



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 17, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BNC National Bank
Charter Number 24224

20175 North 67th Avenue
Glendale, Arizona 85308

Office of the Comptroller of the Currency
Minneapolis Field Office
222 South 9th Street, Suite 800
Minneapolis, MN 55402

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

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Overall CRA Rating: Satisfactory

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

- As of December 31, 2017, 77 percent of bank deposits were held in the State of North Dakota. During this time period, 71 percent of loan originations were made in the State of North Dakota. Weighting is placed on conclusions for the State of North Dakota.
- Excellent borrower and geographic distribution of primary product loans in the State of North Dakota meet the standards of an Outstanding Lending Test rating. The Lending Test ratings for the State of Minnesota and State of Arizona are satisfactory and do not present concern for the bank's distribution of lending to meet their communities' needs.
- The volume of community development lending and qualified investments during the evaluation period meet the standards of a Satisfactory Community Development Test rating. However, the level of qualified investments during the evaluation period in the State of North Dakota demonstrated poor responsiveness to Community Development needs. Excellent responsiveness to community development needs in the State of Arizona supported the Satisfactory rating.

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 generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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) 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

BNC National Bank (BNC) is an interstate financial institution chartered in Glendale, Arizona. As of December 31, 2017, BNC had \$945 million in total assets. BNC is wholly owned by BNCCORP, Inc., a publicly traded holding company located in Bismarck, North Dakota. The holding company had \$971 million in consolidated total assets as of December 31, 2017. Including the main branch in Bismarck, BNC operates 15 branches and 12 automated teller machines (ATMs) in 3 states. Nine of the ATMs are located at BNC branches and three additional ATMs are located offsite at other locations. BNC does not operate any deposit-taking ATMs.

State	Number of Branches	Number of ATMs
Arizona	2	1
Minnesota	1	0
North Dakota	12	11

Management has designated four AAs across these three states. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income CT's. BNC opened two branches and closed two branches during the evaluation period. There have been no other significant changes to BNC's corporate structure.

BNC offers traditional loan and deposit products and services to its customers. These include: consumer loans, business loans, residential real estate loans, agriculture loans, personal and business checking, savings accounts, retirement accounts, wealth management, financial advice, and many online and mobile services.

BNC's business strategy is to continue controlled loan growth within the existing Arizona, Minnesota, and North Dakota markets. There are currently no plans for mergers, acquisitions, or any other notable corporate activities.

The bank's loan portfolio represented approximately 49 percent of total bank assets as of December 31, 2017. Tier One Capital totaled \$93.1 million resulting in a Tier One Leverage ratio of 9.62 percent. The loan portfolio remains concentrated in commercial, commercial real estate, and residential real estate loans. By dollar amount, total outstanding commercial loans represent 70.9 percent of the portfolio, residential real estate loans represent 16.2 percent, consumer loans represent 7.8 percent, and agricultural loans represent 5.1 percent of the portfolio. Given the diverse geographical makeup of BNC's markets, lending activity varies between market areas. A substantial portion of the bank's residential real estate activity stems from a consumer direct channel complemented by retail channels from 12 locations in Arizona, Minnesota, North Dakota, Illinois, Kansas, and Missouri. The consumer direct channel provides the bank access to mortgage loan customers throughout the United States.

There are no financial, legal, or other factors that impede the bank's ability to meet its CRA obligations. The most recent CRA evaluation completed July 27, 2015 resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

BNC was evaluated under the Intermediate Small Bank CRA examination procedures, which includes a Lending Test and a Community Development (CD) Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments and donations. CD services are also reviewed; but are not a rating component for an Intermediate Small Bank CRA evaluation.

The Lending Test covers BNC's performance from January 1, 2015 to December 31, 2017. To determine the bank's primary loan products, we analyzed both the number and dollar of loans originated and purchased during the evaluation period by loan product type. We complete this analysis for each AA based on where the loans were originated. Agriculture, commercial, and residential real estate loan types were determined to be the primary products in BNC's individual AAs. Primary products are representative of the bank's lending strategy since the last CRA examination. Refer to Table 2 for a list of primary products identified in each AA. The bank's lending test performance for the years 2015 and 2016 were evaluated on a combined basis. Due to changes in census data effective in 2017, lending performance during this period was evaluated separately.

Assessment Area	Loan Category
Phoenix MSA	Commercial Loans
Bismarck MSA	Commercial Loans
Minneapolis/St. Paul MSA	Commercial & Residential Real Estate Loans
North Dakota Non MSA	Agriculture Loans

The CD Test includes BNC's loans, investments, and donations from July 28, 2015 to December 31, 2018.

Data Integrity

To evaluate BNC National Bank's lending performance, we selected a random sample of 180 primary product loans. The sample included 120 commercial loans, 40 agriculture loans, and 20 residential real estate loans from 2015-2016 and 2017. We used information from the bank's loan files to complete our review.

Loan data reported by the bank on its 2015 and 2016 HMDA LARs was tested for accuracy during a data integrity examination conducted prior to the start of this CRA evaluation. All data was found to be accurate and reliable. Management did not submit the 2017 HMDA LAR for review prior to conducting the CRA evaluation. Testing for 2017 residential real estate loans was conducted via loan sampling. We reviewed all of the bank's CD loans and investments covering this evaluation period. All CD transactions and activities included in this performance evaluation were validated as meeting CD regulatory definitions.

Selection of Areas for Full-Scope Review

In each state where the bank has a branch, at least one AA within that state was selected for a full-scope review. Due to BNC's share of customer deposits allocated to both the Bismarck AA and ND Non MSA, both AAs were chosen for full scope reviews. Refer to Appendix A and the "Scope of Evaluation" section under each State Rating for more information.

Ratings

The bank's overall rating combines all state ratings. The rating for the State of North Dakota was weighted more heavily than the other states. North Dakota accounts for the largest portion of BNC's branches, deposit activity, and loan volume. The state ratings are based on the primary products which received full-scope reviews. Refer to Table 3 for further detail.

Table 3 – BNC's AA Impact			
Assessment Area	Percent of Branches	Percent of Deposits	Percent of Loans Originated by \$
Bismarck MSA	46.7%	44.1%	66.6%
ND Non MSA	33.3%	33.1%	4.5%
Phoenix MSA	13.3%	2.3%	12.2%
Minneapolis MSA	6.6%	20.5%	16.7%

Source: Bank loan reports, Bank deposit reports, FDIC market share report.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Criteria

BNC's performance under the Lending Test is excellent. The bank's lending activity reflects excellent responsiveness to AA credit needs for business, agriculture, and residential real estate loans. BNC's LTD ratio is reasonable. A substantial majority of BNC's loans are originated to borrowers located inside the AAs.

Loan-to-Deposit Ratio (LTD)

BNC's LTD ratio is reasonable given the bank's size, financial condition, and the AAs credit needs. The LTD is calculated on a bank-wide basis. BNC's average quarterly LTD ratio was 55.3 percent for the 10 quarters since the last CRA examination. The ratio ranged from a quarterly low of 48.0 percent to a high of 61.6 percent. The bank's lower than peer LTD ratio is explainable given their practice of selling the guaranteed portions of Small Business Administration (SBA) loans and loan participations. When factoring in the sold SBA loans segments and loan participations, BNC's average quarterly LTD ratio would be 72.5 percent. This results in a satisfactory placement amongst the bank's peer group.

Institution	Total Assets as of June 30, 2017 (\$000)	Average Ratio September 30, 2015 – December 31, 2017
Western State Bank and Trust	\$998,959	98.5%
Starion Financial	\$1,259,287	83.9%
First Western Bank and Trust	\$1,070,809	73.2%
Dakota Community Bank and Trust	\$752,662	71.7%
American Bank Center	\$1,372,691	70.2%
BNC National Bank	\$1,000,485	55.3%

Source: Call Report Data.

Lending in Assessment Area

BNC originated a substantial majority of its loans to borrowers located inside its AAs during the evaluation period. BNC's lending within the AA exceeds the standard for satisfactory performance. Illustrated in Table 5, BNC originated or purchased 90.0 percent of the Bank's loans by number and 60.9 percent of loans by dollar within the AA during the evaluation period. Emphasis is placed on the sampling results for the number of loans due a small number of commercial loans to businesses outside the AAs skewing the volume distribution sampling results. The following table shows the lending by product type inside and outside the AAs.

Table 5 - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Commercial	106	88.3	14	11.7	120	\$30,619	56.1	\$23,986	43.9	\$54,605
Agriculture	40	100.0	0	0.0	40	\$4,959	100.0	\$0	0.0	\$4,959
Home Mortgage	16	80.0	4	20.0	20	\$3,261	78.0	\$922	22.1	\$4,184
Total	162	90.0	18	10.0	180	\$38,839	60.9	\$24,909	39.1	\$63,748
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

State Rating

State of North Dakota

CRA rating for the North Dakota: Satisfactory

The lending test is rated: Outstanding

The community development test is rated: Satisfactory

- BNC's performance in the State of North Dakota meets the standards for Satisfactory performance.
- The distribution of loans to business of different sizes in the Bismarck MSA AA reflects reasonable penetration of AA demographics.
- The distribution of loans to farms of different sizes reflects excellent penetration of the North Dakota Non-MSA AA demographics.
- The distribution of loans to businesses and farms across census tracts (CTs) of different income levels reflects excellent distribution to low- and moderate-income CTs.
- The volume of Community Development (CD) lending demonstrates adequate responsiveness to the CD needs of the bank's AAs.
- The level of CD qualified investments demonstrates poor responsiveness to CD needs of the bank's AAs.

Description of Institution's Operations in North Dakota

BNC has two AAs in North Dakota: Bismarck MSA, and North Dakota Non-MSA. During the evaluation period BNC had 12 branches in North Dakota. Seven branches were located in the Bismarck MSA and five branches were located in the North Dakota Non-MSA.

Bismarck MSA

The AA is comprised of Burleigh, Morton, Oliver, and Sioux counties in North Dakota. The seven branches are located within Burleigh and Morton counties; however, the bank selects the entire MSA as their AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

This AA accounts for 44.1 percent of the bank's deposits as of December 31, 2017, and 66.6 percent of the bank's loans originated during the evaluation period. The primary lending product for the Bismarck MSA AA is commercial loans.

Based on the 2010 U.S. census, there are 27 CTs in the MSA. Of the 27 CTs, three are designated as low-income, two are designated as moderate-income, 17 are designated as middle-income, and five are designated as upper-income. The 2016 estimated median family income is \$67,178.

Based on the 2015 ACS census, there are 27 CTs in the MSA. Of the 27 CTs, two are designated as low-income, four are designated as moderate-income, 19 as designated as middle-income, and two are designated as upper-income. The 2017 estimated median family income is \$82,181.

Major industries within the AA include state government, finance, healthcare, and it also serves as a major distribution center for the agricultural industry. The three major employers in the AA according to the Bismarck-Mandan Development Association data includes: State of North Dakota, Sanford Health, and the Bismarck public school district.

North Dakota Non-MSA

The AA is comprised of seven CTs located in rural North Dakota. The CTs are located in Divide, McLean, Ward, Emmons, Mountrail, and McKenzie counties in North Dakota. BNC selects the 7 census tracts as their AA due to branch location and proximity. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

This AA accounts for 33.1 percent of the bank's deposits as of December 31, 2017, and 4.5 percent of the bank's loans originated during the evaluation period. The primary lending product for the North Dakota Non-MSA AA is agriculture loans.

Based on the 2010 U.S. census, there are no CTs designated as low-income, one designated as moderate-income, five designated as middle-income, and one designated as upper-income. The 2016 estimated median family income is \$58,592.

Based on the 2015 ACS census, there are no CTs designated as low-income, one designated as moderate-income, four designated as middle-income, and two designated as upper-income. The 2017 estimated median family income is \$72,620.

Major industries within the AA include agriculture, accounting, manufacturing, coal mining, and oil and gas exploration. Major employers in North Dakota vary by rural region.

Scope of Evaluation in North Dakota

We completed full-scope reviews of the Bismarck MSA AA and North Dakota Non-MSA AA due to the variance in primary products during the evaluation period. The Bismarck MSA and North Dakota Non-MSA account for 44.1 percent and 33.1 percent of the bank's deposits, respectively, as of December 31, 2017. Thus the Bismarck AA is given the most weight for arriving at the overall performance conclusions for the State of North Dakota. However, strong consideration is also given to the North Dakota Non-MSA conclusions when arriving at the conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BISMARCK MSA

LENDING TEST

The bank's performance under the Lending Test in the State of North Dakota in the Bismarck MSA AA is rated excellent.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans to business of different sizes in both periods of 2015-2016 and 2017 reflects reasonable distribution amongst AA demographics. In 2015-2016, BNC originated 60 percent of loans sampled to businesses with revenues less than \$1 million. Although below the demographic for the percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 45 percent. In 2017, BNC originated 47 percent of loans sampled to business with revenues less than \$1 million. Although also below the demographic for the percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 45 percent.

Geographic Distribution of Loans

The distribution of commercial loans to CTs of different income levels reflects excellent dispersion of AA demographics. In 2015-2016, BNC's distribution of commercial loans to low-income CTs exceeded the demographic for the percent of businesses located in the CTs. The percent of bank loans distributed to moderate-income tracts received the most weighting in 2017 due to census changes, and BNC's distribution of commercial loans to moderate-income CTs greatly exceeded the demographic for the percent of businesses located in the CTs.

Responses to Complaints

Neither the bank nor the OCC received any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

Community Development (CD) activities in the Bismarck MSA AA demonstrates adequate responsiveness to meet the community's needs considering the availability of opportunities in the stable economy.

Number and Amount of Community Development Loans

BNC provided an adequate level of CD loans to the Bismarck MSA AA during the evaluation period. BNC originated 13 qualified CD loans in the AA totaling \$8.8 million. As of December 31, 2017 represented 18 percent of the bank's allocated Tier One Capital. CD loans in the Bismarck MSA AA included financing for an affordable housing project, business loans for

economic stabilization in low- or moderate-income CTs, and a daycare loan for a business located in a low-income CT.

Number and Amount of Qualified Investments

BNC's level of investments in the Bismarck MSA AA demonstrates poor responsiveness to meet the community development needs. Qualified grants and donations totaled \$1.2 million during the evaluation period. As of December 31, 2017 this represented 2.9 percent of the bank's allocated Tier One Capital. The qualified investments for the Bismarck MSA AA are below the investment volumes in the Phoenix MSA AA and Minneapolis MSA AA, even though the majority of deposits are allocated to the Bismarck MSA AA. Examples of qualified community development investments made during the evaluation period include:

- Donations to organizations supporting food banks
- Investments in low- and moderate-income housing
- Donations to organizations supporting affordable housing

Extent to Which the Bank Provides Community Development Services

The bank's level of CD services is adequate. Employees served eight different organizations during the CD evaluation period. The organizations served provide support for victims of domestic violence, literacy courses for Title One schools, and local United Way projects. These services extended through the entire evaluation period.

Responsiveness to Community Development Needs

BNC demonstrates adequate responsiveness to CD needs in the Bismarck MSA AA. Management satisfactorily addressed opportunities for CD participation in their AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH DAKOTA NON MSA

LENDING TEST

The bank's performance under the Lending Test in the State of North Dakota in the North Dakota Non-MSA AA is rated excellent.

Lending to Borrowers of Different Incomes and to Farms of Different Sizes

The distribution of agriculture loans to businesses of different sizes in 2015-2016 and 2017 reflects excellent distribution. In 2015-2016, 95 percent of bank loans were made to farms with revenues less than \$1 million. This aligns with the demographic comparator for the AA and exceeds the aggregate peer comparator by 83 percent in 2015-2016 and 2017, respectively.

Geographic Distribution of Loans

The distribution of agriculture loans across geographies of different incomes in the North Dakota Non-MSA AA reflects excellent distribution. Distribution of agriculture loans to farms

located in moderate-income CTs greatly exceeds the demographic comparator for both sampling periods. Specifically, in 2015-2016 BNC originated 100 percent of agriculture loans sampled to farms located in moderate-income CTs, exceeding the demographic comparator for the AA of 21 percent. In 2017, BNC originated 80 percent of agriculture loans samples to farms located in moderate-income CTs, exceeding the demographic comparator for the AA of 23 percent. No low-income CTs are located within the AA for analysis purposes.

Responses to Complaints

Neither the bank nor the OCC received any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

CD activities in the North Dakota Non-MSA AA are adequate; however, qualified investments were nominal and represent poor responsiveness.

Number and Amount of Community Development Loans

BNC provided an adequate level of CD loans to the AA during the evaluation period. BNC originated 6 qualified CD loans in the AA totaling \$4.5 million. As of December 31, 2017 this represents 15 percent of the bank's allocated Tier One Capital. Notable CD loans in the AA included financing USDA rural development loans, and loans to businesses located in moderate-income CTS for the purpose of economic revitalization and stabilization.

Number and Amount of Qualified Investments

BNC's level of investments in the ND non-MSA AA demonstrates poor responsiveness to the CD needs of the AA. The bank had one qualified donation for the AA, and the donation was for a nominal amount.

Extent to Which the Bank Provides Community Development Services

Management provided adequate CD services to the AA. During the evaluation period one employee served as a financial advisor to the Linton Industrial Development Board. Linton, North Dakota is located in a moderate-income CT. These services extended through the entire evaluation period.

Responsiveness to Community Development Needs

BNC demonstrates adequate responsiveness to CD needs in the North Dakota Non-MSA AA. Management satisfactorily addressed opportunities for CD lending in their AA during the evaluation period; however, qualified investments demonstrated poor responsiveness to CD needs.

State Rating

State of Arizona

CRA rating for the Arizona: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Outstanding

- BNC's performance in the State of Arizona meets the standards for Satisfactory performance.
- The distribution of loans to business of different sizes in the Phoenix MSA AA reflects reasonable penetration of AA demographics.
- The distribution of loans to businesses across CTs of different income levels reflects reasonable distribution to low- and moderate-income CTs.
- The volume of Community Development (CD) lending demonstrates excellent responsiveness to the CD needs of the bank's AA.
- The level of CD qualified investments demonstrates excellent responsiveness to CD needs of the bank's AA.

Description of Institution's Operations in Arizona

BNC has one AA in Arizona, the Phoenix MSA AA. During the evaluation period BNC had two branches in Arizona, both located in the Phoenix MSA AA. The Phoenix MSA AA includes all of Maricopa and Pinal counties. It is the largest MSA in the state of Arizona. The branches are located in the cities of Glendale and Scottsdale. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

This AA accounted for 2.3 percent of the bank's deposits as of December 31, 2017, and 12.2 percent of the bank's loans originated during the evaluation period. The primary lending product for the AA is commercial loans.

Based on the 2010 U.S. census, there are 991 CTs in the AA. Of the 991 CTs, 91 are designated low-income, 243 are moderate-income, 336 are middle-income, 311 are upper income, and 10 tracts are listed as "N/A." The 2016 estimated median family income is \$64,408.

Based on the 2015 ACS census, there are 991 CTs in the AA. Of the 991 CTs, 110 are designated low-income, 231 are moderate-income, 326 are middle-income, 311 are upper income, and 13 are listed as "N/A." The 2017 estimated median family income is \$63,686.

Major industries within the MSA include retail services, healthcare, financial services, manufacturing, and real estate. Major employers located in the MSA include the State of

Arizona, City of Phoenix, Wal-Mart Stores, Inc., Banner Health Systems, Wells Fargo, Bank of America, Maricopa County, and Arizona State University.

Scope of Evaluation in Arizona

We completed a full-scope review of the State of Arizona Phoenix MSA AA. Commercial loans is the primary lending category for the AA, as it represents 40.0 percent of loan originations by number and 72.7 percent of loans originated by dollar volume. Other loan types within the AA represent a small segment of loan production in the area and are not meaningful to analyze during our CRA lending assessment.

A member of the local community who serves as a small business consultant in Phoenix, Arizona was contacted during this CRA examination. The contact stated the state of Arizona appears to still be recovering from the recent economic recession. Small business lending from nationwide financial institutions is minimal in the region, so lending to small businesses from community financial institutions meets a vital need. Community financial institutions provide opportunities for lending to the region's underserved populations. Affordable housing lending was also noted as need within the Phoenix MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHOENIX MSA

LENDING TEST

The bank's performance under the Lending Test in the State of Arizona in the Phoenix MSA AA is rated Satisfactory.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans to businesses of different sizes in both periods of 2015-2016 and 2017 reflects reasonable penetration of AA demographics. In 2015-2016, BNC originated 55 percent of loans sampled to businesses with revenues less than \$1 million. Although below the demographic comparator of 84 percent for the percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 42 percent. In 2017, BNC originated 65 percent of loans sampled to business with revenues less than \$1 million. Although also below the demographic of 88 percent for the percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 42 percent.

Geographic Distribution of Loans

The distribution of commercial loans to CTs of different income levels reflects reasonable dispersion of AA demographics to moderate-income CTs in 2015-2016 and low-income CTs in 2017. Geographic distribution of commercial loans in 2015-2016 to low-income CTs is excellent.

Responses to Complaints

Neither the bank nor the OCC received any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

CD activities in the Phoenix MSA AA are rated outstanding and demonstrate excellent responsiveness to meet the community's needs.

Number and Amount of Community Development Loans

BNC demonstrated excellent responsiveness in meeting the CD needs of the AA during the evaluation period. BNC originated 26 qualified CD loans in the AA totaling \$16.9 million. As of December 31, 2017, this represented 99 percent of the bank's allocated Tier One Capital. CD loans in the AA included financing for an affordable housing project and general business loans for economic stabilization.

Number and Amount of Qualified Investments

BNC's level of investments in the Phoenix MSA is excellent given the bank's opportunities and responsiveness to the identified needs in the MSA. Qualified investments totaled \$1.9 million during the evaluation period. This represents 9.2 percent of the bank's Tier One Capital allocated to the Phoenix MSA.

Extent to Which the Bank Provides Community Development Services

The bank's level of CD services is adequate. Three employees worked with three CD organizations during the evaluation period. Services included providing credit analysis services to an organization providing loan guarantees to businesses with insufficient collateral to qualify for conventional financing. Another example includes providing financial services to an organization supporting low- and moderate-income individuals while a family member is hospitalized. These services extended through the entire evaluation period.

Responsiveness to Community Development Needs

BNC demonstrates excellent responsiveness to CD needs in the Phoenix MSA AA. Management appropriately identified and addressed opportunities for CD participation in their AA during the evaluation period.

State Rating

State of Minnesota

CRA rating for the Minnesota: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

- BNC's performance in the State of Minnesota meets the standards for Satisfactory performance.
- The distribution of loans to business of different sizes in the Minneapolis MSA AA reflects reasonable penetration of AA demographics.
- The distribution of loans to businesses across CTs of different income levels reflects excellent distribution in 2015-2016 and reasonable distribution in 2017 to low- and moderate-income CTs.
- The distribution of residential real estate loans to borrowers of different income levels reflects reasonable distribution when context is given to the affordability of housing for low-income level borrowers.
- The geographic distribution of residential real estate loans reflects reasonable distribution. The bank demonstrates poor distribution to low-income CT's, but this is due to the low volume of owner-occupied housing units in the CTs coupled with strong lending competition throughout the AA.
- The volume of Community Development (CD) lending demonstrates adequate responsiveness to the CD needs of the bank's AA.
- The level of CD qualified investments demonstrates excellent responsiveness to CD needs of the bank's AA.

Description of Institution's Operations in Minnesota

BNC has one AA in Minnesota, the Minneapolis MSA AA. The AA is comprised of portions of the larger Minneapolis-St. Paul-Bloomington MN-WI MSA. During the evaluation period BNC had one branch in the AA, located in Golden Valley, MN. Management has designated the AA to include the following Minnesota counties: Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

This AA accounted for 20.5 percent of the bank's deposits as of December 31, 2017, and 16.7 percent of the bank's loans originated during the evaluation period. The primary lending products for the AA are commercial loans and residential real estate loans.

Based on the 2010 U.S. census, there are 732 CTs in the AA. Of the 732 CTs, 63 are designated as low-income, 140 as moderate-income, 318 as middle-income, 207 as upper-income, and four are listed as "N/A." The 2016 estimated median family income is \$79,301.

Based on the 2015 ACS census, there are 732 CTs in the AA. Of the 732 CTs, 56 are designated as low-income, 164 as moderate-income, 321 as middle-income, 184 as upper-income, and seven are listed as "N/A." The 2017 estimated median family income is \$85,636.

The AA includes a diverse economic base; however, major industries include electronics manufacturing, milling, machinery, medical products, food processing, and graphic arts. The largest employers within the MSA include the University of Minnesota-Twin Cities, 3M, and Target Stores Inc.

Scope of Evaluation in Minnesota

We completed a full-scope review of the State of Minnesota Minneapolis MSA AA. Commercial and residential real estate loans are the primary lending categories for the AA. Commercial loan originations represent 62 percent of loans originated by volume, and 26 percent by number. Residential real estate loan originations represent 35 percent of loans originated by volume, and 71 percent by number. Other loan types within the AA represent a small segment of loan production in the area and are not meaningful to analyze during our CRA lending assessment.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in the State of Minnesota in the Minneapolis MSA AA is rated Satisfactory.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans to businesses of different sizes in 2015-2016 and 2017 reflects reasonable penetration of AA demographics. In 2015-2016, BNC originated 55 percent of loans sampled to businesses with revenues less than \$1 million. Although below the demographic comparator of 82 percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 47 percent. In 2017, BNC originated 50 percent of loans sampled to business with revenues less than \$1 million. Although also below the demographic of 84 percent of businesses in the MSA reporting revenues less than \$1 million, BNC exceeds the aggregate peer comparator of 47 percent.

Geographic Distribution of Loans

In 2015-2016 the geographic distribution of business loans is excellent. Sampled originations to businesses located in low-income CTs greatly exceeds the demographic comparator. Sampled originations to businesses in moderate-income CTs is equal to the demographic

comparator. Both categories exceed the aggregate peer comparators for low- and moderate-income CTs.

In 2017 the geographic distribution of business loans is reasonable. Sampled originations to businesses located in low-income CTs reflects poor distribution; however, sampled origination to businesses located in moderate-income CTs reflects excellent distribution. The demographic comparator for the percent of businesses in moderate-income CTs is 17 percent and exceeds low-income CTs at 5 percent, therefore more weight is placed on the bank's exceeding distribution of business loans to moderate-income CTs in 2017.

Lending to Residential Real Estate Borrowers of Different Incomes

Lending to residential real estate borrowers of different income levels reflects reasonable distribution. In 2015-2016 BNC originated 16 percent of bank loans to moderate-income borrowers, which is reasonable in comparison to the demographic comparator of 17 percent for the percent of families designated as moderate-income. Although BNC's origination of loans to low-income borrowers reflects poor distribution in 2015-2016, the average housing price for the AA supports a lack of affordability for low-income borrowers during the evaluation period.

In 2017, the 20 sampled residential real estate loans reflected reasonable distribution to low-income and moderate-income borrowers, mirroring the percent of families designated as both low- and moderate-income.

Geographic Distribution of Residential Real Estate Loans

The geographic distribution of residential real estate loans in 2015-2016 reflects reasonable distribution when context is given to the number of owner-occupied housing units located in low-income CTs and the strong lending competition within the bank's market. Demographic data supports BNC has more opportunities to lend to moderate-income CTs as the number of owner-occupied housing units exceeds 20 thousand, whereas the number of owner-occupied housing units in low-income CTs is approximately 4 thousand in 2015-2016. The volume of units also includes rental properties and abandoned units within the demographics.

The geographic distribution of residential real estate loans in 2017 reflects reasonable distribution when context is given to the number of owner-occupied housing units located in low-income CTs and the strong lending competition within the bank's market. Demographic data supports BNC has more opportunities to lend to moderate-income CTs as the number of owner-occupied housing units exceeds 20 thousand in 2017. BNC's lending to moderate-income CTs in 2017 reflects excellent distribution. The volume of owner-occupied housing units in low-income CTs presents difficulty for lending due to the volume of units totaling approximately 3 thousand in 2017.

Responses to Complaints

Neither the bank nor the OCC received any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

CD activities in the Minneapolis MSA AA are rated satisfactory and demonstrate adequate responsiveness to meet the community's needs.

Number and Amount of Community Development Loans

BNC demonstrated adequate responsiveness in meeting the CD needs of the AA during the evaluation period. BNC originated 4 qualified CD loans in the AA totaling \$2.6 million. As of December 31, 2017 this represents 75 percent of the bank's allocated Tier One Capital.

Number and Amount of Qualified Investments

BNC's level of investments in the Minneapolis MSA is excellent given the bank's opportunities and responsiveness to the identified needs of the MSA. Qualified grants and donations totaled \$2.6 million during the entire evaluation period. This represents 116.9 percent of the bank's Tier One Capital allocated to the Minneapolis MSA as of December 31, 2017. Examples of community development investments during the evaluation period include:

- Donations to organizations supporting small businesses
- Donations to organizations supporting victims of abuse
- Investments in low- and moderate-income housing

Extent to Which the Bank Provides Community Development Services

The bank's level of CD services is adequate. One employee serves on the finance committee for an organization dedicated to serving low-income children who are at-risk of abuse or neglect. CD services extended through the entire evaluation period.

Responsiveness to Community Development Needs

BNC demonstrates adequate responsiveness to CD needs in the Phoenix MSA AA. Management appropriately identified and addressed opportunities for CD participation in their AA during the evaluation period

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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): 1/01/2015 – 12/31/2017 Investment and CD Loans Test: 7/28/2015 – 12/31/2017	
Financial Institution	Loan Products Reviewed	
BNC National Bank Glendale, Arizona	Bismarck MSA: Commercial ND Non MSA: Agriculture Phoenix MSA: Commercial Minneapolis MSA: Commercial & Residential Real Estate	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>Not Applicable.</i>	<i>Not Applicable.</i>	<i>Not Applicable.</i>
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
1. Bismarck MSA 2. ND Non MSA 3. Phoenix MSA 4. Minneapolis MSA	1. Full Scope 2. Full Scope 3. Full Scope 4. Full Scope	<i>Not Applicable.</i>

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State/Multistate Rating
BNC National Bank	Outstanding	Satisfactory	Satisfactory
Multistate Metropolitan Area or State:			
North Dakota	Outstanding	Satisfactory	Satisfactory
Arizona	Satisfactory	Outstanding	Satisfactory
Minnesota	Satisfactory	Satisfactory	Satisfactory

Appendix C: Community Profiles for Full-Scope Areas and Lending Test Demographic Data

State of North Dakota – Bismarck ND MSA AA

Demographic Information of the Bismarck MSA AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	11.1	7.4	63.0	18.5	0.0
Population by Geography	114,778	7.0	7.5	67.2	18.3	0.0
Housing Units by Geography	48,580	6.6	8.7	68.7	15.9	0.0
Owner-Occupied Units by Geography	32,872	6.0	7.2	68.1	18.7	0.0
Occupied Rental Units by Geography	12,675	7.1	11.3	72.0	9.6	0.0
Vacant Units by Geography	3,033	10.6	14.7	62.2	12.5	0.0
Businesses by Geography	9,266	7.0	6.5	70.6	16.0	0.0
Farms by Geography	791	4.6	13.8	69.9	11.8	0.0
Family Distribution by Income Level	29,794	19.0	18.4	22.9	39.6	0.0
Household Distribution by Income Level	45,547	23.8	16.3	18.5	41.5	0.0
Median Family Income MSA - 13900 Bismarck, ND MSA		\$67,178	Median Housing Value			\$136,222
			Median Gross Rent			\$553
			Families Below Poverty Level			7.0%

Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the Bismarck MSA AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	7.4	14.8	70.4	7.4	0.0
Population by Geography	123,407	3.5	13.1	76.1	7.3	0.0
Housing Units by Geography	54,283	2.4	15.1	76.7	5.8	0.0
Owner-Occupied Units by Geography	36,299	1.2	11.9	78.7	8.2	0.0
Occupied Rental Units by Geography	14,960	4.3	22.3	72.8	0.7	0.0
Vacant Units by Geography	3,024	7.5	18.6	71.5	2.5	0.0
Businesses by Geography	9,548	1.2	21.5	70.5	6.8	0.0
Farms by Geography	727	3.2	15.7	75.2	5.9	0.0
Family Distribution by Income Level	32,488	18.8	18.8	24.8	37.6	0.0
Household Distribution by Income Level	51,259	22.5	17.6	19.0	40.8	0.0
Median Family Income MSA - 13900 Bismarck, ND MSA		\$82,181	Median Housing Value			\$186,274
			Median Gross Rent			\$723
			Families Below Poverty Level			5.8%

Source: 2015 ACS Census and 2017 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

BNC's Bismarck AA consists of a total of 27 contiguous census tracts in the Bismarck metropolitan area. The AA is comprised of Burleigh, Morton, Oliver, and Sioux counties in North Dakota. BNC selects the entire MSA as their AA. The AA meets regulatory requirements.

As of June 30, 2017, BNC had a 10.3 deposit market share in the Bismarck MSA AA. This ranks third out of 20 financial institutions gathering deposits in all four counties. Wells Fargo Bank, N.A. and Starion Bank rank first and second in deposit market shares, which together constituted 34.0 percent of the deposit market in the four counties. As of December 31, 2017, 44.1 percent of the deposits BNC holds are from the Bismarck MSA.

State of North Dakota - ND Non MSA AA

Demographic Information of the ND Non MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	71.4	14.3	0.0
Population by Geography	22,618	0.0	15.7	66.7	17.6	0.0
Housing Units by Geography	13,073	0.0	16.1	68.9	15.1	0.0
Owner-Occupied Units by Geography	7,824	0.0	17.3	66.8	15.9	0.0
Occupied Rental Units by Geography	1,913	0.0	13.4	72.6	14.0	0.0
Vacant Units by Geography	3,336	0.0	14.7	71.5	13.8	0.0
Businesses by Geography	2,179	0.0	13.5	65.5	21.0	0.0
Farms by Geography	641	0.0	22.0	61.3	16.7	0.0
Family Distribution by Income Level	6,445	18.0	17.3	22.3	42.3	0.0
Household Distribution by Income Level	9,737	22.5	14.6	16.7	46.3	0.0
Median Family Income Non-MSAs - ND		\$58,592	Median Housing Value			\$77,398
			Median Gross Rent			\$419
			Families Below Poverty Level			7.0%
<i>Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0</i> (*) The NA category consists of geographies that have not been assigned an income classification.						

Demographic Information of the ND Non MSA AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	57.1	28.6	0.0
Population by Geography	25,882	0.0	13.4	52.4	34.2	0.0
Housing Units by Geography	14,466	0.0	14.6	57.0	28.4	0.0
Owner-Occupied Units by Geography	8,195	0.0	15.7	57.2	27.1	0.0
Occupied Rental Units by Geography	2,743	0.0	11.3	49.5	39.2	0.0
Vacant Units by Geography	3,528	0.0	14.4	62.4	23.1	0.0
Businesses by Geography	2,263	0.0	13.3	50.8	36.0	0.0
Farms by Geography	573	0.0	20.9	60.0	19.0	0.0
Family Distribution by Income Level	7,115	20.2	17.2	20.6	42.1	0.0
Household Distribution by Income Level	10,938	25.1	15.5	17.4	42.0	0.0
Median Family Income Non-MSAs - ND		\$72,620	Median Housing Value			\$131,455
			Median Gross Rent			\$669
			Families Below Poverty Level			6.2%
<i>Source: 2015 ACS Census and 2017 D&B Data. Due to rounding, totals may not equal 100.0</i> (*) The NA category consists of geographies that have not been assigned an income classification.						

BNC's ND Non MSA AA consists of a total of 7 census tracts located in rural North Dakota. The census tracts are located in Divide, McLean, Ward, Emmons, Mountrail, and McKenzie counties in North Dakota. BNC selects the 7 census tracts as their AA due to branch location and proximity. The AA meets regulatory requirements.

As of June 30, 2017, BNC had a 6.1 percent deposit market share in the ND Non MSA AA. This ranks fifth out of 22 financial institutions gathering deposits in all seven census tracts. First Western Bank & Trust and First International Bank and Trust rank first and second in deposit market shares, and together constituted 36.3 percent of the deposit market shares in the seven census tracts. As of December 31, 2017, 33.1 percent of the deposits BNC holds are from the ND Non MSA AA.

State of Arizona – Phoenix MSA AA

Demographic Information of the Phoenix MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	991	9.2	24.5	33.9	31.4	1.0
Population by Geography	4,192,887	8.2	24.7	36.0	31.0	0.2
Housing Units by Geography	1,745,666	7.4	26.4	35.9	30.3	0.0
Owner-Occupied Units by Geography	1,008,811	3.7	21.5	38.1	36.8	0.0
Occupied Rental Units by Geography	492,017	14.1	34.3	32.3	19.3	0.0
Vacant Units by Geography	244,838	9.6	30.5	34.0	25.8	0.1
Businesses by Geography	328,447	6.5	15.9	30.8	46.3	0.5
Farms by Geography	6,597	5.5	17.1	34.5	42.4	0.4
Family Distribution by Income Level	1,000,063	21.2	17.8	20.5	40.6	0.0
Household Distribution by Income Level	1,500,828	22.6	17.1	18.5	41.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Scottsdale, AZ MSA		\$64,408	Median Housing Value			\$251,130
			Median Gross Rent			\$934
			Families Below Poverty Level			10.0%

Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Information of the Phoenix MSA AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	991	11.1	23.3	32.9	31.4	1.3
Population by Geography	4,407,915	10.6	23.5	33.7	31.9	0.3
Housing Units by Geography	1,832,045	9.4	23.9	35.6	31.1	0.1
Owner-Occupied Units by Geography	967,478	4.5	19.6	37.1	38.7	0.0
Occupied Rental Units by Geography	602,639	16.7	29.7	32.6	20.8	0.2
Vacant Units by Geography	261,928	10.7	26.4	36.5	26.3	0.1
Businesses by Geography	347,383	6.4	16.7	29.6	46.7	0.5
Farms by Geography	7,023	5.7	20.6	31.7	41.7	0.3
Family Distribution by Income Level	1,036,417	21.9	17.3	19.5	41.3	0.0
Household Distribution by Income Level	1,570,117	23.4	16.5	17.9	42.2	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Scottsdale, AZ MSA		\$63,686	Median Housing Value			\$197,320
			Median Gross Rent			\$991
			Families Below Poverty Level			12.5%

Source: 2015 ACS Census and 2017 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

BNC's Phoenix AA consists of a total of 991 contiguous census tracts in the Phoenix metropolitan area. The AA is comprised of Maricopa and Pinal counties in Arizona. BNC selects the entire MSA as their AA. The AA meets regulatory requirements.

As of June 30, 2017, BNC had a 0.2 percent deposit market share in the Phoenix MSA AA. This ranks 34th out of 60 financial institutions gathering deposits in the two counties. JPMorgan Chase Bank, N.A. and Wells Fargo Bank, N.A. rank first and second in deposit market shares, and together constituted 49.4 percent of the deposit market in the two counties. As of December 31, 2017, 20.5 percent of the deposits BNC holds are from the Phoenix MSA.

State of Minnesota – Minneapolis MSA AA

Demographic Information of the Minneapolis MSA AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	732	8.6	19.1	43.4	28.3	0.5
Population by Geography	3,062,766	6.7	16.5	46.1	30.7	0.1
Housing Units by Geography	1,258,115	6.7	17.7	46.8	28.8	0.0
Owner-Occupied Units by Geography	853,565	2.7	13.3	49.6	34.5	0.0
Occupied Rental Units by Geography	330,789	16.0	27.9	40.6	15.5	0.0
Vacant Units by Geography	73,761	12.0	22.3	43.3	22.4	0.0
Businesses by Geography	221,745	4.8	15.1	45.2	34.9	0.0
Farms by Geography	5,946	1.6	10.6	54.7	33.1	0.0
Family Distribution by Income Level	761,040	18.9	17.4	23.1	40.6	0.0
Household Distribution by Income Level	1,184,354	22.6	16.3	19.4	41.7	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$256,544
			Median Gross Rent			\$863
			Families Below Poverty Level			6.4%
Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.						

Demographic Information of the Minneapolis MSA AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	732	7.7	22.4	43.9	25.1	1.0
Population by Geography	3,171,206	6.3	19.2	46.3	27.9	0.3
Housing Units by Geography	1,289,111	5.9	20.1	47.1	26.6	0.3
Owner-Occupied Units by Geography	847,611	2.4	15.4	50.0	32.2	0.1
Occupied Rental Units by Geography	378,382	13.2	30.3	40.9	14.9	0.9
Vacant Units by Geography	63,118	10.0	22.3	46.6	20.4	0.8
Businesses by Geography	228,145	4.7	16.7	47.8	30.4	0.3
Farms by Geography	6,124	1.6	10.5	58.8	29.1	0.1
Family Distribution by Income Level	788,752	20.2	17.2	22.0	40.5	0.0
Household Distribution by Income Level	1,225,993	23.6	16.1	18.4	42.0	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$230,018
			Median Gross Rent			\$965
			Families Below Poverty Level			7.0%
Source: 2015 ACS Census and 2017 D&B Data. Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.						

BNC's Minneapolis AA consists of a total of 732 contiguous census tracts in the Minneapolis/St. Paul multi-state metropolitan statistical area. The AA is comprised of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, and Wright counties in Minnesota. BNC select these entire counties within the MMSA as their AA. The AA meets regulatory requirements.

As of June 30, 2017, BNC had a 0.02 percent deposit market share in the Minneapolis MSA AA. This ranks 107th out of 131 financial institutions gathering deposits in the nine counties. Wells Fargo, N.A. and U.S. Bank, N.A. rank first and second in the deposit market shares, and together constituted 79.0 percent of the deposit market in the nine counties. As of December 31, 2017, 2.3 percent of the deposits BNC holds are from the Minneapolis MSA.

Bismarck ND MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bismarck MSA	20	9,097	2.9	1,984	77.9	60.0	45.7	5.6	35.0	16.5	5.0	
Total	20	9,097	2.9	1,984	77.9	60.0	45.7	5.6	35.0	16.5	5.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Bismarck ND MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																	2015-16		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bismarck MSA	20	9,097	2.9	1,984	6.8	10.0	8.9	6.6	5.0	5.6	70.6	75.0	66.9	16.1	10.0	18.6	0.0	0.0	0.0
Total	20	9,097	2.9	1,984	6.8	10.0	8.9	6.6	5.0	5.6	70.6	75.0	66.9	16.1	10.0	18.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Bismarck ND MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues												2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bismarck MSA	60	16,593	8.6	1,984	79.2	47.3	45.7	6.3	52.7	14.5	0.0	
Total	60	16,593	8.6	1,984	79.2	47.3	45.7	6.3	52.7	14.5	0.0	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Bismarck ND MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bismarck MSA	60	16,593	8.6	1,984	1.2	0.0	0.8	21.5	37.0	21.7	70.5	60.0	68.8	6.8	3.0	8.7	0.0	0.0	0.0
Total	60	16,593	8.6	1,984	1.2	0.0	0.8	21.5	37.0	21.7	70.5	60.0	68.8	6.8	3.0	8.7	0.0	0.0	0.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*

ND Non MSA AA Distribution of Loans to Farms by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
ND Non MSA	20	2,606	10.4	396	99.3	95.0	51.8	0.6	5.0	0.1	0.0	
Total	20	2,606	10.4	396	99.3	95.0	51.8	0.6	5.0	0.1	0.0	

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*

ND Non MSA AA Distribution of Loans to Farms by Income Category of the Geography																		2015-16		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
ND Non MSA	20	2,606	10.4	396	0.0	0.0	0.0	23.2	100.0	6.6	60.5	0.0	60.6	16.3	0.0	32.8	0.0	0.0	0.0	
Total	20	2,606	10.4	396	0.0	0.0	0.0	23.2	100.0	6.6	60.5	0.0	60.6	16.3	0.0	32.8	0.0	0.0	0.0	

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*

ND Non MSA AA Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (\$000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
ND Non MSA	20	2,590	21.0	396	99.0	95.0	51.8	0.7	5.0	0.3	0.0
Total	20	2,590	21.0	396	99.0	95.0	51.8	0.7	5.0	0.3	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

ND Non MSA AA Distribution of Loans to Farms by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
ND Non MSA	20	2,590	21.0	396	0.0	0.0	0.0	20.9	80.0	6.6	60.0	10.0	59.8	19.0	10.0	33.6	0.0	0.0	0.0
Total	20	2,590	21.0	396	0.0	0.0	0.0	20.9	80.0	6.6	60.0	10.0	59.8	19.0	10.0	33.6	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Phoenix AZ MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Phoenix MSA	20	5,355	5.1	124,716	83.9	55.0	41.6	4.0	45.0	12.1	0.0	
Total	20	5,355	5.1	124,716	83.9	55.0	41.6	4.0	45.0	12.1	0.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Phoenix AZ MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Phoenix MSA	20	5,355	5.1	124,716	6.4	25.0	6.3	15.9	10.0	14.5	30.9	30.0	28.4	46.2	30.0	50.3	0.6	5.0	0.4	
Total	20	5,355	5.1	124,716	6.4	25.0	6.3	15.9	10.0	14.5	30.9	30.0	28.4	46.2	30.0	50.3	0.6	5.0	0.4	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Phoenix AZ MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (\$000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Phoenix MSA	20	6,042	19.3	124,716	87.8	65.0	41.6	4.3	35.0	7.9	0.0	
Total	20	6,042	19.3	124,716	87.8	65.0	41.6	4.3	35.0	7.9	0.0	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Phoenix AZ MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2017	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (\$000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Phoenix MSA	20	6,042	19.3	124,716	6.4	5.0	6.0	16.7	15.0	16.0	29.6	10.0	27.6	46.7	70.0	50.1	0.5	0.0	0.4	
Total	20	6,042	19.3	124,716	6.4	5.0	6.0	16.7	15.0	16.0	29.6	10.0	27.6	46.7	70.0	50.1	0.5	0.0	0.4	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Minneapolis MN MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minneapolis MSA	20	50,816	66.8	75,211	81.9	55.0	46.7	6.3	45.0	11.7	0.0	
Total	20	50,816	66.8	75,211	81.9	55.0	46.7	6.3	45.0	11.7	0.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Minneapolis MN MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Minneapolis MSA	20	50,816	66.8	75,211	4.8	15.0	3.7	15.0	15.0	13.5	45.2	45.0	43.2	35.0	25.0	39.7	0.0	0.0	0.0		
Total	20	50,816	66.8	75,211	4.8	15.0	3.7	15.0	15.0	13.5	45.2	45.0	43.2	35.0	25.0	39.7	0.0	0.0	0.0		

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Minneapolis MN MSA AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Minneapolis MSA	20	2,618	29.4	75,211	84.1	50.0	46.7	6.9	50.0	9.0	0.0	
Total	20	2,618	29.4	75,211	84.1	50.0	46.7	6.9	50.0	9.0	0.0	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Minneapolis MN MSA AA Distribution of Loans to Small Businesses by Income Category of the Geography																		2017	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Minneapolis MSA	20	2,618	29.4	75,211	4.7	0.0	3.8	16.7	30.0	14.7	47.8	30.0	46.2	30.4	40.0	35.1	0.3	0.0	0.2
Total	20	2,618	29.4	75,211	4.7	0.0	3.8	16.7	30.0	14.7	47.8	30.0	46.2	30.4	40.0	35.1	0.3	0.0	0.2

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Minneapolis MN MSA AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Minneapolis MSA	150	39,011	100.0	156,886	18.9	4.7	7.8	17.4	16.0	19.5	23.1	28.0	21.7	40.6	47.3	33.4	0.0	4.0	17.6	
Total	150	39,011	100.0	156,886	18.9	4.7	7.8	17.4	16.0	19.5	23.1	28.0	21.7	40.6	47.3	33.4	0.0	4.0	17.6	

*Source: 2010 U.S Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Minneapolis MN MSA AA Distribution of Home Mortgage Loans by Income Category of the Geography																	2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Minneapolis MSA	150	39,011	100.0	156,886	2.7	1.3	2.5	13.3	8.0	12.1	49.6	44.0	49.5	34.5	46.7	35.9		
Total	150	39,011	100.0	156,886	2.7	1.3	2.5	13.3	8.0	12.1	49.6	44.0	49.5	34.5	46.7	35.9		

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Minneapolis MN MSA AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MN MSA	20	3,931	40.6	134,667	20.2	20.0	9.0	17.2	15.0	22.1	22.0	45.0	21.9	40.5	20.0	30.1	0.0	0.0	16.9
Total	20	3,931	40.6	134,667	20.2	20.0	9.0	17.2	15.0	22.1	22.0	45.0	21.9	40.5	20.0	30.1	0.0	0.0	16.9

*Source: 2015 ACS Census 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Minneapolis MN MSA AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
MN MSA	20	3,931	40.6	134,667	2.4	0.0	3.1	15.4	30.0	15.7	50.0	45.0	51.2	32.2	25.0	29.9	0.1	0.0	0.1
Total	20	3,931	40.6	134,667	2.4	0.0	3.1	15.4	30.0	15.7	50.0	45.0	51.2	32.2	25.0	29.9	0.1	0.0	0.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*