



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

August 13, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bremer Bank, National Association
Charter Number 23300

605 Second Street
Menomonie, WI 54751

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

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

Performance Levels	Bremer Bank - Menomonie Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Bremer’s lending test performance in the WI non-MSA AA is good. Bremer demonstrates excellent lending activity, good geographic distribution, and good borrower income distribution. Lending within the bank’s assessment area is good with 87% of all bank loans made in one of the bank’s assessment areas.
- Bremer provided an excellent level of qualified investments throughout the bank’s assessment areas. Qualified investments are primarily from charitable contributions that address the needs of low- and moderate-income individuals.
- Bremer’s performance under the service test is excellent. Bremer’s delivery systems are readily accessible to low- and moderate-income individuals and geographies. Bremer provides a good level of community development services to organizations that target low- and moderate-income individuals and address the issues of affordable housing.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Bremer Bank, National Association (Bremer) is a \$667 million intrastate bank headquartered in Menomonie, Wisconsin. It operates an additional 14 branches located mainly in western and northern Wisconsin. During this evaluation period, Bremer closed the Mondovi and Eau Galle branches. Bremer has 15 ATMs in Wisconsin. There has been no merger or acquisition activity during this evaluation period.

As of December 31, 2011, Bremer held \$47 million in Tier 1 Capital. Bremer's lending focus is to meet the community's commercial, residential real estate, agricultural, and consumer lending needs. Bremer uses a variety of loan programs that include Small Business Administration (SBA), Farm Service Agency (FSA), and U.S. Department of Agriculture (USDA) loans. As of December 31, 2011, Bremer's \$398 million loan portfolio consisted of 11% commercial, 28% commercial real estate, 26% retail, 19% agricultural loans, and 16% tax exempt loans.

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

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

Scope of the Evaluation

Evaluation Period/Products Evaluated

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

We evaluated performance with consideration given to each product's weight within the AA. Overall, home mortgage loans represent 44% of loans originated during the evaluation period, while small loans to business represent 29%, and small loans to farms represent 28%. Although home improvement loans were considered, they were given minimal consideration since these loans comprised only 3% of total home mortgage loans. Loans for multi-family dwellings represent less than 1% of total home loans; therefore, an analysis of that product would not be meaningful and was not done for this evaluation.

Data Integrity

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

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

Selection of Areas for Full-Scope Review

We selected the Wisconsin Non-MSA AA to receive a full-scope review. We completed a limited scope review of the St. Croix AA due to the lower loan volume in the AA compared to the WI non-MSA AA. The WI non-MSA AA represents 82% of loans originated during the evaluation period. For this evaluation, we combined the Bayfield and Ashland County AA with the Burnett, Polk, and Dunn County AA for analysis purposes as none of the counties are in an MSA.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews.

Bremer's rating is based mainly on the area that received a full-scope review, the Wisconsin Non-MSA AA.

Other

We made one community contact within the WI non-MSA AA as part of this evaluation. Our contact indicated there is an increased need for social services, given the high unemployment rate and decline in individual credit scores to obtain necessary financing. The contact also expressed a need for more high energy efficiency construction and rehabilitation of existing construction in the area, to help low- and moderate-income individuals on their utility bills. Our contact recognized Bremer as a leading community bank in the area and credited the Otto Bremer Foundation for providing increased support in recent years to support emergency assistance funding for individuals.

Fair Lending or Other Illegal Credit Practices Review

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated High Satisfactory. Based on a full-scope review, the bank's performance in the WI non-MSA is good.

Lending Activity

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

The volume of lending in the WI non-MSA is excellent. Lending levels reflect excellent responsiveness in relation to the identified credit needs and the bank's deposit market share. According to the June 30, 2011 FDIC Deposit market share report, Bremer ranks first of 22 banks located in the assessment area, with 24.73% deposit market share. Bremer originated 1,589 home mortgage loans totaling \$161 million and 1,129 small loans to businesses totaling \$133 million during the evaluation period. The bank ranks fourth of 220 lenders in overall market share for home mortgage loans with 7.83% of the market. The bank ranks first of 37 lenders in overall market share for small business loans with 25.64%.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is good.

Home Mortgage Loans

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

Bremer's geographic distribution of home mortgage loans in the WI non-MSA is good. More weight was given to home refinance loans as they represent 78% of all home mortgage loans. There were no low-income census tracts in this assessment area, so analysis was based on lending in moderate-income census tracts.

Home Purchase Loans

Bremer's geographic distribution of home purchase loans is excellent. The percentage of loans originated from moderate income census tracts exceeds the percentage of owner-occupied housing units in those geographies. Similarly, Bremer's market share for loans made in moderate-income geographies exceeds its overall market share for home purchase loans.

Home Improvement Loans

Bremer's geographic distribution of home improvement loans is excellent. The percentage of loans originated from moderate-income census tracts exceeds the percentage of owner-occupied housing units in those geographies. Bremer's market share for loans made in moderate-income geographies exceeds its overall market share.

Home Refinance Loans

Bremer's geographic distribution of home refinance loans is good. The percentage of loans originated from moderate-income census tracts was near to the percentage of owner-occupied housing units in those geographies. Bremer's market share for loans made in moderate-income geographies is significantly lower than its overall market share.

Small Loans to Businesses

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

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

Small Loans to Farms

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

Bremer's geographic distribution of small loans to farms is adequate. The percentage of loans originated in moderate-income census tracts is significantly lower than demographics, but is considered adequate given the limited number of farms and the closer proximity of other lenders to these areas. Bremer's market share of small loans to farms in moderate-income geographies is significantly lower than its overall market share.

Lending Gap Analysis

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

Inside/Outside Ratio

Bremer's level of loan originations and purchases within the assessment area is good. During our evaluation period, Bremer originated 87% of all small farm, small business, and home mortgage (refinance, purchase, and home improvement) loans within the assessment area.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is good.

Home Mortgage Loans

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

Bremer's distribution of home mortgage loans by the income level of the borrower in the WI non-MSA AA is good.

Home Purchase Loans

Bremer's demographic distribution of home purchase loans is good. The percentage of home purchase loans to low-income families is near to the percentage of low-income families in the assessment area. The percentage of home purchase loans exceeds the percentage of moderate-income families in the assessment area. Bremer's market share of loans to low-income borrowers is lower than its overall market share, while loans to middle-income borrowers exceed its overall market share.

Home Improvement Loans

Bremer's demographic distribution of home improvement loans is good. The percentage of home improvement loans to low-income families is near to the percentage of low-income families in the assessment area. The percentage of home improvement loans exceeds the percentage of moderate-income families in the assessment area. Bremer's market share of loans to low-income borrowers exceeds its overall market share, while loans to middle-income borrowers are significantly lower than its overall market share.

Home Refinance Loans

Bremer's demographic distribution of home refinance loans is good. The percentage of home refinance loans to both low- and moderate-income borrowers are near to the percentage of low- and moderate-income families in the assessment area. Bremer's market share of home refinance loans to both low- and moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

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

Bremer's borrower distribution of small loans to businesses is excellent. The percentage of loans to businesses with revenues of \$1 million or less almost meets the percentage of businesses reporting revenues of \$1 million or less in the AA. Bremer's market share to businesses with revenues of \$1 million or less exceeds the overall market share. Bremer's lending market share within this AA of 25.64% was ranked first out of 37 lenders in market share for the AA.

Small Loans to Farms

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

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

Community Development Lending

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

Community development lending had a neutral impact on the bank's lending performance. Bremer originated one community development loan during the evaluation period in the WI non-MSA AA totaling \$200 thousand. This volume constitutes 0.47% of allocated Tier One Capital. This loan helped provide affordable housing to low- and moderate-income individuals. Other loans with community development characteristics were already considered in the evaluation of home mortgage and small loans to businesses.

Product Innovation and Flexibility

Bremer does not have any new flexible or innovative loan products for this evaluation period. However, Bremer continues to offer various loan programs, some developed internally, to assist low- and moderate-income borrowers in meeting credit needs. Bremer's relationships with various local and state housing agencies and lenders help to provide a variety of products targeted to low- and moderate-income individuals for successful home ownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Bremer's performance under the lending test in the St. Croix AA is not inconsistent with the bank's overall performance in the WI non-MSA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Outstanding. Based on a full-scope review, the bank's performance in the WI non-MSA AA is excellent. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Bremer's level of investments in the WI non-MSA AA is excellent given the bank's opportunities and responsiveness to the identified needs of the AA. Bremer made 112 qualified grants and donations totaling \$2.5 million during the evaluation period. This equates to 5.79% of the bank's allocated Tier One Capital for the AA. In addition, the bank has another \$374 thousand in investments that benefit the greater regional area including this AA.

Bremer's qualified investments consisted primarily of charitable contributions to various organizations that provide community services and affordable housing targeted to low- and moderate-income individuals. Examples of community development investments included providing funds for food shelves, operating funds for domestic abuse organizations, and funding to support affordable housing.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the St. Croix is not inconsistent with the bank's overall Outstanding performance under the investment test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Outstanding. Based on a full-scope review, the bank's performance in the WI non-MSA AA is excellent.

Retail Banking Services

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

Bremer's delivery systems are readily accessible to individuals of different income levels and in geographies of different income levels in the WI non-MSA AA. Bremer operates 13 branches in this assessment area, including one seasonal branch in La Pointe, WI that is open from mid-May to early October annually. Two branches are located in moderate-income tracts and eleven are in moderate-income census tracts. The percentage of the bank's branches located in moderate-income census tracts exceeds the percentage of the population living in those tracts. Bremer closed two branches during the evaluation period, but both branches were located in middle-income census tracts. These closures do not adversely affect the accessibility of its delivery systems, particularly in moderate-income geographies.

Services do not vary in a way that inconveniences the AA, particularly low- and moderate-income individuals. Bremer offers a variety of traditional banking products and services to meet the needs of the AA. A majority of the branches have Saturday drive-up hours.

In addition to the bank's existing branch network, banking services are available in several formats and include online banking, telephone banking, online loan applications, and an ATM network. Bremer does not track the impact of these services on its low- and moderate-income customers. Therefore, we did not place significant weight on these systems to reach conclusions on Bremer's performance. Bremer has fourteen ATMs in the WI non-MSA AA. None of the ATMs are deposit-taking. Two ATMs are located in moderate-income census tracts and twelve are in middle-income census tracts. The percentage of ATMs in moderate-income census tracts exceeds the percentage of population living in those tracts. Bremer closed one Amery ATM in a middle-income census tract during the evaluation period due to low transaction volume. Bremer belongs to the MoneyPass ATM network which allows its customers to use any MoneyPass ATM in the United States without a surcharge or bank fee.

Community Development Services

Bremer provides a good level of community development services based on the opportunities in the AA. Thirteen bank employees provided their financial expertise to 13 organizations that promote various

community development initiatives in the assessment area. A majority of the qualified activities are volunteer board positions. This includes community service organizations that are mainly targeted to low- and moderate-income individuals, addressing the issues of affordable housing, and promoting economic development initiatives. Examples include: serving as board members of housing authorities, participating in homebuyer seminars and foreclosure seminars targeted to low- and moderate-income individuals, and serving as board members on food pantry and homeless shelter organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the St. Croix AA is not inconsistent with the bank's overall Outstanding performance under the Service Test. The St. Croix AA contains no low- or moderate-income census tracts. The bank's performance in the St. Croix AA has no impact on the overall investment test performance. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2008 to 12/31/2011 Investment, Service, and CD Loans: 01/01/2008 to 06/30/2012	
Financial Institution	Products Reviewed	
Bremer Bank, National Association (Bremer) Menomonie, WI	Home Mortgage, Small Business, Small Farm and Community Development Loans; Qualified Investments; Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Otto Bremer Foundation	Affiliate	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Bremer WI Non-MSA	Full Scope	Burnett, Polk, Dunn, Bayfield Counties; Tract #9501 in Ashland County
Bremer St. Croix AA	Limited Scope	St. Croix County (Part of Minneapolis-St. Paul-Bloomington, MN-WI MSA #33460)

Appendix B: Market Profiles for Full-Scope Areas

Wisconsin Non-MSA AA

Demographic Information for Full-Scope Area: Wisconsin Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0	13.33	83.33	3.33	0
Population by Geography	114,845	0	8.50	87.25	4.25	0
Owner-Occupied Housing by Geography	34,429	0	8.81	86.37	4.82	0
Businesses by Geography	12,825	0	11.22	84.77	4.01	0
Farms by Geography	1,161	0	7.15	86.91	5.94	0
Family Distribution by Income Level	30,373	0	9.07	86.28	4.65	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,738	0	12.78	84.50	2.72	0
Median Family Income	= \$46,680	Median Housing Value				
HUD Adjusted Median Family Income for 2007	= \$59,100	Unemployment Rate		= \$93,094		
Households Below the Poverty Level	=11%	(State rate as of 12/31/11		= 7.5%		
		BLS)				

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

The Wisconsin Non- MSA AA consists of the Counties of Dunn, Polk and Burnett in western Wisconsin and Bayfield County and one census tract in Ashland County in northern Wisconsin. The AA complies with the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The economy has declined during this evaluation period. The unemployment rates in all the counties in the AA increased since the last CRA evaluation. As of December 31, 2011, the Bureau of Labor and Statistics reported unemployment of 6.5% in Dunn County, 8.4% in Polk County, and 9.1% for Burnett County, and 10.0% in Bayfield County. In comparison, the national unemployment rate was 8.9% and the state unemployment rate was 7.5%. The major industries in the AA include manufacturing, education, health care, public administration, and retail. The largest employers are from the medical field, public school systems, light manufacturing, and local governments. Community and credit needs in the AA are typical and include business, home mortgage loans, retail, and agricultural lending. Bremer's primary business focus is on these loan products.

Competition among financial institutions in the AA is high. Based on the June 30, 2011 FDIC Deposit Market Share report, Bremer ranks first among 22 institutions with a presence in the AA with 24.73% deposit market share.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: BREMER MENONOMIE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Bremer WI Non-MSA AA	82.15	1,589	160,706	1,129	132,913	1,032	95,457	1	200	3,751	389,276	91.33
Limited Review:												
Bremer St. Croix AA	17.85	388	50,295	195	26,571	232	19,358	2	1,075	817	97,299	8.67

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

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

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]													
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Bremer WI Non-MSA AA	298	74.69	0.00	0.00	8.81	10.07	86.37	85.23	4.82	4.70	6.00	0.00	8.41	5.75	5.13									
Limited Review:																								
Bremer St. Croix AA	101	25.31	0.00	0.00	0.00	0.00	77.74	93.07	22.26	6.93	1.68	0.00	0.00	2.09	0.00									

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

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: BREMER MENONOMIE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans					
Full Review:															
Bremer WI Non-MSA AA	53	79.10	0.00	0.00	8.81	18.87	86.37	75.47	4.82	5.66	5.43	0.00	6.25	4.83	14.29
Limited Review:															
Bremer St. Croix AA	14	20.90	0.00	0.00	0.00	0.00	77.74	100.00	22.26	0.00	0.00	0.00	0.00	0.00	0.00

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

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Bremer WI Non-MSA AA	1,237	81.92	0.00	0.00	8.81	7.52	86.37	86.18	4.82	6.31	8.48	0.00	3.44	9.15	8.02	
Limited Review:																
Bremer St. Croix AA	273	18.08	0.00	0.00	0.00	0.00	77.74	96.34	22.26	3.66	1.73	0.00	0.00	2.22	0.32	

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

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: BREMER MENONOMIE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography [*]				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans					
Full Review:															
Bremer WI Non-MSA AA	1	100.00	0.00	0.00	4.53	0.00	95.19	100.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bremer St. Croix AA	0	0.00	0.00	0.00	0.00	0.00	82.16	0.00	17.84	0.00	0.00	0.00	0.00	0.00	0.00

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

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Bremer WI Non-MSA AA	1,129	85.27	0.00	0.00	11.22	13.20	84.77	85.56	4.01	1.24	16.03	0.00	19.46	17.37	2.50									
Limited Review:																								
Bremer St. Croix AA	195	14.73	0.00	0.00	0.00	0.00	82.67	93.85	17.33	6.15	3.97	0.00	0.00	4.58	2.19									

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Bremer WI Non-MSA AA	1,032	81.65	0.00	0.00	7.15	0.58	86.91	90.70	5.94	8.72	69.73	0.00	0.00	69.06	92.00	
Limited Review:																
Bremer St. Croix AA	232	18.35	0.00	0.00	0.00	0.00	94.38	100.00	5.62	0.00	68.83	0.00	0.00	69.74	0.00	

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families [*] **	% BANK Loans ^{****}	% Families [*] 1	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Bremer WI Non-MSA AA	298	74.69	18.18	11.64	20.47	26.37	25.51	25.00	35.84	36.99	6.11	3.57	6.76	5.74	6.70	
Limited Review:																
Bremer St. Croix AA	101	25.31	15.56	27.55	20.93	32.65	28.42	26.53	35.08	13.27	1.71	2.00	1.70	2.20	0.88	

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

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: BREMER MENONOMIE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer WI Non-MSA AA	53	79.10	18.18	12.77	20.47	23.40	25.51	29.79	35.84	34.04	5.68	9.52	2.38	6.00	6.35
Limited Review:															
Bremer St. Croix AA	14	20.90	15.56	18.18	20.93	9.09	28.42	45.45	35.08	27.27	0.00	0.00	0.00	0.00	0.00

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

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: BREMER MENONOMIE					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Bremer WI Non-MSA AA	1,237	81.92	18.18	11.61	20.47	18.38	25.51	29.57	35.84	40.43	9.58	13.57	11.98	10.34	7.87	
Limited Review:																
Bremer St. Croix AA	273	18.08	15.56	14.12	20.93	31.76	28.42	33.33	35.08	20.78	1.90	2.26	1.91	2.58	1.27	

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

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: BREMER MENONOMIE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bremer WI Non-MSA AA	1,129	85.27	75.20	74.14	68.38	20.11	11.51	16.03	26.02
Limited Review:									
Bremer St. Croix AA	195	14.73	74.01	72.31	64.10	22.05	13.85	3.97	6.29

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

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

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

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.83% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: BREMER MENONOMIE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Bremer WI Non-MSA AA	1,032	81.65	98.54	84.01	70.45	20.64	8.91	69.73	72.86
Limited Review:									
Bremer St. Croix AA	232	18.35	97.72	86.21	77.16	13.79	9.05	68.83	73.02

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

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

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

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.63% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: BREMER MENONOMIE									
Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2012									
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bremer WI Non-MSA AA	0	0	0	2,485	112	2,485	73.24	0	0
Regional or Statewide	0	0	16	375	16	375	11.05		
Limited Review:									
Bremer St. Croix AA	0	0	19	533	19	533	15.71	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: BREMER MENONOMIE				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bremer WI Non-MSA AA	91.33	13	86.67	0.00	15.38	84.62	0.00	0	2	0	0	-2	0	0.00	8.50	87.25	4.25
Limited Review:																	
Bremer St. Croix AA	8.67	2	13.33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	78.60	21.40

Bremer WI Non MSA AA

Demographic Information for Full Scope Area: Bremer WI Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	13.33	83.33	3.33	0.00
Population by Geography	114,845	0.00	8.50	87.25	4.25	0.00
Owner-Occupied Housing by Geography	34,429	0.00	8.81	86.37	4.82	0.00
Business by Geography	12,825	0.00	11.22	84.77	4.01	0.00
Farms by Geography	1,161	0.00	7.15	86.91	5.94	0.00
Family Distribution by Income Level	30,373	18.18	20.47	25.51	35.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,738	0.00	12.78	84.50	2.72	0.00
Median Family Income	46,680	Median Housing Value		93,094		
HUD Adjusted Median Family Income for 2011	59,100	Unemployment Rate (2000 US Census)		3.15%		
Households Below Poverty Level	11%					

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

Source: 2000 US Census and 2011 HUD updated MFI

Bremer St. Croix AA

Demographic Information for Limited Scope Area: Bremer St. Croix AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	0.00	80.00	20.00	0.00
Population by Geography	63,155	0.00	0.00	78.60	21.40	0.00
Owner-Occupied Housing by Geography	17,885	0.00	0.00	77.74	22.26	0.00
Business by Geography	8,833	0.00	0.00	82.67	17.33	0.00
Farms by Geography	658	0.00	0.00	94.38	5.62	0.00
Family Distribution by Income Level	17,102	15.56	20.93	28.42	35.08	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,241	0.00	0.00	86.64	13.36	0.00
Median Family Income	64,885	Median Housing Value		142,186		
HUD Adjusted Median Family Income for 2011	82,700	Unemployment Rate (2000 US Census)		1.48%		
Households Below Poverty Level	4%					

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

Source: 2000 US Census and 2011 HUD updated MFI

