

**COMMUNITY  
REINVESTMENT  
ACT**

**PUBLIC FILE**

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# **COMMUNITY REINVESTMENT ACT NOTICE**

**Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.**

## **Your involvement is encouraged.**

**You are entitled to certain information about our operations and our performances under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relation to our performance in helping to meet community credit needs, as well as our response to those comments. You may review this information today.**

**At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, Division of Depositor and Consumer Protection, FDIC, 1100 Walnut Street, Suite 2100, Kansas City, Missouri, 64106. You may send written comments about our performance in helping to meet community credit needs to Charter President/CEO, Minnwest Bank, P.O. Box 439 Redwood Falls, MN 56283 and the FDIC Regional Director. You may also submit comments electronically through the FDIC's web site at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC in evaluation our CRA performance and may be made public.**

**You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Minnwest Corporation, a bank holding company. You may request for the Community Affairs Officer, Federal Reserve Bank of Minneapolis, 90 Hennepin Ave, Minneapolis, MN 55401, an announcement of applications covered by the CRA filed by bank holding companies.**

THACK



you for

THACK \$5,000



Thank you! We appreciate you!

Glen  
Lake



Thank you  
so much Minnwest  
We really  
appreciate it!  
Mrs. Julian

From, 5th and 6th graders at Glen Lake Elementary School

# **PUBLIC DISCLOSURE**

April 4, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Minnwest Bank  
Certificate Number: 16958

300 South Washington Street  
Redwood Falls, Minnesota 56283

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

1100 Walnut Street, Suite 2100  
Kansas City, Missouri 64106

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

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

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

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

**The Lending Test is rated High Satisfactory.**

- Lending levels reflect excellent responsiveness to assessment area credit needs.
- The institution made a substantial majority of loans in the institution’s assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of borrowers reflects good penetration among farms and business customers of different sizes and retail customers of different income levels.
- The institution exhibits a good record of serving the credit needs of the most economically disadvantaged areas, low-income individuals and/or very small businesses, consistent with safe and sound banking practices.
- The institution has made a relatively high level of community development loans.
- The institution uses innovative and/or flexible lending practices in order to serve assessment area credit needs.

**The Investment Test is rated Low Satisfactory.**

- The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

- The institution exhibits good responsiveness to credit and community economic development needs.
- The institution rarely uses innovative and/or complex investments to support community development initiatives.

**The Service Test is rated Low Satisfactory.**

- Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas.
- To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The institution provides a limited level of community development services.

## **DESCRIPTION OF INSTITUTION**

Minnwest Bank is a full-service interstate financial institution headquartered in Redwood Falls, Minnesota. The bank is wholly owned by Minnwest Corporation, a one-bank financial holding company based in Minnetonka, Minnesota. In addition to the holding company, the bank is affiliated with Minnwest Finance, Inc., located in Minnetonka, Minnesota, which provides agricultural financial services, such as long-term fixed-rate agricultural equipment and real estate loans. Minnwest Bank received a “Satisfactory” CRA rating at the April 22, 2019, FDIC Performance Evaluation based on Interagency Large Institution Examination Procedures.

Minnwest Bank offers a variety of credit products, including agricultural, commercial, home mortgage, and consumer loans through its 36 branches in Minnesota (30) and South Dakota (6). On November 19, 2021, Minnwest bank acquired Roundbank, Waseca, Minnesota. The bank acquired 4 offices as part of the acquisition, all located in middle-income census tracts. Two of the acquired offices are in the Minneapolis Assessment Area and two offices are located in the newly formed Waseca Assessment Area. Additionally, since the prior evaluation, the bank closed one limited service office, opened a new office, and moved one office across the street. Additional details on branch changes are included in the applicable assessment area sections.

Loan products vary slightly by market area; however, agricultural loans followed by commercial loans continue to represent the institution’s primary business lines, followed by home mortgage and consumer loans. The bank continues to offer loan products through secondary market referral programs, local agencies, and governmental programs for farms, businesses, and consumers. Generally, the bank’s participation in the aforementioned programs assists small businesses, small farms, and home mortgage or consumer borrowers, including low- and moderate-income persons. Details are presented in the Lending Test under the Innovative or Flexible Lending Practices section of this evaluation. The institution also offers a full line of traditional deposit services, including checking, savings, health savings, individual retirement, and certificate of deposit accounts.

Internet and mobile banking services provide alternative means of accessing loan and deposit accounts.

As of December 31, 2021, the institution reported total assets of \$2,703,865,000, total loans of \$1,908,909,000, and total deposits of \$2,388,816,000. Loans, deposits, and assets grew 13.2, 37.6, and 32.1 percent, respectively since the prior evaluation. Examiners did not identify any impediments that affect the bank’s ability to meet the credit needs of its assessment areas. The following table illustrates the bank’s loan portfolio.

<b>Loan Portfolio Distribution as of December 31, 2021</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	221,442	11.6
Secured by Farmland	306,853	16.1
Secured by 1-4 Family Residential Properties	142,195	7.4
Secured by Multifamily (5 or more) Residential Properties	156,046	8.2
Secured by Nonfarm Nonresidential Properties	540,601	28.3
<b>Total Real Estate Loans</b>	<b>1,367,137</b>	<b>71.6</b>
Commercial and Industrial Loans	129,311	6.7
Agricultural Production and Other Loans to Farmers	325,998	17.1
Consumer Loans	21,292	1.1
Obligations of State and Political Subdivisions in the U.S.	10,861	0.6
Other Loans	1,236	0.1
Lease Financing Receivable (net of unearned income)	53,074	2.8
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>1,908,909</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		



## DESCRIPTION OF ASSESSMENT AREAS

The CRA requires financial institutions to identify one or more assessment areas within which its CRA performance will be evaluated. Minnwest Bank has designated eight assessment areas with six in Minnesota and two in South Dakota. The following table details the assessment areas.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
<b>Minnesota</b>			
Nonmetropolitan Minnesota	Big Stone, Chippewa, Lac qui Parle, Lincoln, Lyon, Murray, Pipestone, Redwood, Renville, Rock, Sibley, Stevens*, Swift, and Yellow Medicine	57	16
Minneapolis	Dakota, Hennepin, Le Sueur*, Ramsey, Scott* and Sherburne	569	4
Rochester	Fillmore, Olmsted, and Wabasha	45	6
St. Cloud	Benton and Stearns	38	1
Waseca	Waseca*	5	2
Winona	Winona	10	1
<b>South Dakota</b>			
Nonmetropolitan South Dakota	Codington, Grant, and Roberts	13	4
Sioux Falls	Lincoln and Minnehaha	53	2
<i>Source: Bank Data</i>			
<i>*Added since the prior evaluation</i>			

The Winona assessment area is located in nonmetropolitan Minnesota. Examiners analyzed the bank’s performance in the Nonmetropolitan Minnesota and the Winona assessment areas separately; however, examiners presented the bank’s performance in these two assessment areas together under the heading “Nonmetropolitan Minnesota Assessment Area.” This is because both assessment areas have similar economics and demographics. Further, agricultural lending is the primary credit need in both assessment areas and lending activity is similar.

Further, Minnwest designated the Waseca Assessment Area and added Le Sueur and Scott counties to the Minneapolis Assessment Area in November of 2021, in conjunction with the Roundbank acquisition. Due to the bank’s limited duration of operations in these areas, no analysis was performed for these geographies.

Additional information on the assessment areas is located later in the evaluation.

## SCOPE OF EVALUATION

### **General Information**

This evaluation covered the period from the prior evaluation dated April 22, 2019, to the current evaluation dated April 4, 2022. Examiners used Interagency Large Institution Examination Procedures to evaluate Minnwest Bank’s CRA performance using the Lending, Investment, and Service tests. The criteria for the tests are outlined in the Appendices. The tests are used to

determine the bank’s overall rating as well as its ratings in the states of Minnesota and South Dakota. Banks must achieve at least a Low Satisfactory rating under the Lending Test to obtain an overall Satisfactory rating.

Full-scope analyses were conducted for all assessment areas reviewed. Examiners placed the greatest weight on the bank’s performance in the State of Minnesota when arriving at conclusions, since the majority of the bank’s lending, deposit, and branch activity occurs in that state. Performance in South Dakota received less weight when deriving overall conclusions. The following table reflects the distribution of 2020 reported loans, deposits, and branches by each rated area.

<b>Rated Area Breakdown of Loans, Deposits, and Branches</b>			
<b>Rated Area</b>	<b>% Reported Loans (by \$)</b>	<b>% Deposits (by \$)</b>	<b>% Branches (by #)</b>
<b>Minnesota</b>	89.3	89.5	83.3
<b>South Dakota</b>	10.7	10.5	16.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: Bank Records</i>			

**Activities Reviewed**

Examiners determined the bank’s primary product lines are agriculture and commercial loans followed by home mortgage lending. This conclusion considered Consolidated Reports of Condition and Income data, the number and dollar volume of reported loans during the evaluation period, and the bank’s business strategy.

This evaluation considered all small business and small farm loans reported under CRA data collection requirements for 2019, 2020, and 2021. The bank originated 1,913 small farm loans totaling \$265.8 million in 2019, 2,362 loans totaling \$271.4 million in 2020, and 3,008 loans totaling \$265.8 million in 2021. The bank originated 692 small business loans totaling \$89.2 million in 2019, 2,048 loans totaling \$181.7 million in 2020, and 1,410 loans totaling \$151.9 million in 2021. In addition, examiners reviewed home mortgage loans reported on the bank’s 2019, 2020, and 2021 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. The bank originated 87 home mortgage loans totaling \$68.5 million in 2019, 111 loans totaling \$108.9 million in 2020, and 102 loans totaling \$123.0 million in 2021.

CRA aggregate lending data for 2019 and 2020 and D&B data for all three years provided a standard of comparison for the small business and small farm loans reviewed. HMDA aggregate lending data for 2019 and 2020, as well as 2015 American Community Survey (ACS) data provided a standard of comparison for the home mortgage loans reviewed. Examiners placed more weight on the comparisons to the aggregate lending data since it is typically a better indicator of market conditions and loan demand. In general, examiners did not identify any trends between the three years of CRA small farm and HMDA data that materially affected conclusions. Therefore, only small farm and home mortgage data for 2020 is presented in this evaluation for the Geographic Distribution and Borrower Profile criteria as this is the most recent year with available aggregate data. Examiners also did not identify any trends between the three years of CRA small business data for Geographic Distribution and therefore, only 2020 is presented in this evaluation. However, due to anomalies caused by the significant number of SBA Paycheck Protection Program loans

originated in 2020 and 2021, examiners presented all three years of CRA small business loan data for Borrower Profile.

For the two rated areas small farm lending received the most weight followed by small business lending; however, weightings varied slightly by assessment area. Additional information can be found in the Scope of the Evaluation section for each rated area later in this evaluation. Because home mortgage lending is not a primary product of the institution over the evaluation period, this area was generally not reviewed unless there was significant volume in a particular assessment area. Due to the limited volume, home mortgage lending carried little weight when deriving overall conclusions.

Community development loans, investments, and services since the previous evaluation dated April 22, 2019, were reviewed and are included in this evaluation. Community development activities from Minnwest Bank and Roundbank are included for this same time period as long as the activities were not considered in their prior respective CRA performance evaluations. Investments that were made before the prior evaluation, and that remain outstanding, are included at the current book values as prior period investments. Any community development activities made in the broader statewide or regional area that includes the counties in the acquired Roundbank assessment area counties are given consideration in the bank-wide analysis, since those activities cannot be attributed to the assessment areas being reviewed. Furthermore, delivery systems and retail banking services, including those targeting low- and moderate-income individuals, were reviewed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

Minnwest Bank demonstrated high satisfactory performance under the Lending Test. While the bank's Lending Activity and Assessment Area Concentration criteria performance was excellent, the remaining criteria all support a high satisfactory assessment.

#### **Lending Activity**

Lending levels reflect excellent responsiveness to the credit needs of the assessment areas. The institution continues to be an active lender by originating a significant volume of small farm, small business, and home mortgage loans.

Minnwest Bank's average net loan-to-deposit ratio was 86.9 percent over the 11 quarter-ends since the previous evaluation and is 78.7 percent as of December 31, 2021. In the combined assessment areas, based on 2020 CRA aggregate data, Minnwest Bank ranked 1<sup>st</sup>, by number, out of 44 lenders for originating small farm loans, and 9<sup>th</sup>, by number, out of 229 lenders for originating small business loans. In the combined assessment areas, based on 2020 HMDA aggregate data, the bank ranked 201<sup>st</sup> out of 729 lenders by number for originating and purchasing home mortgage loans. Ultimately, in the combined Minnesota assessment areas where examiners placed the greatest weight, Minnwest Bank exhibited strong market performance in its two primary product lines by ranking 1<sup>st</sup> among all small farm lenders and 9<sup>th</sup> among all small business lenders according to 2020 aggregate data. Minnwest

Bank ranked 2<sup>nd</sup> among small farm lenders and 12<sup>th</sup> among small business lenders in the South Dakota assessment areas according to 2020 aggregate data.

**Assessment Area Concentration**

A substantial majority of loans are made in Minnwest Bank’s assessment areas, which demonstrates the bank’s willingness to meet the credit needs of the assessment areas. Details are provided in the following table.

Lending Inside and Outside of the Combined Assessment Areas										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	70	80.5	17	19.5	87	40,037	58.5	28,442	41.5	68,478
2020	89	80.2	22	19.8	111	76,908	70.6	31,979	29.4	108,887
2021	71	69.6	31	30.4	102	45,914	37.3	77,089	62.7	123,002
<b>Subtotal</b>	<b>230</b>	<b>76.7</b>	<b>70</b>	<b>23.3</b>	<b>300</b>	<b>162,858</b>	<b>54.2</b>	<b>137,509</b>	<b>45.8</b>	<b>300,367</b>
Small Business										
2019	617	89.2	75	10.8	692	72,801	81.6	16,411	18.4	89,212
2020	1,782	87.0	266	13.0	2,048	147,814	81.4	33,857	18.6	181,671
2021	1,244	88.2	166	11.8	1,410	122,255	80.5	29,677	19.5	151,932
<b>Subtotal</b>	<b>3,643</b>	<b>87.8</b>	<b>507</b>	<b>12.2</b>	<b>4,150</b>	<b>342,870</b>	<b>81.1</b>	<b>79,945</b>	<b>18.9</b>	<b>422,815</b>
Small Farm										
2019	1,647	86.1	266	13.9	1,913	228,904	86.1	36,935	13.9	265,839
2020	2,040	86.4	322	13.6	2,362	230,985	85.1	40,392	14.9	271,377
2021	2,616	87.0	392	13.0	3,008	225,376	84.8	40,473	15.2	265,849
<b>Subtotal</b>	<b>6,303</b>	<b>86.5</b>	<b>980</b>	<b>13.5</b>	<b>7,283</b>	<b>685,265</b>	<b>85.3</b>	<b>117,800</b>	<b>14.7</b>	<b>803,065</b>
<i>Source: HMDA Reported Data; CRA Reported Data            Due to rounding, totals may not equal 100.0%</i>										

**Geographic Distribution**

Overall, the geographic distribution of loans reflects good penetration throughout the institution’s assessment areas. Conclusions regarding the bank’s overall lending performance is consistent with the conclusions in Minnesota; however, South Dakota demonstrated adequate penetration overall. Minnesota received the most weight when deriving overall conclusions, resulting in an overall good assessment. Emphasis under the Geographic Distribution criterion is placed on the bank’s record of lending in low- and moderate-income census tracts. Examiners reviewed only those loans extended within the assessment areas to perform this analysis. A complete discussion of the bank’s geographic distribution lending performance can be found in the separate assessment area sections of this evaluation.

**Borrower Profile**

Overall, the distribution of borrowers reflects good penetration among farm and business customers of different sizes and retail customers of different income levels. Conclusions regarding the bank’s

overall lending performance is consistent with the conclusions in Minnesota; however, South Dakota demonstrated excellent penetration overall. Minnesota received the most weight when deriving overall conclusions, resulting in an overall good assessment. Examiners focused on the percentage by number of small farm and small business loans to farms and businesses with gross annual revenues of \$1 million or less and home mortgage loans to low- and moderate-income borrowers. Examiners reviewed only those loans extended within the assessment areas to perform this analysis. A complete discussion of the bank's borrower profile lending performance can be found in the separate assessment area sections of this evaluation.

### **Innovative or Flexible Lending Practices**

Minnwest Bank uses innovative and/or flexible lending practices in order to serve the assessment areas' credit needs. These include agricultural, commercial, home mortgage, and consumer loan programs, and involve proprietary, state, and federal loan programs. Many of these loan programs require extra effort by bank personnel when compared to conventional loans, which ultimately assist smaller farms and businesses, and low- and moderate-income borrowers who might not otherwise qualify for credit.

Minnwest Bank continues to offer flexible loan programs, including programs with government guarantees, down payment assistance, low-interest home improvement loans, and financing for other specialized needs. Minnwest Bank offers loans for farmers through federal programs offered by the Farm Service Agency (FSA) and Farmer Mac. These programs increase access to credit and in many cases reduce borrowing costs for the benefit of farmers and rural communities. The bank also offers the AgBMP loan program through the state of Minnesota. This is a water quality program that provides low-interest loans to farmers, rural landowners, and agriculture supply businesses to encourage agricultural management best practices that prevent or reduce runoff from feedlots and farm fields, and other pollution problems.

The bank also continues to offer government-guaranteed loan programs through the Small Business Administration (SBA). In addition to traditional SBA loans, Minnwest Bank originated 4,283 loans totaling \$209.5 million in 2020 and 2021 through the SBA's Paycheck Protection Program (PPP). These loans involved flexible underwriting due to unique financial strains on businesses and their employees as a result of the COVID-19 pandemic. Two of these loans were considered community development loans in this evaluation. The remaining SBA PPP loans were reported as small business loans in 2020 and 2021, as reflected in the data.

For consumer lending, Minnwest Bank continues to offer low-interest home improvement loans for low- and moderate-income persons through the Minnesota Housing Finance Agency. Additionally, in 2020, the bank collaborated with Small Business United 365 (SBU365), a United Way agency servicing the St. Cloud Assessment Area. Using donated funds, SBU365 runs a microloan program that provides funds for rental deposits to low- and moderate-income families that want to secure permanent housing but cannot afford a down payment. SBU365 provides an interest free, fully forgivable, loan of up to \$1,500 for a rental deposit and Minnwest Bank provides the loan servicing including monthly billing and credit reporting services in the hopes to improve borrower's credit history. So far, 11 loans totaling \$9.9 thousand dollars have been originated through the program, all benefiting the St. Cloud Assessment Area.

In response to the COVID-19 pandemic, in 2020, the institution offered a short-term COVID Emergency unsecured loan to all bank customers with a 24-month term and the option to defer payments for 6 months. Minnwest Bank also originated loans through the Federal Reserve Mainstreet Lending program benefitting small and medium-sized businesses impacted by the COVID-19 pandemic. Lastly, Minnwest bank used innovative lending practices by offering consumer and commercial borrowers the option to defer loan payments, for borrowers that met certain qualifications, and did so for 295 consumer and 211 agricultural and commercial borrowers. There were no fees associated with the deferrals.

Overall, the bank uses innovative and/or flexible lending practices and programs in order to better serve the assessment areas' credit needs. The bank's use of these programs helps demonstrate the bank's good record of serving the credit needs of disadvantaged areas within the assessment areas, low- and moderate-income individuals, and farms and businesses of varying sizes. The following table shows additional details on the bank's flexible and innovative lending activity.

<b>Innovative or Flexible Lending Programs</b>										
<b>Type of Program</b>	<b>2019*</b>		<b>2020</b>		<b>2021</b>		<b>2022*</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
USDA-FSA	31	16,963	39	11,966	24	9,471	1	250	95	38,650
Farmer Mac	11	6,130	23	8,471	21	9,844	0	00	55	24,445
AgBMP	11	494	5	279	7	469	0	00	23	1,242
SBA	16	10,159	2,032	150,890	2,328	99,577	10	6,687	4,386	267,313
Mainstreet Lending Program	0	0	4	3,852	0	0	0	0	4	3,852
Minnesota Housing Finance Agency	21	444	28	680	20	470	2	118	71	1,712
COVID Emergency Unsecured Loan	0	0	22	49	0	0	0	0	22	49
<b>Totals</b>	<b>90</b>	<b>34,190</b>	<b>2,153</b>	<b>176,187</b>	<b>2,400</b>	<b>119,831</b>	<b>13</b>	<b>7,055</b>	<b>4,656</b>	<b>337,263</b>
<i>Source: Bank Data</i>										
<i>*Partial year</i>										

### **Community Development Loans**

Minnwest Bank originated a relatively high level of community development loans, which is consistent with the bank's performance in Minnesota. Performance in South Dakota was inconsistent, but did not impact the overall rating as more weight was given to Minnesota. The institution originated 31 community development loans totaling approximately \$110.9 million during the evaluation period. This is an increase of approximately 60.6 percent by dollar volume from the previous evaluation. Two of the qualifying community development loans were SBA PPP loans totaling \$2.7 million.

The bank made loans to various organizations throughout its assessment areas, the broader Minnesota statewide area, and on a national level, primarily to help support affordable housing, but also for economic development and the revitalization and stabilization of moderate-income or distressed and/or underserved geographies. These loans were generally responsive to the opportunities for community development lending, particularly in Minnesota. The table includes 13 and 6 loans totaling \$43.1 million and \$47.2 million that benefited the broader statewide area of

Minnesota and on a national level, respectively. The bank received credit for these loans because it has been responsive to the assessment areas' lending needs including community development lending. Minnwest Bank's community development lending volume represents 5.9 percent of net loans and 4.1 percent of total assets. This community development lending performance is reasonable in relation to the performance of three similarly situated institutions. Specifically, comparable bank ratios of community development loans to net loans ranged from 1.7 to 12.8 percent; while, the ratios of community development loans to total assets ranged from 1.2 to 10.4 percent. Further details regarding qualified loans made in each assessment area are discussed in the applicable assessment area sections of the evaluation. The following tables illustrate the bank's community development loans by assessment area, purpose, and year.

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Nonmetropolitan Minnesota	0	0	0	0	0	0	2	2,774	2	2,774
Minneapolis	5	9,244	0	0	3	6,398	1	1,500	9	17,142
Rochester	0	0	0	0	0	0	0	0	0	0
St. Cloud	1	654	0	0	0	0	0	0	1	654
Statewide Minnesota Activities	9	27,017	0	0	1	1,900	3	14,200	13	43,117
<b>Minnesota Total</b>	<b>15</b>	<b>36,915</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>8,298</b>	<b>6</b>	<b>18,474</b>	<b>25</b>	<b>63,687</b>
Nonmetropolitan South Dakota	0	0	0	0	0	0	0	0	0	0
Sioux Falls	0	0	0	0	0	0	0	0	0	0
<b>South Dakota Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
National Activities	6	47,180	0	0	0	0	0	0	6	47,180
<b>Total</b>	<b>21</b>	<b>84,095</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>8,298</b>	<b>6</b>	<b>18,474</b>	<b>31</b>	<b>110,867</b>

Source: Bank Data

<b>Community Development Lending by Year</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019 (partial)	6	29,708	0	0	0	0	3	14,200	9	43,908
2020	5	20,536	0	0	1	2,620	2	2,774	8	25,930
2021	10	33,851	0	0	3	5,678	1	1,500	14	41,029
<b>Total</b>	<b>21</b>	<b>84,095</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>8,298</b>	<b>6</b>	<b>18,474</b>	<b>31</b>	<b>110,867</b>

Source: Bank Data

## INVESTMENT TEST

Minnwest Bank demonstrated low satisfactory performance under the Investment Test. The bank's performance under Investment and Grant Activity and Responsiveness to Credit and Community Development needs support this conclusion. Minnwest Bank's overall performance is consistent with the conclusions for both Minnesota and South Dakota.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Minnwest Bank made or retained 292 qualified investments totaling approximately \$18.4 million during the evaluation period. Overall, the bank's qualified investment activity has increased by approximately 52.9 percent, by dollar volume, since the previous evaluation.

The volume of qualified investments represented 0.7 percent of total assets and 3.5 percent of total securities as of December 31, 2021. A review of the similarly situated institutions revealed that qualified investments ranged from 0.2 percent to 2.6 percent of total assets and 14.9 percent to 27.9 percent of total securities. Minnwest Bank's qualified investments to total assets ratio is comparable to the performance of the similarly situated institutions; however, the bank's qualified investments to total securities ratio significantly lags those of the similarly situated institutions. While the qualified investments to total securities ratio is included as a measurement, examiners focused more on the qualified investments to total assets ratio as investment strategies can vary between institutions and influence the comparison.

Of the 292 qualified investments, 18 totaling \$6.1 million were made during prior evaluation periods, but remained outstanding as of the current evaluation period; 24 totaling approximately \$11.6 million are newly purchased investments, and 250 totaling \$644,562 are donations. The following tables illustrate the bank's qualified investments by assessment area, purpose, and year. The tables also include 3 annual donations of \$52,500 to sponsor access to EVERFI financial literacy courses for schools across the bank's assessment areas that served primarily low- or moderate-income students or schools located in distressed and/or underserved areas; therefore, these donations were counted at the institution level. Finally, the tables include 16 qualified investments totaling approximately \$1.1 million that benefited the broader statewide areas of Minnesota and South Dakota, which are detailed in the applicable State sections of the evaluation. The bank received credit for these investments because it has been responsive to the assessment areas' community development investment needs. Further details regarding qualified investments made in each assessment area are discussed in the applicable assessment area sections of the evaluation.



Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nonmetropolitan MN	2	222	102	2,652	8	126	88	10,552	200	13,552
Minneapolis	2	2,414	13	84	1	<1	1	362	17	2,860
St. Cloud	0	0	11	24	1	8	0	0	12	32
Rochester	1	179	7	23	0	0	0	0	8	202
Broader Statewide MN	3	4	2	6	1	1	1	556	7	567
<b>Minnesota Total</b>	<b>8</b>	<b>2,819</b>	<b>135</b>	<b>2,789</b>	<b>11</b>	<b>135</b>	<b>90</b>	<b>11,470</b>	<b>244</b>	<b>17,213</b>
Nonmetropolitan SD	0	0	17	10	0	0	16	348	33	358
Sioux Falls	0	0	3	45	0	0	0	0	3	45
Broader Statewide SD	0	0	6	16	0	0	3	563	9	579
<b>South Dakota Total</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>71</b>	<b>0</b>	<b>0</b>	<b>19</b>	<b>911</b>	<b>45</b>	<b>982</b>
Institution Level	0	0	3	158	0	0	0	0	3	158
<b>Total</b>	<b>8</b>	<b>2,819</b>	<b>164</b>	<b>3,018</b>	<b>11</b>	<b>135</b>	<b>109</b>	<b>12,381</b>	<b>292</b>	<b>18,353</b>

Source: Bank Data

Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	222	0	0	1	98	15	5,825	<b>18</b>	<b>6,145</b>
2019 (partial)	2	2,239	0	0	0	0	8	1,447	<b>10</b>	<b>3,686</b>
2020	1	354	1	2,500	0	0	8	3,912	<b>10</b>	<b>6,766</b>
2021	0	0	0	0	0	0	4	1,112	<b>4</b>	<b>1,112</b>
<b>Subtotal</b>	<b>5</b>	<b>2,815</b>	<b>1</b>	<b>2,500</b>	<b>1</b>	<b>98</b>	<b>35</b>	<b>12,296</b>	<b>42</b>	<b>17,709</b>
Qualified Grants & Donations	3	4	163	518	10	37	74	85	250	644
<b>Total</b>	<b>8</b>	<b>2,819</b>	<b>164</b>	<b>3,018</b>	<b>11</b>	<b>135</b>	<b>109</b>	<b>12,381</b>	<b>292</b>	<b>18,353</b>

Source: Bank Data

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits good responsiveness to credit and community development needs. The bank's qualified investment activity addressed some community development needs identified by community contacts, including the bank's commitment to providing access to financial literacy courses across its assessment areas. Additionally, some donations were provided annually or as part of multi-year pledges, ensuring that community development organizations have sustained funding.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives. The investments made during the evaluation period and those held from prior periods are routinely provided by private investors and do not evidence innovation or complexity.

## SERVICE TEST

Minnwest Bank demonstrated low satisfactory performance under the Service Test, which is consistent in Minnesota and South Dakota. The Accessibility of Delivery Systems primarily supports this assessment.

### Accessibility of Delivery Systems

Minnwest Bank’s delivery systems are reasonably accessible to essentially all portions of its assessment areas including low- and moderate-income geographies and individuals and distressed and/or underserved areas. The bank’s service delivery systems include 36 offices and 29 ATMs located within its assessment areas, as well as alternative delivery methods. The following table shows the overall distribution of branches, ATMs, and population by tract income level.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	54	7.1	191,151	6.2	0	0.0	0	0.0
Moderate	164	21.6	634,378	20.5	3	8.3	3	10.3
Middle	358	47.2	1,436,153	46.5	30	83.3	23	79.3
Upper	177	23.4	820,680	26.6	3	8.3	3	10.3
NA	5	0.7	8,349	0.3	0	0.0	0	0.0
<b>Total</b>	<b>758</b>	<b>100.0</b>	<b>3,090,711</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>

*Source: 2015 ACS Data; Bank Data  
Due to rounding, totals may not equal 100.0%*

Alternate delivery systems are also available to enhance accessibility to financial services. The bank offers electronic delivery systems that include telephone, internet, and mobile banking. The bank’s website has information on the its products and services, provides customers access to online banking services, and allows users to apply for and open a checking, savings, or certificate of deposit account. Online banking services include accessing account information, making transfers and loan payments, and sending external transfers or bill payments. Mobile banking is available for customers to access account information, transfer funds, make loan payments, deposit funds, and send money using bill pay and TransferNow. Other alternative delivery systems offered include electronic statements and mobile wallet.

### Changes in Branch Locations

The bank’s record of closing and opening of branches has not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or individuals. Since the prior examination, the bank closed one limited service location, opened one new location, and moved one office across the street. All locations were in middle-income census tracts. These changes are discussed in more detail in the separate assessment area sections.

### Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Further, branch hours and services are convenient and reasonable in comparison to other financial

institutions operating in the assessment areas. Many offices have weekend hours on Saturday and offer extended hours through drive-up windows.

Minnwest Bank offers two lower-cost deposit accounts with low monthly service fees and a zero minimum balance, which is particularly beneficial for low- and moderate-income individuals. Additional features for the accounts include debit cards with no monthly fees, ATM access, online banking and bill pay, electronic statements, and mobile banking with the availability for mobile deposits and payments. Ultimately, these low-cost account offerings provide affordable, traditional banking services and allow consumers to work toward financial security, which is particularly responsive to low- and moderate-income individuals.

Minnwest Bank continues to participate in the Interest on Lawyer's Trust Account (IOLTA) and Interest on Real Estate Trust Account (IORETA) programs, which permits lawyers to deposit funds into interest bearing trust accounts. The interest generated from IOLTAs is donated to the Minnesota Lawyer Trust Account Board and South Dakota Bar Trust Foundation to provide legal assistance to low- and moderate-income individuals. The interest generated from IORETAs is donated to the Minnesota Housing Trust Fund to provide housing assistance to low- and moderate-income individuals. As of April 4, 2022, Minnwest Bank had 31 IOLTAs and 20 IORETAs benefitting the State of Minnesota and 1 IOLTA benefitting the State of South Dakota.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services. Since the previous evaluation, bank employees provided 22 instances totaling 213 hours of financial expertise or technical assistance to community development organizations in the assessment areas. The number of community development services has declined since the prior evaluation, which reported 127 community development services. Further, the number of services is significantly lower than comparable banks services, which ranged from 114 to 249. Management attributed the decline in services to limited opportunities caused by the COVID-19 pandemic. While some opportunities to provide financial expertise were limited, the bank did provide loan modifications or payment deferrals to businesses and consumers affected by pandemic. These services demonstrated responsiveness to the credit needs of the assessment areas.

The following tables illustrate the bank's community development services by assessment area, purpose, and year. The majority of the services benefitted the State of Minnesota. Further details are located in the separate assessment area sections of the evaluation.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Nonmetropolitan Minnesota	0	4	2	1	7
Minneapolis	0	0	0	0	0
Rochester	0	0	4	0	4
St. Cloud	0	3	0	0	3
<b>Minnesota Total</b>	<b>0</b>	<b>7</b>	<b>6</b>	<b>1</b>	<b>14</b>
Nonmetropolitan South Dakota	0	3	2	1	6
Sioux Falls	0	2	0	0	2
<b>South Dakota Total</b>	<b>0</b>	<b>5</b>	<b>2</b>	<b>1</b>	<b>8</b>
<b>Total</b>	<b>0</b>	<b>12</b>	<b>8</b>	<b>2</b>	<b>22</b>
<i>Source: Bank Data</i>					

<b>Community Development Services by Year</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019 (partial)	0	1	2	1	4
2020	0	1	2	0	3
2021	0	7	2	1	10
Year to Date 2022	0	3	2	0	5
<b>Total</b>	<b>0</b>	<b>12</b>	<b>8</b>	<b>2</b>	<b>22</b>
<i>Source: Bank Data</i>					

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## MINNESOTA

### CRA RATING FOR MINNESOTA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MINNESOTA

For this evaluation, Minnwest Bank has four assessment areas in Minnesota: the Nonmetropolitan Minnesota, Minneapolis, Rochester, and the St. Cloud assessment areas as previously discussed. The bank operates 30 offices and 24 ATMs in the Minnesota assessment areas. Details for the individual assessment areas are provided in subsequent sections.

### SCOPE OF EVALUATION – MINNESOTA

Examiners evaluated the bank's CRA performance for Minnesota through full-scope reviews of the Nonmetropolitan Minnesota, Minneapolis, Rochester, and St. Cloud assessment areas. More weight was given to overall conclusions derived from the Nonmetropolitan Minnesota Assessment Area followed by Minneapolis, Rochester, and then St. Cloud. Examiners reviewed small farm, small business, and home mortgage loans in the Nonmetropolitan Minnesota Assessment Area. Small business and small farm loans were reviewed in the Rochester Assessment Area. Finally, only small business lending was reviewed in the Minneapolis and St. Cloud assessment areas. When analyzing performance in the Nonmetropolitan Minnesota and Rochester assessment areas, small farm lending received the most weight, followed by small business, and then home mortgage lending as applicable.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN MINNESOTA

#### LENDING TEST

Minnwest Bank demonstrated high satisfactory performance under the Lending Test in the State of Minnesota. This is consistent with the bank's performance in the Nonmetropolitan Minnesota Assessment Area, which received the most weight in drawing conclusions, and the Minneapolis Assessment Area. Performance in the Rochester and St. Cloud assessment areas was inconsistent, but did not impact the overall conclusion. Details are discussed under each assessment area analysis.

#### Lending Activity

The bank's lending activity reflects excellent responsiveness to the credit needs of Minnesota. Refer to the separate Minnesota assessment area sections of this evaluation for specific details.

### **Geographic Distribution**

Overall, the geographic distribution of loans reflects good penetration throughout the assessment areas in Minnesota. This is consistent with the bank's performance in the Nonmetropolitan Minnesota, Minneapolis, and Rochester assessment areas. Performance in the St. Cloud Assessment Area was inconsistent, but did not impact the overall conclusion. Details are discussed in each assessment area analysis.

### **Borrower Profile**

Overall, the distribution of borrowers reflects good penetration among farm and business customers of different sizes and retail customers of different income levels throughout the assessment areas in Minnesota. This is consistent with the bank's performance in all of the assessment areas with the exception of the Rochester Assessment Area where performance was excellent. Performance in Rochester did not change the overall conclusion. Details are discussed in each assessment area analysis.

### **Innovative or Flexible Lending Practices**

Consistent with the information presented at the institution level, Minnwest Bank makes use of innovative and/or flexible lending practices in order to serve credit needs in Minnesota. These programs help meet the credit needs of smaller farms and businesses and low- and moderate-income individuals throughout the Minnesota assessment areas.

### **Community Development Loans**

The institution originated a relatively high level of community development loans in Minnesota. Specifically, the bank originated 12 loans totaling approximately \$20.6 million in Minnesota assessment areas, and another 13 loans totaling approximately \$43.1 million in greater statewide Minnesota areas. These loans primarily supported affordable housing initiatives. The loans to a lesser extent promoted other community development purposes, including economic development and revitalization and stabilization initiatives. The assortment of community development activity is responsive to the identified credit needs. Performance is consistent with the Rochester Assessment Area. The Nonmetropolitan Minnesota and St. Cloud assessment areas had an adequate level of community development lending, and no community development loans were originated in the Rochester Assessment Area. Community development lending levels in the statewide area were also at a high level. Refer to each assessment area for more details.

## **INVESTMENT TEST**

Minnwest Bank demonstrated low satisfactory performance under the Investment Test in Minnesota, supported by its adequate performance throughout all Minnesota assessment areas.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified community development investments, rarely in a leadership position, and primarily makes use of investments that are routinely provided by private investors. A significant majority of the bank's qualified investment activity, approximately 93.8 percent by dollar, occurred in Minnesota. Specifically, Minnwest Bank made 237 qualified investments totaling \$16.6 million in its Minnesota assessment areas. An additional 7 qualified investments totaling \$566,509 benefited broader statewide Minnesota. Of these 7 investments, 3

donations totaling \$4,000 were to organizations that promote affordable housing; 2 donations totaling \$6,000 were to organizations that provide community services to low- and moderate-income individuals; a \$750 donation promoted economic development; and 1 prior period investment of \$555,759 helped to revitalize or stabilize portions of Minnesota. The bank's level of qualified investments in Minnesota increased from the previous evaluation, when it received credit for 194 qualified investments totaling approximately \$10.7 million. Details regarding the level of qualified investment activity for each assessment area within Minnesota are provided under the individual assessment area sections.

### **Responsiveness to Credit and Community Development Needs**

The institution exhibits good responsiveness to credit and community development needs, considering the available opportunities in Minnesota and the investment capacity of the bank.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in Minnesota.

## **SERVICE TEST**

Minnwest Bank demonstrated low satisfactory performance under the Service Test in Minnesota. Performance in the Nonmetropolitan Minnesota, Rochester, and St. Cloud assessment areas was consistent with low satisfactory performance. Performance in the Minneapolis Assessment Area was poor, but did not change the overall conclusion.

### **Accessibility of Delivery Systems**

The institution's delivery systems are reasonably accessible to essentially all portions of the assessment areas in Minnesota. Minnwest Bank operates two offices and two ATMs in moderate-income census tracts in Minnesota, providing access to banking services for low- and moderate-income individuals. Furthermore, alternate delivery systems are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

The institution's opening and closing of branches has not adversely affected the accessibility of its banking services and delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Refer to the separate assessment area sections for specific details.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals, within Minnesota. Further, branch hours and services are convenient and reasonable in comparison to other financial institutions operating in the assessment areas. This performance is consistent with performance at the institution level.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in Minnesota. During the current evaluation period, employees provided 14 instances of financial services totaling 156 service hours. Refer to the separate assessment area sections for specific details.

## **NONMETROPOLITAN MINNESOTA ASSESSMENT AREA - *Full-Scope Review***

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMETROPOLITAN MINNESOTA ASSESSMENT AREA**

The Nonmetropolitan Minnesota Assessment Area includes all of the following counties: Big Stone, Chippewa, Lac qui Parle, Lincoln, Lyon, Murray, Pipestone, Redwood, Renville, Rock, Sibley, Stevens, Swift, Winona, and Yellow Medicine. According to 2015 ACS data, the assessment area consists of 5 moderate-, 58 middle-, and 4 upper-income census tracts. The bank operates 17 offices and 14 ATMs in the assessment area. One office is located in a moderate-income census tract and the remaining 16 offices are located in middle-income census tracts. One ATM is located in a moderate-income census tract and 13 ATMs are located in middle-income census tracts. Two offices are located in a distressed area, 1 is located in a distressed and underserved area, and 3 are located in an underserved area.



**Economic and Demographic Data**

The table below illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Nonmetropolitan Minnesota Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	67	0.0	7.5	86.6	6.0	0.0
Population by Geography	209,780	0.0	7.0	84.8	8.2	0.0
Housing Units by Geography	95,770	0.0	7.2	85.2	7.7	0.0
Owner-Occupied Units by Geography	62,438	0.0	6.1	85.3	8.6	0.0
Occupied Rental Units by Geography	21,884	0.0	10.7	83.3	6.0	0.0
Vacant Units by Geography	11,448	0.0	6.0	88.3	5.7	0.0
Businesses by Geography	17,156	0.0	7.7	85.3	6.9	0.0
Farms by Geography	3,852	0.0	3.0	89.5	7.5	0.0
Family Distribution by Income Level	53,573	18.6	17.8	23.8	39.8	0.0
Household Distribution by Income Level	84,322	24.5	16.1	19.4	40.0	0.0
Median Family Income Non-MSAs - MN	\$63,045		Median Housing Value			\$120,328
			Median Gross Rent			\$591
			Families Below Poverty Level			7.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 30.6 percent; followed by agriculture, forestry and fishing (18.3 percent); non-classifiable establishments (10.4 percent); and retail trade (10.2 percent). In addition, 70.2 percent of area businesses have 4 or fewer employees, and 88.6 percent operate from a single location.

Examiners reviewed the FFIEC’s listing of non-metropolitan, middle-income, distressed and/or underserved geographies for the evaluation period. The FFIEC updates its listing annually. Numerous geographies within Minnwest Bank’s Nonmetropolitan Minnesota Assessment Area were designated as distressed, underserved or both during the review period. The following table illustrates those counties having distressed and/or underserved geographies.

<b>Nonmetropolitan Minnesota Assessment Area Distressed and/or Underserved Areas</b>			
<b>County</b>	<b>Distressed</b>	<b>Underserved</b>	<b>Years</b>
Big Stone		X	2021, 2020, 2019
Lac Qui Parle	X	X	2021, 2020, 2019
Lincoln		X	2021, 2020, 2019
Murray		X	2021, 2020, 2019
Renville	X		2021, 2020, 2019
Stevens		X	2021, 2020, 2019
Swift		X	2021, 2020, 2019
<i>Source: FFIEC</i>			

The table below presents the 2020 FFIEC-estimated median family income levels for the Nonmetropolitan Minnesota Assessment Area, which are utilized in the Borrower Profile analysis.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Nonmetropolitan Minnesota Median Family Income</b>				
2020 (\$70,900)	<\$35,450	\$35,450 to <\$56,720	\$56,720 to <\$85,080	≥\$85,080
<i>Source: FFIEC</i>				

### **Competition**

The Nonmetropolitan Minnesota Assessment Area is competitive for financial services. According to 2021 FDIC Deposit Market Share data, 57 FDIC-insured financial institutions operate 127 offices within the assessment area. Of these institutions, Minnwest Bank ranks 1<sup>st</sup> with 16.6 percent of the deposit market share. There is moderate competition for small farm loans in the assessment area as 34 lenders originated 3,733 small farm loans in 2020 based on CRA aggregate data. Of these institutions, Minnwest Bank ranked 1<sup>st</sup> with 42.7 percent of the market share by number. Furthermore, there is a moderate level of demand and competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 79 lenders reported 4,197 small business loans. Of these institutions, Minnwest Bank ranked 1<sup>st</sup> with 22.8 percent of the market share by number. Finally, there is a very high level of competition for home mortgage loans as 297 lenders reported 9,505 HMDA loans in the assessment area in 2020, with Minnwest Bank ranking 33<sup>rd</sup> with 0.7 percent of the market share by number.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the area’s credit and community development needs. This information helps to determine whether local financial institutions are responsive to those needs. It also shows what credit and community development opportunities are available. Examiners referenced three previously conducted community contact interviews with representatives from economic development entities active in the Nonmetropolitan Minnesota Assessment Area.

One contact stated that the COVID-19 pandemic and low unemployment rates created challenges for small businesses in the area. Specifically, businesses were affected by shutdowns and a

workforce that was experiencing housing, childcare, and broadband limitations. The contact also stated that some businesses have waited to expand due to the pandemic, and although some businesses have closed, others have opened in their place. A contact stated there is a shortage of housing availability in the area and a trend of increasing home values and market rents. The housing market is competitive and many homes are selling for above asking price, resulting in fewer affordable housing options for lower-income families who may have difficulty qualifying for mortgage loans. Further, according to a contact, some local crop farmers have been considering growing hemp to diversify crop options. However, there are concerns that financing may be a challenge due to regulatory requirements and state statutes. Overall, the contacts stated that financial institutions have been responsive to the credit needs of the assessment area.

### **Credit and Community Development Needs and Opportunities**

Examiners reviewed information from the community contacts, bank management, and demographic and economic data to determine assessment area needs and opportunities. Examiners concluded that agricultural, commercial, and home mortgage lending represent the primary credit needs of the Nonmetropolitan Minnesota Assessment Area. The assessment area's community development needs are primarily related to community services and economic development. Further, there is opportunity for revitalization and stabilization due to the number of distressed and/or underserved geographies in the assessment area. Finally, a contact noted support for local childcare centers as a need in the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NONMETROPOLITAN MINNESOTA ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated good performance under the Lending Test in the Nonmetropolitan Minnesota Assessment Area. The bank's performance under the geographic distribution and borrower profile criteria drove this conclusion.

#### **Lending Activity**

The bank's lending activity reflects excellent responsiveness to the credit needs of the Nonmetropolitan Minnesota Assessment Area. In 2020, the bank originated 66.6 percent, by number, of loans reviewed in the assessment area, whereas, according to the 2020 Deposit Market Share report, 64.2 percent of the bank's deposits came from the assessment area. The bank reported 1,595 small farm loans totaling \$185.1 million, 956 small business loans totaling \$66.9 million, and 52 home mortgage loans totaling \$4.8 million in 2020. As previously noted, the bank ranked 1<sup>st</sup> in market share for both small farm and small business loans and 33<sup>rd</sup> for home mortgage loans in this assessment area.

#### **Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the assessment area. The combined performance of the bank's good small farm and home mortgage lending and adequate small business performance supports this conclusion. Small farm lending carried the most weight, resulting in good performance overall.

### ***Small Farm Loans***

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. As noted in the table, the bank’s performance of lending in the moderate-income census tracts is slightly above aggregate lending performance and comparable to the demographic data.

<b>Geographic Distribution of Small Farm Loans Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	2.9	1.9	35	2.2	3,593	1.9
Middle	89.8	89.9	1,412	88.5	165,681	89.5
Upper	7.3	8.1	148	9.3	15,830	8.6
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>1,595</b>	<b>100.0</b>	<b>185,104</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area when compared to aggregate data. As shown in the table, the bank’s record of originating small business loans, by number, in moderate-income geographies slightly lags aggregate lending and demographic data. As previously noted, there is significant competition for small business loans and a smaller percentage of small businesses are located in the five moderate-income census tracts in the assessment area as illustrated in the table.

<b>Geographic Distribution of Small Business Loans Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	7.8	9.4	59	6.2	3,760	5.6
Middle	85.3	84.0	854	89.3	59,847	89.5
Upper	6.9	6.6	43	4.5	3,279	4.9
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>956</b>	<b>100.0</b>	<b>66,886</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>						

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

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area when compared to aggregate data. The bank’s record of originating home mortgage loans in moderate-income geographies is higher than aggregate lending data as illustrated in the following table.

<b>Geographic Distribution of Home Mortgage Loans Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	6.1	5.7	5	9.6	262	5.5
Middle	85.3	82.9	47	90.4	4,513	94.5
Upper	8.6	11.4	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>4,775</b>	<b>100.0</b>

*Source: 2015 ACS; Bank Data, 2020 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of borrowers reflects good penetration among business and farm customers of different sizes and retail customers of different income levels. The bank's good lending performance in small farm, small business, and home mortgage lending supports this conclusion.

### ***Small Farm Loans***

The distribution of borrowers reflects good penetration among farms with gross annual revenues of \$1 million or less when compared to aggregate data, which is depicted in the following table.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	98.0	54.9	918	57.6	133,807	72.3
>\$1,000,000	1.2	--	169	10.6	37,334	20.2
Revenue Not Available	0.8	--	508	31.9	13,963	7.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>1,595</b>	<b>100.0</b>	<b>185,104</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

The distribution of borrowers reflects good penetration among businesses with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank's small business lending in 2019 is slightly higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank's small business lending is significantly lower than aggregate performance; however, a majority of small business loans did not have revenue information available, because this category includes PPP loan originations whereby the bank was not required to collect revenue information. Of the 658 loans with no revenue information available, approximately 89.8 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank's willingness to serve the needs of smaller businesses. Further, in 2021, the bank's record of lending to business with gross annual revenues of \$1 million or less significantly increased and exceeded 2019 and 2020 bank performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	77.8	50.6	192	52.7	12,858	35.4
2020	79.3	37.0	196	20.5	16,246	24.3
2021	80.3	--	457	61.2	20,538	35.1
<b>&gt;\$1,000,000</b>						
2019	6.5	--	124	34.1	20,966	57.7
2020	5.8	--	102	10.7	21,974	32.9
2021	5.5	--	154	20.6	31,186	53.3
<b>Revenue Not Available</b>						
2019	15.7	--	48	13.2	2,498	6.9
2020	14.9	--	658	68.8	28,666	42.9
2021	14.2	--	136	18.2	6,747	11.5
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>364</b>	<b>100.0</b>	<b>36,322</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>956</b>	<b>100.0</b>	<b>66,886</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>747</b>	<b>100.0</b>	<b>58,471</b>	<b>100.0</b>
<i>Source: 2019, 2020 &amp; 2021 D&amp;B Data; Bank Data; 2019 &amp; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

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

As depicted in the table below, the distribution of borrowers reflects good penetration among individuals of different income levels, including low- and moderate-income borrowers when compared to aggregate data. Specifically, the bank's performance to low- and moderate-income borrowers slightly exceeds aggregate data.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Assessment Area: Nonmetropolitan Minnesota</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	18.6	7.9	6	11.5	271	5.7
Moderate	17.8	20.0	12	23.1	710	14.9
Middle	23.8	23.4	7	13.5	280	5.9
Upper	39.8	34.1	16	30.8	1,134	23.8
Not Available	0.0	14.6	11	21.2	2,380	49.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>4,775</b>	<b>100.0</b>

*Source: 2015 ACS; Bank Data, 2020 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### **Community Development Loans**

Minnwest Bank has made an adequate level of community development loans in the Nonmetropolitan Minnesota Assessment Area. The bank originated 2 community development PPP loans totaling \$2.8 million in the assessment area promoting revitalization of distressed and underserved middle-income geographies.

### **INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the Nonmetropolitan Minnesota Assessment Area. The bank’s Investment and Grant Activity primarily drove this rating; however the good Responsiveness to Credit and Community Development Needs performance helped offset the Community Development Initiatives performance in supporting the conclusion.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the Nonmetropolitan Minnesota Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The vast majority of the bank’s qualified investment activity, 73.8 percent by dollar, occurred in the Nonmetropolitan Minnesota Assessment Area. Specifically, the bank made 200 qualified investments totaling approximately \$13.6 million in the assessment area, including 21 newly purchased investments totaling approximately \$9 million; 11 prior period investments totaling \$4.3 million; and 168 donations totaling \$250,821. Of the 200 qualified investments, 2 totaling \$221,504 were to organizations that promote affordable housing; 102 totaling approximately \$2.7 million were to organizations that provide community services to low- and moderate-income individuals, 8 totaling \$126,057 were to organizations that promote economic development; and 88 totaling approximately \$10.6 million helped revitalize or stabilize portions of the assessment area. The bank’s level of qualified investments in this assessment area increased from the previous evaluation, when it received credit for 145 qualified investments totaling \$8.1 million.

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits good responsiveness to credit and community development needs in the Nonmetropolitan Minnesota Assessment Area, as demonstrated through the bank's qualified investment activity to support community services targeted to low-and moderate-income individuals and revitalization or stabilization efforts in the primarily distressed and/or underserved portions of the assessment area. The bank also made several donations to support local childcare facilities, which was specifically identified as a community need by a community contact. Further, the bank's participation in EVERFI benefited several schools in the assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the Nonmetropolitan Minnesota Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

### **SERVICE TEST**

Minnwest Bank demonstrated adequate performance under the Service Test in the Nonmetropolitan Minnesota Assessment Area. Performance under Accessibility of Delivery Systems primarily supports this conclusion. The limited level of CD Services was considered, but did not drop the Service Test assessment to poor.

### **Accessibility of Delivery Systems**

Minnwest Bank's delivery systems are reasonably accessible to essentially all portions of the assessment area. Of the bank's 17 offices in this assessment area, one is located in a moderate-income census tract and is a full-service facility. Additionally, 6 offices are located in distressed and/or underserved geographies. Furthermore, the alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

The institution's closing of a branch has not adversely affected the accessibility of its banking services and delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Specifically, the bank closed one limited service office in Beaver Creek, Minnesota located in a middle-income census tract. The bank has two offices located within ten miles in the city of Luverne, Minnesota.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in the Nonmetropolitan Minnesota Assessment Area. During the evaluation period, employees provided 7 instances of financial services totaling 31 hours, to provide community services to low- and moderate-income individuals and to promote economic development.



## MINNEAPOLIS ASSESSMENT AREA - *Full-Scope Review*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MINNEAPOLIS ASSESSMENT AREA

The Minneapolis Assessment Area includes all of the following contiguous counties: Dakota, Hennepin, Ramsey, Sherburne, Scott, and Le Sueur. All of the Minneapolis Assessment Area counties are included in the Minneapolis-St. Paul-Bloomington Minnesota-Wisconsin Metropolitan Statistical Area (MSA). Since the previous evaluation, the bank added Scott and Le Sueur counties with the 2021 acquisition of Roundbank. As previously mentioned, due to the timing of acquisition, these counties are excluded from the assessment area for this evaluation. According to 2015 ACS data, the assessment area evaluated for this review consists of 54 low-, 124 moderate-, 216 middle-, 143 upper-income, and 5 non-designated tracts. The bank operates 4 offices and 4 ATMs in the assessment area. Three offices and ATMs are located in middle-income census tracts, and 1 office and ATM is located in an upper-income census tract.

#### **Economic and Demographic Data**

The table below illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Minneapolis Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	542	10.0	22.9	39.9	26.4	0.9
Population by Geography	2,224,044	8.6	21.2	40.3	29.5	0.4
Housing Units by Geography	931,165	7.8	21.6	41.6	28.5	0.5
Owner-Occupied Units by Geography	571,184	3.3	16.5	44.1	36.1	0.1
Occupied Rental Units by Geography	312,909	15.5	30.3	37.5	15.7	1.1
Vacant Units by Geography	47,072	12.3	25.2	39.1	22.3	1.0
Businesses by Geography	258,014	6.8	18.4	41.4	33.0	0.4
Farms by Geography	4,626	3.3	15.5	47.5	33.6	0.1
Family Distribution by Income Level	536,617	22.1	17.0	21.3	39.7	0.0
Household Distribution by Income Level	884,093	25.8	16.4	18.0	39.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul- Bloomington, MN-WI MSA		\$84,589	Median Housing Value			\$231,125
			Median Gross Rent			\$952
			Families Below Poverty Level			8.1%

*Source: 2015 ACS and 2021 D&B Data*

*Due to rounding, totals may not equal 100.0%*

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

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 40.3 percent; followed by non-classifiable establishments (20.9 percent); finance, insurance, and real estate (10.8 percent); and retail trade (9.3 percent). In addition, 62.9 percent of area businesses have 4 or fewer employees, and 92.1 percent operate from a single location.

### **Competition**

The Minneapolis Assessment Area is competitive for financial services. According to 2021 FDIC Deposit Market Share data, 97 FDIC-insured financial institutions operate 464 offices within the assessment area. Of these institutions, Minnwest Bank ranks 31<sup>st</sup> with 0.2 percent of the deposit market share. There is an extremely high level of demand and competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 203 lenders reported 52,982 small business loans. Of these institutions, Minnwest Bank ranked 25<sup>th</sup> with 0.7 percent of the market share by number.

### **Community Contact**

Examiners referenced a community contact interview previously conducted with a representative from a community development organization that serves the Minneapolis Assessment Area. The contact indicated that the COVID-19 pandemic has had a significant impact on businesses within the assessment area. Although there have been business closures and shutdowns, government assistance programs have helped limit the economic impact. The contact noted that their organization has worked to distribute government funds through the CARES Act, some of which has gone to financial assistance services and public health initiatives and worked with several businesses to distribute PPP loans. The contact also mentioned that there has been a steady increase in median home values in the area, and that a majority of new housing is above affordability thresholds based on ACS data. Further, the contact stated that there is heavy competition in the Twin Cities metro area with new banks continuing to enter the market. The contact was not aware of any discriminatory practices by any area financial institutions and stated that local financial institutions are meeting the needs of the assessment area.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that commercial and home mortgage lending represent the primary credit needs of the Minneapolis Assessment Area. Further, the assessment area's community development needs are related to affordable housing, community services, and economic development.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MINNEAPOLIS ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated good performance under the Lending Test in the Minneapolis Assessment Area. The bank's performance under all rated criterion supports this conclusion. Examiners only considered small business lending in this assessment area because small farm and

home mortgage lending is not a business focus of the bank in this area, and small farm lending was not identified as a primary credit need. Further, the volume of small farm and home mortgage loans was limited.

**Lending Activity**

The bank’s lending activity reflects good responsiveness to the credit needs of the Minneapolis Assessment Area. In 2020, the bank originated 9.3 percent, by number, of loans reviewed in the assessment area, whereas, according to the 2020 Deposit Market Share report, 16.1 percent of the bank’s deposits came from the assessment area. The bank reported 354 small business loans totaling \$33.4 million, and 10 home mortgage loans totaling \$53.1 million in 2020. As previously noted, the bank ranked 23<sup>rd</sup> in market share for small farm loans and 25<sup>th</sup> for small business loans.

**Geographic Distribution**

The geographic distribution of small business loans reflects good penetration throughout the assessment area when compared to aggregate data. As shown in the table, the bank’s record of originating small business loans, by number, in low-income geographies slightly lags demographic data while the lending in moderate-income geographies exceeds aggregate data.

<b>Geographic Distribution of Small Business Loans Assessment Area: Minneapolis</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	6.7	6.5	16	4.5	2,217	6.6
Moderate	18.3	17.5	78	22.0	4,815	14.4
Middle	41.7	41.7	134	37.9	15,970	47.7
Upper	32.8	34.0	125	35.3	10,411	31.1
Not Available	0.4	0.3	1	0.3	36	0.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>354</b>	<b>100.0</b>	<b>33,449</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

**Borrower Profile**

The distribution of borrowers reflects good penetration among businesses with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank’s small business lending in 2019 is slightly higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank’s small business lending is significantly lower than aggregate performance; however, as mentioned previously, a majority of small business loans in 2020 did not have revenue information available, because this category includes PPP loan originations. Of the 313 loans with no revenue information available, approximately 80.5 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank’s willingness to serve the needs of smaller businesses. Further, in 2021, of the 57 loans with no revenue information available, approximately 75.4 percent were to borrowers with loan sizes of \$100,000 or less.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Minneapolis</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	85.5	52.9	30	54.5	6,663	48.8
2020	87.2	44.7	29	8.2	7,657	22.9
2021	87.6	--	69	39.4	12,536	41.2
<b>&gt;\$1,000,000</b>						
2019	6.1	--	23	41.8	6,596	48.3
2020	5.2	--	12	3.4	4,218	12.6
2021	4.7	--	49	28.0	11,826	38.9
<b>Revenue Not Available</b>						
2019	8.4	--	2	3.6	400	2.9
2020	7.6	--	313	88.4	21,574	64.5
2021	7.7	--	57	32.6	6,064	19.9
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>13,659</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>354</b>	<b>100.0</b>	<b>33,449</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>175</b>	<b>100.0</b>	<b>30,426</b>	<b>100.0</b>
<i>Source: 2019, 2020 &amp; 2021 D&amp;B Data; Bank Data; 2019 &amp; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### **Community Development Loans**

Minnwest Bank made a relatively high level of community development loans in the Minneapolis Assessment Area. The bank originated 9 community development loans totaling \$17.1 million in the assessment area. This includes 5 loans totaling \$9.2 million promoting affordable housing, 2 loans totaling \$6.4 million promoting economic development, and one loan for \$1.5 million to help the revitalization and stabilization of a moderate-income geography. The affordable housing and economic development loans, which make up a majority of the loans, are particularly responsive as they address identified credit needs within the assessment area.

### **INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the Minneapolis Assessment Area. The bank's Investment and Grant Activity and Responsiveness performance primarily drove this assessment; however, the good performance under Credit and Community Development Needs helped offset the low level of innovative of complex investments.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the Minneapolis Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by

private investors. The bank made 17 qualified investments totaling approximately \$2.9 million in the assessment area, including 2 newly purchased investments totaling \$2.4 million; 1 prior period investment of \$361,829; and 14 donations totaling \$84,486. Of the 17 qualified investments, 2 totaling \$2.4 million were to organizations that promote affordable housing; 13 totaling \$83,986 were to organizations that provide community services to low- and moderate-income individuals; a \$500 donation was to an organization that promotes economic development; and a \$361,829 investment helped revitalize and stabilize a moderate-income area in the assessment area. The bank's level of qualified investments in this assessment area decreased by number and increased by dollar from the previous evaluation, when it received credit for 23 qualified investments totaling approximately \$2.3 million.

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits good responsiveness to credit and community development needs in the Minneapolis Assessment Area, as demonstrated through the bank's qualified investments to support affordable housing initiatives and community services targeted to low-and moderate-income individuals in the assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the Minneapolis Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

## **SERVICE TEST**

Minnwest Bank demonstrated poor performance under the Service Test in the Minneapolis Assessment Area, primarily because the bank did not conduct any community development services in this assessment area since the prior evaluation. Management attributed the lack of community development service activity to the COVID-19 pandemic, which caused a decrease in in-person service opportunities.

### **Accessibility of Delivery Systems**

Minnwest Bank's delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank has two locations in this assessment area and acquired two branches in this assessment area when it acquired Roundbank in November of 2021. Three offices are located in middle-income geographies and the fourth location is in an upper-income geography. Minnwest Bank's alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

There have been no changes to the branch locations in this assessment area with the exception of the branches added during the Roundbank acquisition.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

**Community Development Services**

Minnwest Bank did not provide any community development services in the Minneapolis Assessment Area during the review period.

**ROCHESTER ASSESSMENT AREA - *Full-Scope Review***

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
ROCHESTER ASSESSMENT AREA**

The Rochester Assessment Area includes all of Fillmore, Olmsted, and Wabasha counties, which is the same as the prior evaluation. All of the assessment area counties are included in the Rochester MSA. According to 2015 ACS data, the assessment area consists of 13 moderate-, 21 middle-, and 11 upper-income census tracts. The bank operates 4 full service and 2 limited service offices, and 3 ATMs in the assessment area. The bank opened a full-service office in Rochester in September of 2020 and converted a full-service office to limited service. Further, the bank's office in Wykoff, Minnesota moved across the street in January of 2022. One limited service office and ATM are located in a moderate-income census tract and the remaining locations are located in middle-income census tracts.

**Economic and Demographic Data**

The following table illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Rochester Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	45	0.0	28.9	46.7	24.4	0.0
Population by Geography	190,960	0.0	26.7	43.6	29.7	0.0
Housing Units by Geography	81,275	0.0	28.7	44.0	27.3	0.0
Owner-Occupied Units by Geography	56,663	0.0	23.0	45.0	32.0	0.0
Occupied Rental Units by Geography	18,720	0.0	43.5	40.5	16.0	0.0
Vacant Units by Geography	5,892	0.0	36.5	45.7	17.7	0.0
Businesses by Geography	16,589	0.0	26.7	44.0	29.2	0.0
Farms by Geography	1,281	0.0	23.6	58.5	18.0	0.0
Family Distribution by Income Level	50,391	19.1	18.5	23.6	38.9	0.0
Household Distribution by Income Level	75,383	23.5	16.3	19.0	41.3	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		\$81,036	Median Housing Value			\$179,644
			Median Gross Rent			\$830
			Families Below Poverty Level			5.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data            Due to rounding, totals may not equal 100.0%            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 35.2 percent; followed by non-classifiable establishments (15.3 percent); retail trade (12.1 percent); and finance, insurance, and real estate (10.5 percent). In addition, 66.9 percent of area businesses have 4 or fewer employees, and 90.4 percent operate from a single location.

**Competition**

The Rochester Assessment Area is a competitive for financial services. According to 2021 FDIC Deposit Market Share data, 32 FDIC-insured financial institutions operate 76 offices within the assessment area. Of these institutions, Minnwest Bank ranks 15<sup>th</sup> with 1.6 percent of the deposit market share. There is moderate competition for small farm loans in the assessment area as 17 lenders originated 607 small farm loans in 2020 based on CRA aggregate data. Of these institutions, Minnwest Bank ranked 2<sup>nd</sup> with 21.3 percent of the market share by number. Furthermore, there is a high level of demand and competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 83 lenders reported 3,099 small business loans. Of these institutions, Minnwest Bank ranked 9<sup>th</sup> with 3.2 percent of the market share by number.

**Community Contact**

Examiners referenced a community contact interview conducted in early 2021 with an economic development organization serving the Rochester Assessment Area. The community contact

indicated that the economy was struggling due to the COVID-19 pandemic. The contact stated there is little housing growth and limited new construction, contributing to the area's affordable housing problems. Further, new construction costs have increased noticeably. Small businesses closed as a result of the pandemic, and CARES Act funds were nearly depleted. The contact noted the area's primary needs are affordable housing and support for small businesses. Communities have access to credit through financial institutions, the SBA, FSA, and other non-traditional lenders. Further, the contact stated that many businesses and farms seek government programs with lower rates. Overall, the contact felt that credit and community development needs are being met, but the community contact indicated more could be done, such as providing small business loan programs and revolving housing trust funds.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that commercial and home mortgage lending represent the primary credit needs of the Rochester Assessment Area. Further, the assessment area's community development needs are primarily related to affordable housing and economic development.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ROCHESTER ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated adequate performance under the Lending Test in the Rochester Assessment Area. While the bank's performance for the Borrower Profile criterion was excellent, and the performance under the Lending Activity and Geographic Distribution criteria was good, the lack of Community Development Lending impacted the assessment. Home mortgage lending was not reviewed for this assessment area, because home mortgage lending is not a business focus of the bank in this area. Further, the volume of home mortgage lending was limited.

### **Lending Activity**

The bank's lending activity reflects good responsiveness to the credit needs of the Rochester Assessment Area. In 2020, the bank originated 6.0 percent, by number, of loans reviewed in the assessment area, whereas, according to the 2020 Deposit Market Share report, 5.3 percent of the bank's deposits came from the assessment area. The bank reported 129 small farm loans totaling \$12.1 million, 100 small business loans totaling \$7.3 million, and 6 home mortgage loans totaling \$1.0 million in 2020. As previously noted, the bank ranked 2<sup>nd</sup> in market share for small farm loans and 9<sup>th</sup> for small business loans.

### **Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the assessment area. The combined performance of good small farm and adequate small business lending performance supports this conclusion. Small farm lending received the most weight when deriving conclusions, resulting in overall good penetration.



### ***Small Farm Loans***

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. As noted in the table, the bank's performance of lending in the moderate-income census tracts is above aggregate lending performance and demographic data.

<b>Geographic Distribution of Small Farm Loans</b> <b>Assessment Area: Rochester</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	23.1	23.4	38	29.5	4,216	34.7
Middle	59.1	67.8	86	66.7	7,472	61.5
Upper	17.8	8.7	5	3.9	454	3.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>129</b>	<b>100.0</b>	<b>12,142</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area when compared to aggregate data. As shown in the table, the bank's record of originating small business loans, by number, in moderate-income geographies slightly lags aggregate lending and demographic data. As previously noted, there is significant competition for small business loans in this assessment area. Further, Minnwest Bank increased its lending in the moderate-income tracts by number from 14.7 percent in 2019 to 19.0 percent in 2021.

<b>Geographic Distribution of Small Business Loans</b> <b>Assessment Area: Rochester</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	27.0	24.6	18	18.0	1,099	15.0
Middle	44.0	44.6	62	62.0	3,332	45.5
Upper	29.0	30.8	20	20.0	2,890	39.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>7,321</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of borrowers reflects excellent penetration among farms and business customers of different sizes. The bank's excellent lending performance in small farm and small business lending supports this conclusion.

### ***Small Farm Loans***

The distribution of borrowers reflects excellent penetration among farms with gross annual revenues of \$1 million or less when compared to aggregate data, which is depicted in the following table.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Rochester</b>						
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	97.9	64.0	109	84.5	10,695	88.1
>\$1,000,000	1.3	--	9	7.0	1,056	8.7
Revenue Not Available	0.9	--	11	8.5	391	3.2
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>129</b>	<b>100.0</b>	<b>12,142</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among businesses with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank's small business lending in 2019 is significantly higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank's small business lending is significantly lower than aggregate performance; however, a majority of small business loans did not have revenue information available because this category includes PPP loan originations. Of the 68 loans with no revenue information available, approximately 89.7 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank's willingness to serve the needs of smaller businesses. Further, in 2021, the bank's record of lending to business with gross annual revenues of \$1 million or less significantly increased nearly matching the bank's 2020 performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Rochester</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	83.8	54.5	26	76.5	1,376	38.0
2020	85.5	48.9	25	25.0	2,127	29.1
2021	85.8	--	63	75.0	6,029	76.0
<b>&gt;\$1,000,000</b>						
2019	5.0	--	7	20.6	1,805	49.8
2020	4.3	--	7	7.0	2,150	29.4
2021	3.9	--	7	8.3	1,549	19.5
<b>Revenue Not Available</b>						
2019	11.3	--	1	2.9	443	12.2
2020	10.2	--	68	68.0	3,044	41.6
2021	10.3	--	14	16.7	351	4.4
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>3,624</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>7,321</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>84</b>	<b>100.0</b>	<b>7,929</b>	<b>100.0</b>
<i>Source: 2019, 2020 &amp; 2021 D&amp;B Data; Bank Data; 2019 &amp; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### **Community Development Loans**

The bank did not originate any community development loans in the Rochester Assessment Area. Management attributed performance to significant competition in the Rochester market area. Although opportunities do exist for community development lending, management commented that often times they are given to institutions with stronger ties to the Rochester market area. Nevertheless, opportunities do exist for community development loans as identified through community contacts. The contact did state that overall, they felt that credit and community development needs of the assessment area are being met.

### **INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the Rochester Assessment Area. The bank's Investment and Grant Activity and Responsiveness to Credit and Community Development Needs performance supports this conclusion.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the Rochester Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank made 8 qualified investments totaling \$202,469 in the assessment area,

including 1 newly purchased investment totaling \$178,969 to an organization that promotes affordable housing and 7 donations totaling \$23,500 to organizations that provide community services to low- and moderate-income individuals. The bank's level of qualified investments in this assessment area decreased by number but increased by dollar from the previous evaluation, when it received credit for 13 qualified investments totaling \$164,704.

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits adequate responsiveness to credit and community development needs in the Rochester Assessment Area, primarily demonstrated through the bank's qualified investment to support an affordable housing initiative within assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the Rochester Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

## **SERVICE TEST**

Minnwest Bank demonstrated adequate performance under the Service Test in the Rochester Assessment Area. Performance under Accessibility of Delivery Systems and Changes in Branches primarily supports this conclusion. The limited level of Community Development Services was considered, but did not drop the Service Test assessment to poor.

### **Accessibility of Delivery Systems**

Minnwest Bank's delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank has four full-service locations, two limited service locations, and three ATMs in this assessment area. One limited service location and one ATM are located in a moderate-income geography, with the remaining in middle-income geographies. Furthermore, the alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

The institution's opening of branches has generally not adversely affected the accessibility of its banking services and delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank moved its Wykoff, Minnesota branch, located in a middle-income census tract, across the street since the prior evaluation. The bank also opened a branch in Rochester, Minnesota in a middle-income census tract and converted its full-service office in Rochester in a moderate-income census tract to a drive-up only location. Both the new and drive-up only Rochester locations are within two miles of each other. The new full-service branch effectively serves the moderate-income areas.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

**Community Development Services**

Minnwest Bank provided a limited level of community development services in the Rochester Assessment Area. During the evaluation period, employees provided 4 instances of financial services totaling 35 hours of financial expertise or technical assistance to promote economic development.

**ST. CLOUD ASSESSMENT AREA - *Full-Scope Review***

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN  
THE ST. CLOUD ASSESSMENT AREA**

The St. Cloud Assessment Area includes Benton and Stearns counties, both of which are located within the St. Cloud MSA. There have been no changes to the assessment area since the prior evaluation and according to 2015 ACS data, the assessment area consists of 4 moderate-, 29 middle-, and 5 upper-income census tracts. The bank operates 1 office and 1 ATM in the assessment area in a middle-income census tract.

**Economic and Demographic Data**

The table below illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the St. Cloud Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	38	0.0	10.5	76.3	13.2	0.0
Population by Geography	191,816	0.0	12.7	71.7	15.7	0.0
Housing Units by Geography	79,007	0.0	13.3	73.2	13.5	0.0
Owner-Occupied Units by Geography	51,046	0.0	7.9	76.5	15.7	0.0
Occupied Rental Units by Geography	21,851	0.0	26.4	63.7	9.9	0.0
Vacant Units by Geography	6,110	0.0	12.4	79.7	7.9	0.0
Businesses by Geography	16,546	0.0	14.1	68.5	17.4	0.0
Farms by Geography	1,330	0.0	2.6	89.6	7.7	0.0
Family Distribution by Income Level	47,374	20.0	17.5	23.0	39.5	0.0
Household Distribution by Income Level	72,897	23.7	16.0	19.4	40.9	0.0
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$69,359	Median Housing Value			\$165,394
			Median Gross Rent			\$744
			Families Below Poverty Level			7.7%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* ) The NA category consists of geographies that have not been assigned an income classification.*

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 33.9 percent; followed by non-classifiable establishments (14.2 percent); retail trade (11.9 percent); and finance, insurance and real estate (10.3 percent). In addition, 66.6 percent of area businesses have 4 or fewer employees, and 90.3 percent operate from a single location.

**Competition**

The St. Cloud Assessment Area is competitive for financial services. According to 2021 FDIC Deposit Market Share data, 32 FDIC-insured financial institutions operate 61 offices within the assessment area. Of these institutions, Minnwest Bank ranks 18<sup>th</sup> with 1.5 percent of the deposit market share. There is moderate competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 81 lenders reported 2,959 small business loans. Of these institutions, Minnwest Bank ranked 9<sup>th</sup> with 3.9 percent of the market share by number.

**Credit and Community Development Needs and Opportunities**

Considering information from bank management and demographic and economic data, examiners determined that commercial lending, including small business loans, represents the primary credit

need of the St. Cloud Assessment Area. Further, the assessment area’s community development needs are primarily related to community services and economic development.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ST. CLOUD ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated adequate performance under the Lending Test in the St. Cloud Assessment Area. The bank’s performance under the Lending Activity, Geographic Distribution, and Community Development Loans criteria support this conclusion. The bank’s performance for the Borrower Profile criterion was higher, but did not impact the overall Lending Test assessment. Examiners only considered small business lending in this assessment area because small farm and home mortgage lending are not business focuses or identified needs in this assessment area. Further, no small farm loans and very limited home mortgage loans were originated during the evaluation period.

#### **Lending Activity**

The bank’s lending activity reflects adequate responsiveness to the credit needs of the St. Cloud Assessment Area. In 2020, the bank originated 3.1 percent, by number, of loans in the assessment area, whereas, according to the 2020 Deposit Market Share report, 4.8 percent of the bank’s deposits came from the assessment area. The bank reported 116 small business loans totaling \$16.3 million and 5 home mortgage loans totaling \$347 thousand in 2020 in the assessment area. As previously noted, the bank ranked 9<sup>th</sup> in market share for small business loans.

#### **Geographic Distribution**

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area when compared to aggregate data. As shown in the table below, the bank’s record of originating small business loans, by number, in moderate-income geographies slightly lags aggregate lending data.

<b>Geographic Distribution of Small Business Loans Assessment Area: St. Cloud</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	13.9	14.4	14	12.1	1,454	8.9
Middle	68.9	68.9	92	79.3	13,878	84.9
Upper	17.2	16.7	10	8.6	1,022	6.2
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>116</b>	<b>100.0</b>	<b>16,354</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

**Borrower Profile**

The distribution of borrowers reflects good penetration among businesses with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank’s small business lending in 2019 is significantly higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank’s small business lending is significantly lower than aggregate performance; however, a majority of small business loans did not have revenue information available because this category includes PPP loan originations. Of the 85 loans with no revenue information available, approximately 74.1 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank’s willingness to serve the needs of smaller businesses. Further, in 2021, the bank’s record of lending to business with gross annual revenues of \$1 million or less increased.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Saint Cloud</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	82.4	47.8	29	80.6	5,767	79.7
2020	84.1	37.3	17	14.7	4,706	28.8
2021	84.5	--	31	50.0	2,961	28.4
<b>&gt;\$1,000,000</b>						
2019	6.7	--	6	16.7	1,450	20.0
2020	5.9	--	14	12.1	3,906	23.9
2021	5.5	--	20	32.3	6,722	64.5
<b>Revenue Not Available</b>						
2019	11.0	--	1	2.8	21	0.3
2020	10.1	--	85	73.3	7,742	47.3
2021	10.0	--	11	17.7	736	7.1
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>7,238</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>116</b>	<b>100.0</b>	<b>16,354</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>62</b>	<b>100.0</b>	<b>10,419</b>	<b>100.0</b>
<i>Source: 2019, 2020 &amp; 2021 D&amp;B Data; Bank Data; 2019 &amp; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

**Community Development Loans**

Minnwest Bank made an adequate number of community development loans in the St. Cloud Assessment Area. Specifically, the bank originated only one loan totaling approximately \$654 thousand that supported community development through affordable housing.



## **INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the St. Cloud Assessment Area. The bank's Investment and Grant Activity and Responsiveness to Credit and Community Development needs supports this conclusion.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the St. Cloud Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank made 12 qualified investments, all in the form of donations, totaling \$32,450 in the assessment area. Of the 12 donations, 11 totaling \$24,450 were to organizations that provide community services to low- and moderate-income individuals and one \$8,000 donation was made to an organization that promotes economic development.

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits adequate responsiveness to credit and community development needs in the St. Cloud Assessment Area, primarily demonstrated through the bank's qualified investment activity to support community services targeted to low- and moderate-income individuals in the assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the St. Cloud Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

## **SERVICE TEST**

Minnwest Bank demonstrated adequate performance under the Service Test in the St. Cloud Assessment Area. Performance under Accessibility of Delivery Systems primarily supports this conclusion. While the bank's CD Services were limited, they did not drop the Service Test conclusion to a poor level.

### **Accessibility of Delivery Systems**

Minnwest Bank operates one branch and an ATM in this assessment area located in a middle-income census tract. Although delivery systems are limited, they are reasonably accessible to essentially all portions of the St. Cloud Assessment Area. Furthermore, the alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

There have been no changes to the branch locations in this assessment area.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in the St. Cloud Assessment Area. During the evaluation period, one employee provided 3 instances of financial services totaling 90 hours of financial expertise and technical assistance to provide community services to low- and moderate-income individuals. This particular individual worked with the SBU365 microloan program to fund rental deposits to low- and moderate-income families. This is further discussed under the Innovative and Flexible Lending Practices section at the institution level.

## **SOUTH DAKOTA**

### **CRA RATING FOR SOUTH DAKOTA: SATISFACTORY**

**The Lending Test is rated: Low Satisfactory**

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: Low Satisfactory**

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA**

Minnwest Bank has delineated two assessment areas in South Dakota, the Nonmetropolitan South Dakota and Sioux Falls assessment areas. The bank operates six offices and five ATMs in the South Dakota assessment areas. Details for the individual assessment areas are provided in subsequent sections.

## **SCOPE OF EVALUATION – SOUTH DAKOTA**

Examiners evaluated the bank's CRA performance for South Dakota through full-scope reviews of the Nonmetropolitan South Dakota and Sioux Falls assessment areas. More weight was given to overall conclusions derived from the Nonmetropolitan South Dakota Assessment Area. Examiners reviewed small farm and small business loans in both assessment areas and afforded more weight to small farm lending when deriving overall conclusions for the Nonmetropolitan South Dakota Assessment Area. Small business lending carried more weight in the Sioux Falls Assessment Area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH DAKOTA**

### **LENDING TEST**

Minnwest Bank demonstrated low satisfactory performance under the Lending Test in the State of South Dakota. The bank's performance is consistent throughout both South Dakota assessment areas.

### **Lending Activity**

The bank's lending activity reflects excellent responsiveness to the credit needs of South Dakota. Refer to the separate South Dakota assessment area sections of this evaluation for specific details.

### **Geographic Distribution**

Overall, the geographic distribution of loans reflects adequate penetration throughout the assessment areas in South Dakota. This is consistent with the bank's performance in both assessment areas. Details are discussed under each assessment area analysis.

### **Borrower Profile**

Overall, the distribution of borrowers reflects excellent penetration among business and farm customers of different sizes throughout the assessment areas in South Dakota. Performance in the Sioux Falls Assessment Area was inconsistent, but did not impact the overall rating. Refer to each assessment area for more details.

### **Innovative or Flexible Lending Practices**

Consistent with the information presented at the institution level, Minnwest Bank makes use of innovative and/or flexible lending practices in order to serve credit needs in South Dakota. Flexible loan programs offered within the State of South Dakota include the programs described earlier in the evaluation with the exception of the AgBMP, MHFA, and SBU365 loan program that are only offered in Minnesota. The programs offered help meet the credit needs of smaller farms and businesses and low- and moderate-income individuals throughout the South Dakota assessment areas.

### **Community Development Loans**

The bank did not originate any community development loans in South Dakota. Management commented that there are limited opportunities for community development lending, especially in the nonmetropolitan areas of the state, as it is primarily comprised of very small towns. Further, there is heavy competition for community development loans in the metropolitan areas of South Dakota including Sioux Falls. Nonetheless, opportunities still exist as identified through community contacts. The contacts did agree that financial institutions are highly competitive and did note that they are responsive to and meeting the area's credit needs.

## **INVESTMENT TEST**

Minnwest Bank demonstrated low satisfactory performance under the Investment Test in South Dakota, supported by its adequate performance in both South Dakota assessment areas.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified community development investments, rarely in a leadership position, and primarily makes use of investments that are routinely provided by private investors. Specifically, Minnwest Bank made 36 qualified investments and donations totaling approximately \$403,320 in the South Dakota assessment areas. Additionally, 9 qualified investments totaling \$579,504 were made at the broader statewide level. This includes 3 prior period investments totaling \$563,411 that revitalized and stabilized the area and 6 donations totaling \$16,093 to organizations that provide community services targeted to low- and moderate-income

individuals. Overall, 5.4 percent of the bank's qualified investment activity, by dollar, occurred in South Dakota. Details regarding the level of qualified investment activity for both assessment areas in South Dakota are provided under the individual assessment area sections.

### **Responsiveness to Credit and Community Development Needs**

The institution exhibits adequate responsiveness to credit and community development needs, considering the available opportunities in South Dakota and the investment capacity of the bank.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in South Dakota.

## **SERVICE TEST**

Minnwest Bank demonstrated low satisfactory performance under the Service Test in South Dakota. The Accessibility of Delivery Systems primarily supports this conclusion. Performance in both assessment areas was consistent with low satisfactory performance.

### **Accessibility of Delivery Systems**

The institution's delivery systems are reasonably accessible to essentially all portions of the assessment areas in South Dakota. One office and one ATM are located in a moderate-income census tract in South Dakota, providing access to banking services for low- and moderate-income individuals. Furthermore, alternate delivery systems are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

There have been no changes to the branch locations in South Dakota since the previous evaluation.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals, within South Dakota. Further, branch hours and services are convenient and reasonable in comparison to other financial institutions operating in the assessment areas. This performance is consistent with performance at the institution level.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in South Dakota. During the current evaluation period, employees provided 8 instances of financial services totaling 57 service hours in the state. Refer to the separate assessment area sections for specific details.

## NONMETROPOLITAN SOUTH DAKOTA ASSESSMENT AREA – *Full-Scope Review*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NONMETROPOLITAN SOUTH DAKOTA ASSESSMENT AREA

The Nonmetropolitan South Dakota Assessment Area includes all of Codington, Grant, and Roberts counties. There have been no changes to the assessment area since the prior evaluation. According to 2015 ACS data, the assessment area consists of one moderate-, ten middle-, and two upper-income census tracts. The bank operates four offices and three ATMs in the assessment area. Three offices are located in middle-income census tracts and the remaining office is located in an upper-income census tract. Two ATMs are located in middle-income census tracts and one is in an upper-income census tract. Two offices and one ATM are located in an underserved geography.

#### **Economic and Demographic Data**

The table below illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Nonmetropolitan South Dakota Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	13	0.0	7.7	76.9	15.4	0.0
Population by Geography	45,295	0.0	10.8	73.1	16.1	0.0
Housing Units by Geography	21,085	0.0	12.2	72.5	15.3	0.0
Owner-Occupied Units by Geography	13,180	0.0	8.2	71.9	19.9	0.0
Occupied Rental Units by Geography	5,615	0.0	23.7	69.4	6.9	0.0
Vacant Units by Geography	2,290	0.0	7.0	83.8	9.2	0.0
Businesses by Geography	4,733	0.0	19.0	63.7	17.3	0.0
Farms by Geography	626	0.0	2.9	77.2	20.0	0.0
Family Distribution by Income Level	11,950	16.8	20.0	23.5	39.7	0.0
Household Distribution by Income Level	18,795	21.6	15.9	19.1	43.4	0.0
Median Family Income Non-MSAs - SD	\$60,845		Median Housing Value			\$126,632
			Median Gross Rent			\$595
			Families Below Poverty Level			7.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 31.3 percent; followed by non-classifiable establishments (14.8 percent); agriculture, forestry and fishing (11.7 percent); retail trade (11.0 percent); and finance, insurance,

and real estate (10.8 percent). In addition, 66.6 percent of area businesses have 4 or fewer employees, and 89.6 percent operate from a single location.

Examiners reviewed the FFIEC's listing of non-metropolitan, middle-income, distressed and/or underserved geographies for the evaluation period. Roberts County was considered underserved in 2019 and 2021 and both distressed and underserved in 2020.

### **Competition**

The Nonmetropolitan South Dakota Assessment Area is competitive for financial services. According to 2021 FDIC Deposit Market Share data, 10 FDIC-insured financial institutions operate 25 offices within the assessment area. Of these institutions, Minnwest Bank ranks 8<sup>th</sup> with 4.0 percent of the deposit market share. There is moderate competition for small farm loans in the assessment area as 20 lenders originated 1,109 small farm loans in 2020 based on CRA aggregate data. Of these institutions, Minnwest Bank ranked 1<sup>st</sup> with 26.1 percent of the market share by number. Furthermore, there is a moderate level of demand and competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 50 lenders reported 1,535 small business loans. Of these institutions, Minnwest Bank ranked 5<sup>th</sup> with 7.9 percent of the market share by number.

### **Community Contact**

Examiners referenced a community contact interview previously conducted with an individual familiar with the agricultural industry in the assessment area. Per the contact, the primary credit need in the area is agricultural lending; however, the contact added that loan demand in general has decreased over the past year due to government stimulus payments. Further, the contact stated that the local economy is heavily reliant on the agricultural industry, which is doing well. The contact also described a recent expansion in area dairy operations that resulted in a significant population increase. Finally, the contact stated that local financial institutions are meeting the credit needs of the area.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that agricultural lending represents the primary credit need of the assessment area, followed by commercial lending. The assessment area's community development needs are primarily related to community services and revitalization and stabilization of distressed geographies in the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NONMETROPOLITAN SOUTH DAKOTA ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated adequate performance under the Lending Test in the Nonmetropolitan South Dakota Assessment Area. While the bank had excellent performance under Lending Activity and Borrower Profile, the adequate Geographic Distribution and lack of Community Development Lending impacted the conclusion. Home mortgage lending activity was not reviewed for this

assessment area since it is not a business focus for the bank and was not identified as a primary credit need in the assessment area. Further, the volume of lending during the review period was limited.

**Lending Activity**

The bank’s lending activity reflects excellent responsiveness to the credit needs of the Nonmetropolitan South Dakota Assessment Area. In 2020, the bank originated 10.6 percent, by number, of loans in the assessment area, whereas, according to the 2020 Deposit Market Share report, 4.7 percent of the bank’s deposits came from the assessment area. The bank reported 289 small farm loans totaling \$31.5 million, 121 small business loans totaling \$7.8 million, and 6 home mortgage loans totaling \$704.0 thousand in 2020. As previously noted, the bank ranked 1<sup>st</sup> in market share for small farm loans and 5<sup>th</sup> for small business loans.

**Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the assessment area. The bank’s good small farm lending performance supports this conclusion. Although small business lending was poor, performance overall was adequate considering small farm lending carried the most weight.

***Small Farm Loans***

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. While Minnwest Bank did not originate any loans in the only moderate-income census tract in the assessment area, this is comparable with aggregate lending data. In addition, demographic data indicates that only approximately 1.8 percent of farms are located in the moderate-income census tract, which limits opportunities to lend. Furthermore, the moderate-income census tract in the assessment area is located within the City of Watertown, which is approximately 15 miles from the bank’s nearest branch. Management stated that there are several other financial institutions located in the city of Watertown, which examiners confirmed. According to 2020 Deposit Market Share data, there are 5 financial institutions operating 7 locations in the sole moderate-income census tract in the assessment area.

<b>Geographic Distribution of Small Farm Loans Assessment Area: Nonmetropolitan South Dakota</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	1.8	0.4	0	0.0	0	0.0
Middle	83.0	82.7	230	79.6	25,575	81.2
Upper	15.2	17.0	59	20.4	5,917	18.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>289</b>	<b>100.0</b>	<b>31,492</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

***Small Business Loans***

The geographic distribution of small business loans reflects poor penetration throughout the assessment area when compared to aggregate data. As shown in the table, the bank’s record of originating small business loans, by number, in moderate-income geographies significantly lags

aggregate lending and demographic data. As previously noted, there is competition for small business loans in the assessment area, there are 5 other financial institutions operating 7 locations in the sole moderate-income census tract, and it is approximately 15 miles from the bank's nearest office. Although there are mitigating factors present, the bank's performance is still significantly lower than aggregate and demographic data.

<b>Geographic Distribution of Small Business Loans Assessment Area: Nonmetropolitan South Dakota</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	15.8	13.3	1	0.8	38	0.5
Middle	70.9	76.3	109	90.1	7,597	96.9
Upper	13.2	10.4	11	9.1	207	2.6
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>121</b>	<b>100.0</b>	<b>7,842</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>						

### **Borrower Profile**

The distribution of borrowers reflects excellent penetration among farm and business customers of different sizes. The bank's excellent lending performance in small farm and small business lending supports this conclusion.

### ***Small Farm Loans***

The distribution of borrowers reflects excellent penetration among farms with gross annual revenues of \$1 million or less when compared to aggregate data, which is depicted in the following table.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category Assessment Area: Nonmetropolitan South Dakota</b>						
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	96.8	66.8	225	77.9	25,195	80.0
>\$1,000,000	2.1	--	28	9.7	5,461	17.3
Revenue Not Available	1.1	--	36	12.5	836	2.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>289</b>	<b>100.0</b>	<b>31,492</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among business with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank's small business lending in 2019 is significantly higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank's small business lending is significantly lower than aggregate performance; however, a majority of small business loans did not have



revenue information available because this category includes PPP loan originations. Of the 75 loans with no revenue information available, approximately 96.0 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank’s willingness to serve the needs of smaller businesses. Further, in 2021, the bank’s record of lending to business with gross annual revenues of \$1 million or less significantly increased.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Nonmetropolitan South Dakota</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	79.3	50.0	57	72.2	2,811	50.0
2020	80.7	39.3	36	29.8	3,226	41.1
2021	82.5	--	57	67.9	2,053	53.3
<b>&gt;\$1,000,000</b>						
2019	6.3	--	7	8.9	1,867	33.2
2020	5.7	--	10	8.3	2,039	26.0
2021	5.0	--	12	14.3	1,414	36.7
<b>Revenue Not Available</b>						
2019	14.4	--	15	19.0	943	16.8
2020	13.6	--	75	62.0	2,577	32.9
2021	12.6	--	15	17.9	382	9.9
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>79</b>	<b>100.0</b>	<b>5,621</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>121</b>	<b>100.0</b>	<b>7,842</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>84</b>	<b>100.0</b>	<b>3,849</b>	<b>100.0</b>
<i>Source: 2019, 2020 &amp; 2021 D&amp;B Data; Bank Data; 2019 &amp; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

**Community Development Loans**

The bank did not originate any community development loans in the Nonmetropolitan South Dakota Assessment Area. Management commented that there are limited opportunities for community development lending, and the area is primarily comprised of very small towns.

**INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the Nonmetropolitan South Dakota Assessment Area. The bank’s Investment and Grant Activity and Responsiveness to Credit and Community Development Needs performance supports this conclusion.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the Nonmetropolitan South Dakota Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank made 33 qualified investments totaling \$358,249 in the assessment area, including 2 prior period investments totaling \$334,358 and 31 donations totaling \$23,891. Of the 33 investments, 17 totaling \$9,869 were to organizations that provide community services to low- and moderate-income individuals and 16 totaling \$348,380 helped to revitalize or stabilize portions of the assessment area. The bank's level of qualified investments in this assessment area increased from the previous evaluation, when it received credit for 6 qualified investments totaling \$325,986.

### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits adequate responsiveness to credit and community development needs in the Nonmetropolitan South Dakota Assessment Area, as demonstrated through the bank's qualified investments to support community services targeted to low- and moderate-income individuals and revitalization or stabilization efforts in the primarily distressed and/or underserved portions of the assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the Nonmetropolitan South Dakota Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

## **SERVICE TEST**

Minnwest Bank demonstrated adequate performance under the Service Test in the Nonmetropolitan South Dakota Assessment Area. Performance under Accessibility of Delivery Systems primarily supports this conclusion. While the bank's CD Services were limited, they did not drop the Service Test conclusion to a poor level.

### **Accessibility of Delivery Systems**

Minnwest Bank's delivery systems are reasonably accessible to essentially all portions of the Nonmetropolitan South Dakota Assessment Area. The bank operates four branches and three ATMs in this assessment area in three middle- and one-upper income census tracts. One branch is located in an underserved geography. Furthermore, the alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

There have been no changes to the branch locations in this assessment area.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in the Nonmetropolitan South Dakota Assessment Area. During the evaluation period, employees provided 6 instances of financial services totaling 15 hours of financial expertise or technical assistance to promote community services to low- and moderate-income individuals, revitalization of underserved areas, and economic development.

## **SIOUX FALLS ASSESSMENT AREA – *Full-Scope Review***

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SIOUX FALLS ASSESSMENT AREA**

The Sioux Falls Assessment Area includes all of Lincoln and Minnehaha counties, both of which are included within the Sioux Falls MSA. There have been no changes to the assessment area since the prior evaluation. According to 2015 ACS data, the assessment area consists of 17 moderate-, 24 middle-, and 12 upper-income census tracts. The bank operates 2 offices and 2 ATMs in the assessment area. One office and ATM are located in a moderate-income census tract and the other office and ATM are in an upper-income census tract.

## **Economic and Demographic Data**

The table below illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Sioux Falls Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	53	0.0	32.1	45.3	22.6	0.0
Population by Geography	228,816	0.0	29.5	47.7	22.9	0.0
Housing Units by Geography	93,533	0.0	32.7	45.4	21.9	0.0
Owner-Occupied Units by Geography	58,782	0.0	21.5	51.8	26.7	0.0
Occupied Rental Units by Geography	29,395	0.0	53.2	33.8	13.0	0.0
Vacant Units by Geography	5,356	0.0	43.7	38.5	17.8	0.0
Businesses by Geography	28,117	0.0	37.0	34.9	28.2	0.0
Farms by Geography	1,288	0.0	11.2	59.8	29.0	0.0
Family Distribution by Income Level	57,695	18.8	17.9	24.4	38.9	0.0
Household Distribution by Income Level	88,177	21.9	18.1	18.8	41.2	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$72,948	Median Housing Value			\$160,629
			Median Gross Rent			\$725
			Families Below Poverty Level			7.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data            Due to rounding, totals may not equal 100.0%            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

D&B data for 2021 indicates that service industries represent the largest portion of businesses in the assessment area at 33.3 percent; followed by non-classifiable establishments (22.8 percent); finance, insurance, and real estate (12.8 percent); and retail trade (9.5 percent). In addition, 61.3 percent of area businesses have 4 or fewer employees, and 91.6 percent operate from a single location.

## **Competition**

The Sioux Falls Assessment Area is competitive for financial services. According to 2021 FDIC Deposit Market Share data, 33 FDIC-insured financial institutions operate 118 offices within the assessment area. Of these institutions, Minnwest Bank ranks 20<sup>th</sup> with 0.2 percent of the deposit market share. There is moderate competition for small farm loans in the assessment area as 19 lenders originated 571 small farm loans in 2020 based on CRA aggregate data. Of these institutions, Minnwest Bank ranked 7<sup>th</sup> with 4.6 percent of the market share by number. Furthermore, there is a high level of demand and competition for small business loans in the assessment area as evidenced by the 2020 aggregate CRA data, which revealed that 106 lenders reported 7,356 small business loans. Of these institutions, Minnwest Bank ranked 11<sup>th</sup> with 1.8 percent of the market share by number.

### **Community Contact**

Examiners referenced a community contact interview previously conducted with a business development center that serves the assessment area. The contact indicated that the economy was growing, after a brief dip in early 2020 due to the COVID-19 pandemic. The assessment area attracts many new businesses and the contact highlighted two new businesses that will provide for approximately 6,000 new jobs in the area. The contact indicated that the biggest struggle is finding qualified manufacturing employees. A shortage of childcare and affordable housing is also a concern. The contact stated that even with several new single- and multi-family units being built, these have not met the housing need. Overall, the contact felt that banks are doing a good job meeting the area's credit and deposit needs and that several institutions have been highly responsive. However, while needs are being met, the contact indicated that more could be done, such as through supporting small business loan programs and revolving housing trust funds.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that commercial and home mortgage lending represent the primary credit needs of the Sioux Falls Assessment Area. Further, the assessment area's community development needs are primarily related to affordable housing, community services, and economic development. The community contact also identified the local childcare shortage as a community development opportunity in the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SIOUX FALLS ASSESSMENT AREA**

### **LENDING TEST**

Minnwest Bank demonstrated adequate performance under the Lending Test in the Sioux Falls Assessment Area. Lending Activity and Borrower Profile performance were good, and Geographic Distribution performance was adequate. The lack of Community Development lending did impact conclusions. Home mortgage lending activity was not reviewed for this assessment area since it is not a business focus for the bank. Further, the volume of lending during the review period was limited.

### **Lending Activity**

The bank's lending activity reflects good responsiveness to the credit needs of the Sioux Falls Assessment Area. In 2020, the bank originated 4.4 percent, by number, of loans in the assessment area, whereas, according to the 2020 Deposit Market Share report, 4.9 percent of the bank's deposits came from the assessment area. The bank reported 26 small farm loans totaling \$2.2 million, 135 small business loans totaling \$16.0 million, and 10 home mortgage loans totaling \$17.0 million in 2020. As previously noted, the bank ranked 7<sup>th</sup> in market share for small farm loans and 11<sup>th</sup> for small business loans.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the assessment area. The bank's adequate small farm and small business lending performance supports this conclusion.

### ***Small Farm Loans***

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment area. The bank did not originate any small farm loans in moderate-income census tracts in 2020. Management stated there is heavy competition in this assessment area from traditional financial institutions, as well as farm credit agencies that offer lower rates. Considering the bank's performance is comparable to aggregate data, the lower percentage of farms located in moderate-income census tracts, and competition, overall performance is adequate.

<b>Geographic Distribution of Small Farm Loans</b> <b>Assessment Area: Sioux Falls</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	9.5	1.9	0	0.0	0	0.0
Middle	61.8	74.9	25	96.2	1,867	84.2
Upper	28.6	23.2	1	3.8	350	15.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>2,217</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area when compared to aggregate data. As shown in the table, the bank's record of originating small business loans, by number is comparable to aggregate data.

<b>Geographic Distribution of Small Business Loans</b> <b>Assessment Area: Sioux Falls</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	36.5	33.4	43	31.9	3,815	23.9
Middle	36.0	35.8	44	32.6	4,968	31.1
Upper	27.5	30.8	48	35.6	7,179	45.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>15,962</b>	<b>100.0</b>

*Source: 2020 D&B Data; Bank Data; 2020 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of borrowers reflects good penetration among farm and business customers of different sizes. The bank's good lending performance in small farm and small business lending supports this conclusion.

### ***Small Farm Loans***

The distribution of borrowers reflects good penetration among farms with gross annual revenues of \$1 million or less when compared to aggregate data, which is depicted in the following table.

Although comparable to aggregate in 2020, in 2019 the bank exceeded aggregate data by 14.2 percent and demonstrated comparable performance in 2021.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Sioux Falls</b>						
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	97.8	68.8	17	65.4	1,837	82.9
>\$1,000,000	1.3	--	1	3.8	300	13.5
Revenue Not Available	0.9	--	8	30.8	80	3.6
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>2,217</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The distribution of borrowers reflects good penetration among business with gross annual revenues of \$1 million or less when compared to aggregate data. As illustrated in the following table, the bank’s small business lending in 2019 is higher than aggregate data, which is reflective of typical bank performance. In 2020, the bank’s small business lending is significantly lower than aggregate performance; however, a majority of small business loans did not have revenue information available because this category includes PPP loan originations. Of the 100 loans with no revenue information available, approximately 84.0 percent were to borrowers with loan sizes of \$100,000 or less, indicating the bank’s willingness to serve the needs of smaller businesses. Further, in 2021, the bank’s record of lending to business with gross annual revenues of \$1 million or less increased and exceeded 2019 and 2020 bank performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Sioux Falls</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;=\$1,000,000</b>						
2019	84.7	50.1	28	57.1	3,720	58.7
2020	85.7	42.5	20	14.8	4,854	30.4
2021	87.1	--	54	58.7	5,534	49.6
<b>&gt;\$1,000,000</b>						
2019	5.3	--	20	40.8	2,467	38.9
2020	4.9	--	15	11.1	4,338	27.2
2021	4.1	--	23	25.0	4,192	37.6
<b>Revenue Not Available</b>						
2019	10.0	--	1	2.0	150	2.4
2020	9.4	--	100	74.1	6,770	42.4
2021	8.8	--	15	16.3	1,435	12.9
<b>Totals</b>						
<b>2019</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>6,337</b>	<b>100.0</b>
<b>2020</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>15,962</b>	<b>100.0</b>
<b>2021</b>	<b>100.0</b>	<b>--</b>	<b>92</b>	<b>100.0</b>	<b>11,161</b>	<b>100.0</b>

*Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

### **Community Development Loans**

The bank did not originate any community development loans in the Sioux Falls Assessment Area. Management commented that there is heavy competition for community development loans in the metropolitan areas of South Dakota, including Sioux Falls.

### **INVESTMENT TEST**

Minnwest Bank demonstrated adequate performance under the Investment Test in the Sioux Falls Assessment Area. The bank's Investment and Grant Activity and Responsiveness to Credit and Community Development Needs performance primarily supports this conclusion.

### **Investment and Grant Activity**

Minnwest Bank has an adequate level of qualified investments in the Sioux Falls Assessment Area, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank made three qualified investments, all in the form of donations, totaling \$45,071 in the assessment area. All three donations were to organizations that provide community services to low- and moderate-income individuals.



### **Responsiveness to Credit and Community Development Needs**

Minnwest Bank exhibits adequate responsiveness to credit and community development needs in the Sioux Falls Assessment Area, as demonstrated through the bank's qualified investments to support community services targeted low- and moderate-income individuals in the assessment area.

### **Community Development Initiatives**

Minnwest Bank rarely uses innovative and/or complex investments to support community development initiatives in the Sioux Falls Assessment Area. The bank's investments in this assessment area are in widespread use and are not necessarily considered innovative or complex.

## **SERVICE TEST**

Minnwest Bank demonstrated adequate performance under the Service Test in the Sioux Falls Assessment Area. Performance under Accessibility of Delivery Systems primarily supports this conclusion. While the bank's CD Services were limited, they did not drop the Service Test conclusion to a poor level.

### **Accessibility of Delivery Systems**

Minnwest Bank operates two branches and two ATMs in this assessment area. One of the branches and ATMs is located in a moderate-income census tract and the other in an upper-income census tract. Although delivery systems are somewhat limited, they are reasonably accessible to essentially all portions of the Sioux Falls Assessment Area. Furthermore, the alternative delivery methods provide further access to bank services and are consistent with those discussed in the bank's overall performance.

### **Changes in Branch Locations**

There have been no changes to the branch locations in this assessment area.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals and are consistent with the bank's overall performance.

### **Community Development Services**

Minnwest Bank provides a limited level of community development services in the Sioux Falls Assessment Area. During the evaluation period, employees provided 2 instances of financial services totaling 42 hours of financial expertise or technical assistance to promote community services to low- and moderate-income individuals.

## APPENDICES

### LARGE BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
  - i. The proportion of the bank's lending in the bank's assessment area(s);
  - ii. The dispersion of lending in the bank's assessment areas(s); and
  - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
  - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
  - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
  - iii. Small business and small farm loans by loan amount at origination; and
  - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

#### **Investment Test**

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

## **Service Test**

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

**SUMMARY OF RATINGS FOR RATED AREAS**

<b>Rated Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>	<b>Rating</b>
Minnesota	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
South Dakota	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

## GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

**Community Development Loan:** A loan that:

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

**Community Development Service:** A service that:

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

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

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

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

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

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

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

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

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

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

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

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Branches of Minnwest Bank

**1. Belview Branch Office:**

113 North Main Street  
Belview, MN 56214

State Code – 27      County Code – 127      Census Tract – 7504.00      MSA Code – NA

Lobby Hours

Monday – Wednesday, Friday      9:00 AM – 4:00 PM  
Thursday      9:00 AM – 6:00 PM

**2. Big Stone City Branch Office**

607 Cornell Ave.  
Big Stone City, SD 57216

State Code – 46      County Code-051      Census Tract – 9531.00      MSA Code - NA

Lobby Hours

Monday –Friday      9:00 AM – 4:00 PM

Drive Up Hours

Monday - Friday      9:00 AM – 4:00 PM

**3. Danube Branch Office:**

200 Oak Street  
Danube, MN 56230

State Code – 27      County Code – 129      Census Tract – 7905.00      MSA Code – NA

Lobby Hours

Monday – Friday      8:30 AM – 4:30 PM

Drive-up / Walk-up Hours

Monday – Friday      8:00 AM – 5:00 PM

**4. Dawson Branch Office:**

579 Pine St  
Dawson, MN 56232

State Code – 27      County Code – 073      Census Tract – 1803.00      MSA Code – NA

Lobby Hours

Monday – Friday      9:00 AM – 4:00 PM

Drive-up Hours

Monday – Friday      8:00 AM – 5:00 PM

**5. Eagan Branch Office:**

1150 Yankee Doodle Road  
Eagan, MN 55121

State Code – 27      County Code - 037      Census Tract - 0607.27      MSA Code – 33460

Lobby Hours

Monday – Friday

9:00 AM – 5:00 PM

Saturday

By appointment only

Drive-up Hours

Monday – Friday

8:00 AM – 5:00 PM

Saturday

9:00 AM – 12:00 PM

ITM – Virtual Banker

Monday – Friday

7:00 AM – 6:00 PM

Saturday

9:00 AM – 2:00 PM

**6. Farmington Branch Office**

3380 Vermillion River Trail  
Farmington, MN 55024

State Code – 27      County Code – 037      Census Tract – 0609.05      MSA Code – 33460

Lobby Hours

Monday – Friday

8:30 AM – 5:00 PM

Saturday

Closed

Drive-Up Hours

Monday – Friday

8:00 AM – 5:00 PM

Saturday

9:00 Am – 12:00 PM

**7. Florence Branch Office**

218 Main Avenue  
Florence SD 57235

State Code – 046      CountyCode – 029      Census Tract – 9546.00      MSA Code – NA

Lobby Hours

Monday – Tuesday

9:00 AM – 4:00 PM

Wednesday

9:00 AM – 5:30 PM

Thursday – Friday

9:00 AM – 4:00 PM

**8. Gibbon Branch Office:**

1069 1<sup>st</sup> Avenue  
Gibbon, MN 55335

State Code – 27      County Code – 143      Census Tract – 1702.00      MSA Code – NA

Lobby Hours

Monday – Thursday      8:00 AM – 3:00 PM  
Friday      8:00 AM – 6:00 PM

**9. Hammond Branch Office:**

276 Center Street East  
Hammond, MN 55991

State Code – 27      County Code -157      Census Tract 4904.00      MSA Code – 40340

Lobby Hours

Monday – Thursday      10:00 AM – 4:30 PM  
Friday      10:00 AM – 5:00 PM  
Saturday      9:00 AM – 12:00 PM

**10. Lake Wilson Branch Office:**

300 Broadway Ave  
Lake Wilson, MN 56151

State Code – 27      County Code – 101      Census Tract – 9002.00      MSA Code – NA

Lobby Hours

Monday – Friday      9:00 AM – 3:00 PM

Drive-up Hours

Monday – Friday      8:30 AM – 3:00 PM

**11. Lewiston Branch Office:**

225 East Main Street  
Lewiston, MN 55952

State Code – 27      County Code – 169      Census Tract – 6709.00      MSA Code – NA

Lobby Hours

Monday – Friday      9:00 AM – 4:00 PM

Drive-up Hours

Monday – Friday      7:30 AM – 5:00 PM  
Saturday      8:00 AM – 12:00 PM

Walk-up Hours

Monday – Friday      7:30 AM – 5:00 PM  
Saturday      8:00 AM – 12:00 PM

**12. Luverne Branch Office (Downtown):**

116 E Main St  
Luverne, MN 56156

State Code – 27	County Code - 133	Census Tract 5703.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Friday	8:00 AM – 5:00 PM	

**13. Luverne Highway 75 Branch Office:**

800 S Kniss Ave  
Luverne, MN 56156

State Code – 27	County Code - 133	Census Tract 5702.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Friday	8:00 AM – 5:00 PM	
	Saturday	9:00 AM – 12:00 PM	
ITM – Virtual Banker			
	Monday – Friday	7:00 AM – 6:00 PM	
	Saturday	9:00 AM – 2:00 PM	

**14. Marshall Branch Office:**

301 Baseline Road  
Marshall, MN 56258

State Code – 27	County Code – 083	Census Tract – 3604.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	8:30 AM – 4:30 PM	
Drive-up Hours			
	Monday – Friday	8:00 AM – 6:00 PM	
	Saturday	9:00 AM – 12:00 PM	
ITM – Virtual Banker			
	Monday – Friday	7:00 AM – 6:00 PM	
	Saturday	9:00 AM – 2:00 PM	

**15. Minnetonka Branch Office:**

14820 Highway 7  
Minnetonka, MN 55345

State Code – 27	County Code - 053	Census Tract 0262.02	MSA Code – 33460
Lobby Hours			
	Monday – Friday	9:00 AM – 5:00 PM	
	Saturday	By appointment only	
Drive-up Hours			

Monday – Friday	8:00 AM – 5:00 PM
Saturday	9:00 AM – 12:00 PM
ITM- Virtual Banker	
Monday – Friday	7:00 AM – 6:00 PM
Saturday	9:00 AM – 2:00 PM

**16. Montevideo Branch Office (Downtown):**

107 North First St  
Montevideo, MN 56265

State Code – 27	County Code – 023	Census Tract – 9506.01	MSA Code – NA
Lobby Hours			
Monday – Friday		9:00 AM – 4:00 PM	

**17. Montevideo Highway 7 Branch Office:**

1404 MN Hwy 7  
Montevideo, MN 56265

State Code – 27	County Code – 023	Census Tract – 9506.02	MSA Code – NA
Lobby Hours			
Monday – Friday		9:00 AM – 4:00 PM	
Drive-up Hours			
Monday – Friday		8:00 AM – 6:00 PM	
Saturday		9:00 AM – 12:00 PM	

**18. Morton Branch Office:**

(Limited Service Facility)  
224 West 2<sup>nd</sup> Street  
Morton, MN 56270

State Code – 27	County Code – 129	Census Tract – 7904.00	MSA Code – NA
Lobby Hours			
Monday, Wednesday, & Friday 9:00 AM – 1:00 PM			

**19. New Prague Branch Office**

1100 First Street Northeast  
New Prague, MN 56071

State Code – 27	County Code – 139	Census Tract – 0812.00	MSA Code - 33460
Lobby Hours			
Monday – Friday		9:00 AM – 4:00 PM	
Saturday		Closed	
Drive-Up Hours			

Monday – Friday	8:00 AM – 5:00 PM
Saturday	9:00 AM – 12:00 PM
ITM – Virtual Banker	
Monday – Friday	7:00 AM – 6:00 PM
Saturday	9:00 AM – 2:00 PM

**20. Ortonville Branch Office:**

21 SE 2<sup>nd</sup> St  
Ortonville, MN 56278

State Code – 27	County Code – 011	Census Tract – 9503.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:45 PM	
Drive-up Hours			
	Monday – Thursday	8:00 AM – 5:30 PM	
	Friday	8:00 AM – 6:00 PM	
	Saturday	9:00 AM – 12:00 PM	

**21. Redwood Falls Downtown Branch Office:**

300 South Washington Street  
Redwood Falls, MN 56283

State Code – 27	County Code – 127	Census Tract – 7503.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Friday	8:00 AM – 5:30 PM	

**22. Redwood Falls East Branch Office:**

1275 East Bridge Street  
Redwood Falls, MN 56283

State Code – 27	County Code – 127	Census Tract – 7502.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:30 PM	
	Saturday	9:00 AM – 12:00 PM	
Drive-up Hours			
	Monday – Friday	7:30 AM – 6:00 PM	
	Saturday	9:00 AM – 12:00 PM	
ITM – Virtual Banker			
	Monday – Friday	7:00 AM – 6:00 PM	
	Saturday	9:00 AM – 2:00 PM	



**23. Rochester – West Circle:**

2575 Commerce Drive NW  
Suite 100  
Rochester, MN 55901

State Code – 27      County Code - 109      Census Tract 0014.01      MSA Code – 40340

Lobby Hours

Monday – Friday      9:00 AM – 5:00 PM  
Saturday      9:00 AM – 12:00 PM

Drive-up Hours

Monday – Friday      9:00 AM – 5:00 PM  
Saturday      9:00 AM – 12:00 PM

ITM – Virtual Banker

Monday – Friday      7:00 AM – 6:00 PM  
Saturday      9:00 AM – 2:00 PM

**24. Rochester Downtown Branch Office:**

324 1<sup>st</sup> Ave Southwest  
Rochester, MN 55902

State Code – 27      County Code 109      Census Tract – 0001.00      MSA Code – 40340

Lobby Hours

Monday – Friday      8:30 AM – 5:00 PM

**25. Sioux Falls Branch Office:**

5001 S Louise Ave  
Sioux Falls, SD 56108

State Code – 46      County Code - 083      Census Tract 0101.10      MSA Code – 43620

Lobby Hours

Monday – Friday      9:00 AM – 4:00 PM

Drive-up Hours

Monday – Friday      7:30 AM – 5:30 PM  
Saturday      9:00 AM – 12:00 PM

ITM – Virtual Banker

Monday – Friday      7:00 AM – 6:00 PM  
Saturday      9:00 AM – 2:00 PM

**26. Sioux Falls East Branch Office:**

5324 E Arrowhead Parkway, Suite 101  
Sioux Falls, SD 57110

State Code – 46	County Code - 099	Census Tract 0004.05	MSA Code – 43620
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Friday	7:30 AM – 5:30 PM	

**27. Slayton Branch Office:**

2565 King Ave  
Slayton, MN 56172

State Code – 27	County Code - 101	Census Tract 9003.00	MSA Code – NA
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Friday	8:00 AM – 5:00 PM	
	Saturday	8:00 AM – 12:00 PM	
Walk-up Hours			
	Monday – Friday	8:00 AM – 9:00 AM	
	Monday – Friday	4:00 PM – 5:00 PM	
	Saturday	8:00 AM – 12:00 PM	
ITM – Virtual Banker			
	Monday – Friday	7:00 AM – 6:00 PM	
	Saturday	9:00 AM – 2:00 PM	

**28. Spring Valley Branch Office:**

640 N. Broadway Avenue  
Spring Valley, MN 55975

State Code- 27	County code – 045	Census Tract – 9603.00	MSA Code: 40340
Lobby Hours			
	Monday – Friday	9:00 AM – 4:00 PM	
Drive-up Hours			
	Monday – Thursday	8:00 AM – 4:00 PM	
	Friday	8:00 AM – 5:00 PM	
ITM – Virtual Banker			
	Monday – Friday	7:00 AM – 6:00 PM	
	Saturday	9:00 AM – 2:00 PM	

**29. St. Cloud Branch Office:**

3130 2<sup>nd</sup> Street South  
PO Box 7429  
St. Cloud, MN 56301

State Code – 27      County Code – 145      Census Tract – 0004.01      MSA Code – 41060

Lobby Hours  
Monday – Friday      9:00 AM – 5:00 PM  
Drive-up Hours  
Monday – Friday      8:00 AM – 5:30 PM  
Saturday      9:00 AM – 12:00 PM  
Walk-Up Hours  
Monday – Friday      8:00 AM – 5:30 PM  
Saturday      9:00 AM – 12:00 PM  
ITM – Virtual Banker  
Monday – Friday      7:00 AM – 6:00 PM  
Saturday      9:00 AM - 2:00 PM

**30. Summit Branch Office:**

401 Maple St.  
Summit, SD 57266

State Code – 46      County Code – 109      Census Tract – 9408.00      MSA Code - NA

Lobby Hours  
Mon., Wed., Thur., Fri.      9:00 AM – 4:00 PM  
Tuesday      9:00 AM – 5:00 PM

**31. Tracy Branch Office:**

250 3<sup>rd</sup> St  
Tracy, MN 56175

State Code – 27      County Code – 083      Census Tract – 3607.00      MSA Code – NA

Lobby Hours  
Monday – Friday      9:00 AM – 3:00 PM  
Drive-up Hours  
Monday – Friday      8:00 AM – 5:00 PM  
Saturday      9:00 AM – 12:00 PM

**32. Waldorf Branch Office**

102 S. Main Street  
Waldorf, MN 56091

State Code – 27      County Code – 161      Census Tract – 7902.00      MSA Code – NA

Lobby Hours  
Monday – Friday      8:30 AM – 4:00 PM

Saturday

Closed

**33. Waseca Branch Office**

200 2<sup>nd</sup> Street NE  
Waseca, MN 56093

State Code – 27      County Code – 161      Census Tract – 7904.00      MSA Code – NA

Lobby Hours:

Monday – Friday

8:30 AM – 4:30 PM

Saturday

Closed

Drive-Up Hours

Monday – Friday

7:30 AM – 5:30 PM

Saturday

8:30 AM – 12:00 PM

**34. Wilmot Branch Office:**

709 Main St.  
Wilmot, SD 57279

State Code – 46      County Code – 109      Census Tract – 9504.00      MSA Code - NA

Lobby Hours

Monday – Wednesday, Friday

9:00 AM – 4:00 PM

Thursday

9:00 AM – 6:00 PM

**35. Wykoff Branch Office:**

102 Gold Street North  
Wykoff, MN 55990

State Code – 27      County Code – 045      Census Tract – 9602.00      MSA Code - 40340

Lobby Hours

Monday – Friday

9:00 AM – 12:30 PM

1:00 PM – 2:00 PM

ITM – Virtual Banker

Monday – Friday

7:00 AM – 6:00 PM

Saturday

9:00 AM – 2:00 PM

## **BRANCHES OPENED AND CLOSED IN THE LAST 2 CALENDAR YEARS**

### **2022**

Minnwest Bank relocated the Wykoff Branch on 1/31/22 located at:

1. 101 S. Gold St.  
Wykoff, MN 55990

**TO the new location of:**

2. 102 Gold St North  
Wykoff, MN 55990

### **2023**

- Spring Valley Branch relocated to 640 N Broadway Ave., Spring Valley, MN 55975 and opened on 5/15/23. The two facilities located at 100 S. Broadway, Spring Valley and 113 West Main St., Spring Valley were closed on 5/13/23.
- Rochester branch located at 331 16<sup>th</sup> Avenue NW, Rochester, MN 55901 closed on 12/11/23.
- A new Rochester branch located at 2575 Commerce Dr. NW., Rochester, MN 55901 opened on 12/11/23.

## **Minnwest Bank Services**

<b>Account Reconciliation</b>	<b>MasterCard ATM/Debit Card (personal and business)</b>	<b>Text Banking</b>
<b>Account Analysis</b>	<b>Merchant Capture</b>	<b>TransferNow</b>
<b>ACH</b>	<b>Merchant Credit Card Processing</b>	<b>Wire Transfers</b>
<b>ACH Check Positive Pay</b>	<b>Mobile Banking</b>	<b>Remote Deposit Capture</b>
<b>Activity Manager</b>	<b>Mobile Deposits (personal and business)</b>	
<b>After Hours Call Center</b>	<b>Monetary Instrument Sales – Cashier Checks (customers only)</b>	
<b>Alert Notifications</b>	<b>Money Line</b>	
<b>ATM Machines</b>	<b>Money Magic Club</b>	
<b>Bank By Mail</b>	<b>Night Depository Service</b>	
<b>Business Credit Cards</b>	<b>Notary Service</b>	
<b>Card Valet</b>	<b>Online Banking (Consumer and Business)</b>	
<b>Cash Management Services</b>	<b>Online Bill Pay (Consumer and Business)</b>	
<b>Certificate of Deposit Account Registry Service (CDARS)</b>	<b>Online Statements</b>	
<b>CheckmarcUSA</b>	<b>Online Account Opening (Consumer and Business)</b>	
<b>Direct Deposit</b>	<b>Payroll and HR Services for Businesses</b>	
<b>Digital Wallet</b>	<b>Photocopies</b>	
<b>Drive Up Banking</b>	<b>Prime Club</b>	
<b>Fax Machine</b>	<b>Safe Deposit Boxes</b>	
<b>Foreign Currency purchase/exchange</b>	<b>Savings Bond Redemption</b>	
<b>Funds Management Sweeps</b>	<b>SMS Interactive Fraud Alerts</b>	
<b>ITM</b>	<b>Telephone Transfers</b>	

## Minnwest Bank Available Products

<b>LOAN SERVICES</b>				
<b><u>Agricultural Loans</u></b>	<b><u>Commercial Loans</u></b>	<b><u>Consumer Loans</u></b>	<b><u>Residential Real Estate</u></b>	<b><u>Community Development Loans</u></b>
Operating Loans (Crop/Feeder)	Operating (secured, lines of credit)	Secured, Unsecured, Lines of Credit	Home Purchase	Small Business Administration
Equipment & Machinery	Capital (secured, lines of credit)	Motor Vehicles, Trucks, Motorcycles	Construction Loans	Mortgages
Real Estate	Inventory (secured, lines of credit)	Recreational Vehicles	Conventional	
Lease Financing	Commercial Real Estate	Ready Credit	Home Improvement	
Borrower Programs: FSA, AG BMP, RFA, SBA, Farmer Mac	Lease Financing	Personal Loans	Home Equity	
	Letters of Credit	Bill Consolidation	Home Equity Line of Credit	
	SBA Loans	Vacation Loans	Secondary Market Loans: FHA, VA, 1 <sup>st</sup> Time Home Buyer, Rural Development, Minnesota/South Dakota Housing	

<b>DEPOSIT ACCOUNTS CHECKING ACCOUNTS</b>			
<b>PERSONAL</b>	<b>BUSINESS</b>	<b>NONPROFIT</b>	<b>PUBLIC FUNDS</b>
Minnwest Classic Checking	Classic Business Checking	Nonprofit Checking	Classic Public Funds Checking
Minnwest Preferred Checking	Platinum Business Checking – earnings Credit	Classic Nonprofit Checking	Public Funds Checking
Minnwest Platinum Checking	Loyalty Banking Program	Platinum Nonprofit Checking	Analysis Public Funds Checking
Minnwest Digital Checking			

<b>SAVINGS ACCOUNTS</b>			
<b>PERSONAL</b>	<b>BUSINESS</b>	<b>NONPROFIT</b>	<b>PUBLIC FUNDS</b>
Thrift Savings	Classic Business Savings	Nonprofit Savings	Public Funds Savings
Investment Savings	Platinum Business Savings	Platinum Nonprofit Savings	
Money Max Savings	Nonprofit Savings		

<b>CERTIFICATE OF DEPOSIT</b>		
<b>PERSONAL</b>	<b>BUSINESS</b>	<b>PUBLIC FUNDS</b>
Classic Certificates	Business Classic Certificate	Public Money Manager Certificate
Digital Certificate of Deposit	Business Money Manager Certificate	
Money Manager Certificate		
Brokered Certificates		

<b>OTHER DEPOSIT ACCOUNTS</b>	
<b>RETIREMENT</b>	<b>HSA</b>
Traditional	Personal
Roth	
Simple	
SEP	
Classic IRA CD	
Money Manager IRA	





# BUSINESS SCHEDULE OF FEES & SERVICES

Effective February 20, 2023

## CASH MANAGEMENT SERVICES

The following services may be subject to additional approval

### Online Banking

Access to view accounts, make transfers and view statements

Monthly Maintenance _____	No Charge
Security Tokens > 3 _____	\$ 10.00
Security Token Replacement _____	\$ 10.00

**Bill Pay** - Pay your bills from your online banking by check or electronically when available.

Monthly Maintenance _____	\$ 5.00
---------------------------	---------

### Mobile Banking with Mobile Deposit

Access your accounts and Cash Management services from your mobile phone and deposit using the camera on your phone anytime, anywhere.

Monthly Maintenance _____	No Charge
---------------------------	-----------

**ACH Origination** - Originate electronic payments & collections

#### High Volume

Monthly Maintenance _____	\$ 20.00
Per File _____	\$ 5.00
Per Item <sup>(9)</sup> _____	\$ 0.10

#### Low Volume

Monthly Maintenance _____	\$ 10.00
Per File _____	No Charge
Per Item <sup>(9)</sup> > 5 _____	\$ 0.50

Same Day ACH <sup>(10)</sup> _____	\$ 1.00
------------------------------------	---------

Incoming ACH Addendum Access _____	\$ 5.00
_____ per month	

IAT Origination (Int'l ACH) _____ per month	\$ 10.00
---	----------

ACH Return Item _____	\$ 10.00
-----------------------	----------

File Reversal _____	\$ 25.00
---------------------	----------

Item Reversal _____	\$ 10.00
---------------------	----------

### Online Wire Origination

Originate wire transfers from your online banking

Monthly Maintenance _____	No Charge
Domestic - Outgoing _____	\$ 10.00
Foreign - Outgoing _____	\$ 20.00
Reverse Wire _____	\$ 20.00

### Remote Deposit Capture (RDC)

Deposit checks from your desk 24/7

Monthly Maintenance per Scanner _____	
Single Feed _____	\$ 50.00
Muti Feed _____	\$ 65.00
RDC Scanner Reinstallation _____	\$ 80.00

### Multibank Reporting

Aggregated view of bank accounts

Monthly Maintenance _____	\$ 30.00
---------------------------	----------

### Positive Pay - ACH & Check

Puts the control in your hands

Only the checks you want paid get paid

Monthly Maintenance - 1st Account _____	\$ 35.00
Monthly Maintenance - Ea. Addtn'l Acct _____	\$ 15.00
ACH Only Mthly Maintenance _____	\$ 15.00

## Other Services & Related Fees

Account Closing Fee (if open less than 4 months) _____	\$ 25.00
Cashiers Checks <sup>(2)</sup> _____	\$ 5.00
Counter Checks _____	\$ 0.50
Credit Reference/Audit Confirmation _____	\$ 5.00
Inactive Account <sup>(1)</sup> _____ monthly	\$ 10.00
Garnishment or Levy _____ per incident	\$ 100.00
Notary Service (for Customers Only) _____	No Charge

## ATM/Debit Card Related

Card Replacement _____	\$ 10.00
Non-Minnwest or MoneyPass ATM _____	
_____ per transaction	\$ 2.50
International _____ 1% of transaction amount	

## Check & Image Related

Collection Item - Domestic _____	
_____ any correspondent fee or other charges +	\$ 25.00
Check Image - Non Image Readable manually submitted	
_____ per item	\$ 15.00
Returned Deposit Item _____	\$ 5.00
Returned Item - Special Handling _____ per month	\$ 10.00
Stop Payment - per Check or ACH _____	\$ 35.00
Stop Payment - series of checks _____	\$ 35.00

## Foreign Check & Currency Processing

Deposited _____ registered mail cost +	\$ 25.00
Returned _____	\$ 35.00
Currency _____ correspondent charge, ins. & postage +	\$ 10.00
Collection Item - Foreign _____	
_____ any correspondent fee or other charges +	\$ 40.00

## Overdraft Related Fees

Overdraft/Non-Sufficient Funds <sup>(3)</sup> _____	\$ 35.00
_____ per presentment	
Non-Sufficient Fund item > \$5,000 <sup>(3)</sup> _____	
_____ per presentment	\$ 45.00
Continued Negative Balance <sup>(4)</sup> _____	
_____ every 7 business days	\$ 35.00
Overdraft Protection Sweep Fee <sup>(11)</sup> _____ per transfer	\$ 5.00

## Night Depository Services

Night Depository Access Key > 2 _____ each	\$ 10.00
Replacement Key for Night Depository _____	\$ 10.00
Zipper Bag -small (first one free) _____	\$ 5.00
Zipper Bag - large _____	\$ 8.00
Locking Zipper Bag _____	\$ 25.00
Plastic Deposit Bags (Quantity 100) _____	\$ 45.00
Replacement Key for Locking Bag _____ each	\$ 10.00

## SCHEDULE OF FEES & SERVICES



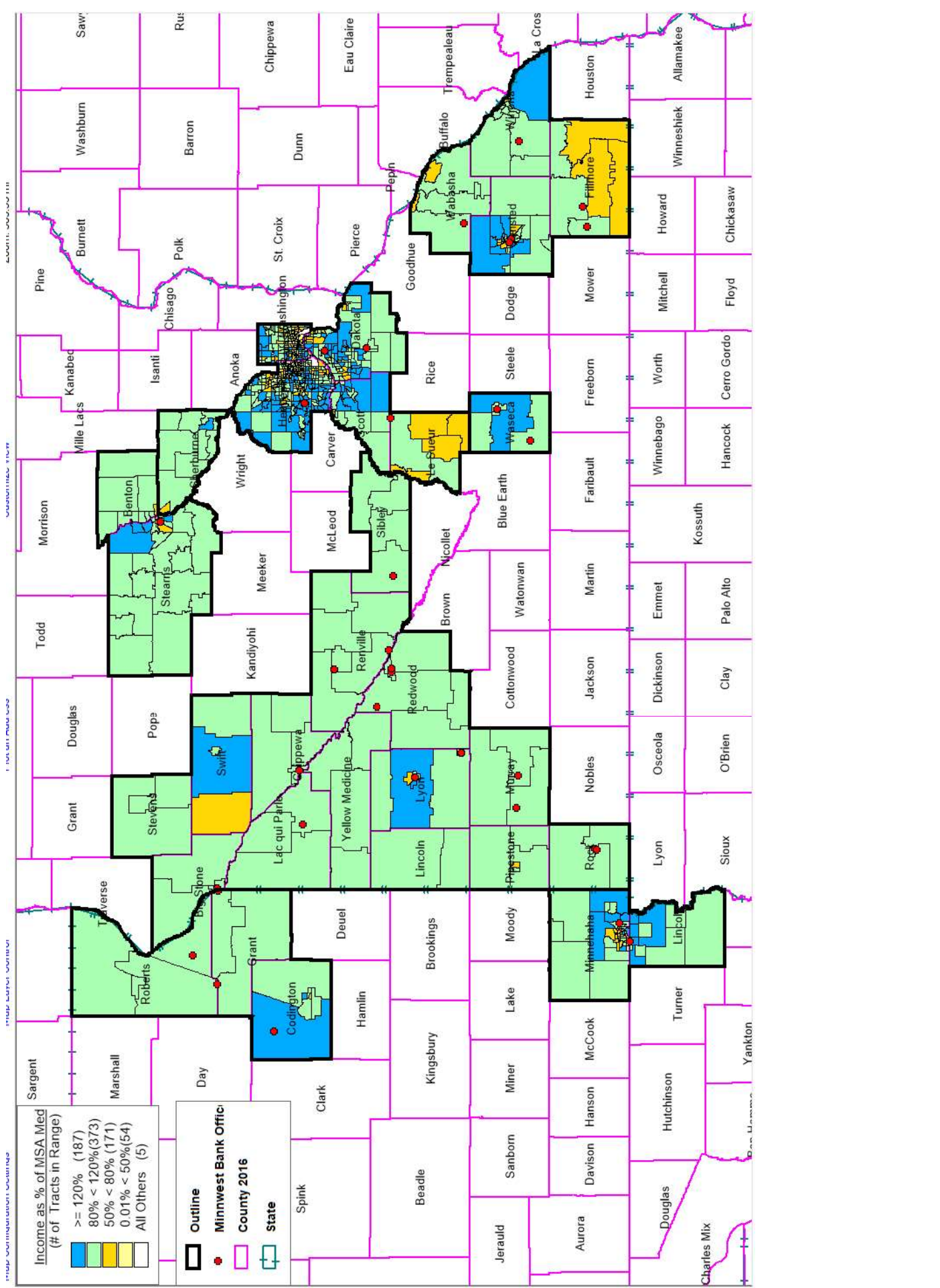
SERVICE	CHARGE
Account Research	\$40.00/hour - \$20.00 minimum
Account Closing Fee (if open less than 4 months)	\$25.00
Account Reconciliation	\$40.00/hour - \$20.00 minimum
ACH Funds Transfer Fee - Individual	\$2.00/transfer
ATM Usage Fee - other than Minnwest Bank and Money Pass network locations	\$2.50
ATM/Debit Card Replacement Fee	\$10.00
ATM International Service Fee	1% of the transaction amount
Bonds - Reissue, name change, etc	\$15 per form + \$1.00 per bond
Cashier's Checks*	\$5.00
Platinum Checking customers	No Charge
*Cashier's Check Customer Charges:	
If check made out to the customer named on the account and from a savings or certificate - no charge	
If check created out to the customer named on the account of a checking account - charge	
If check made out to a third party - charge (customer must be present)	
Check Copies / Images	\$1.00/page of images
Check Image - Non Image Readable manually submitted	\$15.00
Collection Item - Domestic	\$25.00 + any correspondent fee
Collection Item - Foreign	\$40.00 + any correspondent fee or other charges
Counter Checks	\$0.50 each
Executions, Garnishments, Levies	\$100.00
Fax	\$3.00 first page, \$0.25 each add'l page
Foreign Currency	\$10.00 + correspondent charge, insurance & postage
Foreign Check per Item Processing	
Deposited	\$25.00 + registered mail costs
Returned	\$35.00
Imaged Check Handling (receiving check copies with Classic DDA paper statement)	\$3.00/month
Inactive Account Fee	\$10.00/month
If an account has no customer initiated activity, including deposits or withdrawals, within the time period listed below, the account is considered inactive.	
Checking - two years	
Savings - two years	
Indemnity Bond	\$35.00
IRA/HSA Transfer Fee (to another financial institution)	\$25.00
Notary fee (customer)	Free

SERVICE	CHARGE
Overdraft Fee*	\$25.00/per presentment**
Continued Negative Balance Fee	\$25.00 every 7 business days
Photo Copies	\$0.50/copy
Prime Club Members	10 free/month
Returned Deposited Item	\$5.00
Nonsufficient Funds (NSF) Fee*	\$25.00 per presentment**
Reference Form Completion	\$5.00
Safe Deposit Box replacement key	\$30.00
Safe Deposit Box - Drill and replace lock	\$100.00 + cost to drill and replace lock
Safe Deposit Box Rent - \$5 discount if paid by auto payment	
Small (2x5, 3x5, 3.5x5) = \$40.00	Mid Medium (4x10, 5x10) = \$60.00
Mid Small (4x5, 5x5) = \$45.00	Large (6x10, 7x10, 9x10, 10x10) = \$75.00
Medium (3x10) = \$50.00	X-Large (10x11, 15x10) = \$80.00
Safe Deposit Box Late Fee - 30 days or more past due	\$10.00/month
Statement printout	\$5.00/statement + \$1.00/page of images + account research fee
Stop Pay Handling Fee	
One check or ACH Item	\$35.00/item
Series of checks	\$35.00/per series
Wire Transfer	
Domestic - incoming	\$15.00
Domestic - outgoing	\$25.00
Foreign - incoming	\$30.00
Foreign - outgoing	\$50.00

\*An overdraft or nonsufficient funds (NSF) may be caused by check, in-person withdrawals, ATM/Debit Card withdrawals or other electronic means.

\*\*Maximum Nonsufficient Funds (NSF) Fees and Overdraft Fees combined of four (4) per day or \$100. At the end of the business day, if your account is overdrawn by \$25.00 or less, an Overdraft or Nonsufficient Funds (NSF) Fee will not be charged.

# Minnwest Bank, Redwood Falls, MN Cert#16958, Map Based on Median Family Income of the Census Tract



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Minnwest Bank has designated eight Facility Based Assessment Areas, six in Minnesota and two in South Dakota.

<b>Description of Facility Based Assessment Areas</b>		
<b>Facility Based Assessment Area</b>	<b>Counties within Facility Based Assessment Area</b>	<b># of Branches w/in Facility Based Assessment Area</b>
<b>State: Minnesota</b>		
Non Metropolitan Minnesota	Big Stone, Chippewa, Lac qui Parle, Lincoln, Lyon, Murray, Pipestone, Redwood, Renville, Rock, Sibley, Stevens, Swift and Yellow Medicine	16
Minneapolis	Dakota, Hennepin, Le Sueur, Ramsey, Scott and Sherburne	4
Rochester	Fillmore, Olmsted and Wabasha	6
St. Cloud	Benton and Stearns	1
Waseca	Waseca	2
Winona	Winona	1
<b>State: South Dakota</b>		
Non Metropolitan South Dakota	Codington, Grant and Roberts	4
Sioux Falls	Lincoln and Minnehaha	2

# Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Website ( [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda) ). HMDA data for many other financial institutions are also available at this Website.

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: ARIZONA (04)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Outside Assessment Area</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	1	278	1	278	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	278	1	278	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	278	1	278	0	0
STATE TOTAL	0	0	0	0	1	278	1	278	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>MONROE COUNTY (087), FL</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	284	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	284	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	284	0	0	0	0
STATE TOTAL	0	0	0	0	1	284	0	0	0	0



Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: GEORGIA (13)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>BIBB COUNTY (021), GA</b>										
<b>MSA 31420</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	4	172	0	0	0	0	4	172	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	172	0	0	0	0	4	172	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	4	172	0	0	0	0	4	172	0	0
STATE TOTAL	4	172	0	0	0	0	4	172	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: ILLINOIS (17)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>MCLEAN COUNTY (113), IL</b>										
<b>MSA 14010</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	1	1,000	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	1,000	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	1,000	0	0	0	0
STATE TOTAL	0	0	0	0	1	1,000	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MICHIGAN (26)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>OAKLAND COUNTY (125), MI</b>										
<b>MSA 47664</b>										
<b>Outside Assessment Area</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	1	420	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	420	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	420	0	0	0	0
STATE TOTAL	0	0	0	0	1	420	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>ANOKA COUNTY (003), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	2	71	3	628	3	1,922	4	1,383	0	0
Middle Income	0	0	3	467	2	1,350	2	350	0	0
Upper Income	0	0	0	0	1	841	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	71	6	1,095	6	4,113	6	1,733	0	0
<b>BENTON COUNTY (009), MN</b>										
<b>MSA 41060</b>										
<b>Inside AA 0004</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	100	0	0	2	1,350	1	500	0	0
Middle Income	2	157	0	0	2	1,260	1	57	0	0
Upper Income	0	0	1	114	0	0	1	114	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	257	1	114	4	2,610	3	671	0	0
<b>BIG STONE COUNTY (011), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	10	473	2	265	1	295	9	559	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	473	2	265	1	295	9	559	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>BLUE EARTH COUNTY (013), MN</b>										
<b>MSA 31860</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	4	115	1	152	0	0	5	267	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	115	1	152	0	0	5	267	0	0
<b>BROWN COUNTY (015), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	120	1	135	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	120	1	135	0	0	0	0	0	0
<b>CARVER COUNTY (019), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	3	1,213	2	713	0	0
Upper Income	1	60	1	183	2	1,406	1	60	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	60	1	183	5	2,619	3	773	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>CASS COUNTY (021), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	1	155	0	0	1	155	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	155	0	0	1	155	0	0
<b>CHIPPEWA COUNTY (023), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	8	255	1	150	0	0	4	186	0	0
Middle Income	5	203	0	0	1	350	3	395	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	458	1	150	1	350	7	581	0	0
<b>CHISAGO COUNTY (025), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	350	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	350	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>COTTONWOOD COUNTY (033), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	75	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	75	0	0	0	0	0	0	0	0
<b>CROW WING COUNTY (035), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	80	1	140	0	0	2	190	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	80	1	140	0	0	2	190	0	0
<b>DAKOTA COUNTY (037), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	24	1	223	3	2,090	3	1,514	0	0
Middle Income	11	401	3	650	13	5,286	12	2,753	0	0
Upper Income	4	232	3	550	6	2,974	6	2,012	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	16	657	7	1,423	22	10,350	21	6,279	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>DOUGLAS COUNTY (041), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	2	37	0	0	0	0	1	12	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	37	0	0	0	0	1	12	0	0
<b>FARIBAULT COUNTY (043), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	20	0	0	0	0	1	20	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	20	0	0	0	0	1	20	0	0
<b>FILLMORE COUNTY (045), MN</b>										
<b>MSA 40340</b>										
<b>Inside AA 0003</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	10	400	1	175	1	300	10	475	0	0
Middle Income	2	63	1	201	1	383	3	641	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	12	463	2	376	2	683	13	1,116	0	0



Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>FREEBORN COUNTY (047), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	2	1,104	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	1,104	0	0	0	0
<b>GOODHUE COUNTY (049), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	453	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	453	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>HENNEPIN COUNTY (053), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	1	474	0	0	0	0
Median Family Income 40-50%	0	0	1	200	1	1,000	2	1,200	0	0
Median Family Income 50-60%	1	34	1	150	1	325	0	0	0	0
Median Family Income 60-70%	0	0	0	0	1	1,000	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	2	118	2	465	4	2,030	3	865	0	0
Median Family Income 90-100%	2	129	1	127	2	1,050	3	456	0	0
Median Family Income 100-110%	2	78	1	250	0	0	0	0	0	0
Median Family Income 110-120%	1	50	3	610	6	3,325	7	2,467	0	0
Median Family Income >= 120%	7	465	6	1,028	6	3,573	14	3,303	0	0
Median Family Income Not Known	0	0	1	200	0	0	1	200	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	15	874	16	3,030	22	12,777	30	8,491	0	0
<b>ISANTI COUNTY (059), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	50	2	300	0	0	3	350	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	50	2	300	0	0	3	350	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>KANDIYOHI COUNTY (067), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	2	575	1	275	0	0
Middle Income	0	0	1	150	0	0	1	150	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	150	2	575	2	425	0	0
<b>LAC QUI PARLE COUNTY (073), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	7	285	1	125	3	2,300	3	120	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	7	285	1	125	3	2,300	3	120	0	0
<b>LE SUEUR COUNTY (079), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	9	529	3	535	2	578	9	857	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	9	529	3	535	2	578	9	857	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>LINCOLN COUNTY (081), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	50	0	0	0	0	1	50	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	50	0	0	0	0	1	50	0	0
<b>LYON COUNTY (083), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	2	40	1	150	1	874	1	25	0	0
Middle Income	16	692	8	1,560	5	1,826	14	1,151	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	18	732	9	1,710	6	2,700	15	1,176	0	0
<b>MORRISON COUNTY (097), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	2	1,350	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	1,350	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>MOWER COUNTY (099), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	7	373	0	0	0	0	6	363	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	7	373	0	0	0	0	6	363	0	0
<b>MURRAY COUNTY (101), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	19	675	5	810	9	4,512	14	1,558	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	19	675	5	810	9	4,512	14	1,558	0	0
<b>NICOLLET COUNTY (103), MN</b>										
<b>MSA 31860</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	24	0	0	0	0	1	24	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	24	0	0	0	0	1	24	0	0



Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>RAMSEY COUNTY (123), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	1	183	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	1	150	0	0	0	0	0	0
Median Family Income 80-90%	0	0	1	250	1	440	1	440	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	1	60	0	0	0	0	1	60	0	0
Median Family Income >= 120%	5	255	0	0	1	260	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	315	3	583	2	700	2	500	0	0
<b>REDWOOD COUNTY (127), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	4	315	2	408	1	600	1	15	0	0
Middle Income	23	1,254	12	2,112	14	8,665	16	3,444	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	27	1,569	14	2,520	15	9,265	17	3,459	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>RENVILLE COUNTY (129), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	8	378	1	175	1	600	4	253	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	8	378	1	175	1	600	4	253	0	0
<b>RICE COUNTY (131), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	6	359	2	371	1	271	7	726	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	359	2	371	1	271	7	726	0	0
<b>ROCK COUNTY (133), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	33	1,058	11	1,719	5	2,353	35	3,313	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	33	1,058	11	1,719	5	2,353	35	3,313	0	0



Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>SCOTT COUNTY (139), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	16	853	2	402	6	4,732	12	2,864	0	0
Upper Income	5	112	1	225	5	2,245	7	1,133	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	21	965	3	627	11	6,977	19	3,997	0	0
<b>SHERBURNE COUNTY (141), MN</b>										
<b>MSA 33460</b>										
<b>Inside AA 0002</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	25	1	150	3	2,320	2	1,025	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	25	1	150	3	2,320	2	1,025	0	0
<b>SIBLEY COUNTY (143), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	18	1	150	0	0	2	168	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	18	1	150	0	0	2	168	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>STEARNS COUNTY (145), MN</b>										
<b>MSA 41060</b>										
<b>Inside AA 0004</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	4	217	0	0	2	660	4	217	0	0
Middle Income	6	400	3	650	7	5,212	5	1,389	0	0
Upper Income	0	0	1	192	2	987	3	1,179	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	617	4	842	11	6,859	12	2,785	0	0
<b>STEELE COUNTY (147), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	100	1	105	2	838	3	943	0	0
Upper Income	2	50	1	105	0	0	2	125	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	150	2	210	2	838	5	1,068	0	0
<b>SWIFT COUNTY (151), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	280	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	280	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>TRAVERSE COUNTY (155), MN</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	10	0	0	0	0	1	10	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	10	0	0	0	0	1	10	0	0
<b>WABASHA COUNTY (157), MN</b>										
<b>MSA 40340</b>										
<b>Inside AA 0003</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	26	0	0	0	0	1	26	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	26	0	0	0	0	1	26	0	0
<b>WASECA COUNTY (161), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0005</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	10	487	4	574	1	840	4	331	0	0
Middle Income	6	300	3	600	2	1,173	6	565	0	0
Upper Income	9	440	1	176	0	0	9	561	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	25	1,227	8	1,350	3	2,013	19	1,457	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>WASHINGTON COUNTY (163), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	140	0	0	1	140	0	0
Middle Income	1	52	1	115	2	1,571	1	600	0	0
Upper Income	0	0	0	0	1	450	1	450	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	52	2	255	3	2,021	3	1,190	0	0
<b>WINONA COUNTY (169), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0006</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	25	1,134	2	362	3	1,398	26	2,569	0	0
Upper Income	3	146	3	587	3	2,015	7	1,133	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	28	1,280	5	949	6	3,413	33	3,702	0	0
<b>WRIGHT COUNTY (171), MN</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	1	975	0	0	0	0
Middle Income	4	325	2	324	2	1,189	2	827	0	0
Upper Income	0	0	0	0	1	758	1	758	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	325	2	324	4	2,922	3	1,585	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: MINNESOTA (27)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>YELLOW MEDICINE COUNTY (173), MN</b>										
<b>MSA NA</b>										
<b>Inside AA 0001</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	5	225	0	0	3	2,044	4	125	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	5	225	0	0	3	2,044	4	125	0	0
TOTAL INSIDE AA IN STATE	301	13,618	99	17,750	145	79,870	289	46,077	0	0
TOTAL OUTSIDE AA IN STATE	41	1,975	22	3,470	29	16,616	50	8,891	0	0
STATE TOTAL	342	15,593	121	21,220	174	96,486	339	54,968	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: NEW YORK (36)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>ALLEGANY COUNTY (003), NY</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	1,000	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	1,000	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	1,000	0	0	0	0
STATE TOTAL	0	0	0	0	1	1,000	0	0	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: SOUTH DAKOTA (46)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>BROWN COUNTY (013), SD</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	1	400	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	400	0	0	0	0
<b>CODINGTON COUNTY (029), SD</b>										
<b>MSA NA</b>										
<b>Inside AA 0007</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	9	347	1	104	0	0	7	343	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	9	347	1	104	0	0	7	343	0	0
<b>DAY COUNTY (037), SD</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	3	192	0	0	0	0	3	192	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	192	0	0	0	0	3	192	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: SOUTH DAKOTA (46)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>GRANT COUNTY (051), SD</b>										
<b>MSA NA</b>										
<b>Inside AA 0007</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	10	537	1	130	1	330	10	617	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	537	1	130	1	330	10	617	0	0
<b>HAMLIN COUNTY (057), SD</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	20	0	0	3	1,050	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	20	0	0	3	1,050	0	0	0	0
<b>LINCOLN COUNTY (083), SD</b>										
<b>MSA 43620</b>										
<b>Inside AA 0008</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	6	317	1	113	4	1,867	6	1,193	0	0
Upper Income	4	242	2	401	3	1,125	3	281	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	559	3	514	7	2,992	9	1,474	0	0



Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: SOUTH DAKOTA (46)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>MINNEHAHA COUNTY (099), SD</b>										
<b>MSA 43620</b>										
<b>Inside AA 0008</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	5	196	0	0	5	1,911	5	1,034	0	0
Middle Income	8	214	2	300	1	300	7	333	0	0
Upper Income	0	0	1	133	0	0	1	133	0	0
Income Not Known	0	0	0	0	1	353	1	353	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	410	3	433	7	2,564	14	1,853	0	0
<b>ROBERTS COUNTY (109), SD</b>										
<b>MSA NA</b>										
<b>Inside AA 0007</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	5	126	0	0	1	300	5	126	0	0
Middle Income	5	167	0	0	2	678	6	545	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	293	0	0	3	978	11	671	0	0
TOTAL INSIDE AA IN STATE	52	2,146	8	1,181	18	6,864	51	4,958	0	0
TOTAL OUTSIDE AA IN STATE	4	212	0	0	4	1,450	3	192	0	0
STATE TOTAL	56	2,358	8	1,181	22	8,314	54	5,150	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>KNOX COUNTY (093), TN</b>										
<b>MSA 28940</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	1	120	0	0	1	120	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	120	0	0	1	120	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	1	120	0	0	1	120	0	0
STATE TOTAL	0	0	1	120	0	0	1	120	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>PARMER COUNTY (369), TX</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	3	0	0	0	0	1	3	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	3	0	0	0	0	1	3	0	0
<b>SMITH COUNTY (423), TX</b>										
<b>MSA 46340</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	288	1	288	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	288	1	288	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	3	0	0	1	288	2	291	0	0
STATE TOTAL	1	3	0	0	1	288	2	291	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: WISCONSIN (55)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>CHIPPEWA COUNTY (017), WI</b>										
<b>MSA 20740</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	2	277	0	0	2	277	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	2	277	0	0	2	277	0	0
<b>ST. CROIX COUNTY (109), WI</b>										
<b>MSA 33460</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	43	1	200	1	350	2	550	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	43	1	200	1	350	2	550	0	0
<b>TREMPEALEAU COUNTY (121), WI</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	2	448	1	332	3	780	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	2	448	1	332	3	780	0	0

Loans by County

Respondent ID: 0000016958

Small Business Loans - Originations

Agency: FDIC - 3

Institution: Minnwest Bank

State: WISCONSIN (55)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>VERNON COUNTY (123), WI</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	25	0	0	0	0	1	25	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	25	0	0	0	0	1	25	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	2	68	5	925	2	682	8	1,632	0	0
STATE TOTAL	2	68	5	925	2	682	8	1,632	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	353	15,764	107	18,931	163	86,734	340	51,035	0	0
TOTAL OUTSIDE AA	52	2,430	28	4,515	41	22,018	69	11,576	0	0
TOTAL INSIDE & OUTSIDE	405	18,194	135	23,446	204	108,752	409	62,611	0	0

**2021 Community Reinvestment Act (CRA)  
FFIEC Institution Register Summary (IRS)**

2021

Minnwest Bank

Reporting Period: 01/01/2021 to 12/31/2021  
Last Action Date: 12/31/2021

**RECORD IDENTIFIERS**

	Records on File	Validity Errors	Syntax Errors	Quality Errors
Transmittal Sheet	1	NC	NC	NA
Small Business Composite Records	356	0	NC	0
Small Farm Composite Records	172	0	NC	0
Community Development Composite Records	1	0	NC	0
Consortium/Third Party Composite Records	0	0	NC	0
Assessment Area Records	28	0	NC	NA
Invalid Record Identifiers	NC	NC	NC	NA
<b>Total # of Records Transmitted</b>	<b>558</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Percentage of Validity Errors</b>	<b>0.00%</b>			

**2021 Community Reinvestment Act (CRA)  
FFIEC Institution Register Summary (IRS)**

2021

Minnwest Bank

Reporting Period: 01/01/2021 to 12/31/2021  
Last Action Date: 12/31/2021

	TRACT SUMMARY			
	Small Business Loans	Small Farm Loans	Community Development Loans	Consortium/Third Party Loans
# of Tracts with Loans	356	172		
Total # of Loans on File	1,410	3,008	14	0
Total Loan Amounts on File (\$ 000)	151,932	265,849	40,939	0
Total # of Originated Loans on File	1,408	3,008	14	0
Total Originated Loans Amounts on File (\$ 000)	151,332	265,849	40,939	0
Total # of Affiliate Loans on File	0	0	0	
Total Affiliate Loan Amounts on File (\$ 000)	0	0	0	
Small Business or Farm Loans <= \$1 Million in Revenues Number	815	2,503		
Small Business or Farm Loans <= \$1 Million in Revenues Total Loan Amount (\$ 000)	59,228	193,021		
Small Business or Farm Loans <= \$100K Number	1,056	2,215		
Small Business or Farm Loans <= \$100K Total Loan Amount (\$ 000)	30,255	64,463		
Small Business or Farm Loans > \$100K to \$250K Number	181	481		
Small Business or Farm Loans > \$100K to \$250K Total Loan Amount (\$ 000)	30,478	86,692		
Small Business or Farm Loans > \$250K Number	173	312		
Small Business or Farm Loans > \$250K Total Loan Amount (\$ 000)	91,199	114,694		

	ASSESSMENT AREA
	Totals
Total Number of Assessment Areas	6
Total MSA/MDs in All Assessment Areas	4
Total non-MSA/MDs Areas by State in All Assessment Areas	2
Total Counties in All Assessment Areas	28
Total Tracts in All Assessment Areas	755

Note(s): Percentage of Validity errors = (Number of Validity Errors / Number of Records Transmitted) \* 100  
'Records on File' are the number of records submitted in this transmission by record identifier NOT the number of Loans or assessment areas reported by your institution.

\*NC Not Calculated