



## **PUBLIC DISCLOSURE**

June 17, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First National Bank of Osakis  
Charter Number 6837

211 Central Ave  
Osakis, MN 56360

Office of the Comptroller of the Currency

222 South 9th Street, Suite 800  
Minneapolis, MN 55402

**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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution .....	2
Scope of the Evaluation .....	2
Discriminatory or Other Illegal Credit Practices Review .....	3
State Rating.....	4
State of Minnesota .....	4
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and credit needs of the assessment area (AA).
- The bank originated a majority of its loans in its AA.
- The distribution of loans among borrowers of different income levels and farms of different sizes is excellent.

### Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable considering the bank's size, financial condition, and the credit needs of the AA. The First National Bank of Osakis (FNB Osakis) had a net LTD ratio averaging 78.16 percent over the 20 quarters since the previous CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 65.68 percent as of September 30, 2021, to a high of 95.76 percent as of December 31, 2023. FNB Osakis ranks third among similarly situated institutions. Similarly situated institutions are those with similar asset size operating within or serving the bank's AA.

Loan-to-Deposit Ratio		
Institution (Headquarters)	Total Assets as of 12/31/2023 (\$000's)	Average LTD Ratio (%)
Viking Bank (Alexandria, MN)	268,593	90.49
Mid-Central National Bank (Wadena, MN)	123,215	79.29
<b>FNB Osakis (Osakis, MN)</b>	<b>91,950</b>	<b>78.16</b>
Minnesota National Bank (Sauk Centre, MN)	322,800	66.67

Source: Call Report data for quarters ending March 31, 2019, through December 31, 2023.

### Lending in Assessment Area

A majority of the bank's loans are inside its AA. The bank originated and purchased 70.0 percent by number and 67.0 percent by dollar of its total loans inside the bank's AAs during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The table on the following page illustrates lending inside and outside of the AA during the evaluation period.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	28	70.0	12	30.0	40	1,020	84.0	196	16.0	1,216
Home Mortgage	28	70.0	12	30.0	40	4,240	63.9	2,403	36.1	6,643
<b>Total</b>	<b>56</b>	<b>70.0</b>	<b>24</b>	<b>30.0</b>	<b>80</b>	<b>5,260</b>	<b>67.0</b>	<b>2,599</b>	<b>33.0</b>	<b>7,859</b>

Source: OCC loan samples of bank loans originated and purchased from 2021-2023.

## Description of Institution

FNB Osakis is a \$92.0 million single-state bank chartered in Osakis, Minnesota. The bank operates from a single location in Osakis. In addition, customers of FNB Osakis can conduct several banking services, such as making deposits and loan payments, and purchasing cashier's checks, at the branches of affiliates Glenwood State Bank and Lowry State Bank in nearby towns of Alexandria, Glenwood, Lowry, and Villard. The bank is wholly owned by the Financial Services of Lowry, which also wholly owns Lowry State Bank. The holding company is headquartered in Lowry, Minnesota. FNB Osakis operates one deposit-taking automated teller machine (ATM) located within the bank's main office, and two nondeposit-taking ATMs at the Galeon Senior Living Facility in Osakis and the Osakis public school. There have been no mergers, acquisitions, branch openings, or branch closings since the prior CRA evaluation.

FNB Osakis offers traditional banking products and services. As of December 31, 2023, the bank's loan portfolio totaled \$81.0 million and represented 88.9 percent of total assets. The bank's loan portfolio was comprised of business loans (45 percent), farm loans (16 percent), home loans (35 percent), and consumer loans (3 percent). Tier one capital totaled \$7.6 million, and the tier one leverage capital ratio was 8.1 percent.

There are no legal, financial, or other factors that impede the bank's ability to meet the credit needs in its AA during the evaluation period. FNB Osakis was rated Satisfactory at the prior CRA evaluation dated March 2, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

FNB Osakis was evaluated using the CRA small bank procedures, which is limited to the Lending Test. The Lending Test consists of LTD ratio analysis, assessment of credit extended inside and outside the AA, distribution of credit to borrowers and geographies of different income levels, and responsiveness to CRA-related complaints. The evaluation period for the LTD ratio analysis covered the quarters ending March 31, 2019 through December 31, 2023. The evaluation period for the complaint review was March 2, 2020 through June 26, 2024. The evaluation period for the remaining portions of the Lending Test was January 1, 2021 through December 31, 2023.

We sampled farm loans and home mortgage loans to determine the bank's performance. We selected these products because they represented a significant portion of the bank's lending activity by dollar and number and lending strategy during the evaluation period.

We analyzed the borrower and geographic distribution of loans originated and purchased in 2021 separate from 2022-2023 because of changes in the demographic comparative data. The bank's lending activity in 2021 was compared to the 2015 American Community Survey (ACS) data. Lending activity in 2022-2023 was compared to the 2020 United States (U.S.) Census data.

We also reviewed the financial, economic, and environmental factors in the AA to evaluate the bank's lending performance. Additionally, we contacted a local community member with knowledge of the economic conditions and demographics to understand the credit needs and opportunities in the AA.

### **Selection of Areas for Full-Scope Review**

The bank has a single AA, within the State of Minnesota, which received a full-scope review. Refer to Appendix A, Scope of Examination for details on the AA.

### **Ratings**

FNB Osakis' overall rating is based on the lending performance within the State of Minnesota. It is the bank's only rating area.

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

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

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

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

## State Rating

### State of Minnesota

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

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

The major factors that support this rating include:

- The distribution of loans to borrowers of different income levels and farms of different sizes is excellent.
- The bank received no CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Minnesota

FNB Osakis' AA consists of a portion of Douglas and Todd Counties in Minnesota. The bank's AA includes two census tracts (CT) in Douglas County and one CT in Todd County. In 2021, all CTs in the AA were middle-income. In 2022-2023, the bank's AA included two middle-income and one upper-income CT. There were no low- or moderate-income (LMI) CTs within the bank's AA during the evaluation period.

Bank competition within the AA is strong. The June 30, 2023, FDIC Deposit Market Share Report indicates there are 21 institutions within 29 branches operating in Douglas and Todd Counties. FNB Osakis ranked tenth with a deposit market share of 3.71 percent. The top three institutions with the largest deposit shares are Bremer Bank (20.83 percent), Bell Bank (10.43 percent), and Glenwood State Bank (8.64 percent). These institutions make up 39.9 percent of total deposits in the AA.

As part of this evaluation, we contacted a local community member who serves as a city council member in Osakis. The contact stated FNB Osakis has historically been active in the community and continues to serve in high regard. Lending needs in the AA are moderate as the community remains primarily middle class with a nearby lake being the main attraction for tourism, recreation, and upper-end real estate.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Osakis AA 2021</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)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	12,163	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,288	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,141	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	620	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,527	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	905	0.0	0.0	100.0	0.0	0.0
Farms by Geography	114	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,565	13.1	18.0	26.3	42.6	0.0
Household Distribution by Income Level	4,761	17.4	13.3	20.2	49.0	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$179,789
			Median Gross Rent			\$808
			Families Below Poverty Level			4.4%
<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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Osakis AA 2022-2023</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)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	12,603	0.0	0.0	61.1	38.9	0.0
Housing Units by Geography	6,634	0.0	0.0	66.3	33.7	0.0
Owner-Occupied Units by Geography	4,375	0.0	0.0	62.1	37.9	0.0
Occupied Rental Units by Geography	583	0.0	0.0	80.6	19.4	0.0
Vacant Units by Geography	1,676	0.0	0.0	72.6	27.4	0.0
Businesses by Geography	1,192	0.0	0.0	54.1	45.9	0.0
Farms by Geography	129	0.0	0.0	66.7	33.3	0.0
Family Distribution by Income Level	3,480	16.1	17.6	22.8	43.5	0.0
Household Distribution by Income Level	4,958	19.5	11.8	20.1	48.6	0.0
Median Family Income Non-MSAs - MN		\$74,737	Median Housing Value			\$212,728
			Median Gross Rent			\$695
			Families Below Poverty Level			5.7%
<i>Source: 2020 U.S. Census and 2023 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>						

## **Scope of Evaluation in Minnesota**

The rating for the State of Minnesota is based wholly on the performance of the Osakis AA as it is the only AA in the state. Refer to Appendix A for additional information. To determine Lending Test conclusions within the AA, the bank's performance for home mortgage lending was weighted more heavily than farm lending performance since it accounted for a higher origination volume during the evaluation period. Further, performance in 2022-23 was weighted more heavily than 2021 performance given it covered a longer time span and represented a higher volume of lending activity.

## **LENDING TEST**

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

Based on a full-scope review, the bank's lending performance in the State of Minnesota is reasonable.

## **Distribution of Loans by Income Level of the Geography**

Geographic distribution analysis is not meaningful because there were no LMI CTs in the Osakis AA during the evaluation period.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and farms of different sizes.

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

Refer to Table P in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During 2021, the bank's distribution of home mortgage loans among borrowers of different income levels was excellent. The bank's percent of home mortgage loans to low-income borrowers exceeded the percentage of low-income families in the AA and aggregate percentage of loans to low-income borrowers made by all reporting lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and aggregate lending performance.

During 2022-2023, the bank's distribution of home mortgage loans among borrowers of different income levels was excellent. The percent of home mortgage loans to low-income borrowers exceeded the percentage of low-income families in the AA and aggregate lending to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was near to the aggregate lending performance.

### ***Small Loans to Farms***

Refer to Table T 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 farms.



During 2021 and 2022-2023, the bank's distribution of loans to small farms was excellent. In both analysis periods, the bank's lending percentage to small farms exceeded the percentage of small farms in the AA and significantly exceeded the aggregate lending performance.

**Responses to Complaints**

During the evaluation period, neither the bank nor the OCC received any complaints related to FNB Osakis' CRA performance.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Home Mortgage, Small Farm	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Minnesota</b>		
Osakis AA	Full Scope	Partial counties of Douglas and Todd, including census tracts 4505 and 4508 in Douglas County and 7907 in Todd County.

## Appendix B: Summary of State Ratings

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<b>RATINGS      FNB Osakis</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
The First National Bank of Osakis	Satisfactory
State:	
Minnesota	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Osakis AA	20	4,470	100.0	596	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>4,470</b>	<b>100.0</b>	<b>596</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Osakis AA	20	2,878	100.0	280	0.0	0.0	0.0	0.0	0.0	0.0	62.1	75.0	56.4	37.9	25.0	43.6	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>2,878</b>	<b>100.0</b>	<b>280</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>62.1</b>	<b>75.0</b>	<b>56.4</b>	<b>37.9</b>	<b>25.0</b>	<b>43.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2021</b>
<b>Total Home Mortgage Loans</b>					<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Osakis AA	20	4,470	100.0	596	13.1	20.0	6.2	18.0	15.0	15.9	26.3	30.0	21.6	42.6	35.0	42.1	0.0	0.0	14.1	
<b>Total</b>	<b>20</b>	<b>4,470</b>	<b>100.0</b>	<b>596</b>	<b>13.1</b>	<b>20.0</b>	<b>6.2</b>	<b>18.0</b>	<b>15.0</b>	<b>15.9</b>	<b>26.3</b>	<b>30.0</b>	<b>21.6</b>	<b>42.6</b>	<b>35.0</b>	<b>42.1</b>	<b>0.0</b>	<b>0.0</b>	<b>14.1</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2022-23</b>
<b>Total Home Mortgage Loans</b>					<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Osakis AA	20	2,878	100.0	280	16.1	20.0	8.6	17.6	20.0	25.4	22.8	40.0	20.0	43.5	20.0	31.8	0.0	0.0	14.3	
<b>Total</b>	<b>20</b>	<b>2,878</b>	<b>100.0</b>	<b>280</b>	<b>16.1</b>	<b>20.0</b>	<b>8.6</b>	<b>17.6</b>	<b>20.0</b>	<b>25.4</b>	<b>22.8</b>	<b>40.0</b>	<b>20.0</b>	<b>43.5</b>	<b>20.0</b>	<b>31.8</b>	<b>0.0</b>	<b>0.0</b>	<b>14.3</b>	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Osakis AA	20	598	100.0	43	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>598</b>	<b>100.0</b>	<b>43</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-23
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Osakis AA	20	742	100.0	40	0.0	0.0	0.0	0.0	0.0	0.0	66.7	80.0	67.5	33.3	20.0	32.5	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>742</b>	<b>100.0</b>	<b>40</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>66.7</b>	<b>80.0</b>	<b>67.5</b>	<b>33.3</b>	<b>20.0</b>	<b>32.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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%

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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Osakis AA	20	598	100.0	43	99.1	100.0	58.1	0.9	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>598</b>	<b>100.0</b>	<b>43</b>	<b>99.1</b>	<b>100.0</b>	<b>58.1</b>	<b>0.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2021 D&amp;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%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Osakis AA	20	742	100.0	40	99.2	100.0	45.0	0.8	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>742</b>	<b>100.0</b>	<b>40</b>	<b>99.2</b>	<b>100.0</b>	<b>45.0</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

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.