



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

August 13, 2012

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Bremer Bank, National Association
Charter Number 11818

1100 W. St. Germain Street
St. Cloud, MN 56301

Office of the Comptroller of the Currency

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **Bremer Bank, National Association** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bremer Bank – St. Cloud 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 major factors that support this rating include:

- Bremer’s lending test performance in the St. Cloud MSA is adequate. Bremer demonstrates excellent lending activity, adequate geographic distribution, and adequate borrower income distribution. Lending within the bank’s assessment area is adequate with 73% of all bank loans made in the bank’s assessment area. Community development lending had a positive impact on the bank’s overall lending performance.
- Bremer provided an adequate level of qualified investments throughout the bank’s assessment area. Qualified investments are primarily charitable contributions that address the needs of low- and moderate-income individuals.
- Bremer’s performance under the service test is good. Bremer’s delivery systems are accessible to low- and moderate-income individuals and geographies. The bank provides an adequate level of community development services to organizations targeted to low- and moderate-income individuals.

Definitions and Common Abbreviations

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

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

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

Description of Institution

Bremer Bank, National Association (Bremer) is a \$609 million intrastate bank headquartered in St. Cloud, Minnesota (MN). The bank has four branches located in St. Cloud, Rice, Sauk Rapids, and Sartell, MN. Bremer operates 13 ATMs in the assessment area (AA), five of which are deposit taking ATMs. There have been no mergers or acquisitions during this evaluation period. Bremer is a full-service commercial bank that offers a wide variety of retail and commercial products and services with some retail loan products targeted to specifically address low- and moderate-income borrowers and underserved areas of the community.

As of December 31, 2011, Bremer held \$59 million in Tier 1 Capital. Bremer's lending focus is to meet the community's commercial, residential real estate, agricultural, and consumer lending needs. Bremer uses a variety of loan programs that include Small Business Administration (SBA), Farm Service Agency (FSA), and U.S. Department of Agriculture (USDA) loans. As of December 31, 2011, Bremer's \$478 million loan portfolio consisted of 75% commercial, 19% consumer, and 6% agricultural loans.

Bremer is a subsidiary of Bremer Financial Corporation (BFC). BFC is an \$8 billion financial services company with banking affiliates in over 100 locations throughout MN, North Dakota, and Wisconsin. BFC non-bank affiliates include trust and insurance companies. BFC is owned by the Otto Bremer Foundation and its employees. The Foundation is headquartered in St. Paul, MN. The Foundation's profits are distributed to support nonprofit activities through its grant-making activities in communities served by BFC affiliates. At Bremer's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test performance.

There are no known legal, financial, or other factors impeding Bremer's ability to help meet the credit needs in its AA. Bremer was rated "Satisfactory" at the last CRA examination dated December 15, 2008.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Bremer's real estate mortgage, small business, and small farm data for the period beginning January 1, 2008 through December 31, 2011. For community development loans, investments and services, the evaluation period was January 1, 2008 through June 30, 2012.

As we evaluated Bremer's Lending Test performance, we gave the greatest weight to the bank's home mortgage performance, since this represented 58% by number of loans originated during the evaluation period. Small loans to businesses represented 36% of the loans, with small farm loans totaling 6%. Within the home mortgage loan category, we gave the greatest weight to home refinance loans (58%), followed by home purchase loans (16%). We did not consider home improvement or multifamily loans as these two products combined accounted for less than two percent of total loan originations during the evaluation period. The analysis of these products would not be meaningful. Although small farm loans were considered, they were given minimal consideration.

Data Integrity

Prior to conducting this evaluation, we tested the accuracy of Bremer's HMDA, small business, and small loans to farms data. We found the data to be accurate and used the data in this evaluation.

We reviewed community development loans, investments, and services provided by Bremer management to ensure they met the regulatory definition of community development. The few that did not meet the definition were excluded from this evaluation.

Selection of Areas for Full-Scope Review

The St. Cloud MSA AA received a full-scope review.

Ratings

The bank's overall rating is based on the area that received a full-scope review, the St. Cloud MSA AA.

Other

We made one community contact as part of this evaluation and also reviewed two community contacts from the St. Cloud AA made during the evaluation period. Small business lending, affordable housing, and assistance and loan opportunities to low-income borrowers are identified credit needs of the market area. The contacts indicated that local financial institutions are active in the local community. Banks have partnered with organizations to provide tax increment financing, construction assistance financing, and new market tax credits for businesses. Local banks also participate in affordable housing initiatives and various lending programs to assist homebuyers.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the St. Cloud MSA is adequate.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in Appendix C for the facts and data used to evaluate the bank's lending activity.

The volume of lending in the St. Cloud MSA is excellent. Lending levels reflect excellent responsiveness in relation to the identified credit needs and the bank's deposit market share. According to the June 30, 2011 FDIC Deposit market share report, Bremer ranks third of 35 banks located in the assessment area, with 12.89% deposit market share. Bremer originated 1,953 home mortgage loans totaling \$306 million and 1,191 small loans to businesses totaling \$281 million during the evaluation period. The bank ranks seventh of 203 lenders in overall market share for home mortgage loans with 5.93% of the market. Bremer ranks fourth among 41 lenders in overall market share for small business loans with 7.60% of the market.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate. The AA is comprised of 34 census tracts, one of which is low-income and four are moderate-income.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Bremer's geographic distribution of home mortgage loans in the St. Cloud MSA is poor. More weight was given to home refinance loans as they represent 64% of all home mortgage loans originated during the evaluation period. The percentage of loans originated from the low-income census tract does not present meaningful analysis given there are no owner-occupied units reported for the geography.

Home Purchase Loans

Bremer's geographic distribution of home purchase loans is poor. The percentage of loans originated from moderate-income tracts is significantly lower than the demographic. Bremer's market share loans made in moderate-income geographies is somewhat lower than its overall market share for home purchase loans.

Home Refinance Loans

Bremer's geographic distribution of home refinance loans is very poor. The percentage of loans originated from moderate-income tracts is significantly lower than the demographic. Bremer's market share for home refinance loans made in moderate-income geographies is lower than its overall market share for home refinance loans.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Bremer's geographic distribution of small loans to businesses is excellent. The percentage of loans originated in both the low- and moderate-income census tracts exceeds the percent of businesses within those geographies. Also, Bremer's market share of small loans to businesses in both the low- and moderate-income census tracts exceeds its overall market share.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Bremer's geographic distribution of small loans to farms is adequate. The percentage of loans originated in low-income census tracts exceeds the percentage of farms within those geographies. The percentage of loans originated in moderate-income census tracts is significantly lower than the demographic. Bremer's market share of small loans to farms in low-income census tracts exceeds its overall market share. Bremer's market share in moderate-income census tracts is significantly lower than its overall market share.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in the low- and moderate-income census tracts. We did not identify any conspicuous gaps in the St. Cloud MSA.

Inside/Outside Ratio

Bremer originated and purchased an adequate percentage of loans within the AA. During the evaluation period, Bremer originated 73% of home mortgage (refinance, purchase, and home improvement), small loans to business, and small loans to farms, by number, within the AA.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Bremer's distribution of home mortgage loans by the income level of the borrower in the St. Cloud MSA is good.

Home Purchase Loans

Bremer's demographic distribution of home purchase loans is excellent. The percentage of home purchase loans exceeds both the percentages of low- and moderate-income families in the AA. Bremer's market share of home purchase loans to low-income borrowers is near to its overall market share, but loans to moderate-income borrowers exceeds its overall market share.

Home Refinance Loans

Bremer's demographic distribution of home improvement loans is good. The percentage of home refinance loans is somewhat lower than the percentage of low-income families in the AA. The percentage of home refinance loans almost meets the percentage of moderate-income families in the AA. Bremer's market share of home refinance loans to low-income borrowers is near to its overall market share, but loans to moderate-income borrowers are somewhat lower than its overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Bremer's borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with revenues of \$1 million or less is lower than the percentage of businesses reporting revenues of \$1 million or less in the AA. Bremer's market share to businesses with revenues of \$1 million is near to the bank's overall market share.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

Bremer's borrower distribution of small loans to farms is adequate. The percentage of loans to farms with revenues of \$1 million or less is somewhat lower than the percentage of farms reporting revenues of \$1 million or less in the AA. Bremer's market share to farms with revenues of \$1 million is near to the bank's overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a positive impact on the bank's lending performance in the St. Cloud MSA. Bremer originated five community development loans to two entities totaling \$5.9 million. This volume constitutes 10.25% of allocated Tier One Capital. The loans provided helped to support low-income housing tax credits and other affordable housing projects.

Product Innovation and Flexibility

Bremer does not have any new flexible or innovative loan products for this evaluation period. However, Bremer continues to offer various loan programs to assist low- and moderate-income borrowers in

meeting credit needs. Bremer's relationships with various local and state housing agencies and lenders help to provide a variety of products targeted to low- and moderate-income individuals for successful home ownership.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Low Satisfactory. Based on a full-scope review, Bremer's performance in the St. Cloud MSA is adequate. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Bremer's level of investments in the St. Cloud MSA are adequate given the bank's opportunities and responsiveness to the identified needs of the MSA. Bremer made 116 qualified grants and donations totaling \$1.3 million during the evaluation period. This equates to 2.18% of the bank's allocated Tier One Capital for the AA. In addition, the bank has another \$324 thousand in investments that benefit the greater regional area including this AA.

Bremer's qualified investments consisted of charitable contributions to various organizations that provide community services and affordable housing targeted to low- and moderate-income individuals. Examples of community development investments included providing funds for food shelves, operating funds to an affordable housing partnership, and funding for an organization that provides various assistance to other nonprofit groups in the community.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Based on a full-scope review, Bremer's performance in the St. Cloud MSA is good.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Bremer's delivery systems are accessible to individuals of different income levels and in geographies of different income levels in the St. Cloud MSA. Bremer operates five branches in this AA. One branch is located in a low-income census tract and four are in middle-income census tracts. The percentage of bank branches located in low-income census tracts exceeds the percentage of the population living in those tracts. There were no branch closures during the evaluation period.

Bremer operates thirteen ATMs in the St. Cloud MSA, including five deposit taking ATMs. There is one ATM located in a moderate-income census tract and one deposit-taking ATM in a low-income census tract. The percentage of ATMs located in low-income census tracts exceeds the percentage of the population living in those tracts. The percentage of ATMs in moderate-income tracts is near to the percentage of population living in those tracts. During the evaluation period, Bremer closed two ATMs. An ATM located in Atwood Center on the campus of St. Cloud State University closed due to a lack of transactions. Another ATM located in the vestibule of the downtown St. Cloud branch closed due to security reasons, but another ATM is available at this branch at the drive-up. These two ATMs were

located in moderate- and low-income census tracts, respectively. Bremer customers can also use the MoneyPass ATM network with 18 locations within a 25 mile radius with no fees.

Services do not vary in a way that inconveniences the AA, particularly low- and moderate-income individuals and geographies. Bremer offers a wide variety of traditional banking products and services to meet the needs of the AA. Hours of operation are reasonable and include Saturday drive-up hours at three locations.

Alternative delivery systems for small business and retail banking services are routine to the industry. Bremer utilizes online banking, telephone banking, and bank by mail systems to foster accessibility to all customers. Bremer does not track the impact of these services on its low- and moderate-income customers; therefore, these systems are given little special weight in our evaluation.

Community Development Services

Bremer provides an adequate level of community development services based on the opportunities in the AA. Twenty bank employees provided their financial expertise to 17 organizations that promote various community development initiatives in the assessment area. A majority of the qualified activities are volunteer board positions. Bank employees provided training, information, and collaboration efforts to various organizations focused upon community development and meeting the needs of persons with low- and moderate-incomes. Community development service examples included providing financial oversight training to a battered woman's shelter, serving as board members for economic and workforce development agencies, and serving on the Board of an affordable housing organization.

Bremer employs a Nonprofit Resource Specialist to coordinate community development services and work with local nonprofits to assess community needs. The specialist lends networking, outreach, organizational, and leadership skills to nonprofit organizations. This position also provided numerous resource referrals, training seminars, and assistance with grant applications.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2008 to 12/31/2011) Investment and Service Tests and CD Loans: (01/01/2008 to 06/30/2012)	
Financial Institution	Products Reviewed	
Bremer Bank, National Association (Bremer) St. Cloud, Minnesota (MN)	Home Mortgage, Small Business, Small Farm, and Community Development Loans; Qualified Investments, Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Otto Bremer Foundation (Foundation)	Holding Company	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
St. Cloud MSA #41060	Full Scope	Benton and Stearns Counties; CT #313 in Sherburne County

Appendix B: Market Profiles for Full-Scope Areas

St. Cloud MSA

Demographic Information for Full-Scope Area: St. Cloud AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	2.78	11.11	72.22	11.11	2.78
Population by Geography	173,789	0.63	9.56	72.11	17.70	0.00
Owner-Occupied Housing by Geography	44,981	0.00	7.70	74.32	17.98	0.00
Businesses by Geography	19,753	2.58	8.75	70.22	18.42	0.03
Farms by Geography	1,808	0.17	11.28	81.42	7.08	0.06
Family Distribution by Income Level	41,991	16.28	19.24	27.57	36.91	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,918	0.09	11.34	77.77	10.80	0.00
Median Family Income	= \$52,671	Median House Value		= \$101,719		
HUD Adjusted Median Family Income for 2011	= \$69,194	Unemployment Rate		= 6.4%		
Households Below the Poverty Level	=9%	(12/31/11 BLS - Not Seasonally Adjusted)				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2011 HUD updated MFI.

The St. Cloud AA consists of the St. Cloud MSA, which includes the MN counties of Stearns and Benton, along with two adjacent CTs in Sherburne County, MN. The AA complies with the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The local economy is improving since the unemployment rate hit a high of 9.9% (not seasonally adjusted) in March 2009. As of December 31, 2011, the St. Cloud MSA unemployment rate of 6.4% compared to the national unemployment rate of 8.9% and the state unemployment rate of 6.4% (according to the Bureau of Labor and Statistics). Major industries in the AA include service based companies, retail trade, and construction. In addition, several technical colleges and universities in the area provide a number of employment opportunities in the education field. Credit needs in the AA are typical and consist of business lending, home and retail lending, including loans for affordable housing.

Competition among financial institutions in the AA is high. As of June 30, 2011, Bremer ranks third out of 35 institutions with a presence in the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For

borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Assessment Area (2011):												
Full Review:												
Bremer St Cloud MSA	100.00	1,953	306,337	1,191	281,257	198	28,562	0	0	3,347	622,062	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2008 to June 30, 2012.

*** Deposit Data as of October 24, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: BREMER ST CLOUD					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Bremer St Cloud MSA	654	100.00	0.00	0.15	7.70	3.21	74.32	63.61	17.98	33.03	5.54	100.00	4.35	4.52	8.46	

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans					
Full Review:															
Bremer St Cloud MSA	39	100.00	0.00	0.00	7.70	0.00	74.32	69.23	17.98	30.77	2.10	0.00	0.00	2.21	2.08

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Bremer St Cloud MSA	1,246	100.00	0.00	0.16	7.70	2.89	74.32	59.79	17.98	37.16	6.31	20.00	3.24	5.65	8.21	

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans					
Full Review:															
Bremer St Cloud MSA	14	100.00	1.77	0.00	15.94	0.00	68.99	78.57	13.30	21.43	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

^{***} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

^{****} Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans					
Full Review:															
Bremer St Cloud MSA	1,191	100.00	2.59	6.80	8.75	10.41	70.22	66.41	18.42	16.37	6.89	25.00	12.90	6.35	7.09

* Based on 2010 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: BREMER ST CLOUD					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Bremer St Cloud MSA	198	100.00	0.17	0.51	11.28	0.51	81.42	95.45	7.08	3.54	16.22	100.00	6.67	16.24	28.57	

* Based on 2010 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: BREMER ST CLOUD					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families [*] **	% BANK Loans ^{****}	% Families [*] 1	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Bremer St Cloud MSA	654	100.00	16.28	19.29	19.24	32.41	27.57	18.52	36.90	29.78	6.10	5.19	7.15	4.23	7.34	

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: BREMER ST CLOUD					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Bremer St Cloud MSA	39	100.00	16.28	5.41	19.24	35.14	27.57	29.73	36.90	29.73	2.18	0.00	1.25	4.55	1.32	

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 5.1% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: BREMER ST CLOUD					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Bremer St Cloud MSA	1,246	100.00	16.28	8.06	19.24	18.54	27.57	25.52	36.90	47.88	6.89	6.42	5.56	5.58	8.78	

^{*} Based on 2010 Peer Mortgage Data (USPR)

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: BREMER ST CLOUD			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bremer St Cloud MSA	1,191	100.00	71.21	42.74	46.60	24.01	29.39	6.89	5.87

^{*} Based on 2010 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2.27% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: BREMER ST CLOUD			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Bremer St Cloud MSA	198	100.00	98.45	73.23	47.98	37.37	14.65	16.22	14.39

[†] Based on 2010 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.51% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2012					
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bremer St Cloud MSA	0	0	0	1,253	0	0	100.00	0	0

^{*} 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

^{**} 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: BREMER ST CLOUD				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bremer St Cloud MSA	100.00	0	0.00	0.00	0.00	80.00	0.00	0	0	0	0	0	0	0.63	9.56	72.11	17.69

