



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 07, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bremer Bank, National Association
Charter Number: 23298

500 Willmar Avenue SE
Willmar, MN 56201

Office of the Comptroller of the Currency

ADC-MINNEAPOLIS (8324) Field Office
Campbell Mithun Tower 222 South Ninth Street
Minneapolis, MN. 55402-3393

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

Table of Contents

OVERALL CRA RATING 2

DEFINITIONS AND COMMON ABBREVIATIONS 3

DESCRIPTION OF INSTITUTION 7

SCOPE OF EVALUATION 8

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 10

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS 11

LENDING TEST 11

INVESTMENT TEST 13

SERVICE TEST 14

APPENDIX A: SCOPE OF EXAMINATIONA-1

APPENDIX B: MARKET PROFILES FOR FULL SCOPE AREAS.....B- 2 -

APPENDIX C: TABLES OF PERFORMANCE DATAC-1

Overall CRA Rating

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

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	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 overall Lending Test performance is good. Bremer's lending reflects good responsiveness to Assessment Area (AA) credit needs. A high percentage of loans are made in Bremer's AA. Bremer demonstrates good borrower distribution of mortgage loans to individuals of all income levels and adequate borrower distribution of loans to small businesses and farms.
- Bremer's overall Investment Test performance is good. Bremer bank and the Otto Bremer Foundation grants provide a significant level of qualified community development investments targeted to the specific needs of their community.
- Bremer's overall Service Test performance is good. Bremer's locations are accessible to all portions of the bank's AA. Employees provide a good level of Community Development (CD) services.

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/AA.

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 re-financings, 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/AA.

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 thousand 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 is an intrastate bank, with headquarters located in Willmar, MN. The bank also has branch locations in Marshall, Redwood Falls, and Mankato, MN. Each of these branch locations contains a deposit-taking automated teller machine (ATM). An additional deposit-taking ATM is located at a grocery store in Willmar. The grocery store location contained a full-service branch until March 2011; however, the branch closed and was replaced with the current deposit-taking ATM. The bank formerly had a branch located in Hutchinson, MN, which was sold in August 2004. The Mankato branch was originally a loan production office (LPO) beginning in October 2010. The LPO became a full service branch in September 2011.

Bremer had total assets of \$556 million, as of September 30, 2011, with \$50 million in Tier One Capital. The bank's primary focus is to maintain a diverse loan portfolio by serving all customer's commercial, commercial real estate, agricultural, residential real estate, and consumer needs. As of September 30, 2011, Bremer's \$420 million loan portfolio consisted of 44% residential real estate loans, 11% consumer loans, and 3% other loans.

Bremer is owned by Bremer Financial Corporation (BFC), a \$7.8 billion holding company headquartered in St. Paul, MN. BFC affiliates have more than 100 locations throughout Minnesota, North Dakota, and Wisconsin. Non-bank affiliates include trust and insurance companies. BFC is owned by the Otto Bremer Foundation (Foundation) and its employees. A majority of the Foundation's assets are invested in BFC. Earnings generated by BFC and other investments support local non-profit activities through the grant-making activities of the Foundation. At the bank's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test Performance.

Bremer's performance was rated "Satisfactory" at its last CRA evaluation on May 9, 2005.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of Evaluation

The bank currently has three AAs: the Willmar AA, the Marshall AA, and the Mankato AA. The Willmar AA is a non-metropolitan statistical area (non-MSA), comprised of Kandiyohi County in its entirety. The Willmar branch, with attached ATM, and the grocery store ATM are located within this AA. The Marshall AA is also a non-MSA, comprised of Lincoln, Lyon, Redwood, and Yellow Medicine Counties in their entirety. The Marshall branch and Redwood branch, along with attached ATMs are located within this AA. The Willmar and Marshall AAs will be combined for evaluation purposes, due to their geographic proximity and similar demographic compositions. These two AAs will be referred to jointly as the Willmar AA for the remainder of this report.

The Mankato AA is comprised of Blue Earth and Nicollet Counties, in their entirety. Both of these counties are part of the Mankato – North Mankato Metropolitan Statistical Area (MSA # 31860). We did not evaluate performance in this AA for this examination as the Mankato branch was not opened until September 2011 and therefore insufficient data was available for a meaningful analysis.

Evaluation Period/Products Evaluated

We evaluated Bremer's small business, small farm, and home mortgage data for the period beginning January 1, 2004 through December 31, 2010. Bank data was compared to demographic data based on 2000 census information.

For community development testing purposes, we considered loans, investments, and services occurring between January 1, 2005 and September 30, 2011.

Data Integrity

Bremer is not required to publicly report data on the home mortgage loans that it originates; however, it gathers HMDA data for internal use. The validity of that data was verified and used to draw conclusions about the bank's home mortgage lending activities.

Prior to conducting this evaluation, we tested the accuracy of the bank's small business and small farm loan data. We found the data to be accurate. We used the data in this evaluation.

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

Selection of Areas for Full Scope Review

We completed a full scope review of the Willmar AA. Refer to Appendix A for more information.

Ratings

The bank's overall rating is based on our full scope review of the Willmar AA.

Other

We made one community contact during this evaluation. We used information obtained from this contact to determine opportunities for participation by banks in helping to meet local credit needs and understand perceptions on the performance of banks in helping to meet those needs. This local business development contact noted small business lending as a primary credit need and described local financial institutions as adequate in meeting those needs.

Community services, especially in the area of financial literacy training, were also noted by the contact as a need in the community, due to the large immigrant population in the Willmar AA. The contact also noted that local financial institutions do a good job of providing these community services to the local immigrant population.

Fair Lending or Other Illegal Credit Practices Review

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, Bremer's performance in the Willmar AA is good.

Lending Activity

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

Bremer's lending activity is good. Lending levels reflect good responsiveness in relation to the identified needs and the bank's market share. Bremer has the largest deposit market share within the Willmar AA, with 16.69% of area deposits, as of June 30, 2011. Their next closest competitors are Minnwest Bank, with 9.90% deposit market share and Wells Fargo, with 8.62%. Bremer leads local bank market competition in small loan farm lending with 43.43% of the market share by number of loans and 49.55% by dollar volume. Their next closest competitors are Wells Fargo and Bank of the West, with 21.11% and 14.01% of the market share (by number of loans), respectively. Bremer has the second largest market share in the AA for small loan business lending with 16.25% of loans by number; however, they lead the market in loans to small businesses with 59.60% of by dollar volume. Wells Fargo leads the market in small loan business lending, with 26.36% by number of loans. Wells Fargo has only 21.11% of small business loans, by dollar volume.

Bremer is not required to report home mortgage loan information under HMDA, therefore market share information on the bank's mortgage lending is not available.

Distribution of Loans by Income Level of the Geography

The geographic distribution of all loans within the AA was not meaningful since the AA does not include any low- or moderate-income (LMI) census tracts .

Inside/Outside Ratio

A high percentage of Bremer's loan originations/purchases (80% by number) were made within the AA. This ratio excludes affiliate lending and is calculated at the bank level. By product type, 83% of home mortgage loans, 79% of small business loans, and 77% of small farm loans were originated or purchased within the AA. We viewed this as a positive characteristic in our analysis of lending performance.

Distribution of Loans by Income Level of the Borrower

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.

The overall borrower distribution of home mortgage loans reflects good penetration among individuals of different income levels. Bremer's distribution of home mortgage loans to borrowers of different income levels is good. Home refinance loans represented the largest category of residential real estate lending while home purchase loans represented the second largest category during the evaluation period. As a result, home refinance and purchase lending received greater weight than home improvement which was very limited during the evaluation period. Performance of lending to low-income individuals takes into consideration a moderate poverty level of 10%. Sixteen percent of the AA families are low-income families and 19% are moderate-income families.

Bremer's distribution of home refinance loans to borrower's of different income levels is adequate. The percentage of home refinance loans to low-income borrowers was somewhat lower than the AA demographic. The percentage of home refinance loans to moderate-income borrowers approximated the AA demographic.

Bremer's distribution of home purchase loans to borrower's of different income levels is excellent. The percentage of home purchase loans to low-income borrowers was slightly lower than the AA demographic. The percentage of home purchase loans to moderate-income borrowers exceeded the AA demographic.

Bremer's distribution of home improvement loans to borrower's of different income levels is good. The percentage of home improvement loans to low-income borrowers was somewhat lower than the AA demographic. The percentage of home improvement loans to moderate-income borrowers exceeded the AA demographic.

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 originations and purchase of small loans to businesses.

Bremer's distribution of loans to small businesses is adequate. The percentage of loans to small businesses is significantly lower than the demographic information for the AA. Although the bank does not meet the AA demographics for small business lending, they rank second of 33 banks for small business loan market share. Bremer's market share of loans to small businesses exceeded its overall market share. Additionally, the AA contains a high volume of businesses owned by immigrants, which do not generally have a high demand for business loans.

Small Loans to Farms

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

Bremer's distribution of loans to small farms is adequate. The percentage of loans to small farms is somewhat lower than the AA demographic. However, Bremer ranks highest in small farm loan market share and its lending to small farms exceeds its overall market share.

Community Development Lending

Bremer's community development lending is good. Bremer made a relatively high level of community development loans during the evaluation period. Bremer originated five community development loans, totaling \$3.49 million, during this evaluation period. Two loans were to finance the construction of homes for Habitat for Humanity, which provides affordable housing to low- to moderate-income individuals. Two additional loans were to finance the construction of 14 single-family homes in the Marshall area, to provide affordable housing to low- and moderate-income families. The last community development loan was to finance the purchase of commercial real estate for the Minnesota Valley Action Council, a non-profit organization, located in the Mankato area, which sponsors programs and services for low- to moderate-income individuals. This loan does not directly benefit the bank's Willmar AA and therefore was only given partial consideration.

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.

Product Innovation and Flexibility

Bremer's products are consistent with those found throughout the Bremer banking organization and those offered by competitors. The products are not considered to be innovative or flexible, and had a neutral impact on the lending test performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the investment test is rated high satisfactory. Based on the full scope review, the bank's performance in the Willmar AA is good.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

To evaluate Bremer's performance under the investment test, we considered the amount of community development investment opportunities available within the AA. There exist numerous investment opportunities in the Willmar AA, particularly to organizations such as Habitat for Humanity, building affordable housing for LMI individuals, and immigrant and Native American outreach groups, promoting financial literacy and economic development opportunities.

Bremer's level of qualified investments is good given the bank's capacity and investment opportunities. Qualifying investments within the Willmar AA totaled \$3,410,762, from 116 separate grants and investments. Dollar-wise, community development investments made during the evaluation period comprise 6.8% of September 30, 2011 Tier One Capital levels. The investments made during the evaluation period are responsive to the identified needs of the Willmar AA.

Qualified investments consist of donations and grants made by the bank and the Foundation. Bremer supports a number of organizations that provide social services and affordable housing to LMI individuals. Bremer is also a strong supporter of educational opportunities directed to LMI children and adults.

SERVICE TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the Service Test is rated high satisfactory. Based on the full scope review, the bank's performance in the Willmar AA is good.

Retail Banking Services

Bremer's performance with regards to retail banking services is adequate. The distribution of branches in the AA fosters accessibility to individuals of all income levels and is given positive consideration in our evaluation. The bank's AA is comprised entirely of middle- and upper-income census tracts; however, service delivery systems remain accessible to individuals of different income levels. The bank currently operates four full-service banking offices in Willmar, Marshall, Redwood Falls, and Mankato, MN. Additionally, each branch contains a deposit-taking ATM. One stand-alone ATM is located at a grocery store in Willmar, which replaced a full-service branch in 2011, due to the close proximity of the bank's newly built main Willmar location. Bremer relocated their main branch from downtown Willmar to a newly built facility 1.4 miles away in October 2006. The downtown branch was subsequently closed. An ATM was maintained at that location until 2007, but was moved to Rice Memorial Hospital due to low usage in the area. The Rice Memorial Hospital ATM was subsequently closed in 2011, again due to low usage.

Bremer opened a Loan Production Office in Mankato, MN in October 2010. The LPO became a full-service branch in September 2011.

Bremer's hours of operation are reasonable and consistent throughout Bremer branches. Alternative delivery systems for small businesses and retail banking services are routine to the industry. Bremer utilizes internet banking, telephone banking, ATMs, and bank-by-mail systems to provide accessibility to all customers. Bremer does not track the affect of these services on its LMI customers. Given the routine nature of these services, and the lack of impact data on the bank's LMI customers, we did not weight these alternative delivery systems heavily in our evaluation.

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.

Community Development Services

The bank's community development services performance in the Willmar AA is good. Bremer and their employees are involved with various local organizations focused on the needs of individuals of different income levels. For example, Bremer has been specifically involved with ARC Kandiyohi County, providing financial advising services to mostly LMI persons with disabilities, New Horizons Crisis Center, again, providing financial advising to LMI individuals, and the Redwood Economic Development Corps, providing development opportunities to small businesses in the area.

Bremer's officers and directors have taken on leadership roles in the community in organizations which provide services to individuals of different income levels. Such organizations include Habitat for Humanity (affordable housing), Marshall Area Financial Empowerment Collaborative (financial literacy), Redwood Area Chamber of Commerce – Agriculture Committee (services for small farms), United Way of Southwest Minnesota (provides financial services), and West Central Industries (healthcare and social services).

Bremer also has a designated non-profit resource specialist on staff. This employee is responsible for working with non-profit organizations in the AA to provide training, education, and career building opportunities. The organizations benefitting from these services largely serve LMI individuals.

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): 1/1/2004 to 12/31/2010 Investment and Service Tests and CD Loans: 1/1/2005 to 9/30/2011	
Financial Institution	Products Reviewed	
Bremer Bank, NA Willmar, MN	Home mortgage, small loans to businesses, small loans to farms, multifamily and CD loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Otto Bremer Foundation	Owner	Investments
List of AAs and Type of Examination		
AA	Type of Exam	Other Information
Willmar AA Marshall AA	Full Scope Full Scope	Willmar AA and Marshall AA are combined in this report for purposes of this analysis and referred to as the Willmar AA
Mankato AA	N/A	The Mankato AA will not be analyzed during this review, due to limited data availability.

Appendix B: Market Profiles for Full Scope Areas

Willmar AA

Demographic Information for Full Scope Area: Bremer Willmar AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0	0	93.55	6.45	0
Population by Geography	100,952	0	0	91.62	8.38	0
Owner-Occupied Housing by Geography	29,661	0	0	91.73	8.27	0
Businesses by Geography	8,519	0	0	91.25	8.75	0
Farms by Geography	1,987	0	0	94.92	5.08	0
Family Distribution by Income Level	26,706	16.31	19.23	25.86	38.60	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,491	0	0	94.66	5.34	0
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below the Poverty Level	= \$45,608 = \$58,700 =10%					Median Housing Value = \$79,467 Unemployment Rate = 2.17%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2010 HUD updated MFI.

The Willmar AA is comprised of both the Willmar and the Marshall AAs. These two AAs were combined for purposes of this evaluation. The combined Bremer Willmar AA is comprised of 31 non-contiguous census tracts in southwestern, MN and contains Kandiyohi, Lincoln, Lyon, Redwood, and Yellow Medicine Counties in their entirety. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The AA is not located in a Metropolitan Statistical Area. The cities of Willmar, Marshall, and Redwood Falls comprise the largest population concentrations and economic centers of the AA. Willmar has a population of 19,610, Marshall has a population of 13,680, and Redwood Falls has a population of 5,254 as of 2010 census information¹. Unemployment in the AA as of the year 2000 was only 2.17%; however, unemployment levels have seen significant increases since 2008. As of September 30, 2011 unemployment in the AA ranged from 4.4% in Lincoln County to 5.8% in Marshall County. Statewide unemployment for Minnesota was 5.9% as of that date.

¹ 2010 Census Redistricting Data (Public Law 94-171), Summary File

The biggest employer in the AA is Jennie-O Turkey Store, a turkey-processing plant in Willmar, which employs over 1,000 employees from the local community. Other major employers from Kandiyohi County include Rice Memorial Hospital and Affiliated Medical Centers, Molenaar, LLC, and West Central Steel. The MinnWest Technology Campus also opened in 2006, whose mission is to promote the advancement of biosciences and technology in the Willmar Lakes Area. Major employers in Lyon County include Avera Regional Hospital, Southwest Minnesota State University, public school system, US Bank Leasing Division, and the Schwan Food Company. Redwood County's largest employer is the Jackpot Junction Casino Hotel, which is owned and operated by the Lower Sioux Community. Agriculture and farming are very strong in all 5 counties within the AA. Overall, services make up the largest business demographic in the AA, with 42% of businesses. Agriculture, forestry, and fishing is the next largest, with 19% of businesses, followed by retail trade, with 10% of businesses. Construction and manufacturing make up 6% and 3% of businesses, respectively.

The Bremer Willmar AA contains only middle- and upper-income census tracts; however, 19% of families living in the AA are considered moderate-income families, while 16% are considered low-income families. Ten percent of households are living below the poverty line. According to the 2010 List of Middle-Income Non-metropolitan Distressed or Underserved Geographies, both census tracts located in Lincoln County are "underserved" due to their "remote rural location," and all six census tracts in Redwood County are considered "distressed," due to population loss between 1990 and 2000 census data.

One of the major factors distinguishing the Bremer Willmar AA from other areas is the influx of immigrants and refugees of Hispanic and East African heritage to the area over the last 10 years, most notably in Kandiyohi County and the City of Willmar. Both groups came to Southwestern Minnesota in search of jobs, mainly in the manufacturing sector. Currently, the Jennie-O Turkey Store employs over 500 immigrants. Because of the large immigrant population in the AA, there exists many community development opportunities to assist these groups acclimate to American culture. These opportunities include, but are not limited to mortgage lending, small business lending, and financial literacy programs.

Affordable housing has become an issue in the Willmar AA, particularly in Kandiyohi County. There are a few rental properties in the Willmar area and the few available are nearly as expensive as those in the Twin Cities Metropolitan Statistical Area.

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/AA; (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.

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/AA. Community development loans to statewide or regional entities or made outside the bank’s AA 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 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 AA.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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 AA.
- 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/AA. 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 thousand) 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/AA.

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 AA. 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 WILLMAR AA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2010				
AA (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 Willmar	100.00	3,035	327,614	1,717	314,358	1,857	184,044	5	3,488	6,609	826,016	0.00

^{*} Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2005 to September 30, 2011.

^{***} Deposit Data as of November 08, 2011. 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 31, 2010		Geography: BREMER WILLMAR AA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER							
AA:	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 Willmar	1,246	100.00	0.00	0.00	0.00	0.00	91.73	87.00	8.27	13.00	0.00	0.00	0.00	0.00	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 DECEMBER 31, 2010			Geography: BREMER WILLMAR AA				Evaluation Period: JANUARY 1, 2004 TO					Market Share (%) by Geography*				
AA:	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 Willmar	127	100.00	0.00	0.00	0.00	0.00	91.73	89.76	8.27	10.24	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 DECEMBER 31, 2010			Geography: BREMER WILLMAR AA						Evaluation Period: JANUARY 1, 2004 TO						
AA:	Total Home Mortgage Refinance 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	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Willmar	1,652	100.00	0.00	0.00	0.00	0.00	91.73	84.69	8.27	15.31	0.00	0.00	0.00	0.00	0.00

* 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 2010		Geography: BREMER WILLMAR AA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31,							
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Bremer Willmar	10	100.00	0.00	0.00	0.00	0.00	89.61	80.00	10.39	20.00	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 DECEMBER 31, 2010		Geography: BREMER WILLMAR AA								Evaluation Period: JANUARY 1, 2004 TO					
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Willmar	1,717	100.00	0.00	0.00	0.00	0.00	91.25	85.56	8.75	14.44	16.25	0.00	0.00	18.31	15.54

* 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 (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2010			Geography: BREMER WILLMAR AA				Evaluation Period: JANUARY 1, 2004 TO					Market Share (%) by Geography*				
AA:	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 Willmar	1,857	100.00	0.00	0.00	0.00	0.00	94.92	88.42	5.08	11.58	43.43	0.00	0.00	42.34	67.50	

* 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2010		Geography: BREMER WILLMAR AA							Evaluation Period: JANUARY 1, 2004 TO DECEMBER						
AA:	Total Home Purchase 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 Willmar	1,246	100.00	16.31	12.88	19.23	24.41	25.86	25.76	38.60	36.95	0.00	0.00	0.00	0.00	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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.7% 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2010		Geography: BREMER WILLMAR AA								Evaluation Period: JANUARY 1, 2004 TO DECEMBER					
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Willmar	127	100.00	16.31	9.09	19.23	23.14	25.86	28.10	38.60	39.67	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 4.7% 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 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2010			Geography: BREMER WILLMAR AA								Evaluation Period: JANUARY 1, 2004 TO				
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Willmar	1,652	100.00	16.31	7.98	19.23	17.33	25.86	26.81	38.60	47.88	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 4.7% of loans originated and purchased by bank.

⁴ 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 DECEMBER 31, 2010			Geography: BREMER WILLMAR AA			Evaluation Period: JANUARY 1, 2004 TO			
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	
AA:									
Full Review:									
Bremer Willmar	1,717	100.00	77.90	51.25	55.56	22.48	21.96	16.25	17.44

^{*} 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 - 2010).

^{****} 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 6.12% 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 DECEMBER 31, 2010		Geography: BREMER WILLMAR AA			Evaluation Period: JANUARY 1, 2004 TO				
AA:	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 Willmar	1,857	100.00	98.24	80.67	69.47	22.19	8.35	43.43	46.17

^{*} 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 - 2010).

^{****} 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 8.35% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 30, 2011		Geography: BREMER WILLMAR AA				Evaluation Period: JANUARY 1, 2005 TO SEPTEMBER			
AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bremer Willmar	0	0	116	3,410	116	3,410	100%	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 JANUARY 1, 2004 TO DECEMBER 31, 2010				Geography: BREMER WILLMAR AA				Evaluation Period:									
MA/AA:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	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 Willmar	0.00	3	100%	0.00	0.00	100%	0.00	2	1	0	0	-1	0	0.00	0.00	91.62	8.38