

# **PUBLIC DISCLOSURE**

May 28, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Minnstar Bank National Association Charter Number 13972

> 200 North Main St. Lake Crystal, MN 56055

Office of the Comptroller of the Currency

222 South Ninth Street Suite 800 Minneapolis, MN 55402-3393

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

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# **Overall CRA Rating**

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

The lending test is rated: Satisfactory.

The major factors supporting this rating include:

- The distribution of loans to businesses within geographies of different income levels is reasonable.
- The distribution of loans to businesses of different sizes is reasonable.
- The bank's loan-to-deposit ratio (LTD) is more than reasonable; and,
- The bank originated a majority of its loans inside is assessment area (AA).

## Loan-to-Deposit Ratio

Minnstar Bank National Association's (Minnstar) LTD ratio is more than reasonable considering the bank's size, financial condition, and the AA's credit needs. From April 1, 2019, through December 31, 2023, the bank's quarterly average LTD ratio was 95.0 percent. The ratio ranged from a low of 80.9 percent on September 31, 2021, to a high of 103.7 percent on December 31, 2023. Minnstar ranked first among four similarly situated banks. Similarly situated banks are defined as those operating within the bank's AA with similar asset-size. The following table reflects Minnstar's LTD ratio compared to three similarly situated institutions.

Loan-to-Deposit Ratio											
Institution	Total Assets	Average LTD									
	(\$000)*	Ratio (%)**									
Minnstar Bank National Association	\$215,548	95.0									
First National Bank Minnesota	\$451,478	81.6									
Saint Clair State Bank	\$116,841	80.3									
Progrowth Bank	\$414,561	47.3									
Samuel Call nament data from him 20, 2010, to December	21 2022										

Source: Call report data from June 30, 2019, to December 31, 2023

#### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA. Minnstar originated or purchased 75 percent of its total loans by both number and dollar volume inside the AA during the evaluation period. To evaluate the bank's lending inside and outside its AA, we selected a sample of 40 business loans originated or purchased during the evaluation period. The following table reflects the bank's lending inside and outside its AA.

Lending Inside and Ou	tside of the	e Assess	ment Area	1						
	N	lumber (	of Loans			Dollar A	Amount o	of Loans \$(0	000s)	
Loan Category	Inside Outside			de	Total	Insid	e	Outsid	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	30	75	10	25	40	11,954	75	4,007	25	15,961
Total	30	75	10	25	40	11,954	75	4,007	25	15,961

Source: Bank Data from January 1, 2021, to December 31, 2023.

Due to rounding, totals may not equal 100.0%

<sup>\*</sup>Total assets as of 12/31/2023

<sup>\*\*</sup>Average LTD ratio from June 30, 2019, to December 31, 2023, using call report data

# **Description of Institution**

Minnstar is a \$216 million national bank located in south central Minnesota. The main office is located in Lake Crystal, Minnesota with a second branch in Mankato, Minnesota. Minnstar has two automated teller machines (ATMs), one located in each branch. The Mankato branch has 24-hour deposit taking ATM, while the Lake Crystal ATM does not accept deposits. The bank is wholly owned by Lake Crystal Bancorporation, Inc., a single-bank holding company. There were no mergers or acquisitions during the evaluation period.

Minnstar has one rating area, which is the state of Minnesota. The rating area included the Minnstar AA. The AA was comprised of the entire Blue Earth County and a portion of Nicollet County. Minnstar is a full-service bank offering traditional lending and deposit products. The bank's deposit products include checking and saving accounts, certificate of deposits (CDs), and safe deposit boxes, while lending products include standard personal, home mortgage, commercial, and agriculture loans.

Minnstar's primary lending focus is commercial loans. As of December 31, 2023, the loan portfolio totaled \$191.9 million in outstanding loan balances, or 89 percent of total assets. Outstanding loans and unused commitments totaled \$221.9 million, or 103 percent of total assets. The loan portfolio, by outstanding dollar volume, was comprised of 67.4 percent commercial, 20 percent home mortgage, 11.7 percent farm, and 0.9 percent consumer loans. Tier 1 capital totaled \$17.3 million.

There were no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AAs. Minnstar was rated Satisfactory at the last CRA evaluation dated July 16, 2019.

# **Scope of the Evaluation**

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

We evaluated Minnstar's CRA performance using small bank performance standards. The evaluation period for the LTD ratio analysis was April 1, 2019, to December 31, 2023. The complaint analysis period spanned July 16, 2019, to May 28, 2024. The evaluation period for the Lending Test covered January 1, 2021, to December 31, 2023; however, two separate analysis periods were used due to changes in the census data. Small business loans originated in 2021 were compared to the 2015 American Community Service (ACS) survey data. Small business loans originated in 2022 and 2023 were compared to the 2020 Census data.

We analyzed the bank's loan originations and purchases during the evaluation period to determine the primary loan product for the AA. Based on this analysis, the bank's primary loan product during the evaluation period was small business loans. To complete the Lending Test, we selected a sample of 20 small business loans for the 2021 analysis period, and 20 small business loans for the 2022 and 2023 analysis period. We selected additional loans as needed to have sufficient information to analyze borrower and geographic distributions for the AA. The table below reflects total loan purchases and originations by dollar and number during the evaluation period.

Loan Origin	ations an	d Purchase	s 2021-2023	
Loan Tyma	Numbe	r of Loans	Dollar of	Loans
Loan Type	#	%	\$ (000s)	%
Farm	145	11.7	36,522	9.6
Business	670	53.9	269,826	71.1
Consumer	340	27.3	70,655	18.6
Home Mortgage	89	7.2	2,536	0.7
Total	1,244	100.0	379,539	100.0
Source: Bank Data from Ja			r 31, 2023.	
Due to rounding, totals ma	y not equal .	100.0%		

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted a community member with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AA.

## Selection of Areas for Full-Scope Review

Minnstar has one AA, which is referred to as the Minnstar AA throughout this performance evaluation. Refer to Appendix A, Scope of Examination, for additional detail.

#### **Ratings**

Minnstar's overall rating is based on the bank's lending performance within the Minnstar AA. We evaluated lending performance using four performance criteria: the LTD ratio; lending in the AA; lending to borrowers of different income levels; and responses to CRA related complaints.

# **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# **State of Minnesota Rating**

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The distribution of loans to businesses throughout geographies with different income levels was reasonable.
- The distribution of loans to businesses of different sizes was reasonable.
- There were no CRA related complaints during the evaluation period.

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

Minnstar's AA is located in the Mankato-North Mankato, MN Metropolitan Statistical Area (MSA). The AA includes all 16 census tracts (CTs) in Blue Earth County and three CTs in south-eastern Nicollet County. The Mankato branch was located in a moderate-income CT, and the Lake Crystal branch was located in a middle-income CT. In 2021, the AA's 19 CTs were comprised of four moderate-income, 14 middle-income, and one upper-income CTs. In 2022 and 2023, the AA consisted of five moderate-income, 11 middle-income, and three upper-income CTs.

Deposit competition in the AA was strong with 20 reporting institutions in the AA. According to the June 30, 2023, FDIC Deposit Market Share Report, Minnstar ranked sixth out of the 20 reporting institutions with \$184.8 million in deposits and a 5.6 percent market share. The major competitors in the area were Wells Fargo Bank, Community Bank Mankato, and Pioneer Bank with 20.9 percent, 12.5 percent, and 12.4 percent deposit market share, respectively.

Per Moody's Analytics as of October 2023, employment had spiked in the Mankato MSA with employment growing multiples faster than the state and the nation. The largest employment sectors were education and health services at 20.5 percent and government at 16.6 percent, followed by manufacturing at 14.6 percent and retail at 13.2 percent. The three largest employers included Taylor Corp., Mayo Clinic Health System, and Minnesota State University at Mankato.

According to the Bureau of Labor Statistics, the non-seasonally adjusted annual unemployment rate for counties in the Mankato AA ranged from 1.9 percent to 4.5 percent in 2021 with the higher rates at the beginning of 2021. The unemployment rates for 2022 and 2023 were more stable, ranging from 1.4 to 2.8 percent. The average unemployment rate for 2022 was 2.1 percent and 2023 was 2.3 percent.

As part of this evaluation, we contacted a community member to gain an understanding of the economic conditions, credit needs, and local financial institution involvement in the AA. The contact's organization focuses on economic development within the bank's AA. The contact noted the organization has experienced significant construction investment into Mankato and the surrounding areas following the COVID-19 pandemic, primarily in 2022 and 2023. The contact stated banks are heavily involved with the community through sponsoring and supporting local events. Many nonprofits within the community have a bank representative on the board.

The following tables illustrate selected demographic characteristics of the Mankato AA.

Table A -	- Demographi	c Informatio	n of the Assess	ment Area									
Assessment Area: 2021 - Mankato AA													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	19	0.0	21.1	73.7	5.3	0.0							
Population by Geography	78,541	0.0	18.7	76.5	4.8	0.0							
Housing Units by Geography	32,822	0.0	17.4	78.2	4.4	0.0							
Owner-Occupied Units by Geography	20,277	0.0	9.5	84.2	6.3	0.0							
Occupied Rental Units by Geography	10,417	0.0	31.6	67.4	1.1	0.0							
Vacant Units by Geography	2,128	0.0	23.2	73.1	3.7	0.0							
Businesses by Geography	7,033	0.0	22.6	73.1	4.3	0.0							
Farms by Geography	517	0.0	4.3	78.9	16.8	0.0							
Family Distribution by Income Level	18,170	20.5	18.0	22.9	38.6	0.0							
Household Distribution by Income Level	30,694	25.5	16.7	17.4	40.3	0.0							
Median Family Income MSA - 31860 Mankato, MN MSA		\$71,814	Median Housin	g Value		\$163,219							
			Median Gross l	Rent		\$743							
			Families Below	Poverty Level		8.2%							

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.

Table A -	Table A – Demographic Information of the Assessment Area											
	Assessmen	t Area: 2022	Mankato AA									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	19	0.0	26.3	57.9	15.8	0.0						
Population by Geography	82,888	0.0	25.8	56.8	17.4	0.0						
Housing Units by Geography	34,691	0.0	26.5	57.4	16.1	0.0						
Owner-Occupied Units by Geography	20,145	0.0	13.6	67.4	19.0	0.0						
Occupied Rental Units by Geography	11,786	0.0	46.0	42.0	12.0	0.0						
Vacant Units by Geography	2,760	0.0	36.7	50.8	12.6	0.0						
Businesses by Geography	7,842	0.0	25.5	59.7	14.8	0.0						
Farms by Geography	570	0.0	5.8	88.4	5.8	0.0						
Family Distribution by Income Level	18,786	20.7	17.5	24.2	37.5	0.0						
Household Distribution by Income Level	31,931	23.8	17.2	18.2	40.9	0.0						
Median Family Income MSA - 31860 Mankato, MN MSA		\$83,590	Median Housin	ıg Value		\$198,944						
			Median Gross l	Median Gross Rent								
			Families Below	Poverty Level		7.2%						

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (\*) The NA category consists of geographies that have not been assigned an income classification.

## **Scope of Evaluation in Minnesota**

The Minnesota state rating was based entirely on the full-scope review of the Minnstar AA. Lending Test results for the 2021 and 2022-2023 analysis periods held equal weighting due to similar loan origination and purchase activity in both periods.

#### LENDING TEST

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

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution in the AA. There were no low-income CTs in the AA; therefore, our analysis focused on Minnstar's performance in the moderate-income CTs.

#### Small Loans to Businesses

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

During the 2021 analysis period, the geographic distribution of loans to businesses in geographies of different income levels was reasonable. The bank's percentage of business loans originated or purchased within moderate-income CTs was near to the demographic comparator and exceeded aggregate lending data.

During the 2022-2023 analysis period, the geographic distribution of loans to businesses in geographies of different income levels was excellent. The bank's percentage of business loans originated or purchased within moderate-income CTs exceeded both the demographic comparator and aggregate lending data.

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

The bank exhibits a reasonable distribution of loans to businesses of different sizes.

#### Small Loans to Businesses

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

During the 2021 analysis period, the distribution of loans to businesses of different sizes was excellent. The bank's percentage of loans to small businesses exceeded both the demographic comparator and aggregate lending data.

During the 2022-2023 analysis period, the distribution of loans to businesses of different sizes was reasonable. The bank's percentage of loans to small businesses were below the demographic comparator but exceeded aggregate lending data.

## **Responses to Complaints**

The bank received no CRA related complaints during the evaluation period.

# Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	January 1, 2021, to Dece	mber 31, 2023							
Bank Products Reviewed:	Small business								
List of Assessment Areas and Type of Examination									
Rating and Assessment Areas	Type of Exam	Other Information							
Minnesota									
		Blue Earth County (full)							
Minnstar AA	Full-scope	Nicollet County (partial) includes the following CTs:							
		4805.01, 4805.02, and 4806							

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

RATINGS – Minns	tar Bank National Association
Overall Bank:	Lending Test Rating
Minnstar Bank National Association	Satisfactory
MMSA or State:	
Minnesota	Satisfactory

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

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

## **Content of Standardized Tables**

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

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

- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

				oans to Sr sinesses	nall	Low-I	ncome '	Γracts	Moderat	e-Incon	ne Tracts	Middle-	Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inc	ome Tracts
Ass Are	sessment ea:	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate		% Bank Loans	Aggregate									
Mii	nnstar AA	20	3,403	100.0	1,476	0.0	0.0	0.0	22.6	20.0	19.5	73.1	80.0	76.0	4.3	0.0	3.9	0.0	0.0	0.6
Tot	tal	20	3,403	100.0	1,476	0.0	0.0	0.0	22.6	20.0	19.5	73.1	80.0	76.0	4.3	0.0	3.9	0.0	0.0	0.6

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

Due to rounding, totals may not equal 100.0%

MinnStar Bank National Associa (10000013972) excluded from Aggregate

### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022-2023

	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minnstar AA	20	12,302	100.0	1,408	0.0	0.0	0.0	25.5	30.0	24.4	59.7	60.0	63.6	14.8	10.0	11.2	0.0	0.0	0.8
Total	20	12,302	100.0	1,408	0.0	0.0	0.0	25.5	30.0	24.4	59.7	60.0	63.6	14.8	10.0	11.2	0.0	0.0	0.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

MinnStar Bank National Associa (10000013972) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	Т	otal Loans to	Small Business	ses	Businesses	with Revenue	s <= 1MM	Businesses wi		Businesses with Revenues Not Available		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minnstar AA	20	3,403	100.0	1,476	82.3	85.0	50.5	5.6	15.0	12.1	0.0	
Total	20 3,403 100.0 1,4			1,476	82.3	85.0	50.5	5.6	15.0	12.1	0.0	

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

Due to rounding, totals may not equal 100.0%

MinnStar Bank National Associa (10000013972) excluded from Aggregate

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-2023

	Т	otal Loans to	Small Business	ses	Businesses	with Revenue	s <= 1MM	Businesses wi > 1M		Businesses with Revenues Not Available		
Assessment Area:	# \$ (000s) %		% of Total	Overall Market	% Businesses			% Bank Businesses Loans		% Businesses	% Bank Loans	
Minnstar AA	20	12,302	100.0	1,408	83.9	60.0	45.7	4.8	40.0	11.3	0	
Total	20 12,302 100.0			1,408	83.9	60.0	45.7	4.8	40.0	11.3	0	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

MinnStar Bank National Associa (10000013972) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.