

LARGE BANK

Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

Public Disclosure

June 27, 2005

Community Reinvestment Act
Performance Evaluation

Bremer Bank, National Association Charter Number: 23300

> 605 Second Street Menomonie, WI 54751

Office of the Comptroller of the Currency

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

Description of Institution

Bremer Bank, National Association (Bremer) has its main office in Menomonie, Wisconsin. It operates 17 offices throughout Northwestern Wisconsin. The largest locations are in Menomonie and Amery, WI. Other offices with significant lending activity are located in Bayfield, Colfax, Frederic, New Richmond, Siren, and Washburn, WI. The Assessment Areas (AAs) meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income (LMI) areas. For additional information on Bremer's AAs, refer to the Market Profile – Demographic Information Tables in Appendix B.

As of December 31, 2004, Bremer had total assets of \$524 million and held \$33.8 million in Tier 1 capital. The bank's primary focus is to diversify the portfolio by serving customer's commercial, commercial real estate, agricultural, residential real estate, and consumer needs. As of December 31, 2004, Bremer's \$359 million loan portfolio consisted of 43% commercial loans, 32% residential real estate loans, 14% agriculture loans, 9% consumer loans and 2% other.

Bremer is owned by Bremer Financial Corporation (BFC), a \$6.2 billion holding company headquartered in St. Paul, Minnesota and its employees. 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). A majority of Foundation's assets are invested in BFC. Earnings generated by BFC and other investments support local nonprofit 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 "Outstanding" at its last CRA evaluation on June 3, 2002.

Evaluation Period

We evaluated Bremer's small business, small farm, and mortgage data for the period beginning January 1, 2002 through December 31, 2003. The evaluation of this data was completed using two separate analysis periods due to changes in the census data available. Small business, small farm, and mortgage loans originated in 2002 were compared to demographic data based on 1990 census information while loans originated in 2003 were compared to demographic data based on 2000 census information. Small business and small farm loans through 2002 were compared to 2002 peer data and 2003 peer data was used for comparison with the 2003 small business and small farm loans originated.

For community development loans, investments, community development services, and retail services, the evaluation period was January 1, 2002 through December 31, 2004. The bank's branch distribution was compared to demographics based on 2000 census data.

Scope of the Evaluation

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

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

Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated Outstanding.

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

		Bank, National Assoc Performance Tests	ciation
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	Х	Х	
High Satisfactory			Х
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.

We performed a full-scope review of the Menomonie AA and a limited scope review of the Bayfield and St. Croix AA's. The Menomonie AA accounts for 75% of Bremer's loan originations over the evaluation period and the following analysis was based primarily on this loan data, although the limited scope areas were also considered in the analysis. Discussion under the lending test refers primarily to the activity in the Menomonie AA. Refer to Tables 1 through 12 for the facts and data that support this conclusion.

Due to Bremer's diversified focus, we gave the most consideration to home mortgage lending with additional consideration to small business loans and small farm loans. Residential real estate loans made up 56% of the total reported loans during the evaluation period with small loans to businesses comprising 25% and small loans to farms comprising 19%.

Of the residential real estate loans, 86% are home mortgage refinance loans. The bank does not report home improvement loans. We did not evaluate the distribution of multifamily loans as the bank only reported 4 loans for the entire period.

For analysis purposes, we applied equal weight to lending activity during both evaluation periods due to each consisting of one calendar year.

An analysis of the geographic distribution to LMI areas for 2002-2003 represents excellent performance based primarily on the real estate lending.

In our analysis of borrower distribution, the bank's performance is good. In our analysis we considered the difficulties that families living below the poverty level have in purchasing a home and their ability to obtain financing. We also considered housing costs relative to area income and the limiting affects those costs could have on the demand for loans by low-income

families. Refer to Appendix B: Demographic Information Tables for poverty levels and housing costs for the AA.

The major factors that support this overall rating and conclusions with respect to performance tests are detailed on the following pages:

Lending

Refer to Tables 1 through 15 in Appendix C for facts and data used to evaluate the bank's lending. Tables 3 and 9 are intentionally excluded as information on the home improvement loans is not available.

Lending performance is rated Outstanding.

- 92% of Bremer's reportable loans were made inside its assessment area, which represents a substantial majority of loans originated.
- Bremer's lending activity is excellent. The bank's deposit market share is the strongest within the Menomonie AA at 28%. For home mortgage loans, Bremer ranks 3rd in market share with 8% of the home purchase loans and 2nd with 10% of the refinance loans. Small business market share in the Menomonie AA represents 16% and ranks second, while the small farm lending market share represents a first place ranking with 65% of the small farm loans of those banks reporting CRA data.
- Bremer's distribution of loans to moderate-income areas during the evaluation period is excellent. There are no low-income census tracts (CTs).
 - Bremer's home purchase and home refinance lending in moderate-income geographies is considered excellent as Bremer's percent of loans in moderateincome geographies well exceeded demographics in both analysis years for both products.
 - Small loans to businesses made in moderate-income geographies are good. For 2002, small loans to businesses is excellent with 21.45% of Bremer's small loans to businesses exceeding the demographics of 20.88%. For 2003, small loans to businesses is adequate with 1.29% of Bremer's small loans to businesses which is somewhat lower than the demographics of 2.75%. For analysis purposes, we also considered that the geographic distribution to small loans to businesses in the limited scope AAs is excellent.
 - Small loans to farm lending is poor with 8.23% of Bremer's small farm loans which is lower than the demographics of 14.63% for 2002. For 2003, Bremer did not make any small farm loans in moderate-income geographies. The demographics for small farm lending in moderate-income areas for 2003 was 3.68%. Small farm lending in the limited scope AAs is considered adequate.
- Bremer's distribution of residential real estate loans to low- and moderate-income individuals during the evaluation period is good.

- Bremer's distribution of purchase loans to borrowers of different income levels is good. 4% of purchase loans were made to low-income borrowers in 2002 which is lower than the demographics of 20.96% and considered poor. In 2003, 8.20% of purchase loans were made to low-income borrowers which is somewhat lower than the demographics of 8.20% and considered adequate. For analysis purposes, we also considered that the purchase loans in the limited scope AAs to low-income borrowers is excellent. 17.60% of purchase loans were made to moderate-income borrowers in 2002 which is near to the demographics of 20.54% and considered good. In 2003, 15.57% of purchase loans were made to moderate-income borrowers which is somewhat lower than the demographics of 20.28% and considered adequate. Purchase loans to moderate-income borrowers in the limited scope AAs is excellent.
- Bremer's distribution of refinance loans to borrowers of different income levels is good. 6.58% of refinance loans were made to low-income borrowers in 2002 which is somewhat lower than the demographics of 20.96% and considered adequate. In 2003, 7.58% of refinance loans were made to low-income borrowers which is somewhat lower than the demographics of 17.14%. Refinance loans to low-income borrowers in the limited scope AAs is good. 15.23% of refinance loans were made to moderate-income borrowers in 2002 which is somewhat lower than the demographics of 20.54% and considered adequate. In 2003, 17.80% of refinance loans were made to moderate-income borrowers which is near to the demographics of 20.28% and considered good. Refinance loans to moderate-income borrowers in the limited scope AAs is excellent.
- Bremer's distribution of small loans to businesses is excellent. Loans to businesses with revenues of \$1million or less represented 76.56% of the bank's reportable loans in 2002, which is near to the demographics of 81.33% and considered good. For 2003, the bank reported 78.87% of loans to businesses with revenues of \$1 million or less which is above the demographics of 70.78% and considered excellent. Small loans to businesses with revenues of \$1 million or less in the limited scope AAs is also excellent.
- Bremer's distribution of small loans to farms is good. Loans to farms with revenues of \$1 million or less represented 92.27% of the bank's reportable loans in 2002 which is nearly equal to the demographics of 96.96% and considered excellent. 2003 loans to farms with revenues of \$1 million or less represented 86.40% which is near to the demographics of 96.13% and considered good. Small farm lending in the limited scope AAs is good.
- Bremer originated 11 community development loans totaling \$1.6 million during this
 evaluation period. The majority of these loans were to assist developers in funding
 projects for low-income housing.

Investments

In evaluating the bank's qualified investments, we considered community development opportunities in the AAs. While such opportunities do arise, there are fewer opportunities in

the rural AAs than there are in other, more populous, areas.

Refer to Table 14 in Appendix C for facts and data used to evaluate Bremer's level of qualified investments.

Investment Test performance is rated Outstanding. Qualified investments in Bremer's AAs are limited and the bank has sought out opportunities to make investments. The investments made during the evaluation period are responsive to the identified needs of the AAs. Virtually all of the investments attributed to the bank are grants made by the affiliated Otto Bremer Foundation. None of the investments are considered innovative or complex, and all are routinely provided by private investors.

Bremer's level of qualified investments is excellent given the bank's capacity and limited investment opportunities. Qualifying investments in the Menomonie AA total \$1,044,832. This represents 3.78% of the bank's allocated Tier 1 capital. In addition, the bank has investments totaling \$528,188 that benefit the Bayfield and St Croix AAs as well as \$634,445 in investments benefiting the broader regional area of western Wisconsin. As we were unable to determine the actual effect these broader regional investments had on the AA, they were given less weight in our analysis. Overall, community development investments represent 4.65% of the bank's Tier 1 capital within its AAs and 6.53% including the regional investments.

Bremer provided grants primarily to organizations that provide social services and affordable housing to LMI people. The following are examples of Bremer's qualified investments:

- Bremer provided grants to an organization that assists low-income families achieve economic self-sufficiency.
- Bremer provided grants to an organization that funds affordable housing developments in rural communities.
- Bremer provided grants to an organization that provides support for victims of domestic abuse and crime victims. Most of these individuals are low- or moderate-income.
- Bremer provides grants to several organizations that provide community services to LMI individuals.

Services

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

Performance under the service test is rated High Satisfactory.

 Bremer's service delivery systems are accessible to individuals of different income levels. The bank currently operates 12 offices within the AA, with 5 offices located in the Bayfield and St. Croix AA's. All offices in the Menomonie AA are located in middleincome CTs per the 2000 Census data. In addition, the bank has 13 ATM's in the AA, two of which are deposit-taking. All ATMs are located in middle-income CTs. An analysis of the geographic distribution of the bank's offices relative to the population of low- and moderate-income individuals in the AA shows that branch offices are readily accessible to these individuals. Bremer did not open or close any branch offices during the evaluation period.

- The Bayfield AA contains two branches located in moderate-income CTs.
- Bremer's business hours are reasonable and its services do not vary in a way that inconveniences its AA, particularly low- and moderate-income individuals. Bremer offers a wide variety of standard banking products and services to meet the needs of the AA.
- The alternative delivery systems that the bank offers include automated teller machines, Internet banking, and telephone banking. Because Bremer does not maintain information on how the alternative delivery systems impact low- and moderate-income individuals, we did not place significant weight on these systems for this evaluation.
- Bremer's community development services are considered good. Although the bank provides many different levels of service, many of the services have been evaluated through the lending test as home mortgage, small business or small farm products. Through its services, the bank works on a variety of community development issues:
 - Bremer staff provide technical expertise as board or committee members and consultants, to organizations that promote economic, small business or affordable housing development.
 - Bremer staff provide government loan program information and technical expertise to first time homebuyers and small farmers via several instructional seminars over the evaluation period.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Appendix B: Market Profiles for Full-Scope Areas

Institution ID: BREMER BANK, NA

Menomonie 1990

Demographic Information for Full Scope Area: Menomonie 1990													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts/BNAs)	29	0.00	34.48	65.52	0.00	0.00							
Population by Geography	83,766	0.00	15.81	84.19	0.00	0.00							
Owner-Occupied Housing by Geography	22,631	0.00	18.97	81.03	0.00	0.00							
Business by Geography	5,157	0.00	20.88	79.12	0.00	0.00							
Farms by Geography	1,087	0.00	14.63	85.37	0.00	0.00							
Family Distribution by Income Level	21,769	20.96	20.54	23.96	34.54	0.00							
Distribution of Low and Moderate Income Families throughout AA Geographies	9,035	0.00	23.92	76.08	0.00	0.00							
Median Family Income HUD Adjusted Median Family Income for 2002		30,290 50,800	Median Housing Valu Unemployment Rate		50,400 2.75%								
Households Below Poverty Level		11.36%											

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

Source: 1990 US Census and 2002 HUD updated MFI

Menomonie 2000

Demographic Information for Full Scope Area: Men	omonie 2000						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	24	0.00	4.17	91.67	4.17	0.00	
Population by Geography	96,851	0.00	2.13	92.84	5.04	0.00	
Owner-Occupied Housing by Geography	28,507	0.00	2.33	91.85	5.82	0.00	
Business by Geography	5,165	0.00	2.75	93.96	3.29	0.00	
Farms by Geography	1,034	0.00	3.68	91.01	5.32	0.00	
Family Distribution by Income Level	25,322	17.14	20.28	25.74	36.84	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	9,476	0.00	3.46	93.10	3.44	0.00	
Median Family Income		47,360	Median Housing Valu	16	95,699		
HUD Adjusted Median Family Income for 2002		50,800	0,800 Unemployment Rate (1990 US Census) 2.52%				
Households Below Poverty Level		8.35%					

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

Source: 2000 US Census and 2002 HUD updated MFI

Limited Scope Assessment Area Market Profiles

Bayfield 1990

Demographic Information for Limited Scope Area: Bayfield 1990												
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts/BNAs)	8	0.00	62.50	37.50	0.00	0.00						
Population by Geography	16,606	0.00	44.33	55.67	0.00	0.00						
Owner-Occupied Housing by Geography	4,960	0.00	47.74	52.26	0.00	0.00						
Business by Geography	1,387	0.00	55.59	44.41	0.00	0.00						
Farms by Geography	77	0.00	46.75	53.25	0.00	0.00						
Family Distribution by Income Level	4,499	24.36	22.89	23.32	29.43	0.00						
Distribution of Low and Moderate Income Families throughout AA Geographies	2,126	0.00	53.76	46.24	0.00	0.00						
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		30,290 50,800 11.36%	Median Housing Valu Unemployment Rate		50,400 2.75%							

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

Source: 1990 US Census and 2002 HUD updated MFI

St Croix 1990

Demographic Information for Limited Scope Area: S	St Croix 1990					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	20.00	70.00	10.00	0.00
Population by Geography	50,251	0.00	18.41	71.46	10.13	0.00
Owner-Occupied Housing by Geography	13,212	0.00	18.85	71.44	9.70	0.00
Business by Geography	3,495	0.00	17.11	72.05	10.84	0.00
Farms by Geography	574	0.00	36.76	60.28	2.96	0.00
Family Distribution by Income Level	13,364	17.56	19.75	27.51	35.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,987	0.00	28.45	65.71	5.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2002		43,063 76,700	Median Housing Valu Unemployment Rate		70,469 2.46%	
Households Below Poverty Level		8.23%				

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

Source: 1990 US Census and 2002 HUD updated MFI

Bayfield 2000

Demographic Information for Limited Scope Area: Bayfield 2000													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts/BNAs)	6	0.00	50.00	50.00	0.00	0.00							
Population by Geography	17,994	0.00	42.80	57.20	0.00	0.00							
Owner-Occupied Housing by Geography	5,922	0.00	40.00	60.00	0.00	0.00							
Business by Geography	1,239	0.00	47.38	52.62	0.00	0.00							
Farms by Geography	74	0.00	31.08	68.92	0.00	0.00							
Family Distribution by Income Level	5,051	25.50	22.87	25.30	26.33	0.00							
Distribution of Low and Moderate Income Families throughout AA Geographies	2,443	0.00	48.71	51.29	0.00	0.00							
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		47,360 50,800 8.35%	Median Housing Valu Unemployment Rate		95,699 2.52%								

^(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2000 US Census and 2002 HUD updated MFI

St Croix 2000

Demographic Information for Limited Scope Area: S	St Croix 2000						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	10	0.00	0.00	80.00	20.00	0.00	
Population by Geography	63,155	0.00	0.00	78.60	21.40	0.00	
Owner-Occupied Housing by Geography	17,885	0.00	0.00	77.74	22.26	0.00	
Business by Geography	3,639	0.00	0.00	83.68	16.32	0.00	
Farms by Geography	564	0.00	0.00	94.68	5.32	0.00	
Family Distribution by Income Level	17,102	15.43	20.71	28.42	35.45	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	6,180	0.00	0.00	86.67	13.33	0.00	
Median Family Income		65,450	Median Housing Valu	16	136,054		
HUD Adjusted Median Family Income for 2002		76,700	,700 Unemployment Rate (1990 US Census) 1.97%				
Households Below Poverty Level		5.41%	1%				

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

Source: 2000 US Census and 2002 HUD updated MFI

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. Refer to Interagency Q&As 23.12(i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of Assessment Area" is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- **Table 1. Other Products** Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- **Table 2. Geographic Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- **Table 3.** Geographic Distribution of Home Improvement Loans See Table 2.
- **Table 4. Geographic Distribution of Home Mortgage Refinance Loans** See Table 2.

- **Table 5. Geographic Distribution of Multifamily Loans** Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 7. Geographic Distribution of Small Loans to Farms** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 8. Borrower Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- **Table 9.** Borrower Distribution of Home Improvement Loans See Table 8.
- **Table 10. Borrower Distribution of Refinance Loans** See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- **Table 13.** Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- **Table 14. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As 23.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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.

Charter Number: 23300

Table 1. Lending Volume

LENDING VOLUME								ARY 1, 2002 TO	DECEMBER 31,	2003		
	% of Rated Area Loans	Home N	lortgage	Small Loans t	to Businesses	Small Loan	s to Farms	Community Loa	Development ns**	Total Repo	rted Loans	% of Rated Area Deposits in MA/AA***
MA/Assessment Area (2002):	(#) in MA/AA*	# \$ (000's)		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Menomonie 1990	76.88	861	69,425	401	34,543	401	20,001	1	1,000	1,663	123,969	0.00
Menomonie 2000	74.97	916	84,124	388	25,411	331	331 16,138		8 477		125,673	0.00
Limited Review:												
Bayfield 1990	8.55	91	7,267	94	5,757	0	0	0	0	185	13,024	0.00
Bayfield 2000	8.85	107	8,475	86	4,511	0	0	2	148	193	12,986	0.00
St Croix 1990	14.56	206	20,405	52	6,939	57	3,260	0	0	315	30,604	0.00
St Croix 2000	16.19	244	28,604	49	4,190	60	4,650	0	0	353	37,444	0.00

^{*}Loan Data as of December 31, 2002 and December 31, 2003. Rated area refers to either state or multi-state MA rating area.
The evaluation period for Community Development Loans is from January 01, 2002 to December 31, 2004.

Deposit Data as of June 23, 2005. 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 F	PURCHASE		Geo	graphy: BREME	ER MENOMONIE	<u> </u>	Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2003								
		e Purchase ans	Low-Income	Geographies		e-Income aphies	Middle-Incom	e Geographies	Upper-Income	Geographies	M	arket Shai	re (%) by 0	Geography	*
MA/Assessment Area:	#	% 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:															
Menomonie 1990	125	73.96	0.00	0.00	18.97	27.20	81.03	72.80	0.00	0.00	8.78	0.00	9.69	8.48	0.00
Menomonie 2000	122	69.32	0.00	0.00	2.33	2.46	91.85	89.34	5.82	8.20	7.12	0.00	5.45	7.06	8.62
Limited Review:													•		•
Bayfield 1990	17	10.06	0.00	0.00	47.74	70.59	52.26	29.41	0.00	0.00	7.02	0.00	8.45	5.00	0.00
Bayfield 2000	15	8.52	0.00	0.00	40.00	53.33	60.00	46.67	0.00	0.00	5.14	0.00	6.84	4.00	0.00
St Croix 1990	27	15.98	0.00	0.00	18.85	25.93	71.44	74.07	9.70	0.00	1.27	0.00	3.04	1.34	0.00
St Croix 2000	39	22.16	0.00	0.00	0.00	0.00	77.74	92.31	22.26	7.69	1.52	0.00	0.00	1.85	0.48

^{*} Based on 2002 &2003 Peer Mortgage Data (Western)

^{**} 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 1990 and 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

	Total I Improveme		Low-Income	Geographies	Moderato Geogra		Middle- Geogra		Upper-Income	Geographies		Market Sh	are (%) by G	eography*	
MA/Assessment Area:	#	% 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:	•	•												•	
Menomonie 1990	0	0.00	0.00	0.00	18.97	0.00	81.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
Menomonie 2000	0	0.00	0.00	0.00	2.33	0.00	91.85	0.00	5.82	0.00	0.00	0.00	0.00	0.00	0.0
Limited Review:	•	•												•	
Bayfield 1990	0	0.00	0.00	0.00	47.74	0.00	52.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
Bayfield 2000	0	0.00	0.00	0.00	40.00	0.00	60.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
St Croix 1990	0	0.00	0.00	0.00	18.85	0.00	71.44	0.00	9.70	0.00	0.00	0.00	0.00	0.00	0.0
St Croix 2000	0	0.00	0.00	0.00	0.00	0.00	77.74	0.00	22.26	0.00	0.00	0.00	0.00	0.00	0.0

^{*} Based on 2002 & 2003 Peer Mortgage Data (Western)

^{**} 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 1990 and 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

	Total Mortgage	Home Refinance	Low-Income	Geographies		e-Income aphies	Middle-Income	Geographies	Upper-Income Geographies		N	Market Sha	are (%) by 0	Market Share (%) by Geography*			
MA/Assessment Area:	Loa				Googl	иртисо											
Full Review:	#	% 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:																	
Menomonie 1990	735	74.47	0.00	0.00	18.97	28.71	81.03	71.29	0.00	0.00	14.90	0.00	21.84	13.21	0.0		
Menomonie 2000	793	72.82	0.00	0.00	2.33	3.28	91.85	89.28	5.82	7.44	11.83	0.00	13.07	11.93			
Limited Review:			•				•										
Bayfield 1990	74	7.50	0.00	0.00	47.74	35.14	52.26	64.86	0.00	0.00	8.45	0.00	6.12	10.64	0.0		
Bayfield 2000	91	8.36	0.00	0.00	40.00	42.86	60.00	57.14	0.00	0.00	7.37	0.00	7.25	7.46	0.0		
St Croix 1990	178	18.03	0.00	0.00	18.85	15.73	71.44	84.27	9.70	0.00	2.63	0.00	3.44	3.17	0.0		
St Croix 2000	205	18.82	0.00	0.00	0.00	0.00	77.74	97.56	22.26	2.44	2.18	0.00	0.00	2.86	0.2		

^{*} Based on 2002 and 2003 Peer Mortgage Data (Western)

^{**} 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 1990 and 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MUL	Geographic Distribution: MULTIFAMILY Ge						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2003								
		ultifamily ans	Low-Income	Geographies		e-Income aphies	Middle-Income Geographies Upper-Income			Geographies	N	Market Share (%) by Geography [*]			
MA/Assessment Area:	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:						•				•		L. L.		Į.	
Menomonie 1990	1	50.00	0.00	0.00	9.02	0.00	90.98	100.00	0.00	0.00	4.55	0.00	0.00	4.76	0.00
Menomonie 2000	1	50.00	0.00	0.00	0.37	0.00	99.32	100.00	0.31	0.00	9.09	0.00	0.00	9.09	
Limited Review:	•					•				•			•	'	
Bayfield 1990	0	0.00	0.00	0.00	37.23	0.00	62.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bayfield 2000	1	50.00	0.00	0.00	52.11	100.00	47.89	0.00	0.00	0.00	100.00	0.00	100.00	0.00	0.00
St Croix 1990	1	50.00	0.00	0.00	12.06	0.00	71.03	100.00	16.91	0.00	8.33	0.00	0.00	8.33	0.00
St Croix 2000	0	0.00	0.00	0.00	0.00	0.00	82.16	0.00	17.84	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2002 and 2003 Peer Mortgage Data (Western)

^{**} 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 1990 and 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SN	HALL LUANO TO	DOUNTEDOL		400	graphy: BREME	III WENONON	<u> </u>	Lvaluation		ARY 1, 2002 T	O DEOLIVIDE	11 01, 2000			
		Small ss Loans	Low-Income	Geographies		Moderate-Income Geographies		Middle-Income Geographies		Income aphies		Market Sh	are (%) by G	eography*	
MA/Assessment Area:	#	% of Total**	% of Businesses	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Menomonie 1990	401	73.31	0.00	0.00	20.88	21.45	79.12	78.55	0.00	0.00	17.53	0.00	18.18	19.31	0.00
Menomonie 2000	388	74.19	0.00	0.00	2.75	1.29	93.96	95.88	3.29	2.84	15.61	0.00	10.42	16.89	
Limited Review:			•		•		•						•	•	
Bayfield 1990	94	17.18	0.00	0.00	55.59	52.13	44.41	47.87	0.00	0.00	11.02	0.00	14.37	14.04	0.00
Bayfield 2000	86	16.44	0.00	0.00	47.38	66.28	52.62	33.72	0.00	0.00	9.03	0.00	18.45	5.94	0.00
St Croix 1990	52	9.51	0.00	0.00	17.11	9.62	72.05	88.46	10.84	1.92	2.88	0.00	2.03	3.77	0.40
St Croix 2000	49	9.37	0.00	0.00	0.00	0.00	83.68	83.67	16.32	16.33	2.49	0.00	0.00	2.73	1.96

^{*} Based on 2002 and 2003 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 (2002 and 2003).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SM	ALL LOANS 1	TO FARMS		Geograp	hy: BREMER M	ENOMONIE	E	valuation Peri	od: January 1	, 2002 TO DEC	DECEMBER 31, 2003					
		Small Farm Loans	Low-Income	Geographies	Moderati Geogra	e-Income aphies	Middle- Geogra	Income aphies	Upper-Income	Geographies		Market Sh	are (%) by G	Geography*		
MA/Assessment Area:	#	% of Total**	% of Farms ^{***}	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:	<u>'</u>	I.											L. L			
Menomonie 1990	401	87.55	0.00	0.00	14.63	8.23	85.37	91.77	0.00	0.00	73.18	0.00	45.21	77.64	0.00	
Menomonie 2000	331	84.65	0.00	0.00	3.68	0.00	91.01	90.63	5.32	9.37	64.77	0.00	0.00	64.94		
Limited Review:	•	ı												'		
Bayfield 1990	0	0.00	0.00	0.00	46.75	0.00	53.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Bayfield 2000	0	0.00	0.00	0.00	31.08	0.00	68.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
St Croix 1990	57	12.45	0.00	0.00	36.76	24.56	60.28	75.44	2.96	0.00	39.86	0.00	26.42	48.31	0.00	
St Croix 2000	60	15.35	0.00	0.00	0.00	0.00	94.68	98.33	5.32	1.67	28.71	0.00	0.00	28.64	100.00	

^{*} Based on 2002 and 2003 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 (2002 and 2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME	PURCHASE			Geography	: BREMER MENOI	MONIE	Evaluat	ion Period: JAN	ion Period: JANUARY 1, 2002 TO DECEMBER 31, 2003							
		Home se Loans	Low-Income	Borrowers	Moderate-Income Borrowers		Middle-Incom	ne Borrowers	Upper-Incom	e Borrowers		Ma	irket Shar	e*		
MA/Assessment Area:	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:		'							•			i.	<u>. </u>	Ц		
Menomonie 1990	125	73.96	20.96	4.00	20.54	17.60	23.96	22.40	34.54	56.00	9.57	6.85	9.09	7.82	11.06	
Menomonie 2000	122	69.32	17.14	8.20	20.28	15.57	25.74	33.61	36.84	42.62	7.94	10.99	6.03	9.86	7.27	
Limited Review:	'	•							•				•			
Bayfield 1990	17	10.06	24.36	0.00	22.89	29.41	23.32	11.76	29.43	58.82	7.98	0.00	11.11	5.41	8.13	
Bayfield 2000	15	8.52	25.50	23.08	22.87	30.77	25.30	15.38	26.33	30.77	5.12	18.75	10.81	2.70	3.15	
St Croix 1990	27	15.98	17.56	22.22	19.75	40.74	27.51	25.93	35.18	11.11	1.39	2.63	1.68	1.07	0.74	
St Croix 2000	39	22.16	15.43	17.95	20.71	25.64	28.42	38.46	35.45	17.95	1.71	2.89	1.48	2.05	1.12	

^{*} Based on 2002 and 2003 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% (1990) and 1.1% (2000)of loans originated and purchased by bank. *** Percentage of Families is based on the 1990 and 2000 Census information.

^{****} 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.

Table 9. Borrower Distribution of Home Improvement Loans

		tal Home ement Loans	Low-Income	ne Borrowers Moderate-Income Borrowers			Middle-Incom	ne Borrowers	Upper-Incom	e Borrowers		Ma	arket Shar	e*	
MA/Assessment Area:	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:	I														
Menomonie 1990	0	0.00	20.96	0.00	20.54	0.00	23.96	0.00	34.54	0.00	0.00	0.00	0.00	0.00	0.00
Menomonie 2000	0	0.00	17.14	0.00	20.28	0.00	25.74	0.00	36.84	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:	1														
Bayfield 1990	0	0.00	24.36	0.00	22.89	0.00	23.32	0.00	29.43	0.00	0.00	0.00	0.00	0.00	0.00
Bayfield 2000	0	0.00	25.50	0.00	22.87	0.00	25.30	0.00	26.33	0.00	0.00	0.00	0.00	0.00	0.00
St Croix 1990	0	0.00	17.56	0.00	19.75	0.00	27.51	0.00	35.18	0.00	0.00	0.00	0.00	0.00	0.00
St Croix 2000	0	0.00	15.43	0.00	20.71	0.00	28.42	0.00	35.45	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2002 and 2003 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.0% (1990 and 2000) of loans originated and purchased by bank. *** Percentage of Families is based on the 1990 and 2000 Census information.

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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

MA/Assessment Area:	Mo	ll Home rtgage nce Loans	Low-Income	Borrowers	Moderate-Inco	me Borrowers	Middle-Incom	ne Borrowers	Upper-Incom	e Borrowers		Ma	arket Shai	re*	
	#	% of Total**	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
Full Review:	l													<u>. </u>	
Menomonie 1990	735	74.47	20.96	6.58	20.54	15.23	23.96	31.00	34.54	47.19	15.89	18.05	14.78	16.40	15.6
Menomonie 2000	793	72.82	17.14	7.58	20.28	17.80	25.74	32.45	36.84	42.17	13.16	17.96	13.48	14.15	11.8
Limited Review:								l .							
Bayfield 1990	74	7.50	24.36	13.51	22.89	24.32	23.32	27.03	29.43	35.14	9.44	19.23	11.61	9.57	7.0
Bayfield 2000	91	8.36	25.50	8.79	22.87	18.68	25.30	27.47	26.33	45.05	8.32	10.26	8.33	8.25	8.0
St Croix 1990	178	18.03	17.56	19.10	19.75	33.71	27.51	33.15	35.18	14.04	2.82	5.85	3.25	2.61	1.5
St Croix 2000	205	18.82	15.43	9.80	20.71	35.29	28.42	38.73	35.45	16.18	2.44	2.69	3.06	2.71	1.4

^{*} Based on 2002 and 2003 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 0.6% (1990) and 0.2% (2000) of loans originated and purchased by bank. *** Percentage of Families is based on the 1990 and 2000 Census information.

^{****} 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.

Table 11. Borrower Distribution of Small Loans to Businesses

		all Loans to nesses	Businesses With million		Loai	ns by Original Amount Regardless o	f Business Size	Ma	Market Share [*]		
MA/Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Menomonie 1990	401	73.31	81.33	76.56	79.30	11.47	9.23	17.53	34.93		
Menomonie 2000	388	74.19	70.78	78.87	82.22	12.63	5.15	15.61	29.3		
Limited Review:	.				1		1				
Bayfield 1990	94	17.18	82.19	82.98	88.30	9.57	2.13	11.02	25.3		
Bayfield 2000	86	16.44	72.72	81.40	87.21	11.63	1.16	9.03	17.7		
St Croix 1990	52	9.51	78.68	78.85	71.15	13.46	15.38	2.88	6.7		
St Croix 2000	49	9.37	68.48	83.67	77.55	12.24	10.20	2.49	5.3		

^{*} Based on 2002 and 2003 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 - 2002).

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 1.65% (1990) or 8.03% (2000) of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

	_	all Loans to rms	Farms With Re million		Lo	ans by Original Amount Regardless	of Farm Size	Ma	rket Share [*]
MA/Assessment Area:	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:					L		L		
Menomonie 1990	401	87.55	96.96	92.27	86.28	11.47	2.24	73.18	74.60
Menomonie 2000	331	84.65	96.13	86.40	86.40	11.78	1.81	64.77	64.13
Limited Review:					<u> </u>		l		
Bayfield 1990	0	0.00	97.40	0.00	0.00	0.00	0.00	0.00	0.00
Bayfield 2000	0	0.00	94.59	0.00	0.00	0.00	0.00	0.00	0.00
St Croix 1990	57	12.45	94.77	87.72	80.70	15.79	3.51	39.86	40.00
St Croix 2000	60	15.35	93.79	70.00	76.67	15.00	8.33	28.71	23.86

^{*} Based on 2002 and 2003 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 - 2002).

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 2.62% (1990) and 10.49% (2000) of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geograp	hy: Bremer Menomo	ONIE E v	aluation Period: JANU	ARY 1, 2002 TO DECEMBER	R 31, 2004		
MA/Assessment Area:	Prior Perio	od Investments*	Current Peri	od Investments		Total Investments		Unfunded Co	mmitments**
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Menomonie 1990	0	0	21	783	21	783	33.01	0	
Menomonie 2000			15	262	15	262	11.05	0	
Limited Review:	•							_	
Bayfield 1990	0	0	6	109	6	109	4.60	0	
Bayfield 2000			9	244	9	244	10.29	0	
St Croix 1990	0	0	7	149	7	149	6.28	0	
St Croix 2000			2	26	2	26	1.10	0	
Regional 1990	0	0	6	198	6	198	8.35	0	
Regional 2000			10	436	10	436	18.38	0	
Outside AA 1990	0	0	0	0	0	0	0	0	
Outside AA 2000			4	165	4	165	6.96	0	

^{* &#}x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

[&]quot; 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institition's financial reporting system.

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

DISTRIBUTION OF BRANCH	DELIVERY SY	STEM AND B	RANCH OPEN	IINGS/CLOS	INGS	Geogi	raphy: BREN	MER MENOM	ONIE	Ev	aluation Pe	eriod: JANU	JARY 1, 200	2 TO DECEN	/IBER 31, 20	104	
	Deposits			Branch					Bra	anch Openir	0 . 0					ation	
MA/Assessment Area:	% of Rated	# of BANK	% of Rated			Branches by ographies (9	•	# of	# of	Net cl	•	ation of Bra or -)	nches	% of Po	pulation wit	hin Each Ge	graphy
	Area Deposits in AA	Branches	Area Branches in AA	Low	Mod	Mid	Upp	Branch Openings	Branch Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:	•																
Menomonie 1990	0.00	12	70.59	0.00	25.00	75.00	0.00	0	0.00	NA	NA	NA	NA	0.00	15.81	84.19	0.00
Menomonie 2000	81.71	12	70.59	0.00	0.00	100.00	0.00	0	0.00	NA	NA	NA	NA	0.00	2.13	92.84	5.04
Limited Review:	•									•		•	•				
Bayfield 1990	0.00	3	17.65	0.00	66.67	33.33	0.00	0	0.00	NA	NA	NA	NA	0.00	44.33	55.67	0.00
Bayfield 2000	11.88	3	17.65	0.00	66.67	33.33	0.00	0	0.00	NA	NA	NA	NA	0.00	42.80	57.20	0.00
St Croix 1990	0.00	2	11.76	0.00	0.00	100.00	0.00	0	0.00	NA	NA	NA	NA	0.00	18.41	71.46	10.13
St Croix 2000	6.41	2	11.76	0.00	0.00	100.00	0.00	0	0.00	NA	NA	NA	NA	0.00	0.00	78.60	21.40