



## **PUBLIC DISCLOSURE**

February 6, 2023

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

St. Martin National Bank  
Charter Number: 15198

136 Main Street  
St. Martin, MN 56376

Office of the Comptroller of the Currency

222 South Ninth 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

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

**The lending test is rated: Outstanding**

The major factors that support this rating include:

- The bank originated a substantial majority of its loans inside its assessment area (AA).
- The distribution of loans to borrowers of different income levels and farms of different sizes is excellent.
- The loan-to-deposit (LTD) ratio is reasonable based on the institution’s size, financial condition, and AA credit needs.
- The bank did not receive any CRA-related complaints during the evaluation period.

## Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s loan-to-deposit ratio is reasonable.

The bank’s quarterly LTD ratio averaged 54.89 percent for the 13 quarters between December 31, 2018 and December 31, 2021. The LTD ratio ranged from a quarterly low of 38.15 percent in the fourth quarter of 2021 to a high of 68.2 percent in the third quarter of 2019. The LTD ratio declined over the evaluation period due to pandemic related implications. The institution’s agricultural customer base received large amounts of stimulus funding pertaining to COVID-19 relief. This resulted in increased deposit balances and reduced loan demand because of customers’ additional cash-on-hand. The bank’s LTD ratio ranked fourth out of four similarly situated institutions. Similarly situated institutions included those located within the AA with total asset sizes ranging from \$75.9 million to \$137.6 million, as of September 30, 2022.

The following table details the average LTD ratio.

Loan-to-Deposit Ratio		
Institution	Total Assets (\$000)	Average LTD Ratio (%)
Bonanza Valley State Bank	75,861	91.01
First State Bank of Sauk Centre	137,604	77.24
State Bank of Cold Spring	99,897	56.07
<b>St. Martin National Bank</b>	<b>31,159</b>	<b>54.89</b>

*Source: Call report data for quarters ending 12/31/2018-12/31/2021.*

## Lending in Assessment Area

The bank originates a substantial majority of its loans inside its AA.

The bank originated 90 percent of its total loans by number and 87 percent by dollar inside the bank’s AA during the evaluation period. This analysis included a random sample of 20 farm loans and 20 home mortgage loans originated during the evaluation period.

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		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage	18	90.0	2	10.0	20	2,564	85.0	452	15.0	3,017
Farm	18	90.0	2	10.0	20	825	93.7	55	6.3	880
<b>Total</b>	<b>36</b>	<b>90.0</b>	<b>4</b>	<b>10.0</b>	<b>40</b>	<b>3,390</b>	<b>87.0</b>	<b>507</b>	<b>13.0</b>	<b>3,897</b>

Source: Bank Data  
Due to rounding, totals may not equal 100.0%

## Description of Institution

St. Martin National Bank (SMNB) is a \$31.2 million national bank headquartered in St. Martin, Minnesota (MN). Bank ownership is widely held among various individuals, families, and trusts. SMNB has no affiliates or subsidiaries. SMNB is solely located in the state of Minnesota and operates entirely out of the St. Martin branch location. No merger or acquisition activity occurred during the evaluation period. The institution maintains zero deposit taking automated teller machines (ATMs).

SMNB maintains one AA. The St. Martin AA consists of five contiguous census tracts located within Stearns County, MN. The bank's AA is part of the St. Cloud, MN Metropolitan Statistical Area (MSA). The AA is located in the central and western portions of Stearns County and includes CTs around the branch location that the institution can reasonably serve. The AA does not arbitrarily exclude any low-or moderate-income geographies. The bank reasonably excludes eastern census tracts of the county due to their distance from the branch location and their proximity to St. Cloud, MN. These census tracts are appropriately served by institutions operating with a physical presence in the area.

The bank offers traditional banking products and services. The bank's primary products include farm and home mortgage lending. As of December 31, 2021, the loan portfolio totaled \$11.6 million, or 34.9 percent of total assets. The loan portfolio included 36.5 percent farm loans, 45.7 percent home mortgage loans, 11.3 percent business loans, and 6.5 percent consumer loans. Tier 1 capital totaled \$3.6 million, as of December 31, 2021.

The most recent CRA Performance Evaluation, dated February 4, 2019, resulted in a Satisfactory overall rating. There are no financial, legal, or other factors impeding the bank's ability to help meet the AA's credit needs during the evaluation period.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated SMNB's CRA performance using small bank procedures, which consists of the Lending Test. The evaluation period for the LTD ratio analysis spanned from December 31, 2018 to December 31, 2021. Complaint analysis covered February 5, 2019 to February 6, 2023. The evaluation period for the remaining portions of the Lending Test covered January 1, 2019 to December 31, 2021.

We analyzed the bank's loan originations and purchases from January 1, 2019 through December 31, 2021, to determine the primary loan products for the St. Martin AA. Our analysis resulted in the selection of farm and home mortgage loans as the bank's primary products. Home loans and farm loans represent the largest portion of lending activity by dollar, respectively. We did not include business loans as a primary product due to the vast majority of business coded loans being PPP related. Of these PPP loans, bank staff affirmed the majority were to farmers for agricultural purposes. We included agriculture related PPP loans in the farm loan sample. To complete our analysis, we reviewed a sample of 20 farm loans and 20 home mortgage loans.

The table below shows the bank's total loan origination volumes from January 1, 2019 to December 31, 2021.

<b>Loan Originations and Purchases 2019-2021</b>				
<b>Loan Type</b>	<b>Number of Loans</b>		<b>Dollar of Loans</b>	
	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Farm	75	28.1	5,452	37.8
Business	92	34.5	3,623	25.1
Consumer	73	27.3	1,091	7.6
Home	27	10.1	4,266	29.6
<b>Total</b>	<b>267</b>	<b>100.0</b>	<b>14,432</b>	<b>100.0</b>

*Source: Bank data. Due to rounding, totals may not equal 100.0.*

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted a community member with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AA.

### Selection of Areas for Full-Scope Review

The St. Martin AA was selected for a full-scope review as it was the bank's only AA throughout the entirety of the evaluation period.

### Ratings

The bank's overall rating is based entirely on the lending performance in the state of Minnesota rating area. The Minnesota state rating area performance is based on the bank's performance within the St. Martin AA. We evaluated lending performance using the following four criterion: The LTD ratio, lending in the AA, lending to borrowers of different sizes, and responses to CRA-related complaints. We did not evaluate performance based on lending to different income level geographies. Analysis would not be meaningful as the institution's AA does not include any LMI census tracts. All census tracts

within the bank's AA are middle income. The two primary products, farm and home mortgage loans, were given equal weight in the analysis.

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

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

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

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

## State Rating

### State of Minnesota

#### CRA rating for the State of Minnesota: Outstanding

#### The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank originated a substantial majority of its loans inside its AA.
- The distribution of loans to borrowers of different income levels and farms of different sizes is excellent.
- The LTD ratio is reasonable based on the institution's size, financial condition, and AA credit needs.
- The bank did not receive any complaints during the evaluation period related to CRA.

#### Description of Institution's Operations in Minnesota

SMNB operates entirely in the state of Minnesota. The institution maintains one branch location in St. Martin, MN. SMNB's business focus remains agricultural and home mortgage lending. There was no merger or acquisition activity that resulted in a change to the AA during the evaluation period. The AA has not changed since the prior CRA examination in February 2019. The St. Martin AA includes five census tracts in Stearns County, MN. The AA consists of no low-or moderate-income census tracts. The entire AA is comprised of middle-income CTs.

Competition in the St. Martin AA is strong. According to the FDIC Deposit Market Share report as of June 30, 2022, SMNB ranked 27 out of 28 institutions for deposit share in the Stearns County market area. The bank had \$29.9 million in deposits in this market, representing 100 percent of its total deposits. SMNB holds a 0.4 percent share of the total deposit market. Competition in the market includes large national banks, regional banks, as well as similarly sized national-and state-chartered institutions. Stearns Bank National Association holds the largest share of deposits within the market at 16.7 percent. Bremer Bank has the second largest market share with \$877 million in deposits, or 14.3 percent. The remaining institutions operating in the Stearns County market maintain a deposit share that is less than 10 percent of total deposits.

We interviewed a member of the Stearns County government who provided insight on economic conditions, credit needs, and involvement of local financial institutions in the area. The community contact indicated economic conditions were satisfactory in the local area. The housing market continues to perform well. Commodity prices are stable, and the contact expects them to remain so over the next few months. The community contact identified a need for additional development of residential housing and believes this is an opportunity for local institutions to fill a credit need. The community contact stated that, overall, banks in the area meet the needs of their communities.

The following table provides demographic information on the St. Martin AA. Our analysis incorporated relevant demographic information from the AA to provide context to the bank's farm and home mortgage lending performance.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: St. Martin AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	5	0.0	0.0	100.0	0.0	0.0
Population by Geography	22,462	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	10,635	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	7,425	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,437	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,773	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,912	0.0	0.0	100.0	0.0	0.0
Farms by Geography	468	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	6,132	19.7	18.5	26.1	35.7	0.0
Household Distribution by Income Level	8,862	22.6	16.0	20.5	40.9	0.0
Median Family Income MSA – 41060 St. Cloud, MN MSA		\$69,359	Median Housing Value			\$161,604
			Median Gross Rent			\$660
			Families Below Poverty Level			5.9%
<i>Source: 2015 ACS Census and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Minnesota

The rating for the state of Minnesota is based fully on the performance in the St. Martin AA. The St. Martin AA received a full-scope review. Refer to Appendix A for additional information on the AA under review.

## LENDING TEST

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

The bank's lending activity reflects outstanding responsiveness to the AA credit needs for farm and home mortgage loans.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the St. Martin AA is excellent.

## Distribution of Loans by Income Level of the Geography



Refer to Table O and Table S in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan and small loan to farm originations and purchases.

The distribution of loans by income level of the geography is not meaningful due to the AA not containing LMI census tracts.

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

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

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

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

The borrower distribution of home mortgage loans reflects excellent penetration among individuals of different income levels. The bank's home mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending performance to moderate-income borrowers. The bank's home mortgage lending to low-income borrowers exceeded the percentage of low-income families in the AA and significantly exceeded aggregate lending performance.

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

Refer to Table T in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of farm loans reflects excellent penetration among farms of different sizes. The bank's lending to small farms significantly exceeded aggregate lending performance. SMNB's performance was marginally below the percentage of small farms in the AA. Demographic figures indicate that nearly all farms in the AA are small farms. This includes operations such as hobby farms that are less likely to have lending needs. The aggregate performance is considered a better indicator of credit needs in the AA. Given the performance context and the bank's significant overperformance of aggregate data, SMNB's distribution of farm loans is excellent.

### **Responses to Complaints**

SMNB received no CRA-related complaints since the previous CRA evaluation.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Farm and Home Mortgage Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Minnesota		
St. Martin AA	Full-Scope	Stearns County (partial), including CTs: 104.02, 105, 109, 110, and 111

## Appendix B: Summary of MMSA and State Ratings

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RATINGS – St. Martin National Bank	
Overall Bank:	Lending Test Rating
St. Martin National Bank	Outstanding
MMSA or State:	
Minnesota	Outstanding

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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



Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
St Martin AA	20	2,972	100	1,018	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
St Martin AA	20	2,972	100	1,018	19.7	30.0	8.3	18.5	30.0	26.8	26.1	15.0	23.3	35.7	25.0	29.6	0.0	0.0	12.1	
<i>Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography						2019-21						
	Total Loans to Farms		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	

Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
St Martin AA	20	871	100	61	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																				

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
St Martin AA	20	871	100	61	98.5	95.0	39.3	1.1	0.0	0.4	5.0
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											