farm	Revenue	\$1 Million or Less	44	80.0%	\$4,736	81.5%	Total Farms 96.7%	23	82.1%	43.2%	\$2,239	85.7%	60.5%	21	77.8%	45.2%	\$2,497	78.1%	49.5%
		Over \$1 Million	9	16.4%	\$983	16.9%	3.3%	4	14.3%				5	18.5%					
		Total Rev. available	53	96.4%	\$5,719	98.4%	100.0%	27	96.4%				26	96.3%					
		Not Known	2	3.6%	\$91	1.6%	0.0%	1	3.6%				1	3.7%					
		Total	55	100.0%	\$5,810	100.0%	100.0%	28	100.0%				27	100.0%					
	Loan Size	\$100,000 or Less	38	69.1%	\$1,842	31.7%		21	75.0%	77.0%	\$952	36.4%	28.3%	17	63.0%	68.0%	\$890	27.8%	23.2%
		\$100,001 - \$250,000	11	20.0%	\$1,970	33.9%		5	17.9%	17.3%	\$943	36.1%	42.0%	6	22.2%	21.8%	\$1,027	32.1%	39.5%
		\$250,001 - \$500,000	6	10.9%	\$1,998	34.4%		2	7.1%	5.8%	\$718	27.5%	29.7%	4	14.8%	10.2%	\$1,280	40.0%	37.3%
		Total	55	100.0%	\$5,810	100.0%		28	100.0%	100.0%	\$2,613	100.0%	100.0%	27	100.0%	100.0%	\$3,197	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	29	65.9%	\$1,206	25.5%													
		\$100,001 - \$250,000	10	22.7%	\$1,812	38.3%													
		\$250,001 - \$500,000	5	11.4%	\$1,718	36.3%													
		Total	44	100.0%	\$4,736	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2018 FFIEC Census Data and 2018 D&B Information

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: ND Minot 2017								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017						
		Count		Agg %	Dollar		Agg \$ %	
		Bank #	%		Bank \$ (000s)	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.2
	Middle	6	66.7	72.6	1,191	77.0	69.7	74.0
	Upper	3	33.3	27.4	355	23.0	30.3	25.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	9	100.0	100.0	1,546	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.2
	Middle	1	33.3	72.3	211	39.7	68.6	74.0
	Upper	2	66.7	27.7	321	60.3	31.4	25.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	3	100.0	100.0	532	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.2
	Middle	0	0.0	65.0	0	0.0	64.4	74.0
	Upper	1	100.0	35.0	38	100.0	35.6	25.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	38	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	
	Middle	1	100.0	75.0	3,339	100.0	91.3	91.3
	Upper	0	0.0	25.0	0	0.0	8.7	8.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	3,339	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.2
	Middle	8	57.1	71.9	4,741	86.9	71.2	74.0
	Upper	6	42.9	28.1	714	13.1	28.8	25.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	14	100.0	100.0	5,455	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Minot 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		#	%		\$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	40.0%	\$178	20.9%	74.0%	2	40.0%	72.6%	\$178	20.9%	68.3%
	Upper	3	60.0%	\$675	79.1%	25.8%	3	60.0%	27.4%	\$675	79.1%	31.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$853	100.0%	100.0%	5	100.0%	100.0%	\$853	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	40.0%	\$241	29.3%	74.0%	2	40.0%	69.0%	\$241	29.3%	63.1%
	Upper	3	60.0%	\$581	70.7%	25.8%	3	60.0%	31.0%	\$581	70.7%	36.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$822	100.0%	100.0%	5	100.0%	100.0%	\$822	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	74.0%	0	0.0%	66.0%	\$0	0.0%	68.2%
	Upper	1	100.0%	\$30	100.0%	25.8%	1	100.0%	34.0%	\$30	100.0%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$30	100.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$260	100.0%	91.3%	1	100.0%	90.0%	\$260	100.0%	98.3%
	Upper	0	0.0%	\$0	0.0%	8.2%	0	0.0%	10.0%	\$0	0.0%	1.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$260	100.0%	100.0%	1	100.0%	100.0%	\$260	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	74.0%	0	0.0%	56.3%	\$0	0.0%	55.1%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	43.8%	\$0	0.0%	44.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: ND Minot 2018

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$50	100.0%	74.0%	1	100.0%	78.6%	\$50	100.0%	75.4%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	21.4%	\$0	0.0%	24.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	74.0%	0	0.0%	71.9%	\$0	0.0%	67.6%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	28.1%	\$0	0.0%	32.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	6	46.2%	\$729	36.2%	74.0%	6	46.2%	71.8%	\$729	36.2%	69.1%
	Upper	7	53.8%	\$1,286	63.8%	25.8%	7	53.8%	28.2%	\$1,286	63.8%	30.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$2,015	100.0%	100.0%	13	100.0%	100.0%	\$2,015	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: ND Minot

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2018, 2017					2017					2018				
		Count		Bank Dollar		Total Businesses	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		#	%	Bank \$ 000s	Agg \$ %	\$ %	#	%	Bank \$ 000s	Agg \$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%
	Middle	56	76.7%	\$5,760	77.2%	79.0%	32	80.0%	79.4%	\$3,672	78.6%	79.0%	24	72.7%	\$2,088	74.9%
	Upper	17	23.3%	\$1,703	22.8%	19.9%	8	20.0%	19.1%	\$1,002	21.4%	20.1%	9	27.3%	\$701	25.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	\$0	0.0%
<i>Total</i>		<i>73</i>	<i>100.0%</i>	<i>\$7,463</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,674</i>	<i>100.0%</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>\$2,789</i>	<i>100.0%</i>
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Middle	39	75.0%	\$4,245	77.6%	72.9%	18	72.0%	67.3%	\$1,863	61.9%	69.4%	21	77.8%	\$2,382	96.9%
	Upper	13	25.0%	\$1,223	22.4%	27.1%	7	28.0%	32.7%	\$1,148	38.1%	30.6%	6	22.2%	\$75	3.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
<i>Total</i>		<i>52</i>	<i>100.0%</i>	<i>\$5,468</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,011</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>\$2,457</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2018 D&B Information

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: ND Minot 2017								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017						
		Count		Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Agg \$ %		
Home Purchase	Low	0	0.0	5.0	0	0.0	2.9	17.1
	Moderate	4	44.4	21.7	619	40.0	17.5	18.9
	Middle	3	33.3	27.2	477	30.9	28.3	23.2
	Upper	0	0.0	23.8	0	0.0	29.2	40.8
	Unknown	2	22.2	22.3	450	29.1	22.1	0.0
	Total	9	100.0	100.0	1,546	100.0	100.0	100.0
Refinance	Low	0	0.0	6.3	0	0.0	3.6	17.1
	Moderate	1	33.3	13.7	175	32.9	10.7	18.9
	Middle	2	66.7	18.3	357	67.1	18.1	23.2
	Upper	0	0.0	24.8	0	0.0	31.7	40.8
	Unknown	0	0.0	36.8	0	0.0	35.9	0.0
	Total	3	100.0	100.0	532	100.0	100.0	100.0
Home Improvement	Low	0	0.0	4.4	0	0.0	4.7	17.1
	Moderate	0	0.0	18.2	0	0.0	8.8	18.9
	Middle	0	0.0	21.9	0	0.0	19.1	23.2
	Upper	1	100.0	50.4	38	100.0	60.3	40.8
	Unknown	0	0.0	5.1	0	0.0	7.1	0.0
	Total	1	100.0	100.0	38	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	17.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.9
	Middle	0	0.0	0.0	0	0.0	0.0	23.2
	Upper	0	0.0	0.0	0	0.0	0.0	40.8
	Unknown	1	100.0	100.0	3,339	100.0	100.0	0.0
	Total	1	100.0	100.0	3,339	100.0	100.0	100.0
HMDA Totals	Low	0	0.0	5.3	0	0.0	2.9	17.1
	Moderate	5	35.7	18.8	794	14.6	13.8	18.9
	Middle	5	35.7	23.8	834	15.3	22.6	23.2
	Upper	1	7.1	26.1	38	0.7	28.4	40.8
	Unknown	3	21.4	26.0	3,789	69.5	32.4	0.0
	Total	14	100.0	100.0	5,455	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: ND Minot 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	1	20.0%	\$128	15.0%	17.1%	1	20.0%	6.8%	\$128	15.0%	3.7%
	Moderate	2	40.0%	\$258	30.2%	18.9%	2	40.0%	25.7%	\$258	30.2%	19.5%
	Middle	2	40.0%	\$467	54.7%	23.2%	2	40.0%	26.0%	\$467	54.7%	27.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	24.0%	\$0	0.0%	31.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.6%	\$0	0.0%	18.6%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$853</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$853</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	8.0%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	21.6%	\$0	0.0%	18.2%
	Middle	2	40.0%	\$431	52.4%	23.2%	2	40.0%	21.0%	\$431	52.4%	19.6%
	Upper	2	40.0%	\$171	20.8%	40.8%	2	40.0%	32.8%	\$171	20.8%	33.5%
	Unknown	1	20.0%	\$220	26.8%	0.0%	1	20.0%	16.7%	\$220	26.8%	23.3%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$822</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$822</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	6.4%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	12.8%	\$0	0.0%	7.9%
	Middle	1	100.0%	\$30	100.0%	23.2%	1	100.0%	19.1%	\$30	100.0%	16.9%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	57.4%	\$0	0.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	7.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	3.3%	\$0	0.0%	0.5%
	Unknown	1	100.0%	\$260	100.0%	0.0%	1	100.0%	96.7%	\$260	100.0%	99.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$260</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$260</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	12.5%	\$0	0.0%	8.4%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	18.8%	\$0	0.0%	10.7%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	18.8%	\$0	0.0%	11.2%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	43.8%	\$0	0.0%	65.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.3%	\$0	0.0%	4.1%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

2018 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: ND Minot 2018

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	10.7%	\$0	0.0%	9.9%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	10.7%	\$0	0.0%	3.6%
	Middle	1	100.0%	\$50	100.0%	23.2%	1	100.0%	32.1%	\$50	100.0%	37.4%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	39.3%	\$0	0.0%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	14.1%
	Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	3.1%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.9%	\$0	0.0%	98.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	7.7%	\$128	6.4%	17.1%	1	7.7%	7.0%	\$128	6.4%	3.8%
	Moderate	2	15.4%	\$258	12.8%	18.9%	2	15.4%	22.8%	\$258	12.8%	17.4%
	Middle	6	46.2%	\$978	48.5%	23.2%	6	46.2%	23.5%	\$978	48.5%	23.2%
	Upper	2	15.4%	\$171	8.5%	40.8%	2	15.4%	26.7%	\$171	8.5%	29.7%
	Unknown	2	15.4%	\$480	23.8%	0.0%	2	15.4%	20.0%	\$480	23.8%	25.9%
	Total	13	100.0%	\$2,015	100.0%	100.0%	13	100.0%	100.0%	\$2,015	100.0%	100.0%

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: ND Minot

Product Type		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2018, 2017					2017					2018							
		Bank				Total Businesses	Count			Dollar		Count			Dollar				
		Count		Dollar			Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	49	67.1%	\$5,390	72.2%	90.6%	26	65.0%	55.1%	\$3,123	66.8%	40.5%	23	69.7%	53.9%	\$2,267	81.3%	43.4%
		Over \$1 Million	11	15.1%	\$1,491	20.0%	7.8%	8	20.0%				3	9.1%					
		Total Rev. available	60	82.2%	\$6,881	92.2%	98.4%	34	85.0%				26	78.8%					
		Rev. Not Known	13	17.8%	\$582	7.8%	1.5%	6	15.0%				7	21.2%					
		Total	73	100.0%	\$7,463	100.0%	100.0%	40	100.0%				33	100.0%					
	Loan Size	\$100,000 or Less	56	76.7%	\$2,587	34.7%		31	77.5%	87.2%	\$1,381	29.5%	25.1%	25	75.8%	88.0%	\$1,206	43.2%	28.6%
		\$100,001 - \$250,000	12	16.4%	\$2,317	31.0%		5	12.5%	6.1%	\$1,034	22.1%	17.9%	7	21.2%	6.4%	\$1,283	46.0%	20.0%
		\$250,001 - \$1 Million	5	6.8%	\$2,559	34.3%		4	10.0%	6.7%	\$2,259	48.3%	57.0%	1	3.0%	5.6%	\$300	10.8%	51.4%
		Total	73	100.0%	\$7,463	100.0%		40	100.0%	100.0%	\$4,674	100.0%	100.0%	33	100.0%	100.0%	\$2,789	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	35	71.4%	\$1,573	29.2%													
		\$100,001 - \$250,000	11	22.4%	\$2,067	38.3%													
		\$250,001 - \$1 Million	3	6.1%	\$1,750	32.5%													
		Total	49	100.0%	\$5,390	100.0%													
Small Farm	Revenue	\$1 Million or Less	40	76.9%	\$3,153	57.7%	Total Farms	16	64.0%	39.0%	\$1,298	43.1%	63.1%	24	88.9%	50.4%	\$1,855	75.5%	76.6%
		Over \$1 Million	6	11.5%	\$1,892	34.6%	0.0%	4	16.0%				2	7.4%					
		Total Rev. available	46	88.4%	\$5,045	92.3%	100.0%	20	80.0%				26	96.3%					
		Not Known	6	11.5%	\$423	7.7%	0.0%	5	20.0%				1	3.7%					
		Total	52	100.0%	\$5,468	100.0%	100.0%	25	100.0%				27	100.0%					
	Loan Size	\$100,000 or Less	34	65.4%	\$788	14.4%		16	64.0%	76.6%	\$398	13.2%	20.7%	18	66.7%	73.0%	\$390	15.9%	18.2%
		\$100,001 - \$250,000	9	17.3%	\$1,522	27.8%		3	12.0%	11.9%	\$506	16.8%	25.4%	6	22.2%	15.0%	\$1,016	41.4%	31.4%
		\$250,001 - \$500,000	9	17.3%	\$3,158	57.8%		6	24.0%	11.5%	\$2,107	70.0%	53.9%	3	11.1%	11.9%	\$1,051	42.8%	50.4%
		Total	52	100.0%	\$5,468	100.0%		25	100.0%	100.0%	\$3,011	100.0%	100.0%	27	100.0%	100.0%	\$2,457	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	29	72.5%	\$693	22.0%													
		\$100,001 - \$250,000	7	17.5%	\$1,174	37.2%													
		\$250,001 - \$500,000	4	10.0%	\$1,286	40.8%													
		Total	40	100.0%	\$3,153	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2018 FFIEC Census Data and 2018 D&B Information