

COMMUNITY REINVESTMENT ACT (CRA) PUBLIC FILE  
MINNESOTA LAKES BANK

LISTING OF FILE CONTENTS

Bank locations, hours of service and list of bank services.

List of geographic tracts

Bank's loan-to-deposit ratio for each quarter and the prior calendar year

MNLB Community Reinvestment Act Bank Policy

Community Reinvestment Act Lobby Notice

2021 CRA Performance Evaluation – Public Disclosure

CRA Assessment Area Maps

Written comments received by the public



# MINNESOTA LAKES BANK

## MAIN LOCATION

**710 Babcock Blvd. E**  
**P.O. Box 700**  
**Delano, MN 55328**

**763-972-3385**

### Lobby

**Monday - Friday: 9:00 am - 4:00pm**  
**Saturday: Closed**

### Drive-Up

**Monday - Friday: 8:00am - 5:00pm**  
**Saturday: 9:00am - 12:00pm**

Geocode Search Result for 2025 HMDA/CRA Reporting

Street Address	710 BABCOCK BLVD E	MSA/MD Code	33460
City Name	DELANO	State Code	27
State Abbreviation	MN	County Code	171
Zip Code	55328	Tract Code	1010.02

MSA/MD Name: MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MN-WI  
State Name: MINNESOTA  
County Name: WRIGHT COUNTY

## BRANCH LOCATION

**2290 Commerce Blvd.**  
**Mound, MN 55364**

**952-472-5556**

### Lobby

**Monday - Friday: 9:00 am - 4:00pm**  
**Saturday: Closed**

### Drive-Up

**Monday - Friday: 8:00am - 5:00pm**  
**Saturday: 9:00am - 12:00pm**

Geocode Search Result for 2025 HMDA/CRA Reporting

Street Address	2290 COMMERCE BLVD	MSA/MD Code	33460
City Name	MOUND	State Code	27
State Abbreviation	MN	County Code	053
Zip Code	55364	Tract Code	0276.02

MSA/MD Name: MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MN-WI  
State Name: MINNESOTA  
County Name: HENNEPIN COUNTY

LOAN PRODUCTION OFFICE LOCATION	
<b>215 Highway 55 E, Ste 102</b> <b>Buffalo, MN 55313</b>  <b>612-284-1607</b>	<b>Lobby</b> <b>Monday-Friday: 8:00am - 5:00pm</b> <b>Saturday: Closed</b>

Geocode Search Result for 2025 HMDA/CRA Reporting

Street Address	215 HIGHWAY 55 E	MSA/MD Code	33460
City Name	BUFFALO	State Code	27
State Abbreviation	MN	County Code	171
Zip Code	55313	Tract Code	1007.05

MSA/MD Name: MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MN-WI

State Name: MINNESOTA

County Name: WRIGHT COUNTY

THE MINNESOTA LAKES BANK HAS NOT OPENED OR CLOSED ANY ADDITIONAL BRANCHES  
IN THE LAST THREE YEARS



**MINNESOTA  
LAKES BANK**

### **DEPOSIT PRODUCTS**

CHECKING ACCOUNTS  
SAVINGS ACCOUNTS  
CERTIFICATES OF DEPOSIT  
HEALTH SAVINGS ACCOUNTS  
INDIVIDUAL RETIREMENT ACCOUNTS

### **LOAN PRODUCTS**

HOME EQUITY LINE OF CREDIT  
FIRST MORTGAGE FINANCING  
SECOND MORTGAGE FINANCING  
CONSTRUCTION AND LAND DEVELOPMENT  
HOME IMPROVEMENT LOANS  
AGRICULTURAL LOANS  
COMMERCIAL LOANS  
COMMERCIAL LINES OF CREDIT  
SMALL BUSINESS ADMINISTRATION FINANCING  
COMMERCIAL REAL ESTATE  
COMMUNITY DEVELOPMENT LOANS  
RURAL DEVELOPMENT LOANS  
CONSUMER LINES OF CREDIT  
CONSUMER INSTALLMENT LOANS  
OVERDRAFT LINES OF CREDIT

### **OTHER SERVICES AVAILABLE**

TELEPHONE BANKING  
ON-LINE BANKING  
MOBILE BANKING  
REMOTE DEPOSIT  
ATM / DEBIT CARDS  
CASH MANAGEMENT SERVICES  
SAFE DEPOSIT BOXES\*

*Please speak with a member of our staff for additional information regarding our products and services*

*\*Delano Location Only*



## ALL CONSUMER ACCOUNTS

Consumer checking accounts at Minnesota Lakes Bank require a \$50 minimum opening deposit and a \$0.01 account balance minimum at all times. Our accounts also offer access to additional electronic features such as:



Mobile app & mobile deposit



Online banking access



Debit/ATM card



Free access at select ATMs



SecurLOCK app



Bill Pay access\*



MINNESOTA  
**LAKES BANK**

MY COMMUNITY, MY BANK™

[mnlb.bank](https://mnlb.bank)

2290 Commerce Blvd. Mound, MN 55364 | 952.472.5556  
710 Babcock Blvd. E Delano, MN 55328 | 763.972.3385



\*If Online Bill Pay service is not used during the statement cycle, you will be charged \$8 each month you do not meet the Online Bill Pay Qualifications.

## MINNESOTA LAKES BANK **CONSUMER CHECKING ACCOUNTS**

We have the checking account that is right for you.

## ESSENTIAL CHECKING

---

Minnesota Lakes Bank's Essential Checking Account has all the essentials with the option to sign up for additional complimentary electronic features.

- Non-interest earning
- No limit on deposits or withdrawals
- No monthly maintenance fee
- \$3/month paper statements; no charge for electronic statements
- \$1/month check images; no charge with electronic statements
- \$5 cashier's checks
- Paper checks available for purchase

## SUPERIOR CHECKING

---


Minnesota Lakes Bank's Superior Checking Account offers tiered interest rates with no monthly qualifiers.

- Interest paid monthly
- No limit on deposits or withdrawals
- \$10 monthly maintenance fee
- Complimentary paper statements
- Complimentary check images
- Complimentary cashier's checks
- Complimentary specialty checks
- Complimentary photocopies

## PRIME TIME CHECKING

---

Minnesota Lakes Bank's Prime Time Checking Account is reserved for customers 50 years old or better.

- Interest paid monthly
  - No limit on deposits or withdrawals
  - No monthly maintenance fee
  - Complimentary paper statements
  - Complimentary check images
  - Complimentary cashier's checks
  - Complimentary specialty checks
  - Complimentary photocopies
- 

## ALL BUSINESS ACCOUNTS

Business checking accounts at Minnesota Lakes Bank offer other services including a large selection of checks, endorsement stamps, coin and currency exchange, night depository and access to the following electronic features:



Remote deposit capture



Online banking access



Debit/ATM/Credit card



Merchant services



Biz Mobile



Bill Pay access



MINNESOTA  
**LAKES BANK**

MY COMMUNITY, MY BANK™

[mnlb.bank](https://mnlb.bank)

2290 Commerce Blvd. Mound, MN 55364 | 952.472.5556  
710 Babcock Blvd. E Delano, MN 55328 | 763.972.3385



# MINNESOTA LAKES BANK **BUSINESS CHECKING ACCOUNTS**

We have the checking account that is right for you and your business.

## SMALL BUSINESS CHECKING

---

Small Business Checking is designed for the small to midsize business that has a low volume of monthly checks and deposit but requires the electronic features and other bank services.

- Non-interest earning
- No monthly service fee (\$8 service fee if balance falls below \$400 daily balance)
- The first 40 deposit items per month at no charge; \$0.20 will be charged for each item over limit
- The first 20 debit/checks paid per month at no charge; \$0.20 will be charged for each item over limit
- Bill pay services available
- \$3 per paper statement; no charge for electronic statements
- \$1/month check images; no charge with electronic statements

## BUSINESS CHECKING

---


Business checking is for the customer that has a large volume of monthly checks and deposits.

- Earnings credit will be used to offset bank service charges
- \$8 monthly maintenance fee
- No minimum monthly balance required
- \$0.15 per debit/check paid
- \$0.07 per item deposited
- \$3 per paper statement; no charge for electronic statements
- \$1/month check images; no charge with electronic statements

## BUSINESS NOW CHECKING

---

The Business Now Checking account is specifically designed for sole proprietors and nonprofit organizations.

- Interest bearing
  - No monthly service fee (\$8 service fee if balance falls below \$800 daily balance or \$1,600 monthly average balance)
  - \$0.20 charge per debit/check paid if under minimum balance
  - \$3 per paper statement; no charge for electronic statements
  - \$1/month check images; no charge with electronic statements
- 



EFFECTIVE: August 1, 2022

**MISCELLANEOUS FEES**

ACCOUNT BALANCING ASSISTANCE	\$25.00 PER HOUR
ACCOUNT RESEARCH FEE	\$60.00 PER HOUR
AUDIT CONFIRMATION FEE	\$15.00
AUTOMATIC TRANSFER BETWEEN ACCOUNTS HELD WITH US	\$1.00 PER TRANSFER
AUTOMATIC EXTERNAL TRANSFER	\$5.00 PER TRANSFER
AUTOMATIC TRANSFER BETWEEN ACCOUNTS TO COVER OVERDRAFT	\$5.00 PER TRANSFER
BILL PAY SERVICE FEE	\$8.00 IF NOT USED PER MONTHLY CYCLE
CHECK, DEPOSIT SLIP AND WITHDRAWAL TICKETS	FEE DEPENDS ON STYLE AND QUANTITY ORDERED
COUNTER CHECK FEE	\$3.00
DORMANT FEE	\$15.00
INDEMNITY BOND/AFFIDAVIT OF LOSS	\$10.00 PER THOUSAND-\$20.00 MINIMUM
LEVIES AND/OR GARNISHMENTS	\$100.00
PHOTOCOPY PER PAGE	\$2.00 PER PAGE

**BUSINESS E-BANKING**

ACH SERVICES: FILE UPLOAD & BATCH/TEMPLATE CREATION	\$35.00 PER MONTH
REMOTE DEPOSIT	\$40.00 PER MO. + \$5/MO PER ADDITIONAL ACCT.
REMOTE DEPOSIT SCANNERS	\$250 - SINGLE SORT \$450 - MULTI SORT COST CAN BE AMORT. MO. \$40.00 PER MO. + \$5/MO PER ADDITIONAL ACCT.
BIZ MOBILE DEPOSIT	FIRST ACCT COMPLIMENTARY, + \$5/MO PER ADDITIONAL ACCT.
LINE OF CREDIT SWEEP TRANSFER	\$25.00 PER MONTH - PER ACCOUNT

**CHECKING, NOW ACCOUNTS, REGULAR SAVINGS, AND MONEY MARKET ACCTS**

ACCOUNT ACTIVITY PRINTOUT FEE	\$3.00
ACCOUNT CLOSING FEE (LESS THAN 6 MONTHS)	\$25.00
COLLECTION ITEM	\$30.00 PER ITEM
COPY OF CHECK (IMAGE)	\$3.00
COPY OF STATEMENT	\$7.00 PER STATEMENT
INACTIVE FEE	\$10.00 PER MONTH
FOREIGN COLLECTION CURRENCY/CHECKS	\$25.00
PAPER STATEMENT FEE	\$3.00 PER MONTH
RETURNED DEPOSITED ITEM	\$10.00
SPECIAL STATEMENT CUT-OFF FEE	\$10.00
STOP PAYMENT FEE	\$33.00

**CHECKING AND NOW ACCOUNTS**

OVERDRAFT ITEM RETURNED*	\$36.00
OVERDRAFT ITEM PAID*	\$36.00
OVERDRAFT MAXIMUM CHARGE PER DAY*	\$180.00
* The fee applies to overdrafts "created by check, in-person withdrawals, ATM withdrawals, or other electronic means; including re-presented items."	
CONSECUTIVE DAY NEGATIVE BALANCE FEE	\$25.00 EVERY 5TH CONSECUTIVE BUSINESS DAY YOUR ACCOUNT HAS A NEGATIVE BALANCE
IMAGES INCLUDED IN STATEMENT	\$1.00 PER STATEMENT

**REGULAR SAVINGS AND MONEY MARKET**

MINIMUM BALANCE FEE IF THE BAL FALLS BELOW \$100	\$2.00 PER MONTH
--	------------------

**INDIVIDUAL RETIREMENT ACCOUNT FEES**

TERMINATION FEE	\$25.00 AT WITHDRAWAL/ACCOUNT CLOSING
-----------------	---------------------------------------

**SAFE DEPOSIT BOXES**

SAFE DEPOSIT BOX LOST KEY	\$25.00 PER LOST KEY
SAFE DEPOSIT BOX DRILLING	\$485.00
BOX SIZE 3" X 10"	\$40.00 ANNUALLY
BOX SIZE 3" X 5"	\$25.00 ANNUALLY
BOX SIZE 5" X 5"	\$30.00 ANNUALLY
BOX SIZE 5" X 10"	\$60.00 ANNUALLY
BOX SIZE 10" X 10"	\$100.00 ANNUALLY

**WIRE TRANSFER**

INCOMING WIRE FEE	\$20.00
OUT-GOING WIRE FEE	\$30.00
OUT-GOING INTERNATIONAL WIRE FEE	\$65.00
WIRE TRACE/INVESTIGATION FEE	\$65.00
WIRE TRANSFER NOTIFICATION	\$5.00
WIRE TRANSFER RETURN FEE	\$30.00

**ATM/DEBIT CARD FEES**

ATM/DEBIT CARD OUT OF NETWORK WITHDRAWAL FEE	\$3.00 PER TRANSACTION
ATM/DEBIT CARD WITHDRAWAL LIMIT PER DAY	\$500.00
DEBIT CARD POINT-OF-SALE TRANSACTION LIMIT PER DAY	\$1,000.00
ATM/DEBIT CARD REPLACEMENT FEE	\$20.00

ATM/DEBIT CARD REPLACEMENT FEE \$65.00 EXPEDITED

**LOAN ADMINISTRATION**

LIEN CARD REPLACEMENT FEE	\$25.00
LOAN SUBORDINATION FEE	\$150.00
SATISFACTION OF MORTGAGE REPLACEMENT FEE	\$46.00

**OFFICIAL CHECKS**

CASHIER'S CHECKS	\$5.00
------------------	--------

Assessment Area:  
MSA 33460 – State code 27

Carver County - Code 19

901.01	Middle Income Tract
901.02	Middle Income Tract
902.00	Middle Income Tract

Hennepin County – Code 53

262.01	Upper Income Tract
262.02	Upper Income Tract
263.01	Upper Income Tract
263.02	Middle Income Tract
270.01	Upper Income Tract
270.02	Upper Income Tract
271.01	Upper Income Tract
271.02	Upper Income Tract
272.02	Middle Income Tract
272.03	Upper Income Tract
272.04	Upper Income Tract
272.05	Upper Income Tract
273.00	Upper Income Tract
274.00	Upper Income Tract
275.01	Upper Income Tract
275.03	Upper Income Tract
274.05	Upper Income Tract
276.01	Middle Income Tract
276.02	Middle Income Tract
277.01	Upper Income Tract
277.02	Middle Income Tract
277.03	Upper Income Tract

Wright County – Code 171

1007.01	Middle Income Tract
1007.04	Middle Income Tract
1007.05	Middle Income Tract
1007.06	Middle Income Tract
1007.07	Middle Income Tract
1009.00	Middle Income Tract
1010.01	Upper Income Tract
1010.02	Middle Income Tract
1011.01	Middle Income Tract
1011.02	Middle Income Tract



MINNESOTA  
LAKES BANK®

## Statement of Condition

### OFFICERS

**Noah W. Wilcox**  
CEO  
& Chairman of the Board

**Angela Heying**  
Senior Vice President  
& Chief Operating Officer

**Joshua Gehlen**  
Senior Vice President  
& Chief Lending Officer

**Christine Korpi**  
Vice President

**Sherri Dehn**  
Vice President

**Sherry Valley**  
Vice President

**Aaron Schnitzler**  
Vice President

**Kimberley Rostis**  
Vice President

**Austin Wiberg**  
Assistant Vice President

### BOARD OF DIRECTORS

Noah W. Wilcox - Chairman  
Steven H. Burggraf - Director  
Rebecca A. Horgan - Director

Donald B. Johnson II - Director  
Julie A. Wilcox - Director

### ASSETS

Cash & Due from Banks.....	\$14,275,000
U.S. Government Securities & Agencies.....	27,440,000
Municipal Bonds.....	604,000
Fed Funds Sold.....	0
Loans.....	83,871,000
Banking Premises & Equipment.....	3,113,000
Other Assets.....	4,123,000
<b>Total Assets.....</b>	<b>\$133,426,000</b>

### LIABILITIES

Demand Deposits.....	\$34,757,000
Time & Savings Deposits.....	82,820,000
Other Liabilities.....	979,000
<b>Total Liabilities.....</b>	<b>\$118,556,000</b>

### CAPITAL ACCOUNTS

Capital Stock.....	\$596,000
Surplus.....	10,393,000
Undivided Profits.....	4,314,000
Total Equity Capital.....	14,870,000
<b>Total Liabilities &amp; Equity Capital.....</b>	<b>\$133,426,000</b>

DECEMBER 31, 2024



MINNESOTA  
LAKES BANK

710 BABCOCK BLVD E, P.O. BOX 700  
DELANO, MINNESOTA 55328  
T 763 972 3385  
F 763 479 2690

[mnlakesbank.com](http://mnlakesbank.com)  
[bank@mnlakesbank.com](mailto:bank@mnlakesbank.com)

<u>Date</u>	<u>Total Net Loans</u>	<u>Total Deposits</u>	<u>Loan To Deposit Ratio</u>
3/31/2023	\$ 70,499	\$ 120,107	58.70%
6/30/2023	\$ 70,421	\$ 139,591	50.45%
9/30/2023	\$ 69,635	\$ 125,553	55.46%
12/31/2023	\$ 76,342	\$ 127,296	59.97%
<b>Average</b>	<b>\$ 71,724</b>	<b>\$ 128,137</b>	<b>56.14%</b>

<u>Date</u>	<u>Total Net Loans</u>	<u>Total Deposits</u>	<u>Loan To Deposit Ratio</u>
3/31/2024	\$ 78,325	\$ 114,189	68.59%
6/30/2024	\$ 78,947	\$ 121,052	65.22%
9/30/2024	\$ 79,849	\$ 122,500	65.18%
12/31/2024	\$ 83,871	\$ 117,577	71.33%
<b>Average</b>	<b>\$ 80,248</b>	<b>\$ 118,830</b>	<b>67.58%</b>

Dollar amounts in thousands  
Data from the bank's Call/UBPR Report



MINNESOTA  
**LAKES BANK**

## COMMUNITY REINVESTMENT ACT POLICY

BOARD APPROVED: January 2025

## Table of Contents

COMMUNITY REINVESTMENT ACT NOTICE .....	3
Main Office .....	3
COMMUNITY REINVESTMENT ACT NOTICE .....	4
Mound Office .....	4
I.    POLICY STATEMENT .....	5
II.   DELINEATION OF THE COMMUNITIES SERVED .....	5
Assessment Area.....	5
III.  BRANCH CLOSING POLICY .....	6
Before closing a branch .....	6
If we must close a branch .....	6
III.  TYPES OF CREDIT OFFERED TO THE LOCAL COMMUNITIES .....	7
a.  Mortgage loans.....	7
b.  Housing Rehabilitation Loans.....	7
i.  Construction Loans .....	7
ii.  Home Equity Lines of Credit .....	7
iii.  Home Equity Loans.....	7
c.  Small Business Loans .....	7
d.  Consumer Loans .....	8

**Main Office**

## **COMMUNITY REINVESTMENT ACT NOTICE**

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA performance evaluation, prepared by the Federal Reserve Bank of Minneapolis (Reserve Bank); and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from:

Federal Reserve Consumer Help  
PO Box 1200  
Minneapolis, MN 55480

You may send written comments about our performance in helping to meet community credit needs to:

Christine Korpi, CRA Officer  
Minnesota Lakes Bank of Delano  
PO Box 700  
Delano, MN 55328

and to:

Federal Reserve Consumer Help  
PO Box 1200  
Minneapolis, MN 55480

Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank.

We are an affiliate of Wilcox Bancshares, Inc., a holding company. You may request from the Federal Reserve Bank of Minneapolis, 900 Hennepin Avenue, Minneapolis, MN 55401-1804, an announcement of applications covered by the CRA filed by bank holding companies.

**Mound Office**

## **COMMUNITY REINVESTMENT ACT NOTICE**

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the Federal Reserve Consumer Help; Post Office Box 1200; Minneapolis, MN 55480, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the Board evaluates our CRA performance in the community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in its assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at:

Minnesota Lakes Bank  
710 Babcock Blvd  
Delano, MN 55328

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from:

Federal Reserve Consumer Help  
PO Box 1200  
Minneapolis, MN 55480

You may send written comments about our performance in helping to meet community credit needs to:

Christine Korpi, CRA Officer  
Minnesota Lakes Bank of Delano  
P. O. Box. 700  
Delano, MN 55328

and to:

Federal Reserve Consumer Help  
PO Box 1200  
Minneapolis, MN 55480

Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank.

We are an affiliate of Wilcox Bancshares, Inc., a holding company. You may request from the Federal Reserve Bank of Minneapolis, 900 Hennepin Avenue, Minneapolis, MN 55401-1804, an announcement of applications covered by the CRA filed by bank holding companies.

## I. POLICY STATEMENT

It is the policy of the Minnesota Lakes Bank (Bank) to make loans to those in the communities it serves and thus contribute to the entire community's well-being. Authorized bank personnel are expected to make, and seek to develop, all of the sound loans that the resources of the bank permit and that opportunity affords.

In order to ensure that the Bank is meeting the credit needs of the entire community that it serves, the senior officers of the bank have been assigned the responsibility of maintaining communication with the City of Delano and other municipal governments within the local communities served by the Bank to determine if there are special credit needs in the community which are not being met, but could be, by the bank. Communication when possible will also be made with local business, religious and consumer organizations to determine if there are any additional credit needs.

In addition to this, the senior officers of the bank will conduct a call program on the business community for the purpose of soliciting loans and deposits and to insure that no part of the community is being excluded from services offered by the Bank.

The advertising program of the bank, including newspaper and statement inserts and other media forms will be to all the people of the communities served by the Bank and includes informing them of the types of credit available at the bank. Additionally, each customer opening a deposit account will be given a brochure which includes information of the types of services the bank makes available.

At a minimum of annually the Directors of the Bank will review reports showing the results of the above activities

## II. DELINEATION OF THE COMMUNITIES SERVED

The Board of Directors of the Minnesota Lakes Bank continue to affirm an obligation to help meet the credit needs of the local community, including low and moderate income neighborhoods, and to make loans available to all persons residing within its community regardless of race, creed, sex, marital status or national origin, which are consistent with safe and sound lending practices.

**Assessment Area:** Delano is located 35 miles west of Minneapolis, Minnesota, near the western edge of the Minneapolis-St Paul Metropolitan statistical area (MSA). The bank's assessment area includes portions of Hennepin, Carver, and Wright counties. The assessment area contains census tracts 901.01, 901.02 and 902.00 located in Carver County; census tracts 262.01, 262.02, 263.01, 263.02, 270.01, 270.02, 271.01, 271.02, 272.01, 272.02, 272.03, 272.04, 272.05, 273.00, 274.00, 275.01, 275.03, 275.04, 276.01, 276.02, 277.01, 277.02 and 277.03 in Hennepin County; and census tracts 1007.01, 1007.04, 1007.05, 1007.06, 1007.07, 1009.00, 1010.01, 1010.02, 1011.01 and 1011.02 in Wright County.

The main office is located in census tract 1010.02 and the branch office is located in census tract 276.02.

Communities within the assessment area include Delano, Buffalo, Maple Lake, Waverly, Montrose, Greenfield, Rockford, Independence, Maple Plain, Loretto, Medina, Long Lake, Orono, Minnetonka Beach, Mound, Spring Park, Minnetrista, St. Bonifacius, and Watertown.

### **III. BRANCH CLOSING POLICY**

Minnesota Lakes Bank is committed to having a distribution system that effectively and efficiently delivers services to our customers. Traditionally, that distribution system has consisted primarily of our branch network. Today, it may become increasingly difficult to make full service branches competitive and profitable. Accordingly, we must re-evaluate the viability of our branches periodically and may, in some cases, have to close them. Our policy with respect to branches that may need to be closed is as follows:

#### **Before closing a branch:**

1. We will make every attempt to develop a standard evaluation format regarding the profitability of the branch including return on equity measures, where possible.
2. We will try to identify changes in staffing, products offered, use of floor space, etc., that could make an unprofitable branch profitable.
3. We will try to identify ways to increase the volume or mix of business at the branch to increase its profitability.
4. If we consider closing a branch which services a lower income or minority area, we will meet with neighborhood representatives (elected and from volunteer organizations) to discuss measures that could help keep the branch open or make its closing as painless as possible to area customers.

#### **If we must close a branch:**

- a. We will notify the Federal Reserve Bank of Minneapolis, the State of Minnesota Department of Commerce, and the FDIC at least 90 days prior to the proposed closing date. The following information will be included in the notice:
  - i. Identification of the branch to be closed.
  - ii. The proposed date of closing.
  - iii. A detailed statement of the reasons for the decision to close the branch.
  - iv. Statistical or other information in support of such reasons.
- b. We will give the community at least 90 days' notice, through either direct mailing and/or a notice in the regular account statements, to each of the closing branch's customers and we will post signs in the closing branch at least 30 days before the scheduled closing date. We will further notify the community of the closing through local newsprint. The notices will include:
  - i. The location of the branch to be closed.
  - ii. The proposed date of the closing.
  - iii. The location of other branches where the customer may obtain service or a telephone number to call for such information.

"Branch Customers" will be determined using a "reasonable" method, based on the Bank's current system to identify branch customers. A "branch customer" is a customer who has opened a deposit or loan account at the branch to be closed. As systems change, the Bank may use other means of allocating customers, but always by the use of a "reasonable" method.

We will make it easy as possible for customers of a closed branch to continue to bank with us. Instructions on the use and locations of ATMs, Direct Deposit, Bank by Mail, and online banking will be made available. The Bank may also consider expanding ATM services in the area affected. In addition, customers will be encouraged to visit the nearest branch, and Bank personnel will be trained to assist customers in the transition process.

### III. TYPES OF CREDIT OFFERED TO THE LOCAL COMMUNITIES

All of the loans made by the bank will be subject to current financial statements by the borrower, a satisfactory credit history, evidence of ability to repay the loan as agreed, adequate collateral and any other reasonable conditions as may be required from time to time by the bank, including the availability of funds to make loans.

- a. **Mortgage loans:** Minnesota Lakes Bank will make first mortgage loans on single family, owner occupied dwellings to residents of the local communities served by the bank subject to guidelines of the Board of Directors in effect at the time of application. Because the bank has limited funds, Minnesota Lakes Bank will originate and sell loans to the secondary market for residents of the local community. These loans will be for Conventional, FHA, VA and Rural Housing Service mortgages. Terms and conditions as determined by relevant Minnesota Lakes Bank Lending Policy.
- b. **Housing Rehabilitation Loans:**
  - i. **Construction Loans:** Minnesota Lakes Bank will make construction loans to residents of the communities served, when assurances have been made that permanent financing has been arranged to pay off the construction loan. Subject to terms and conditions as determined by relevant Minnesota Lakes Bank Lending Policy.
  - ii. **Home Equity Lines of Credit:** Minnesota Lakes Bank will take a junior lien on property for worthwhile purposes. Subject to terms and conditions as determined by relevant Minnesota Lakes Bank Lending Policy.
  - iii. **Home Equity Loans:** Minnesota Lakes Bank will take a junior lien on property for worthwhile purposes. Subject to terms and conditions as determined by relevant Minnesota Lakes Bank Lending policy.
- c. **Small Business Loans:** Loans to small businesses will be made to qualified borrowers. This will include loans for inventory, equipment and other business purposes. When deemed necessary or practical, Minnesota Lakes Bank will work

with the Small Business Administration seeking their participation or guarantee.

- d. **Consumer Loans:** Consumer loans will be available for any worthwhile purpose to qualified borrowers including loans for investment purposes, automobile loans, recreational vehicle loans and loans for household, family or personal uses. Lines of Credit will be made available to consumers that may be used for any purpose.

# Community Reinvestment Act Notice

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

## **Your Involvement is encouraged.**

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

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from the Federal Reserve Bank of Minneapolis, PO Box 1200, Minneapolis, MN 55480. You may send written comments about our performance in helping to meet community credit needs to Christine Korpi, CRA Officer, Minnesota Lakes Bank, PO Box 700, Delano, MN 55328 and Community Reinvestment Officer, Federal Reserve Bank of Minneapolis, PO Box 1200, Minneapolis, MN 55480. You may also submit comments electronically through the Board website at [www.federalreserveconsumerhelp.gov](http://www.federalreserveconsumerhelp.gov). Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of Wilcox Bancshares, Inc., a bank holding company. You may request from the Federal Reserve Bank of Minneapolis, 90 Hennepin Avenue, Minneapolis, MN 55401-1804 an announcement of applications covered by the CRA filed by bank holding companies.

# **PUBLIC DISCLOSURE**

September 27, 2021

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Minnesota Lakes Bank  
RSSD# 157650

710 Babcock Boulevard East  
Delano, MN 55328

Federal Reserve Bank of Minneapolis  
90 Hennepin Avenue  
P.O. Box 291  
Minneapolis, MN 55480

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

## TABLE OF CONTENTS

Institution's Community Reinvestment Act (CRA) Rating .....	2
Scope of Examination .....	2
Description of Institution.....	2
Description of Assessment Area.....	3
Conclusions with Respect to Performance Criteria.....	5
Fair Lending or Other Illegal Credit Practices Review .....	8
Appendix A – Maps of the Assessment Area .....	9
Appendix B – Demographic Information.....	10
Appendix C – Glossary .....	11

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

## INSTITUTION'S CRA RATING

Minnesota Lakes Bank (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit (NLTD) ratio is reasonable given the bank's size and financial condition, and credit needs of the assessment area (AA).
- A majority of the bank's loans, by number, are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects an excellent penetration among businesses of different sizes.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

## SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Small Institutions to evaluate the bank's CRA performance. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's AA. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio.
- A statistical sample of 65 small business loans originated between January 1, 2020, and December 31, 2020. As shown in Table 1, commercial loans represent the majority of the bank's loan portfolio.

Of the five core performance criteria, examiners placed the greatest weight on borrower distribution, followed by NLTD ratio and lending inside the AA, which received equal weight. The geographic distribution of loans received the least weight.

## DESCRIPTION OF INSTITUTION

Minnesota Lakes Bank is a community bank headquartered in Delano, Minnesota. The bank's characteristics include the following:

- The bank is a wholly owned subsidiary of Wilcox Bancshares, Inc.
- Grand Rapids State Bank, Grand Rapids, Minnesota, is an affiliate.
- The bank has total assets of \$144.6 million as of June 30, 2021.
- In addition to its main office in Delano, the bank has a branch located in Mound, Minnesota, and a loan production office (LPO) in Buffalo, Minnesota.

- The main office and branch have drive-up services and operate cash-dispensing-only ATMs. The bank also operates two cash-dispensing-only ATMs located in Delano at local businesses.
- As shown in the table below, the bank's primary business focus is commercial lending. The bank also offers residential real estate and consumer loans. In 2020 and 2021, the bank actively participated in Paycheck Protection Program (PPP) lending through the Small Business Administration; the bank originated 480 PPP loans totaling \$35.8 million. These loans are designed to help businesses keep their workforces employed during the Coronavirus (COVID-19) crisis. The overall composition of the loan portfolio has remained relatively consistent since the previous evaluation and total loans increased by 56.9%.

<b>Table 1</b>		
<b>Composition of Loan Portfolio as of June 30, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Agriculture	709	0.8
Commercial	72,936	85.9
Consumer	1,292	1.5
Residential Real Estate	9,489	11.2
Other	492	0.6
Gross Loans	84,918	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its June 5, 2017, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## **DESCRIPTION OF ASSESSMENT AREA**

The bank's AA consists of the west central portion of the Minneapolis-St. Paul-Bloomington, MN-WI MSA (MSA). It includes portions of Wright, Hennepin, and Carver counties. See Appendix A for AA maps and Appendix B for additional demographic data.

- The bank changed its AA delineation since the previous evaluation by adding 10 more census tracts: one in Carver County and nine in Hennepin County. The AA now consists of 26 tracts, which includes 14 middle-income and 12 upper-income tracts. The income classifications of some tracts have also changed since the previous evaluation.<sup>1</sup>
- According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranks 44 out of 87 FDIC-insured institutions with offices in Carver, Hennepin, and Wright counties, and holds 0.1% of the deposits.

---

<sup>1</sup> Three tracts in Hennepin County (270.02, 271.02, and 272.03) changed from upper income to middle income.

- Examiners spoke with community contacts who are familiar with the local business economy.

<b>Table 2 Population Change</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>% Change</b>
Carver County	91,042	95,715	5.1
Hennepin County	1,152,425	1,197,776	3.9
Wright County	124,700	128,691	3.2
Minneapolis-St. Paul-Bloomington, MN-WI MSA	3,333,633	3,443,769	3.3
Minnesota	5,303,925	5,419,171	2.2
<i>Source: 2010 U.S. Census Bureau: Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- As shown in Table 2, the population growth for each county is typically consistent with the growth for the entire MSA and the state of Minnesota.
- A community contact indicated that Delano is growing rapidly and another contact indicated that the population of Mound is aging.

<b>Table 3 Median Family Income Change</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>% Change</b>
Carver County	\$100,632	\$101,963	1.3
Hennepin County	\$88,252	\$87,230	-1.2
Wright County	\$83,458	\$82,991	-0.6
Minneapolis-St. Paul-Bloomington, MN-WI MSA	\$86,229	\$84,589	-1.9
Minnesota	\$77,650	\$77,055	-0.8
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- As shown in Table 3, the median family income for each county in the AA is higher than the state of Minnesota, and typically higher than the MSA. The median family income for each county, the MSA, and the state has been stable.
- Bank management and community contacts indicated that many AA residents commute to other areas of the Twin Cities for work at higher paying jobs, contributing to labor shortages for local businesses.

Table 4 Unemployment Rates				
Area	2017	2018	2019	2020
Carver County	2.9%	2.5%	2.7%	5.2%
Hennepin County	3.0%	2.6%	2.7%	6.6%
Wright County	3.5%	3.1%	3.2%	5.5%
Minneapolis-St. Paul-Bloomington, MN-WI MSA	3.2%	2.8%	2.9%	6.4%
Minnesota	3.4%	3.0%	3.2%	6.2%
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics				

- Unemployment rates were consistent from 2017 to 2019 and then spiked in 2020, as shown in Table 4. The COVID-19 pandemic contributed to the unemployment rate due to several business shutdowns. A community contact noted that certain sectors, such as hospitality, suffered the most and many operators struggled to maintain staff. Essential service retailers, like grocery and hardware stores, were less impacted because they remained open. The shutdowns did not appear to significantly impact the financial service or the industrial sectors.
- Another community contact stated Wright County, like other areas, is experiencing ongoing labor force issues with baby boomers retiring at a higher rate than people entering the workforce.
- Industry differs within the AA based on the various communities. Mound mainly has a retail and service sector, many home-based businesses, minimal manufacturing, and some marine businesses. The largest employer is the school district. Other communities have industrial parks with larger-scale manufacturing, medical facilities, construction, and financial services, as well as retail and services.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Lending to Businesses of Different Sizes

The borrower distribution of small business lending is excellent. Table 5 shows the bank's small business lending in the AA. The bank extended 79.4% of its small business loans to businesses with gross annual revenues of \$1 million or less, which is below demographics (91.8%). Nonetheless, the bank's small business lending is excellent. The bank's active participation in the PPP loan program is particularly responsive to credit needs of small businesses and enhances the bank's performance. The bank also operates in a competitive environment that includes several national and regional banks along with credit unions. A community contact stated that many home-based businesses operate in the city of Mound. Smaller, home-based businesses may use a credit card for expenses and have less demand for bank loans. Finally, the majority (58.8%) of the bank's small business loans were for \$100,000 or less, which indicates a willingness to serve the needs of smaller businesses in the AA.

Table 5 Distribution of Small Business Lending by Revenue Size of Businesses					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	27	79.4	3,124	72.0	91.8
Over \$1 Million	7	20.6	1,216	28.0	6.7
Revenue Unknown	0	0.0	0	0.0	1.6
Total	34	100.0	4,339	100.0	100.0
By Loan Size					
\$100,000 or Less	20	58.8	885	20.4	
\$100,001 - \$250,000	9	26.5	1,489	34.3	
\$250,001 - \$1 Million	5	14.7	1,966	45.3	
Total	34	100.0	4,339	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	18	66.7	771	24.7	
\$100,001 - \$250,000	6	22.2	1,011	32.4	
\$250,001 - \$1 Million	3	11.1	1,342	43.0	
Total	27	100.0	3,124	100.0	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

### Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and area where they operate. The bank's NLTD ratio is reasonable.

Table 6 Comparative NLTD Ratios June 30, 2017, to June 30, 2021			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
Minnesota Lakes Bank	Delano, Minnesota	\$144.6	74.1
Similarly Situated Institutions			
Bank of Maple Plain	Maple Plain, Minnesota	\$110.1	54.7
Lake Community Bank	Long Lake, Minnesota	\$146.8	79.9

The bank's average NLTD ratio for the past 17 quarters is 74.1%. At the previous evaluation, the bank's 23-quarter average NLTD was 50.6%. Since then, the bank's average NLTD ratio has increased because of loan growth, especially for commercial loans. According to bank management, loan demand in recent years has been average except for PPP loans, which were in high demand. The bank's NLTD has ranged from 64.7% to 79.7% during the evaluation period; overall, the NLTD ratio does not widely fluctuate.

The NLTD ratio for the bank as of June 30, 2021, is 64.7%, which is slightly below the peer group ratio of 69.1%. The bank's peer group includes insured commercial banks having assets between \$100 million and \$300 million, with two or fewer full-service offices located in an MSA. As shown in Table 6, the bank's average NLTD ratio was below one similarly situated institution and well above another.

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority (52.3%) of its loans, by number, inside the AA, as shown in Table 7. Since the previous evaluation, the bank gained new customers that operate in the Twin Cities but are outside of the bank's AA. Accordingly, the bank expanded its AA by 10 tracts. Of the 31 small business loans outside the AA, the bank made numerous loans to businesses operating in tracts or counties that are part of the Minneapolis-St. Paul MSA but not the bank's AA, especially in Hennepin County. The bank also engages in small business lending with customers operating in northern Minnesota, where the bank's affiliate Grand Rapid State Bank operates.

Finally, while the percentage of the bank's loans, by dollar, inside the AA is 37.3%, nine of the 10 largest loans in the sample were to borrowers outside the AA.

Table 7 Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	34	52.3	\$4,339	37.3	31	47.7	\$7,296	62.7
<b>Total Loans</b>	<b>34</b>	<b>52.3</b>	<b>\$4,339</b>	<b>37.3</b>	<b>31</b>	<b>47.7</b>	<b>\$7,296</b>	<b>62.7</b>
Note: Percentages may not total 100.0 percent due to rounding.								

### Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts, with consideration given to the dispersion of loans throughout the AA. The bank's geographic distribution of small business loans reflects reasonable distribution among the different tracts and dispersion throughout the AA. No unexplained gaps in lending were identified. As stated previously, the AA consists of 14 middle- and 12 upper-income tracts. The

bank did not extend any small business loans in six middle- and nine upper-income tracts, mostly all in Hennepin County, where many financial institutions operate. The bank made 66.4% of its loans by dollar in Wright County, where the main office is located.

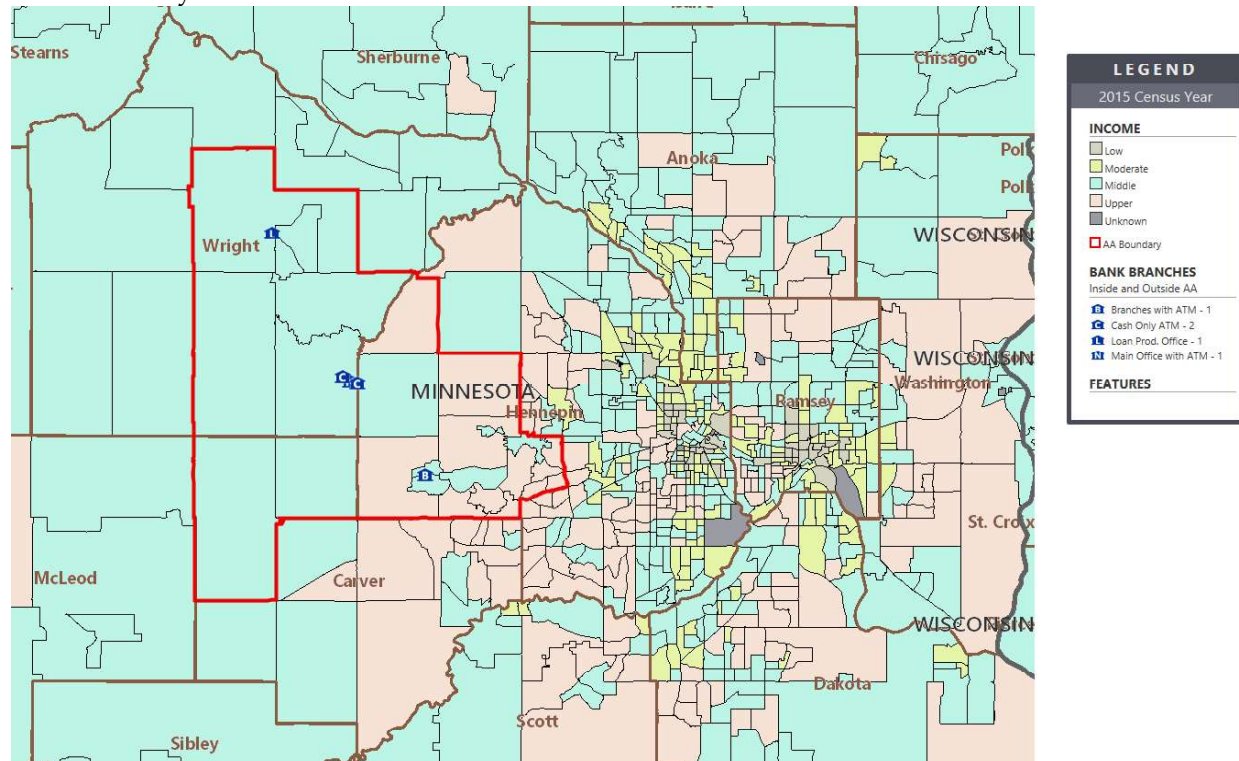
Table 8 Distribution of Small Business Lending by Income Level of Geography					
Census Tract Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	26	76.5	3,556	82.0	52.5
Upper	8	23.5	783	18.0	47.5
Total	34	100.0	4,339	100.0	100.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

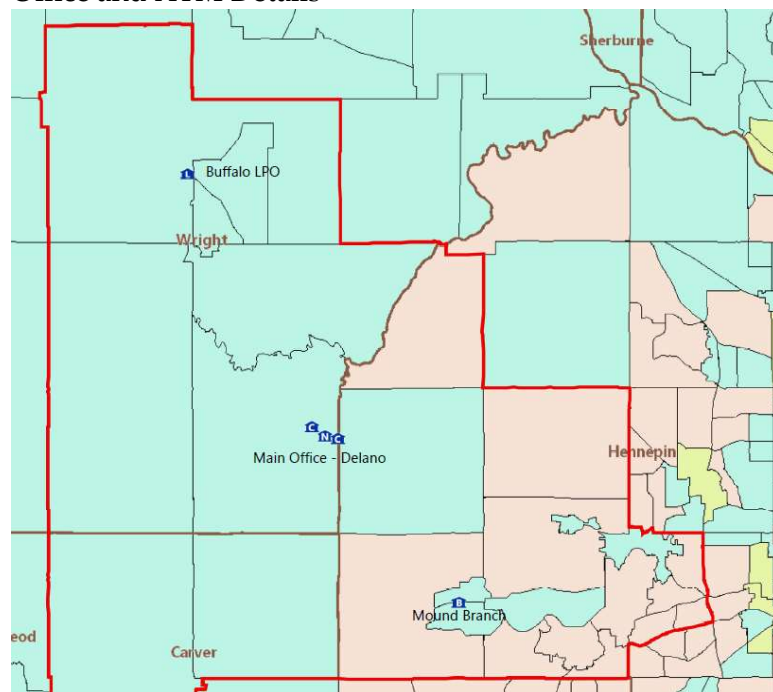
The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs.

## APPENDIX A – MAPS OF THE ASSESSMENT AREA

AA Boundary



Office and ATM Details



APPENDIX B – DEMOGRAPHIC INFORMATION

Minneapolis-St. Paul MSA Assessment Area DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,218	14.2
Moderate	0	0.0	0	0.0	0	0.0	5,684	15.5
Middle	14	53.8	21,509	58.5	1,021	4.7	7,899	21.5
Upper	12	46.2	15,251	41.5	381	2.5	17,959	48.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	26	100.0	36,760	100.0	1,402	3.8	36,760	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	33,306	23,796	57.6	71.4	7,403	22.2	2,107	6.3
Upper	21,614	17,496	42.4	80.9	2,897	13.4	1,221	5.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	54,920	41,292	100.0	75.2	10,300	18.8	3,328	6.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	5,159	52.5	4,728	52.5	350	53.4	81	52.9
Upper	4,662	47.5	4,285	47.5	305	46.6	72	47.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,821	100.0	9,013	100.0	655	100.0	153	100.0
Percentage of Total Businesses:				91.8		6.7		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	231	76.2	229	76.8	2	40	0	0.0
Upper	72	23.8	69	23.2	3	60	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	303	100.0	298	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2020 FFIEC Census Data and 2020 Dun & Bradstreet Data								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX C – GLOSSARY

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

**Census tract:** 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 statistical 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

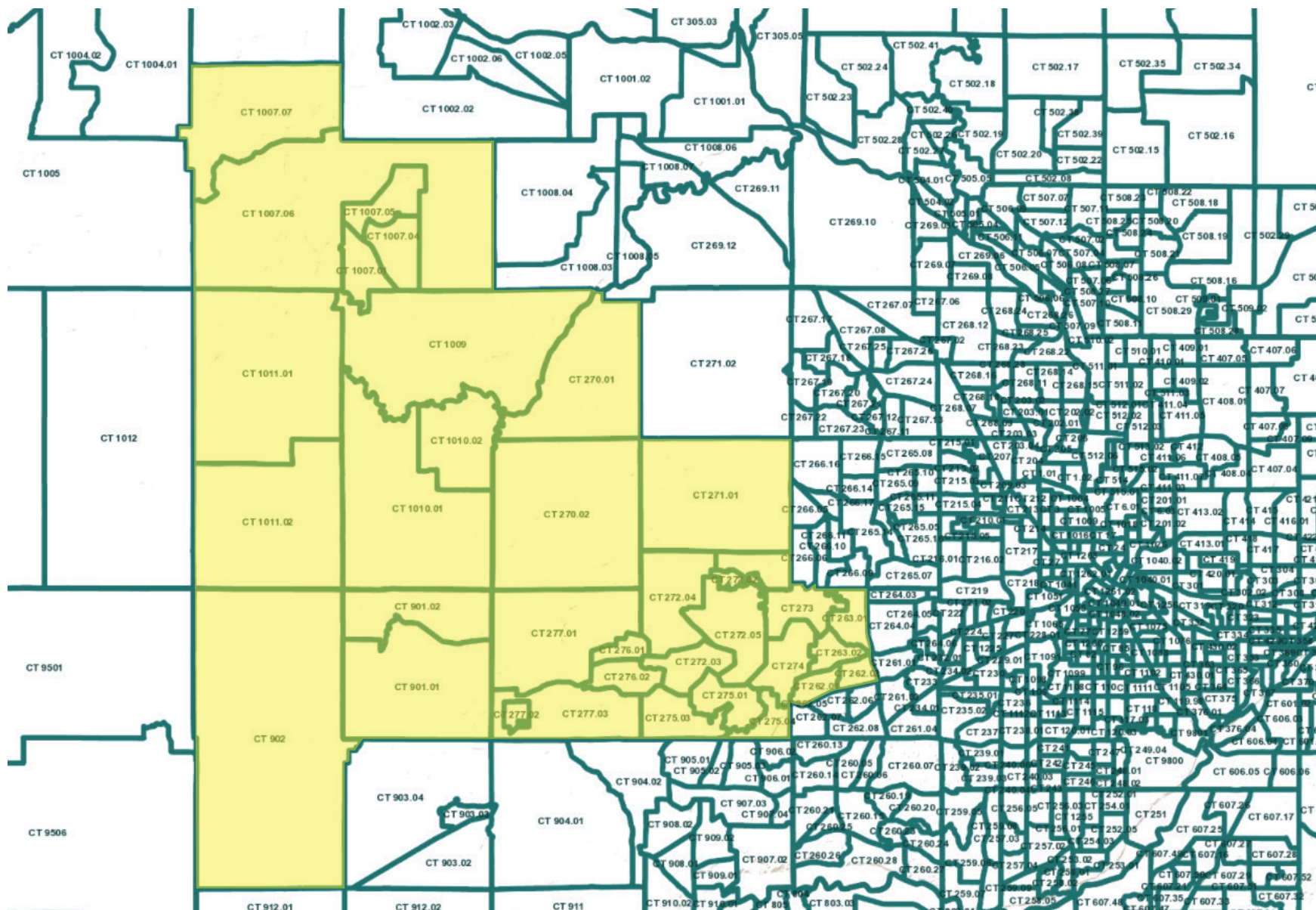
**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.

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



MINNESOTA  
LAKES BANK®



## PUBLIC COMMENTS:

We have not received any written comments from the public for the current year or each of the prior two calendar years.