



PUBLIC DISCLOSURE

May 11, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Stearns Bank National Association
Charter Number 15576

4191 Second Street South
St. Cloud, MN 56303

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.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
STATE RATING	
State of Minnesota	11
State of Georgia	18
State of Florida.....	26
State of Arizona.....	33
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF MULTISTATE METROPOLITAN AREA AND STATE RATINGS	B-1
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS.....	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA.....	D-1

Overall CRA Rating

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

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

Performance Levels	Stearns Bank National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X		
Needs to Improve		X	
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service tests when arriving at an overall rating.

Major factors supporting Stearns’ satisfactory CRA rating include:

- Stearns’ overall borrower distribution of loans originated and purchased during the Lending Test evaluation period is adequate. The bank had adequate performance in the states of Minnesota and Florida, good performance in the state of Georgia, and poor performance in the state of Arizona. Stearns’ performance in the state of Minnesota carried the most weight given its significance to the bank in the overall volume of loans and deposits.
- Stearns’ overall geographic distribution of loans originated and purchased during the evaluation period is adequate. The bank had poor performance in the state of Minnesota, good performance in the states of Arizona and Florida and excellent performance in the state of Georgia.
- Stearns’ overall performance in the Investment Test is rated Needs to Improve. The bank had adequate performance in the state of Minnesota, but poor performance in the states of Florida, Arizona, and Georgia.
- Stearns’ Service Test performance is rated High Satisfactory. Branch and Automated Teller Machine (ATM) locations are accessible to low- and moderate-income persons. In the states of Minnesota and Georgia, employees demonstrated good participation in organizations that provide community development services to low- and moderate-income people within the respective assessment areas. Stearns’ service delivery systems are readily accessible to geographies and individuals of different income levels.

Definitions and Common Abbreviations

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

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

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

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

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

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

Activities that revitalize or stabilize-

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

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

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

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

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

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

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

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

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

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

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

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

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

determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined

in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

Tier 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.

Description of Institution

Stearns Bank National Association (Stearns) is an interstate bank headquartered in St. Cloud, Minnesota. Stearns is the subsidiary of a three-bank holding company known as Stearns Financial Services, Inc. (SFSI), which is also headquartered in St. Cloud, Minnesota. SFSI had total assets of \$1.9 billion as of December 31, 2014. The scope of SFSI operations includes the holding of residential real estate and purchased loans from its subsidiary banks.

Stearns has three affiliates through common ownership by SFSI. All are located in the state of Minnesota and include Stearns Insurance Services, headquartered in St. Cloud; Stearns Bank Holdingford, headquartered in Holdingford; and Stearns Bank Upsala, headquartered in Upsala. This evaluation does not include consideration of these affiliate activities in evaluating Stearns' CRA performance. Stearns does not have any subsidiaries.

During the evaluation period from January 1, 2011 to December 31, 2014, Stearns acquired five branches in Georgia and Florida and closed seven branches in Georgia, Arizona, and Florida. Three of the closed branches were located in the Fort Lauderdale, Chattanooga, and Dalton MSAs. Since these branches were open during the evaluation period, we incorporated these assessment areas (AAs) into our analysis for the period of time they were owned by Stearns.

Stearns is a full-service commercial bank. The bank's business focus is commercial lending, offering a variety of commercial loan products including United States Department of Agriculture (USDA) and Small Business Administration (SBA) loans throughout its AAs. Stearns is a leader in USDA, SBA, and SBA Section 42 housing loans. The bank has a leasing division which originates commercial leases in all 50 States through small business leasing programs. They also offer agriculture, consumer, and residential real estate loans as well as a variety of business and consumer products and services.

Stearns currently has 10 locations in Minnesota, Florida, Georgia, and Arizona. Currently, the main office and one branch are located in the St. Cloud MSA. This is also the location of the bank's operations center. Stearns operates one additional branch in the Minneapolis-St. Paul MSA and one additional branch in the non-MSA portion of Minnesota in Pine County. In addition, the bank operates three offices in Florida in the North Port-Sarasota-Bradenton (Sarasota) and Tampa-St. Petersburg-Clearwater (Tampa) MSAs, one office in Arizona in the Phoenix-Mesa-Scottsdale (Phoenix) MSA, and two offices in Georgia in the Atlanta-Sandy Springs-Roswell (Atlanta) MSA.

Stearns had \$1.7 billion in assets as of December 31, 2014, with net loans and leases representing 86 percent of those assets. The loan portfolio is comprised of approximately 92 percent commercial, 5 percent residential mortgage, 2 percent consumer loans and less than 1 percent agriculture. The bank's tier 1 capital as of December 31, 2014 was \$247 million or 14 percent of total assets.

There are no known legal, financial, or other factors impeding Stearns ability to help meet the credit needs in its AAs.

Stearns was rated "Satisfactory" at the last CRA examination dated November 7, 2011.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Lending Test/Community Development Test

The evaluation period for the Lending Test was January 1, 2011 through December 31, 2014 (evaluation period). The evaluation of this data was completed using two separate analysis periods (analysis periods) due to changes in the census data. Small business, small farm, and residential mortgage loans originated in 2011 were compared to demographic data based on 2000 census information (2011 analysis period) while loans originated from 2012 through 2014 were compared to demographic data based on 2010 census information (2012-2014 analysis period). Community Development loans, investments, and services (CD Test) were evaluated from October 1, 2011 through December 31, 2014. The evaluation period for the Lending and CD Tests included a review of the St. Cloud MSA, the Minneapolis MSA, and the Minnesota (MN) Non-MSA, along with the Phoenix MSA in Arizona, the Sarasota and Tampa MSAs in Florida, and the Atlanta, Chattanooga, TN-GA MSA (Chattanooga) and Dalton MSA in Georgia.

The second evaluation period (EP2) for the Lending and CD Test was October 19, 2012 through November 20, 2013. EP2 included a review of the Fort Lauderdale MSA in Florida. This evaluation period was selected as the bank acquired and closed a branch in this MSA during these dates.

The third evaluation period (EP3) for the Lending and CD Test was March 23, 2012 through June 25, 2014. EP3 included a review of the Chattanooga and Dalton MSAs. This evaluation period was selected as the bank acquired and closed a branch in each MSA during these dates.

To perform our analysis, we used home mortgage loan information and small business and farm loan data collected by Stearns. The 2011 HMDA data was evaluated using 2000 census data. The 2012, 2013, and 2014 HMDA data was evaluated using 2010 census data.

Small loans to businesses represented the largest portion of lending activity overall during the evaluation period with 1,786 loans originated or purchased in the amount of \$177 million. These account for 50 percent by number and 48 percent by dollar volume of the loans evaluated. Home mortgage loans during the same timeframe accounted for 1,061 loans originated or purchased, totaling nearly \$159 million. Small loans to farms during the evaluation period accounted for 693 loans originated or purchased and totaled nearly \$33 million. Small loans to businesses were also the predominant loan product in the Minnesota, Arizona, Florida, and Georgia AAs. As a result, performance of these loans received the most weight in these areas.

In some instances, there were very few loans of a certain loan type originated or purchased in an AA. When there were five or fewer loans of a certain type, no analysis was performed. Performance for that loan type would not have been a material consideration in the evaluation of the bank's overall performance for that AA.

The geographic distribution conclusions are based on the combination of the geographic distribution of the bank's loans within its AAs and whether there were any unexplained gaps in lending in any geographic areas within the AAs.

In our analysis of borrower distribution, we considered the level of poverty in each AA and the impact it could have on the ability of lower-income families to obtain loans. Similarly, we considered housing costs relative to area incomes and the limiting affects those costs could have on the demand for loans by lower-income families. Refer to *Appendix C: Market Profiles* for poverty levels and housing costs for each full-scope AA.

For analysis purposes, more weight was placed on the lending activity from 2012 through 2014 as this represented a longer timeframe with more loan originations and purchases overall.

Investment Test

The evaluation period for the Investment Test was October 1, 2011 through December 31, 2014. We considered donations and investments made by Stearns and the Norman C. Skalicky Foundation (NCSF). We gave primary consideration to the volume of the donations and investments made during the current evaluation period and within the bank's AAs. Additional consideration was given to the responsiveness of those donations and investments to identified community development (CD) needs. We also considered investments made during prior evaluation periods that remain outstanding, although they received a lesser consideration in this evaluation.

Service Test

The evaluation period for the Service Test was October 1, 2011 through December 31, 2014. We gave primary consideration to Stearns' range of products and services offered by the branch offices. We also considered the CD services Stearns provides in its AAs.

Data Integrity

Prior to starting this evaluation, we reviewed the HMDA and small business loan data Stearns submitted. This data was deemed reliable and it was used for this evaluation. During this evaluation, we also confirmed the majority of the loans, investments, and services had a primary purpose of CD and included them in our analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected one AA for a full-scope review. The AA selected was based on highest number of branches and highest volume of deposits within that state. Refer to the *Scope of Examination* (Scope) section under each state for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the four state ratings in which Stearns has branch offices. We placed greater weight on the bank's performance in the areas from which it derives its greater volume of deposits. As a result, the most weight was place on Stearns' performance in the state of Minnesota, from which the bank derives 70 percent of its deposits. The deposit percentages of other rated areas are 15 percent for Georgia, 8 percent for Florida, and 7 percent for Arizona. Refer to the Scope section under each state for details regarding how the areas were weighted in arriving at the respective ratings. Please also refer to *Appendix A: Scope of Examination* for more information.

Inside/Outside Ratio

Stearns' ratio of lending inside its AAs is good. While at the bank level, across all states and considering all products, Stearns originated or purchased only 13 percent of loans inside its AAs, this low volume is skewed by the high number of conditional sales contract leases originated nationwide in a program offered by Stearns. Excluding these nationwide leases, 81 percent of all loan types were originated or purchased within Stearns' AAs. When considering mortgage loans only, Stearns originated or purchased 84 percent of its mortgage loans within its AAs.

Fair Lending or Other Illegal Credit Practices Review

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

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

State Rating

State of Minnesota

CRA Rating for Minnesota¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting each of these ratings for the State of Minnesota are:

- Low Satisfactory for the Lending Test in Minnesota is based on adequate overall geographic distribution and adequate overall borrower income distribution in the AAs.
- Low Satisfactory performance under the Investment Test is based on an adequate level of qualified CD investments given the bank's resources and capacity.
- High Satisfactory performance under the Service Test is demonstrated by the good dispersion of branches and accessibility to products and services as well as the good level of CD services.

Description of Institution's Operations in Minnesota

Stearns has three AAs in Minnesota – the St. Cloud MSA AA, a portion of the Minneapolis MSA (Minneapolis AA), and the counties of Pine and Kanabec which are located in the non-MSA area of east central Minnesota (MN Non-MSA AA). Stearns' Minnesota operations accounts for 70 percent of Stearns' total deposits as of June 30, 2014. As detailed further below, we selected the St. Cloud MSA AA for a full-scope review. Based on 2000 census information, the St. Cloud MSA AA was comprised of 34 census tracts (CT), with 3 percent designated low income and 12 percent designated as moderate-income. Based on 2010 census information, the St. Cloud MSA AA was comprised of 38 CTs, with no lower-income CTs and 16 percent moderate-income CTs.

In the state of Minnesota, the bank has its main office, operations center, and four branches with \$892 million in deposits. According to the June 30, 2014 FDIC Summary of Deposit Market report, Stearns has the largest deposit market share in the seven-county area that comprises their AAs. This ranking is based on 54 institutions with a presence in the AAs. Stearns has the greatest presence in the St. Cloud MSA. The deposit market share reports show Stearns has \$849 million in deposits, or a market share of 19 percent in the St. Cloud MSA, ranking first out of 33 institutions. In the Minneapolis MSA, Stearns has \$15 million in deposits and ranks 22nd in market share of the 24 financial institutions with a presence in that AA. In the MN Non-MSA area, Stearns has 6 percent in deposits and ranks fifth in the market share of eight financial institutions with a presence in that AA.

¹ ***For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.***

In the state of Minnesota, the bank's primary competitor is Wells Fargo National Bank which holds 13 percent of the market share according to the FDIC Summary of Deposits Market report as of June 30, 2014.

Refer to the *Market Profile* in *Appendix C* for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Minnesota

We selected Stearns' St. Cloud MSA AA for a full-scope review as it represents the area in which Stearns has the largest portion of deposits and loans in the state of Minnesota. This AA includes the entire St. Cloud MSA which consists of Stearns and Benton counties. Given the significance of the St. Cloud MSA AA to Stearns in terms of deposit and loan volume, this AA carried the most weight in assigning the ratings for the state of Minnesota and the overall ratings for the bank. We performed limited-scope reviews for the Minneapolis MSA and the MN Non-MSA AAs. As noted previously, ratings assigned are based primarily on results of the AAs that received full-scope reviews. Please refer to *Appendix A: Scope of Examination* for more information.

Because Stearns originated a minimal number of multifamily and home improvement loans in Minnesota, an analysis was not conducted as the data was not meaningful. However, the numbers are included on *Table 3* and *Table 5* for both analysis periods (2011 and 2012-2014) in *Appendix D: Tables of Performance Data*.

We considered information from three community organizations for this evaluation that were located in Stearns county. These organizations were focused on affordable housing and small business lending. Information obtained is included in the *Market Profile* section in *Appendix C*.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the state of Minnesota is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the St. Cloud MSA AA is adequate.

Lending Activity

Refer to *Table 1 "Lending Volume"* in *Appendix D* under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. During the evaluation period, Stearns originated and purchased 589 loans to small businesses in the St. Cloud MSA AA totaling \$63 million. The bank ranked sixth out of 40 lenders with a market share of 5.09 percent.

For mortgage loans, Stearns ranked 16th with a market share of 1.17 percent out of 233 lenders reporting HMDA data. This represents 345 reportable home mortgage loans at \$53 million.

For small farm loans originated and purchased, Stearns had a market share of 37.5 percent totaling \$19 million in 512 loans and ranked first out of 16 lenders in the AA reporting small farm data.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to *Table 2* and *Table 4* in *Appendix D* under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

For the 2011 portion of the evaluation period using 2000 census information, there was one low-income CT and four moderate-income CTs. For the 2012-2014 portion of the evaluation period using 2010 census information, there were no low-income CTs and six moderate-income CTs.

The geographic distribution of Stearns' home mortgage loans is poor.

Home Purchase Loans

Stearns' geographic distribution of home purchase loans in the *St. Cloud MSA AA* is poor. Stearns' home purchase loans to borrowers in moderate-income tracts were lower than the owner-occupied housing units of the AA in both 2011 and 2012-2014. Stearns made no home purchase loans in the lower income tract in 2011, however, this is mitigated by the lack of owner-occupied housing units in the lower-income tract. Stearns' market share for both low- and moderate-income geographies is also lower than its overall market share for home purchase loans.

Home Refinance Loans

Stearns' geographic distribution of home refinance loans in the *St. Cloud MSA AA* is poor. Stearns' home refinance loans to borrowers in moderate-income tracts were lower than the owner-occupied housing units of the AA in both 2011 and 2012-2014. Stearns made no home refinance loans in the lower income tract in 2011, however, this is mitigated by the lack of owner-occupied housing units in the lower-income tract. Stearns' market share for both low- and moderate-income geographies is also lower than its overall market share.

Small Loans to Businesses

Refer to *Table 6* under the *St. Cloud MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of Stearns' loans to small businesses in the *St. Cloud MSA AA* is adequate.

In the *St. Cloud MSA AA*, the percentage of Stearns' loans to small businesses in the low-income geography exceeds the percentage of businesses located in that geography in 2011. Stearns' percentage of loans to small businesses in moderate-income geographies in 2011 and 2012-2014 are both lower than the percentage of businesses located in those geographies. Stearns' lending market share within

this market was the sixth largest out of 47 lenders in 2011 and sixth largest out of 40 lenders in 2012-2014 for the origination of small business loans in the AA. Stearns' market share in low- and moderate-income geographies in 2011, when combined, was higher than its overall market share for small loans to businesses. In 2012-2014, Stearns' market share in the moderate-income geographies was lower than its overall market share for small loans to businesses.

Small Loans to Farms

Refer to *Table 7* in *Appendix D* under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of Stearns' small loans to farms is poor.

The percentage of small loans to farms in low- and moderate-income geography in 2011 and 2012-2014 are below the percentage of farms located in those geographies. In addition, Stearns' market share in both low- and moderate-income geographies is lower than its overall market share for small loans to farms.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the *St. Cloud MSA AA*.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to *Tables 8* and *10* in *Appendix D* under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the *St. Cloud MSA AA* reflects adequate penetration among home mortgage loan customers of different income levels.

Home Purchase Loans

Stearns' distribution of home purchase loans to low-income borrowers significantly exceeded the demographic in 2011, but was below the percentage of low-income families in 2012-2014. However, home purchase loans to moderate-income families exceeded the demographics of the AA in both 2011 and 2012-2014. Stearns' market share for low-income borrowers exceeds the market share in 2011, but was below its overall market share in 2012-2014. For moderate-income families, Stearns was below the market share in 2011, but was near its overall market share to moderate-income families in 2012-2014, which received positive consideration.

Home Refinance Loans

Stearns' distribution of home refinance loans to low-income borrowers in 2011 and 2012-2014 were below the percentage of low-income families in the AA. However, home refinance loans to moderate-income families exceeded the demographics of the AA in both 2011 and 2012-2014. Stearns' market share for low-income borrowers was below its overall market share for home refinance loans for both 2011 and 2012-2014. Stearns exceeded its overall market share for home refinance loans to moderate-income families in 2011 and 2012-2014, which received positive consideration.

Small Loans to Businesses

Refer to **Table 11** in **Appendix D** under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of borrowers in the *St. Cloud MSA AA* reflects poor penetration among business customers of different sizes.

In the *St. Cloud MSA AA*, the percentage of loans to small businesses (businesses with revenues of \$1 million or less) was well below the percentage of small businesses in the MSA for both 2011 and 2012-2014. Stearns' market share of loans to small businesses exceeded its overall market share in 2012-2014 but was below Stearns' overall market share in 2011.

Small Loans to Farms

Refer to **Table 12** in **Appendix D** under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

Borrower distribution in the *St. Cloud MSA AA* reflects adequate penetration among farms of different sizes.

In the *St. Cloud MSA AA*, the percentage of loans to small farms (those with revenues of \$1 million or less) for both 2011 and 2012-2014 was lower than the percentage of small farms in the AA. However, Stearns' market share of loans to small farms exceeded its overall market share in 2012-2014. Stearns' market share of loans to small farms in 2011 was near to its overall market share which received positive consideration.

Community Development Lending

Refer to **Table 1 "Lending Volume"** in **Appendix D** under the *St. Cloud MSA AA* for both analysis periods for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including qualifying multifamily loans. In addition, **Table 5** includes geographic lending data on all multifamily loans, including those that qualified as CD loans. **Table 5** does not separately list CD loans.

CD lending had a positive impact on the lending performance in the St. Cloud MSA AA. Stearns originated three CD loans in the St. Cloud MSA AA during the evaluation period totaling \$7.5 million. Stearns also originated additional CD loans statewide, but not within one of the bank's three AAs.

Product Innovation and Flexibility

None of the CD loans originated in the state of Minnesota are considered to be innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to *Table 1* through *Table 13* under the *Minneapolis MSA AA* and *MN Non-MSA AA* for both analysis periods in *Appendix D* for the facts and data that support conclusions from the limited-scope reviews.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Minneapolis MSA AA in 2011 is consistent with the bank's overall low satisfactory performance under the Lending Test in the state of Minnesota. In the years 2012-2014, the bank's performance is stronger than its overall low satisfactory performance under the Lending Test in the state of Minnesota.

In the MN Non-MSA AA, the bank's performance in 2011 and 2012-2014 is stronger than the bank's overall performance in the state.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to *Table 14* under the *St. Cloud MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the state of Minnesota is rated Low Satisfactory. Qualified investments in the St. Cloud MSA AA are somewhat responsive to identified needs of the AA. None of the investments are considered innovative or complex, and all are routinely provided by private investors.

Stearns' volume of qualified investments in the St. Cloud MSA AA is adequate. During the evaluation period, Stearns made 27 qualified investments in the St. Cloud MSA AA totaling nearly \$237 thousand. Of the 27 investments, one was made in 2011 for \$8 thousand while the balance was made in 2012-2014. In addition, six investments totaling \$570 thousand in prior period investments remain outstanding. All prior period investments consist of mortgage-backed securities, the proceeds of which were used to provide affordable housing to low- and moderate-income borrowers residing in the St. Cloud MSA AA. In addition, the bank made monetary contributions to organizations who provided social services to low- and moderate-income individuals.

Conclusions for Area Receiving Limited-Scope Reviews

Refer to the **Table 14** under the *Minneapolis MSA AA* and *MN Non-MSA AA* for both analysis periods in **Appendix D** for the facts and data that support conclusions from the limited-scope reviews.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Minneapolis MSA and the MN Non-MSA AAs are inconsistent with the bank's overall adequate performance under the Investment Test in the state of Minnesota. In the Minneapolis MSA AA, the bank's performance is stronger than the bank's overall performance in the state. In the MN Non-MSA AA, the bank's performance is weaker than the bank's overall performance in the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the state of Minnesota is rated High Satisfactory. Based on the full-scope review, the bank's performance in the St. Cloud MSA AA is good.

Retail Banking Services

Refer to **Table 15** under the *St. Cloud MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The dispersion of branches and accessibility to products and services is good. Stearns' delivery systems are accessible to essentially all geographies and individuals of different incomes. All Minnesota locations offer drive-up hours on Saturdays and extended hours on Friday evenings. Services do not vary in a way that inconveniences certain portions of the AAs, particularly low- and moderate-income geographies and individuals.

Stearns operates two branches in the St. Cloud MSA AA, which represents 50 percent of its branches in Minnesota. One branch is located in a middle-income CT while the other is located in a moderate-income CT. The moderate-income CT tract, at 50 percent of the bank's branches in the St. Cloud MSA AA, exceeds the moderate-income geography of 17 percent in 2012-2014 and 10 percent in 2011. The St. Cloud MSA AA had no low-income CTs in 2012-2014. The bank had one lower-income CT in 2011 but no branches in this CT.

Stearns has five ATMs in the St. Cloud MSA AA with two located in a moderate-income CT. This helps to serve the population residing in those areas. The percentage of ATMs in moderate-income tracts (40 percent) exceeds the population residing in moderate-income tracts (17 percent).

Stearns' record of opening and closing branches does not adversely affect the accessibility of its delivery systems, particularly to moderate-income geographies or low- and moderate-income individuals. The bank did not open or close any branches in the St. Cloud MSA AA during the evaluation period.

Stearns offers a variety of alternative delivery systems including online banking and telephone banking.

Community Development Services

The bank's level of CD services is adequate. This assessment is based on the opportunities in the AA and the type of organizations that benefit from the services provided.

Stearns' employees provided an adequate level of CD services in the St. Cloud MSA AA. Stearns worked with five community development organizations. In three of the organizations, employees served in a leadership capacity. The organizations provided a variety of services to low- and moderate-income individuals and promoted economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to *Table 15* under the *Minneapolis MSA AA* and *MN Non-MSA AA* for both analysis periods in *Appendix D* for the facts and data that support conclusions from the limited-scope reviews.

Based on limited-scope reviews, the bank's performance under the Service Test in the MN Non-MSA AA and the Minneapolis MSA AA are weaker than the bank's overall high satisfactory performance under the Service Test in Minnesota.

State Rating

State of Georgia

CRA Rating for Georgia²: Satisfactory

The Lending Test is rated: High Satisfactory
The Investment Test is rated: Needs to Improve
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Stearns' overall High Satisfactory Lending Test in the state of Georgia is based on good overall geographic distribution and good overall borrower income distributions.
- Stearns' Needs to Improve performance under the Investment Test in the state of Georgia is due to the poor level of qualified CD investments given the bank's resources and capacity.
- Stearns' High Satisfactory performance under the Service Test for the state of Georgia is demonstrated by the good dispersion of branches and accessibility to products and services, and the good level of CD services. Stearns demonstrated its service delivery systems are readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Georgia

Stearns has three AAs in Georgia – the Atlanta-Sandy Springs-Marietta MSA AA (Atlanta MSA AA), which included the counties of Pickens and Cobb in 2011 and Pickens county only in 2012-2014; the Chattanooga, Tennessee–Georgia MSA AA (Chattanooga MSA AA), which includes the county of Walker; and the Dalton MSA AA, which includes Whitfield county. In March of 2012, the bank acquired Covenant Bank & Trust which had two branches. One branch was located in a middle-income CT in Walker County and the other was located in a moderate-income CT in Whitfield County. Stearns subsequently closed these two branches in June of 2014. Stearns also closed one branch in the Atlanta MSA in an upper-income CT in Cobb County in June 2011.

As discussed further below, we selected the Atlanta MSA AA for a full-scope review. Based on 2000 census data, the Atlanta MSA AA was comprised of 93 CTs with 1 percent low-income CTs and 20 percent moderate-income CTs. Based on 2010 census information, the Atlanta MSA AA was comprised of six CTs with no low-income CTs and 33 percent moderate-income CTs.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Stearns had seven ATMs in the state of Georgia during the evaluation period, and Georgia operations accounted for 11 percent of Stearns' total deposits as of June 30, 2014. The bank's primary competitor in the Atlanta MSA is the Community Bank of Pickens County, which holds 44 percent of the market share compared to 19 percent for Stearns according to the FDIC Summary of Deposit Report as of June 30, 2014.

Stearns has two branches in the Atlanta MSA AA with \$136 million in deposits according to the June 30, 2014 FDIC Summary of Deposits and had the second largest deposit market share (19 percent) in the one-county area that comprised their AA in 2012-2104 out of the seven institutions with a presence in that AA.

Refer to the *Market Profile* in *Appendix C* for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Georgia

We selected Stearns' Atlanta MSA AA for a full-scope review as it represents the area in which Stearns has the largest portion of deposits and loans in the state of Georgia. As noted previously, in 2011 this AA included the counties of Pickens and Cobb, two of the 29 counties comprising the Atlanta MSA. However, this AA included only Pickens county for the 2012-2014 analysis period. Given the significance of the Atlanta MSA AA to Stearns in terms of deposit and loan volume in Georgia, this AA carried the most weight in assigning the ratings for this state.

We performed limited-scope reviews for the Chattanooga and the Dalton MSA AAs. Stearns' Chattanooga MSA AA includes the portion of the MSA which consists of Walker county. Walker county is one of the three counties that comprise the Chattanooga MSA. Stearns' Dalton MSA AA includes Whitfield county, which is one of the two counties that compromise the Dalton MSA. Ratings are based primarily on results of those areas that received full-scope reviews. Please refer to *Appendix A* for more information.

Because Stearns originated a minimal number of multifamily loans in Georgia, an analysis was not conducted as the data was not meaningful. However, the numbers are included on *Table 5 under the Atlanta MSA AA* for both analysis periods (2011 and 2012-2014) in *Appendix D*.

We considered information from one economic development community organization in Jasper, Georgia for this evaluation. Information obtained is included in the *Market Profile* section in *Appendix C*.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Georgia is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Atlanta MSA AA is good.

Lending Activity

Refer to **Table 1 “Lending Volume”** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the bank’s lending activity.

Lending levels reflect poor responsiveness in relation to area credit needs and the bank’s deposit market share. Stearns has the 19th largest deposit share of the 30 financial institutions within its AA, representing 1.17 percent of aggregate deposits and totaling \$136 million.

During the evaluation period, Stearns originated and purchased 139 small loans to businesses in the Atlanta MSA AA totaling \$10 million. The bank ranked 41st out of 750 lenders with a market share of 0.15 percent according to Dunn and Bradstreet data from 2013.

For mortgage loans, Stearns ranked 139th out of 461 lenders reporting HMDA data with a market share of 0.06 percent. This represents 114 reportable home mortgage loans at \$11 million.

For small farm loans originated and purchased, Stearns had a market share of 9.09 percent totaling \$500 thousand for six loans and ranked fourth out of nine lenders in the AA reporting small farm data.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to **Tables 2, 3, and 4** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the geographic distribution of the bank’s home refinance loan originations/purchases.

For the 2012-2014 portion of the evaluation period using 2010 census information, there were no low-income CTs and two moderate-income CTs. For the 2011 portion of the evaluation period using 2000 census information, there was one low-income CTs and 19 moderate income CTs.

The geographic distribution of Stearns’ home refinance, purchase, and home improvement loans in the Atlanta MSA AA is good.

Home Purchase Loans

Stearns’ home purchase loans to borrowers in moderate-income CTs were near to the owner-occupied housing units in the AA in 2012-2014. The bank did not originate any home purchase loans in 2011. Stearns’ market share in both low- and moderate-income geographies for home purchase loans is nominal and therefore does not provide a meaningful comparison.

Home Improvement Loans

Stearns’ home improvement loans to borrowers in moderate-income CTs significantly exceeded the owner-occupied housing units in the AA in 2012-2014. The bank did not originate any home improvement loans in 2011. Stearns’ market share in 2012-2014 in moderate-income CTs for home improvement loans was higher than its overall market share which received positive consideration.

Home Refinance Loans

Stearns' home refinance loans to borrowers in moderate-income CTs significantly exceeded the owner-occupied housing units in the AA in 2012-2014. The bank did not originate any home purchase loans in 2011. Stearns' market share in both low- and moderate-income geographies for home refinance loans is nominal and therefore does not provide a meaningful comparison.

Stearns did not originate any home refinance, home improvement, or home purchase loans to borrowers during 2011. However, only 0.21 percent of all owner-occupied housing units in the Atlanta MSA AA during this time were located in the low-income CT, and only 0.80 percent of the AA population resided in this CT. Lending during this time was also affected by low loan demand due to economic weaknesses, including a high unemployment rate, as well as strong competition from other area financial institutions.

Small Loans to Businesses

Refer to **Table 6** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution analysis of Stearns' small loans to businesses in the Atlanta MSA AA is good.

In the Atlanta MSA AA in 2012-2014, the percentage of Stearns' small loans to businesses in the moderate-income geography was less than the percentage of businesses located in that geography. Stearns' overall percentage of small loans to businesses in low-income geographies exceeded the demographic information in the AA. Stearns' lending market share in both low- and moderate-income geographies exceeded the bank's overall lending market share to small businesses within the AA.

In 2011 in the Atlanta MSA AA, the percentage of Stearns' small loans to businesses in low-income geographies is below the demographics in the area. The percentage of Stearns' small loans to businesses in the moderate-income geographies was near to the demographic information. Stearns' market share in moderate-income geographies exceeded the demographic information.

Small Loans to Farms

Refer to **Table 7** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of Stearns' small loans to farms is good.

In 2012-2014, the percentage of loans to small farms in moderate-income geographies significantly exceeded the percentage of farms located in those geographies. All small farm loans during this analysis period were made to farms located in moderate-income CTs. In addition, Stearns' market share in moderate-income geographies is significantly higher than its overall market share for small loans to farms.

Stearns did not originate any small loans to farms in 2011.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Atlanta MSA AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to *Tables 8, 9 and 10* under the *Atlanta MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Atlanta MSA AA reflects excellent penetration among home mortgage loan customers of different income levels.

Home Purchase Loans

Stearns' distribution of home purchase loans to both low- and moderate-income borrowers exceeded the percentage of low-income families in the AA in 2012-2014. The bank did not originate any home purchase loans in 2011 due to low loan demand and high competition from other area lending institutions. Stearns' market share for low- and moderate-income borrowers for home purchase loans was nominal and therefore did not provide for a meaningful comparison.

Home Improvement Loans

Stearns' distribution of home improvement loans to low-income borrowers significantly exceeded the percentage of low-income families in the AA in 2012-2014. The distribution of home improvement loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. Stearns' market share for low-income borrowers in 2012-2014 exceeded its overall market share for home improvement loans which received positive consideration. Stearns' market share for moderate-income borrowers during this time was less than the overall market share, however, this product represented only 6.14 percent (or seven loans) of all HMDA loans originated. The bank did not originate any home improvement loans in 2011 due to low loan demand and high competition from area financial institutions.

Home Refinance Loans

Stearns' distribution of home refinance loans to low-income borrowers exceeded the percentage of low-income families in the AA in 2012-2014. The distribution of home refinance loans to moderate-income borrowers significantly exceeded the demographic comparator in 2012-2014. The bank did not originate any home refinance loans in 2011 due to low loan demand and high competition. Stearns' market share

for low-income and moderate-borrowers was nominal and therefore did not provide for a meaningful comparison.

Small Loans to Businesses

Refer to **Table 11** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** in the State of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of borrowers in the Atlanta MSA AA reflects poor penetration among business customers of different sizes.

In the Atlanta MSA AA, the percentage of loans to small businesses (those with revenues of \$1 million or less) was significantly below the percentage of businesses in the AA with these revenues in both 2011 and 2012-2014. In addition, Stearns' market share of small loans to businesses was below its overall market share in 2011 and 2012-2014.

In 2012-2014, 82 percent of the bank's loans were originated for \$100,000 or less, 12 percent of small business loan originations were between \$100,000 and \$250,000 and six percent were between \$250,000 and \$1 million. In 2011, 94 percent of the bank's small business loans were originated for \$100,000 or less and six percent of originations were between \$100,000 and \$250,000. No small business loans made were between the amounts of \$250,000 and \$1 million in 2011. Seventy percent of businesses in the Atlanta MSA AA are businesses with revenues of one million or less according to Dunn and Bradstreet data.

Small Loans to Farms

Refer to **Table 12** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution in the Atlanta MSA AA reflects good penetration among farms of different sizes.

In the Atlanta MSA AA, the percentage of loans to small farms (those with revenues of \$1 million or less) was less than the percentage of farms in the AA with these revenues in 2012-2014. However, Stearns' market share of loans to small farms significantly exceeded its overall market share in 2012-2014. The bank did not originate any small farm loans in 2011 due to low loan demand.

Community Development Lending

Refer to **Table 1 "Lending Volume"** under the *Atlanta MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the bank's level of CD 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 multifamily loans, including those that also qualify as CD loans. **Table 5** does not separately list CD loans, however.

CD lending had a positive impact on the lending performance in the Atlanta MSA AA. Stearns originated one CD loan in the Atlanta MSA AA during the evaluation period totaling \$1.3 million. They also originated additional CD loans statewide but not in one of the bank's three AAs.

Product Innovation and Flexibility

None of the CD loans originated in the state of Georgia are considered to be innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to the *Tables 1* through *13* for both analysis periods under the the *Chattanooga and Dalton MSA AAs* in *Appendix D* for the facts and data that support conclusions from the limited-scope reviews.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Chattanooga and Dalton MSA AAs are weaker than the bank's overall high satisfactory performance under the Lending Test in the state of Georgia.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the state of Georgia is poor. Qualified investments made in the Atlanta MSA AA are not responsive to identified needs of the AA.

Refer to *Table 14* under the *Atlanta MSA AA* in *Appendix D* for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Stearns made 10 qualified investments totaling six thousand dollars. Monetary contributions were to organizations who provided social services to low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to the *Table 14* under the the *Chattanooga and Dalton MSA AAs* in *Appendix D* for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Chattanooga MSA AA is inconsistent with the bank's overall poor performance under the Investment Test in Georgia. In the Chattanooga MSA AA, the bank's performance is weaker than the bank's overall performance in the state. In the Dalton MSA, the bank's performance is consistent with the bank's overall performance in the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the state of Georgia is good. Based on the full-scope review, the bank's performance in the Atlanta MSA AA is good.

Retail Banking Services

Refer to *Table 15* under the *Atlanta MSA AA* in *Appendix D* for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The dispersion of branches and accessibility to products and services is good. Stearns' delivery systems are accessible to geographies and individuals of different incomes. All Georgia locations offer drive-up hours on Saturdays. Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals.

Stearns operates two branches in the Atlanta MSA AA, representing 100 percent of the branches in the state of Georgia. Both branches are located in moderate-income CTs. The branches located in the moderate-income CTs represent 100 percent of the bank's branches in the Atlanta MSA AA, which exceeds the moderate-income geography at 23 percent. In the Atlanta MSA AA as of 2014, there were no low-income CTs.

Stearns also has four ATMs in the Atlanta MSA AA all located in moderate-income CTs. This helps to serve the population residing in those areas. The percentage of ATMs in moderate-income tracts (100 percent) exceeds the population residing in moderate-income tracts (35 percent).

Stearns' record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. The bank closed one branch in a middle-income CT in the Chatanooga MSA AA and one branch in a moderate-income CT in the Dalton MSA AA. Both branches closed in June of 2014 due to significant deposit withdrawals, inability of the bank to generate loans, and strong area competition. The bank opened two branches in the Atlanta MSA AA during the evaluation period both located in moderate-income tracts.

Stearns' offers a variety of alternative delivery systems including online banking and telephone banking.

Community Development Services

The bank's level of CD services is adequate. This assessment is based on the opportunities in the AA and the type of organizations that benefit from the services provided.

Stearns employees provided an adequate level of CD services in the Atlanta MSA AA. Stearns worked with two CD organizations. In one of the organizations, employees served in a leadership capacity. The two organization the bank worked with provide a variety of services to low- and moderate-income individuals and promote economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to **Table 15** under the the *Chattanooga and Dalton MSA AAs* in **Appendix D** for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank's performance under the Service Test in the Chattanooga and Dalton MSA AAs are weaker than the bank's overall high satisfactory performance under the Service Test in Georgia.

State Rating

State of Florida

CRA Rating for Florida³: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Stearns' overall Needs to Improve performance under Lending Test in the state of Florida is based on the poor overall geographic distribution and poor overall borrower income distributions.
- Stearns' Needs to Improve performance under the Investment Test in the state of Florida is due to the poor level of qualified CD investments given the bank's resources and capacity.
- Stearns' Low Satisfactory performance under the Service Test for the state of Florida is demonstrated by the good dispersion of branches and accessibility to products and services combined with the very poor level of CD services. Stearns demonstrated its service delivery systems are accessible to geographies and individuals of different income levels

Description of Institution's Operations in Florida

Stearns has three AAs in Florida – the North Port-Bradenton-Sarasota MSA AA (Sarasota MSA AA) which includes Sarasota county; the Tampa-St. Petersburg MSA AA (Tampa MSA AA), which includes Pinellas county; and the Fort Lauderdale - Pompano Beach - Deerfield MSA AA (Fort Lauderdale MSA AA) which includes Broward county.

In October of 2012, Stearns acquired First East Side Savings Bank, located in a middle-income CT in the Fort Lauderdale MSA. Stearns subsequently closed this branch in November of 2013. Stearns' Florida operations account for 8 percent of Stearns' total deposits as of June 30, 2014.

As discussed further below, we selected the Sarasota MSA AA for a full-scope review. Based on 2000 census data, the Sarasota MSA AA was comprised of 83 CTs with 1 percent low-income and 19 percent

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

moderate-income. Based on 2010 census information, the AA was comprised of 94 CTs including 1 percent low-income CTs and 22 percent moderate-income CTs.

Stearns has a notable presence in the Sarasota MSA. In this AA, they have two branches with \$102 million in deposits. According to the June 30, 2014 FDIC Summary of Deposits, Stearns has the 26th largest deposit market share in the one-county area that comprises the Sarasota AA relative to the 39 institutions with a presence in that AA. The bank's primary competitor is Bank of America, Wells Fargo, and SunTrust which together hold 45 percent of the market share according to the Summary of Deposits as of June 30, 2014.

Refer to the *Market Profile* in *Appendix C* for detailed demographics and other performance context information for AAs that received a full-scope review.

Scope of Evaluation in Florida

We selected the Sarasota MSA AA for a full-scope review as this AA represents the area in which Stearns has the largest portion of deposits and loans in the state of Florida. Given the significance of the Sarasota MSA AA to Stearns in terms of deposit and loan volume in Florida, this AA carried the most weight in assigning the ratings for this state. We performed a limited-scope review of the Tampa MSA AA and the Fort Lauderdale MSA AA. Ratings are based primarily on results of those areas that received full-scope reviews. Please refer to *Appendix A: Scope of Examination* for more information.

Because Stearns originated a minimal number of home improvement loans, and originated no multifamily or small farm loans in Florida, an analysis was not conducted as the data was not meaningful. However, the numbers are included on *Tables 3, 5, and 7* for both analysis periods (2011 and 2012-2014) in *Appendix D*.

We considered information from one community organization for this evaluation which focused on small business lending. Information obtained is included in the *Market Profile* section in *Appendix C*.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Florida is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Sarasota MSA AA is adequate.

Lending Activity

Refer to *Table 1 "Lending Volume"* under the *Sarasota MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Stearns is ranked 26th out of 39 financial institutions within the Sarasota MSA AA, representing 0.62 percent of aggregate deposits totaling \$73 million.

During the evaluation period, Stearns originated and purchased 94 small business loans in the Sarasota MSA AA totaling \$13 million. The bank's market share was 0.15 percent, or 22 out of 86 lenders. For mortgage loans, Stearns ranked 92nd out of 508 lenders reporting HMDA data with a market share of 0.13 percent. This represents 76 reportable home mortgage loans at \$12 million.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to *Table 2* and *Table 4* under the *Sarasota MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's home purchase and home refinance loan originations and purchases.

For the 2011 portion of the evaluation period using 2000 census information, there was one low-income CT and 16 moderate-income CTs. For the 2012-2014 portion of the evaluation period using 2010 census information, there was one low-income CT and 21 moderate-income CTs.

The geographic distribution of Stearns' home mortgage loans in the Sarasota MSA AA is poor.

Home Purchase Loans

Home purchase loans to borrowers in moderate-income tracts fell well below the owner-occupied housing units in the AA in 2012-2014. Stearns did not make any home purchase loans to borrowers in low-income tracts in 2012-2014. The lack of lending in the low-income tracts is partially mitigated by the low level of owner-occupied housing units in this CT with only 0.45 percent of all owner-occupied housing residing in this area. In addition, only 1 percent of the population resides in this CT with 9 percent of those being below the poverty level. This makes qualifying for a home mortgage loan more difficult. Stearns did not originate any home purchase loans in the Sarasota MSA AA in 2011.

Stearns' market share in low- and moderate-income CTs for home purchase loans are both lower than its overall market share.

Home Refinance Loans

Home refinance loans in moderate-income CTs was slightly below the owner-occupied housing units of the AA in 2012-2014. In 2011, home refinance loans in moderate-income CTs exceeded the owner-occupied housing units in the AA. Stearns did not make any home refinance loans in the one low-income tract in 2011 or 2012-2014.

Stearns' market share in both low- and moderate-income geographies for home refinance loans in 2012-2014 was nominal and therefore did not provide for a meaningful comparison. Stearns' market share in moderate-income CTs for home refinance loans in 2011 was greater than its overall market share which received positive consideration. Stearns' market share in the low-income CT was nominal and therefore did not provide for a meaningful comparison.

Small Loans to Businesses

Refer to **Table 6** under the *Sarasota MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of Stearns' small loans to businesses in the Sarasota MSA AA is adequate.

In the Sarasota MSA AA, the percentage of Stearns' small loans to businesses in the moderate-income geographies exceeded the percentage of businesses located in that geography in 2012-2014. Stearns did not make any small loans to businesses in the low-income CT in 2012-2014. However, only 0.49 percent of all small businesses in the Sarasota MSA AA were located in this CT. Stearns' market share in the low-income geography is lower than its overall market share for small loans to businesses, while in the moderate-income geographies, Stearns exceeded its overall market share in 2012-2014.

In the Sarasota MSA AA in 2011, the percentage of Stearns' small loans to businesses in the low-income geography exceeded the percentage of businesses located in that geography. For moderate-income CTs in 2011, the percentage of Stearns' small loans to businesses was near the percentage of businesses located in that geography. Stearns' market share in 2011 in the low-income geography exceeded its overall market share for small loans to businesses, while in moderate-income geographies Stearns' market share was near its overall market share. Market share in low- and moderate-income CTs in 2011 received positive consideration.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Sarasota MSA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to **Table 8** and **Table 10** under the *Sarasota MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution in the Sarasota MSA reflects adequate penetration among home purchase and home refinance loan customers of different income levels.

Home Purchase Loans

Stearns' home purchase loans to low- and moderate-income families were below the percentage of low- and moderate-income families in the AA in 2012-2014. Stearns only made five home purchase loans in 2011, so the data was not analyzed given the low volume. Stearns' market share for home purchase loan to low-income borrowers in 2012-2014 was greater than their overall market share which received positive consideration.

Home Refinance Loans

Stearns' distribution of home refinance loans to moderate-income families exceeded the demographics of the AA while the distribution of home refinance loans to low-income families was below the demographics of the AA in 2012-2014. Stearns' market share for home refinance loans in 2012-2014 is not meaningful given its low volume.

In 2011, Stearns' distribution of home refinance loans to low- and moderate-income families significantly exceeded the demographics of the AA. Stearns' market share in 2011 for home refinance loans for both low- and moderate-income individuals also exceeded its overall market share, which received positive consideration.

Small Loans to Businesses

Refer to **Table 11** under the *Sarasota MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of borrowers in the Sarasota MSA AA reflects poor penetration among business customers of different sizes.

In the Sarasota MSA AA, Stearns' percentage of loans to small businesses (those with revenues of \$1 million or less) in 2012-2014 and 2011 was below the percentage of businesses in the AA with these revenues. Stearns' market share of loans to small businesses in 2012-2014 was less than its overall market share. In 2011, Stearns' market share of loans to small businesses exceeded its overall market share, which received positive consideration.

In 2014, 64 percent of the bank's small business loans were originated in the amount of \$100,000 or less with 17 percent between \$100,000 and \$250,000 and 19 percent between \$250,000 and \$1 million. In 2011, 60 percent of small business loan originations were made in the amount of \$100,000 or less, 29 percent of originations were between \$100,000 and \$250,000 and 11 percent were between \$250,000 and \$1 million.

Community Development Lending

Refer to **Table 1 "Lending Volume"** under the *Sarasota MSA AA* for both analysis periods in **Appendix D** for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, **Table 5** for both analysis periods includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. **Table 5** does not separately list CD loans, however.

CD lending had a neutral impact on the lending performance in the Sarasota MSA AA. Stearns did not originate any CD loans in the Sarasota MSA AA during the evaluation period. Stearns originated CD loans elsewhere in the state but not in one of the bank's three AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tampa and Fort Lauderdale MSA AAs is consistent with the bank's overall performance in the state. Refer to *Tables 1* through *13* under the *Tampa* and *Fort Lauderdale MSA AAs* for both analysis periods in *Appendix D* for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the state of Florida is poor. Qualified investments in the Sarasota MSA AA are not responsive to identified needs of the AA.

Refer to *Table 14* under the *Sarasota MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the bank's level of qualified investments.

Stearns' volume of qualified investments in the Sarasota MSA AA is poor. During the evaluation period, Stearns made two investments in the Sarasota MSA AA totaling three thousand dollars. These were monetary contributions to two organizations that provided social services to low- and moderate-income individuals.

Our community contact noted there are significant opportunities for financial institutions to contribute to CD needs throughout Maricopa County in the AA.

Conclusions for Area Receiving Limited-Scope Reviews

Refer to *Table 14* under the *Tampa* and *Fort Lauderdale MSA AAs* for both analysis periods in *Appendix D* for the facts and data used to support limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Tampa MSA AA is consistent with the bank's overall poor performance under the Investment Test in the state of Florida. In the Fort Lauderdale MSA AA, the bank's performance is weaker than the bank's overall performance in the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Florida is rated low satisfactory. Based on the full-scope review, the bank's performance in the Sarasota MSA AA is adequate.

Retail Banking Services

Refer to *Table 15* under the *Sarasota MSA AA* for both analysis periods of *Appendix D* for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The dispersion of branches and accessibility to products and services is good. Stearns' delivery systems are reasonably accessible to all portions of the *Sarasota MSA AA*.

Stearns operates two branches in the *Sarasota MSA AA*, representing 67 percent of Stearns' branches in the state of Florida. ATMs supplement the branch network by providing consumers and small business accounts access to funds during and outside of traditional banking hours. One branch is located in a middle-income CT while the other is located in a moderate-income CT. The branch located in the moderate-income CT represents 50 percent of the bank's branches in the *Sarasota MSA AA*, exceeding the moderate-income geography of 20 percent.

Stearns is not open on Saturdays but does have two ATMs in the *Sarasota MSA AA* with one located in a moderate-income CT and the other located in a middle-income tract. These ATMs help to serve the population residing in those areas. Services do not vary in a way that inconveniences portions of the *AA*, particularly low- and moderate-income geographies and individuals. The percentage of ATMs in moderate-income tracts (50 percent) exceeds the population residing in moderate-income tracts (20 percent).

Stearns' record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. The bank did not open or close any branches in the *Sarasota MSA AA* during the evaluation period.

Stearns offers a variety of alternative delivery systems including online banking and telephone banking.

Community Development Services

The bank's level of CD services is very poor. This assessment is based on the opportunities in the *AA* and the type of organizations that benefit from the services provided.

Stearns' employees did not provide any CD services in the *Sarasota MSA AA*.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the *Tampa* and *Fort Lauderdale MSA AAs* are weaker than the bank's overall low satisfactory performance under the Service Test in the state of Florida. Refer to *Table 15* under the *Tampa* and *Fort Lauderdale MSA AAs* for both analysis periods in *Appendix D* for the facts and data that support these conclusions.

State Rating

State of Arizona

CRA Rating for Arizona⁴: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Stearns' overall Low Satisfactory Lending Test in the state of Arizona is based on the adequate overall geographic distribution.
- Stearns' Needs to Improve performance under the Investment Test in the state of Arizona is due to the poor level of qualified CD investments given the bank's resources and capacity.
- Stearns' High Satisfactory performance under the Service Test for the state of Arizona is demonstrated by the good dispersion of branches and accessibility to products and services combined with the adequate level of CD services. Stearns demonstrated its service delivery systems are readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Arizona

Stearns has one AA in Arizona – the Phoenix-Mesa-Scottsdale MSA (Phoenix MSA AA). The Phoenix MSA AA is made up of all of Maricopa County. Stearns' Arizona operations account for 7 percent of Stearns' total deposits as of June 30, 2014.

Based on the 2000 census information, the AA was comprised of 663 CT; 6 percent low-income and 27 percent moderate-income. Based on the 2010 census information, the AA was comprised of 916 CTs including 9 percent low-income CTs and 24 percent moderate-income CTs.

Stearns has one branch in the Phoenix MSA AA which is located in a moderate-income CT and holds \$82 million in deposits. According to the June 30, 2014 FDIC Summary of Deposits, Stearns has the 32nd largest deposit market share in the one-county area that comprises the Phoenix MSA AA out of 57 institutions with a presence in that AA. The bank's primary competitors are JPMorgan Chase, Wells Fargo, and Bank of America which collectively hold 73 percent of the market share where Stearns holds 0.12 percent according to the FDIC Summary of Deposits as of June 30, 2014.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the *Market Profile* for the *Phoenix MSA AA* in *Appendix C* for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Arizona

We selected the Phoenix MSA AA for a full-scope review as this is Stearns only AA in Arizona and the only area in the state where Stearns has deposits and loans. Refer to *Appendix A* for more information.

Stearns did not originate any home improvement loans and originated only one multifamily loan during both analysis periods. In addition, Stearns did not originate any small farm loans in 2011 and only originated one small farm loan in 2012-2014. Because of the low volumes of originations, an analysis was not conducted as the data was not meaningful. However, the numbers are included on *Tables 3, 5, 7, 9, and 12* under the *Phoenix MSA AA* in *Appendix D*.

We considered information from three community organizations for this evaluation which focused on small business lending and affordable housing. Information obtained is included in the *Market Profile* section in *Appendix C*.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Arizona is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Phoenix MSA AA is adequate.

Lending Activity

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

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Stearns has the 26th largest deposit share of the 39 financial institutions within its AA, representing 0.12 percent of aggregate deposits and totaling \$82 million.

During the evaluation period, Stearns originated and purchased 398 small loans to businesses in the Phoenix MSA AA totaling \$48 million. The bank ranked 28th with a market share of 0.6 percent out of 151 lenders.

For mortgage loans, Stearns ranked 264th out of 752 lenders reporting HMDA data with a market share of 0.01 percent. This represents 65 reportable home mortgage loans at \$21 million.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to *Tables 2* and *4* under the *Phoenix MSA AA* in *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's home refinance loan originations/purchases. For the 2011 portion of the evaluation period using 2000 census information, there were 40 low-income CTs and 181 moderate-income CTs. For the 2012-2014 portion of the evaluation period using 2010 census information, there were 86 low-income CTs and 219 moderate-income CTs.

The geographic distribution of Stearns' home refinance and purchase loans in the Phoenix MSA AA is adequate.

Home Purchase Loans

In 2012-2014, Stearns did not make any home purchase loans to borrowers in low-income tracts. The lending in the low-income tracts is partially mitigated given only 3.61 percent of all owner-occupied housing units in the AA are in these CTs. In addition, the poverty rate is high at 12 percent which makes qualifying for a home mortgage loan more difficult. Home purchase loans to borrowers in moderate-income tracts were near to the demographic information. Stearns' market share in both low- and moderate-income CTs in 2012-2014 was not meaningful.

In 2011, Stearns did not make any home purchase loans. As such, an analysis was not conducted as the information is not meaningful.

Home Refinance Loans

Home refinance loans to low-income tracts exceeded the percentage of owner-occupied units in the AA in 2012-2014; however, the bank did not make any loans to borrowers in moderate-income tracts. Stearns' market share in both low- and moderate-income geographies for home refinance loans is not meaningful.

In 2011, the bank only made one loan. As such, an analysis was not conducted as a comparison of the information would not be meaningful.

Small Loans to Businesses

Refer to *Table 6* under the Phoenix MSA AA in *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution analysis of Stearns' small loans to businesses in the Phoenix MSA AA is excellent.

In the Phoenix MSA AA, the percentage of Stearns' loans to small businesses in the low- and moderate-income CTs exceeded the demographic information in those geographies in 2012-2014. Stearns' lending market share in low-income geographies exceeded the overall market share of the AA while the

lending market share in moderate-income geographies met the overall market share of the AA in 2012-2014

In 2011 in the Phoenix MSA AA, the percentage of Stearns' loans to small businesses in the moderate-income CTs exceeded the demographic information in those geographies. Stearns did not make any loans in low-income CTs. The lack of lending in the low-income tracts is partially mitigated by the fact that only 3.55 percent of small businesses reside in this area. Stearns' lending market shares in low- and moderate-income geographies in 2011 is not meaningful.

Lending Gap Analysis

Our geographic distribution analysis included a review of lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the Phoenix MSA AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to *Tables 8* and *10* under the *Phoenix MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's home refinance loan originations and purchases.

Borrower distribution in the Phoenix MSA AA reflects poor penetration among home mortgage loan customers of different income levels.

Home Purchase Loans

In 2012-2014, Stearns' distribution of home purchase loans to low-income borrowers is below the percentage of low-income families in the AA. In addition, Stearns did not make any home purchase loans to moderate-income families. Stearns' market share in 2012-2014 was not meaningful.

In 2011, the bank did not make any home purchase loans and, as such, the data was not analyzed.

Home Refinance Loans

In 2012-2014, Stearns did not make any home refinance loans to low- or moderate-income families in the AA. In 2011, the bank did not originate enough loans for the data to be analyzed. In addition, Stearns' market share for home purchase and home refinance loans is not meaningful in 2012-2014 or 2011.

Small Loans to Businesses

Refer to *Table 11* under the *Phoenix MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of borrowers in the Phoenix MSA AA reflects very poor penetration among business customers of different sizes.

In both 2012-2014 and 2011 in the Phoenix MSA AA, the percentage of loans to small businesses (those with revenues of \$1 million or less) was well below the percentage of businesses in the AA with these revenues. In addition, Stearns' market share of small loans to businesses is below its overall market share in 2012-2014 and 2011.

In 2012-2014, 73 percent of the bank's loan originations to small businesses were in the amount of \$100,000 or less, 13 percent were between \$100,000 and \$250,000 and 14 percent were between \$250,000 and \$1 million. In 2011, 62 percent of the bank's small business loan originations were \$100,000 or less, 18 percent were between \$100,000 and \$250,000 and 20 percent were between \$250,000 and \$1 million.

Community Development Lending

Refer to *Table 1 "Lending Volume"* in *Appendix D* for the facts and data used to evaluate the bank's level of CD 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 multifamily loans, including those that also qualify as CD loans. *Table 5* does not separately list CD loans, however.

CD lending had a positive impact on the lending performance in the Phoenix MSA AA. Stearns originated 13 CD loans in this AA during the evaluation period totaling \$51.9 million.

Product Innovation and Flexibility

CD loans originated in the state of Arizona are not considered to be innovative or flexible.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the state of Arizona is poor. Qualified investments in the Phoenix MSA AA are not responsive to identified needs of the AA.

Stearns' volume of qualified investments in the Phoenix MSA AA is poor. During the evaluation period, Stearns made three qualified investments in the Phoenix MSA AA totaling just over five thousand dollars. These were monetary contributions to organizations that provided social services to low- and moderate-income individuals.

Our community contact noted there are significant opportunities for financial institutions to contribute to CD needs throughout the Phoenix MSA AA. Specifically the contact noted there is a great need for lenders to offer micro lending which involved extending very small loans to the unemployed, to poor entrepreneurs, and to others living in poverty that are not considered bankable.

Refer to *Table 14* under the *Phoenix MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

Refer to *Table 15* under *the Phoenix MSA AA* for both analysis periods in *Appendix D* for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The dispersion of branches and accessibility to products and services is good. Stearns' delivery systems are reasonably accessible to all portions of Stearns Phoenix MSA AA.

Stearns operates one branch in the Phoenix MSA AA representing 100 percent of Stearns' branches in the state of Arizona. The branch, located in a moderate-income CT, is 100 percent of the bank's branches in the Phoenix MSA AA, which exceeds the moderate-income geography at 24 percent.

Stearns is not open on Saturdays but Stearns does have one ATM in the Phoenix MSA AA which is located in a moderate-income tract. This helps to serve the population residing in those areas. Services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. The percentage of ATMs in the moderate-income tract (100 percent) exceeds the population residing in moderate-income tracts (24 percent).

Stearns' record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. Three branches closed in the Phoenix MSA AA during the evaluation period. All branch closures occurred in middle- and upper-income geographies.

Stearns offers a variety of alternative delivery systems including online banking and telephone banking.

Community Development Services

The bank's level of CD services is adequate. This assessment is based on the opportunities in the AA and the type of organizations that benefit from the services provided.

Stearns' employees provided an adequate level of CD services in the Phoenix MSA AA. Stearns worked with one CD organization. The organization provides a variety of services to low- and moderate-income individuals and promotes economic development.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/2011 to 12/31/2014 Investment/ Service Tests & CD Loans: 10/01/2011 to 12/31/2014	
Financial Institution	Products Reviewed	
Stearns Bank National Association (Stearns) 4191 2nd Street South, St. Cloud, MN 56301	Small Loans to Businesses Home Mortgage Loans Small Loans to Farms	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Minnesota St. Cloud MSA #41060	Full-Scope	Includes Stearns and Benton counties
Minneapolis MSA #33460	Limited-Scope	Includes Sherburne, Isanti and Chisago counties
MN Non-MSA	Limited-Scope	Includes Pine and Kanabec counties
Florida Sarasota MSA #14600	Full-Scope	Includes Sarasota county
Tampa MSA #45300	Limited-Scope	Includes Pinellas county
Ft. Lauderdale #22744	Limited-Scope	Includes Broward county
Arizona Phoenix MSA #38060	Full-Scope	Includes Maricopa county
Georgia Atlanta MSA #12060	Full-Scope	Includes Cobb and Pickens counties (2011) Includes Pickens county (2012-2014)
Chattanooga MSA #16860	Limited Scope	Includes Walker county
Dalton MSA #19140	Limited Scope	Includes Whitfield county

Appendix B: Summary of State Ratings

RATINGS FOR STEARNS BANK NATIONAL ASSOCIATION				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Stearns Bank	Low Satisfactory	Needs Improvement	High Satisfactory	Satisfactory
State:				
Minnesota	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Florida	Needs to Improve	Needs to Improve	Low Satisfactory	Needs to Improve
Arizona	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Georgia	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory

() The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.*

Appendix C: Market Profiles for Full-Scope Areas

State of Minnesota

Demographic Information for Full Scope Area: St. Cloud MSA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	2.94	11.76	73.53	11.76	0.00
Population by Geography	167,932	0.66	9.93	71.05	18.36	0.00
Owner-Occupied Housing by Geography	43,883	0.00	7.89	73.68	18.43	0.00
Businesses by Geography	19,423	2.63	8.90	69.74	18.73	0.00
Farms by Geography	1,801	0.17	11.33	81.40	7.11	0.00
Family Distribution by Income Level	40,812	16.15	19.14	27.52	37.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,403	0.10	11.75	76.98	11.18	0.00
Median Family Income	\$51,474		Median Housing Value	\$101,889		
HUD Updated Median Family Income 2011 Households Below Poverty Level	68,400 9%		Average Annual Unemployment Rate	6.80%		

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full-Scope Area: St Cloud MSA 2012-2014						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	0.00	15.79	76.32	7.89	0.00
Population by Geography	189,093	0.00	16.74	74.67	8.60	0.00
Owner-Occupied Housing by Geography	51,701	0.00	12.52	79.97	7.51	0.00
Businesses by Geography	14,679	0.00	18.50	72.71	8.79	0.00
Farms by Geography	1,903	0.00	12.72	85.71	1.58	0.00
Family Distribution by Income Level	46,838	19.07	17.04	26.14	37.74	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16,916	0.00	19.53	77.27	3.20	0.00
Median Family Income	\$64,993		Median Housing Value	\$176,880		
FFIEC Adjusted Median Family Income for 2014 Households Below the Poverty Level	\$69,600 13%		Average Annual Unemployment Rate	4.50%		

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

Source: 2010 U.S. Census, and 2014 FFIEC updated MFI.

The full-scope AA consists of all the St. Cloud MSA which includes the counties of Stearns and Benton. As of June 30, 2014, Stearns Bank had \$849 million in deposits in this AA. Stearns ranks first in deposit market share in the two-county MSA that comprises this AA out of the 33 institutions with a presence in the MSA. The St. Cloud MSA represented 3.6 percent of the state population in 2010 and an estimated 3.5 percent of the state population in 2013.

Major industries in the St. Cloud MSA include services and retail trade. The largest employers are the St. Cloud Hospital System, Coburn's Grocery Stores, and the State of Minnesota.

Average unemployment in 2014 for the St. Cloud MSA was 4.5 percent, which was above the statewide level at the time of 3.6 percent, but below the nationwide rate of 6.2 percent.

In order to gather current information on the community and potential lending opportunities in the area, we contacted a community leader. Our contact indicated the community and credit needs in the St. Cloud MSA include affordable housing for low- and moderate-income individuals.

State of Georgia

Demographic Information for Full Scope Area: Atlanta MSA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	93	1.08	20.43	39.78	38.71	0.00
Population by Geography	630,734	0.84	18.58	41.59	39.04	0.00
Owner-Occupied Housing by Geography	118,538	0.21	11.49	42.67	45.63	0.00
Businesses by Geography	107,902	1.04	12.63	45.48	40.86	0.00
Farms by Geography	1,609	0.44	12.74	44.93	41.89	0.00
Family Distribution by Income Level	164,835	15.02	16.37	22.19	46.43	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	51,736	1.26	31.94	45.51	21.28	0.00
Median Family Income		\$59,303				
HUD Updated Median Family Income for 2011 Households		\$63,100		Median Housing Value		\$146,681
Households Below Poverty Level		6%		Average Annual Unemployment Rate		9.70%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full-Scope Area: Atlanta MSA 2012-2014						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	6	0.00	33.33	50.00	16.67	0.00
Population by Geography	29,431	0.00	35.20	50.90	13.90	0.00
Owner-Occupied Housing by Geography	9,059	0.00	28.91	48.74	22.35	0.00
Businesses by Geography	2,568	0.00	52.53	37.38	10.09	0.00
Farms by Geography	97	0.00	55.67	38.14	6.19	0.00
Family Distribution by Income Level	8,202	23.07	20.56	21.57	34.81	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,578	0.00	39.83	49.61	10.59	0.00
Median Family Income	\$67,374					
FFIEC Adjusted Median Family Income for 2014	\$70,100		Median Housing Value		\$208,055	
Households Below the Poverty Level	12%		Average Annual Unemployment Rate		6.70%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2014 FFIEC updated MFI.

The 2011 full-scope AA consisted of Pickens and Cobb counties in the Atlanta-Sandy Springs-Marietta MSA (Atlanta MSA). The 2012-2014 full-scope AA included only Pickens county. As of June 30, 2014, Stearns had \$136 million in deposits in this AA. Stearns ranks 19th in deposit market share out of the 30 institutions with a presence in the MSA. The Atlanta MSA represented 7.5 percent of the state's population in 2014.

Major industries in the Atlanta MSA include services and retail trade. Some of the largest employers include Big Canoe Property Owners Association, Inc., Bojangles, Home Depot, The Ingles Markets, Inc. and Cobb county schools.

Unemployment in 2014 for the Atlanta MSA was 6.70 percent which was less than the statewide level of 7.19 percent and higher than the nationwide rate of 6.2 percent.

Community and credit needs in the Atlanta MSA include affordable housing for low- and moderate-income individuals.

State of Florida

Demographic Information for Full Scope Area: Sarasota MSA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	83	1.20	19.28	55.42	24.10	0.00
Population by Geography	325,957	1.20	20.05	53.82	24.93	0.00
Owner-Occupied Housing by Geography	118,538	0.51	17.37	49.90	19.39	0.00
Businesses by Geography	73,318	0.52	17.73	51.07	30.67	0.00
Farms by Geography	1,638	0.55	17.83	53.85	27.78	0.00
Family Distribution by Income Level	95,167	16.14	19.23	23.84	40.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	33,659	1.84	28.59	54.45	15.13	0.00
Median Family Income		\$48,550				
HUD Updated Median Family Income for 2011 Households		59,100		Median Housing Value		\$143,654
Households Below Poverty Level		7%		Average Annual Unemployment Rate		10.30%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full-Scope Area: Sarasota MSA 2012-2014						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	94	1.06	22.34	46.81	29.79	0.00
Population by Geography	379,448	1.01	19.74	50.64	28.60	0.00
Owner-Occupied Housing by Geography	130,833	0.45	17.00	51.25	31.31	0.00
Businesses by Geography	60,839	0.49	20.19	42.63	36.70	0.00
Farms by Geography	1,497	0.67	17.17	48.50	33.67	0.00
Family Distribution by Income Level	103,782	18.22	18.66	21.32	41.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	38,275	1.43	27.23	52.94	18.39	0.00
Median Family Income	\$60,626			Median Housing Value		\$292,979
FFIEC Adjusted Median Family Income for 2014	\$57,300			Average Annual Unemployment Rate		5.80%
Households Below the Poverty Level	9%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2014 FFIEC updated MFI.

The full-scope AA consists of Sarasota county in the North Port-Bradenton-Sarasota MSA. As of June 30, 2014, Stearns Bank had \$73 million in deposits in this AA. Stearns ranks 26th in deposit market share out of the 39 institution with a presence in the MSA. The Sarasota MSA represented 2.0 percent of the state population in 2014.

Major industries in the Sarasota MSA include services, retail trade, and the construction industry. The largest employers are the public education system of Sarasota county, Sarasota Memorial Health Care System, and county government.

Unemployment in 2014 for the Sarasota MSA was 5.8 percent, which is slightly lower than the statewide level of 6.3 percent and the nationwide rate of 6.2 percent.

In order to gather current information on the community and potential lending opportunities in the area, we contacted a community leader. Our contact indicated that the credit needs in the Sarasota MSA include affordable housing for low- and moderate-income individuals.

State of Arizona

Demographic Information for Full Scope Area: Phoenix MSA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	663	6.03	27.30	34.69	31.37	0.60
Population by Geography	3,072,149	4.88	28.69	36.78	29.64	0.01
Owner-Occupied Housing by Geography	764,563	1.53	21.47	40.34	36.66	0.00
Businesses by Geography	464,595	3.55	17.80	32.48	46.10	0.07
Farms by Geography	7,678	2.25	19.71	36.19	41.81	0.04
Family Distribution by Income Level	768,800	19.09	18.51	21.75	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	289,057	7.44	41.75	36.25	14.56	0.00
Median Family Income		\$51,172		Median Housing Value		\$130,648
HUD Updated Median Family Income for 2011 Households		\$65,500		Average Annual Unemployment Rate		8.60%
Households Below Poverty Level		10%				

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full-Scope Area: Phoenix MSA 2012-2014						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	916	9.39	23.91	31.99	33.62	1.09
Population by Geography	3,817,117	8.42	24.46	33.25	33.69	0.18
Owner-Occupied Housing by Geography	916,515	3.61	20.72	35.75	39.90	0.02
Businesses by Geography	339,321	6.44	15.40	29.68	47.96	0.52
Farms by Geography	6,314	5.69	15.89	32.48	45.60	0.35
Family Distribution by Income Level	913,798	20.93	17.44	20.15	41.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	350,618	13.75	36.07	32.18	18.00	0.00
Median Family Income	\$64,408		Median Housing Value		\$258,903	
FFIEC Adjusted Median Family Income for 2014	\$61,900		Average Annual Unemployment Rate		5.90%	
Households Below the Poverty Level	12%					

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

Source: 2010 U.S. Census, and 2014 FFIEC updated MFI.

The AA consists of Maricopa county in the Phoenix-Mesa-Scottsdale MSA. As of June 30, 2014, Stearns Bank had \$82 million in deposits in this AA. Stearns ranks 31st in deposit market share out of the 57 institution with a presence in the MSA. The Phoenix MSA represented 61 percent of the state's population in 2014.

Major industries in the Phoenix MSA include services, retail trade, and the finance industry. The largest employers in the county are the State of Arizona, Wal-Mart, the Banner Health Systems, and the city of Phoenix.

Unemployment in 2014 for the Phoenix MSA was 5.9 percent, which was below the statewide level of 6.9 percent and the nationwide rate of 6.2 percent.

Community and credit needs in the Phoenix MSA include affordable housing for low- and moderate-income individuals and small businesses lending.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 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. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, 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 information above.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2 information above.

- 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 information above.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8 information above.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size,

regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

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

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

Table 1. Lending Volume

LENDING VOLUME		Geography: STEARNS 2011						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in AA**	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans***		Total Reported Loans		% of Rated Area Deposits in AA*****
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
Atlanta MSA (GA)	2.15	0	0	16	852	0	0	0	0	16	852	0.00
Phoenix MSA (AZ)	8.99	2	780	65	10,596	0	0	0	0	67	11,376	0.00
Sarasota MSA (FL)	6.71	15	2,296	35	4,379	0	0	0	0	50	6,675	0.00
St Cloud MSA (MN)	51.28	77	11,413	160	14,219	145	4,831	0	0	382	30,463	0.00
Limited Review:												
Chattanooga MSA (GA)	0.00	0	0	0	0	0	0	0	0	0	0	0.00
Dalton MSA (GA)	0.00	0	0	0	0	0	0	0	0	0	0	0.00
MN NonMSA (MN)	10.20	38	4,701	28	1,856	10	878	0	0	76	7,435	0.00
Minneapolis AA (MN)	14.09	28	3,420	48	3,206	29	1,637	0	0	105	8,263	0.00
Ft Lauderdale MSA (FL)	2.15	0	0	16	576	0	0	0	0	16	576	0.00
Tampa MSA (FL)	4.43	2	188	31	3,000	0	0	0	0	33	3,188	0.00

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

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

*** Deposit Data as of July 21, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase 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:																
Atlanta MSA (GA)	0	0.00	0.21	0.00	11.49	0.00	42.67	0.00	45.63	0.00	0.00	0.00	0.00	0.00	0.00	
Phoenix MSA (AZ)	0	0.00	1.53	0.00	21.47	0.00	40.34	0.00	36.66	0.00	0.00	0.00	0.00	0.00	0.00	
Sarasota MSA (FL)	5	6.33	0.51	0.00	17.37	0.00	54.96	80.00	27.17	20.00	0.10	0.00	0.00	0.13	0.06	
St Cloud MSA (MN)	24	30.38	0.00	0.00	7.89	4.17	73.68	75.00	18.43	20.83	1.11	0.00	0.69	1.20	0.96	
Limited Review:																
Chattanooga MSA (GA)	0	0.00	0.00	0.00	21.73	0.00	73.09	0.00	5.18	0.00	0.00	0.00	0.00	0.00	0.00	
Dalton MSA (GA)	0	0.00	0.00	0.00	13.31	0.00	69.32	0.00	17.36	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Lauderdale MSA (FL)	0	0.00	1.16	0.00	23.67	0.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa MSA (FL)	1	1.27	0.52	0.00	14.42	0.00	57.88	0.00	27.18	100.0	0.01	0.00	0.00	0.00	0.03	
MN NonMSA (MN)	27	34.18	0.00	0.00	2.09	0.00	97.91	100.00	0.00	0.00	0.83	0.00	0.00	0.85	0.00	
Minneapolis AA (MN)	22	27.85	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	4.93	0.00	0.00	4.93	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied (OO) Units is the number of OO units in a particular geography divided by the number of OO housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:																
Atlanta MSA (GA)	0	0.00	0.21	0.00	11.49	0.00	42.67	0.00	45.63	0.00	0.00	0.00	0.00	0.00	0.00	
Phoenix MSA (AZ)	0	0.00	1.53	0.00	21.47	0.00	40.34	0.00	36.66	0.00	0.00	0.00	0.00	0.00	0.00	
Sarasota MSA (FL)	0	0.00	0.51	0.00	17.37	0.00	54.96	0.00	27.17	0.00	0.00	0.00	0.00	0.00	0.00	
St Cloud MSA (MN)	2	50.00	0.00	0.00	7.89	0.00	73.68	100.00	18.43	0.00	0.88	0.00	0.00	1.23	0.00	
Limited Review:																
Chattanooga MSA (GA)	0	0.00	0.00	0.00	21.73	0.00	73.09	0.00	5.18	0.00	0.00	0.00	0.00	0.00	0.00	
Dalton MSA (GA)	0	0.00	0.00	0.00	13.31	0.00	69.32	0.00	17.36	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Lauderdale MSA (FL)	0	0.00	1.16	0.00	23.67	0.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa MSA (FL)	0	0.00	0.52	0.00	14.42	0.00	57.88	0.00	27.18	0.00	0.00	0.00	0.00	0.00	0.00	
MN NonMSA (MN)	0	0.00	0.00	0.00	2.09	0.00	97.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Minneapolis AA (MN)	2	50.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.26	0.00	0.00	5.26	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied units is the number of Owner Occupied units in a particular geography divided by the number of Owner Occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Atlanta MSA (GA)	0	0.00	0.21	0.00	11.49	0.00	42.67	0.00	45.63	0.00	0.00	0.00	0.00	0.00	0.00	
Phoenix MSA (AZ)	1	1.30	1.53	0.00	21.47	0.00	40.34	100.00	36.66	0.00	0.00	0.00	0.00	0.01	0.00	
Sarasota MSA (FL)	10	12.99	0.51	0.00	17.37	20.00	54.96	30.00	27.17	50.00	0.21	0.00	0.57	0.12	0.26	
St Cloud MSA (MN)	50	64.94	0.00	0.00	7.89	2.00	73.68	76.00	18.43	22.00	1.29	0.00	0.64	1.45	1.01	
Limited Review:																
Chattanooga MSA (GA)	0	0.00	0.00	0.00	21.73	0.00	73.09	0.00	5.18	0.00	0.00	0.00	0.00	0.00	0.00	
Dalton MSA (GA)	0	0.00	0.00	0.00	13.31	0.00	69.32	0.00	17.36	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Lauderdale MSA (FL)	0	0.00	1.16	0.00	23.67	0.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa MSA (FL)	1	1.30	0.52	0.00	14.42	0.00	57.88	100.00	27.18	0.00	0.01	0.00	0.00	0.02	0.00	
MN NonMSA (MN)	11	14.29	0.00	0.00	2.09	0.00	97.91	100.00	0.00	0.00	0.25	0.00	0.00	0.26	0.00	
Minneapolis AA (MN)	4	5.19	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.57	0.00	0.00	0.57	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STEARNS 2011						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	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	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	0	0.00	1.18	0.00	37.09	0.00	44.93	0.00	16.83	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	1	50.00	6.97	0.00	40.88	100.00	36.33	0.00	15.82	0.00	1.20	0.00	2.63	0.00	0.00
Sarasota MSA (FL)	0	0.00	0.89	0.00	13.23	0.00	39.09	0.00	46.79	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	1	50.00	1.91	0.00	17.24	0.00	66.46	0.00	14.39	100.00	2.94	0.00	0.00	0.00	8.33
Limited Review:															
Chattanooga MSA (GA)	0	0.00	0.00	0.00	80.85	0.00	15.00	0.00	4.15	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	0.00	0.00	60.23	0.00	8.65	0.00	31.12	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	2.27	0.00	32.48	0.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	1.04	0.00	13.30	0.00	58.79	0.00	26.87	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	0	0.00	0.00	0.00	1.34	0.00	98.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Minneapolis AA (MN)	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multifamily (MF) 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 MF Units is the number of MF units in a particular geography divided by the number of MF housing units in the area based on 2000 Census information.

****MF loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Atlanta MSA (GA)	16	4.01	1.04	0.00	12.63	12.50	45.48	50.00	40.86	37.50	0.11	0.00	0.13	0.12	0.09					
Phoenix MSA (AZ)	65	16.29	3.55	0.00	17.80	26.15	32.48	32.31	46.10	41.54	0.08	0.00	0.13	0.09	0.07					
Sarasota MSA (FL)	35	8.77	0.52	2.86	17.73	14.29	51.07	62.86	30.67	20.00	0.45	3.57	0.43	0.58	0.26					
St Cloud MSA (MN)	160	40.10	2.63	3.13	8.90	3.13	69.74	80.00	18.73	13.75	5.07	4.13	2.13	6.29	3.48					
Limited Review:																				
Chattanooga MSA (GA)	0	0.00	0.00	0.00	26.64	0.00	68.45	0.00	4.92	0.00	0.00	0.00	0.00	0.00	0.00					
Dalton MSA (GA)	0	0.00	0.00	0.00	33.13	0.00	51.90	0.00	14.97	0.00	0.00	0.00	0.00	0.00	0.00					
Ft Lauderdale MSA (FL)	16	4.01	4.01	0.00	19.65	25.00	41.33	50.00	35.01	25.00	0.04	0.00	0.06	0.05	0.03					
Tampa MSA (FL)	31	7.77	0.50	0.00	14.03	16.13	55.11	70.97	30.36	12.90	0.17	0.00	0.18	0.22	0.07					
MN NonMSA (MN)	28	7.02	0.00	0.00	2.26	0.00	97.71	100.00	0.00	0.00	1.04	0.00	0.00	1.08	0.00					
Minneapolis AA (MN)	48	12.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.48	0.00	0.00	12.47	0.00					

* Based on 2011 Peer Small Business Data -- US and PR

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STEARNS 2011								Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Atlanta MSA (GA)	0	0.00	0.44	0.00	12.74	0.00	44.93	0.00	41.89	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	0	0.00	2.25	0.00	19.71	0.00	36.19	0.00	41.81	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	0	0.00	0.55	0.00	17.83	0.00	53.85	0.00	27.78	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	145	78.80	0.17	0.00	11.33	2.76	81.40	97.24	7.11	0.00	50.70	0.00	33.33	52.22	0.00
Limited Review:															
Chattanooga MSA (GA)	0	0.00	0.00	0.00	8.33	0.00	89.88	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	0.00	0.00	14.37	0.00	71.26	0.00	14.37	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	3.30	0.00	21.23	0.00	42.51	0.00	32.96	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	0.49	0.00	17.04	0.00	58.34	0.00	24.13	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	10	5.43	0.00	0.00	4.09	10.00	95.81	90.00	0.00	0.00	20.41	0.00	100.00	18.75	0.00
Minneapolis AA (MN)	29	15.76	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	65.91	0.00	0.00	69.05	0.00

* Based on 2011 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STEARNS 2011						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	0	0.00	15.02	0.00	16.37	0.00	22.19	0.00	46.43	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	0	0.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	5	6.33	16.14	0.00	19.23	20.00	23.84	0.00	40.79	80.00	0.11	0.00	0.13	0.00	0.17
St Cloud MSA (MN)	24	30.38	16.15	35.00	19.14	20.00	27.52	15.00	37.19	30.00	1.07	1.73	0.69	0.69	1.32
Limited Review:															
Chattanooga MSA (GA)	0	0.00	22.70	0.00	22.33	0.00	26.32	0.00	28.66	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	17.76	0.00	19.28	0.00	22.72	0.00	40.24	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	20.85	0.00	18.17	0.00	20.48	0.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	1.27	17.45	0.00	18.61	0.00	22.24	100.00	41.70	0.00	0.01	0.00	0.00	0.05	0.00
MN NonMSA (MN)	27	34.18	17.96	37.04	22.94	37.04	31.21	7.41	27.89	18.52	0.98	1.12	1.07	0.36	1.35
Minneapolis AA (MN)	22	27.85	19.17	10.00	19.86	35.00	25.69	20.00	35.28	35.00	5.24	4.00	5.88	4.21	5.93

* Based on 2011 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 7.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STEARNS 2011						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 5	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	0	0.00	15.02	0.00	16.37	0.00	22.19	0.00	46.43	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	0	0.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	0	0.00	16.14	0.00	19.23	0.00	23.84	0.00	40.79	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	2	50.00	16.15	0.00	19.14	0.00	27.52	0.00	37.19	100.00	0.47	0.00	0.00	0.00	1.61
Limited Review:															
Chattanooga MSA (GA)	0	0.00	22.70	0.00	22.33	0.00	26.32	0.00	28.66	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	17.76	0.00	19.28	0.00	22.72	0.00	40.24	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	20.85	0.00	18.17	0.00	20.48	0.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	17.45	0.00	18.61	0.00	22.24	0.00	41.70	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	0	0.00	17.96	0.00	22.94	0.00	31.21	0.00	27.89	0.00	0.00	0.00	0.00	0.00	0.00
Minneapolis AA (MN)	2	50.00	19.17	0.00	19.86	0.00	25.69	50.00	35.28	50.00	5.26	0.00	0.00	10.00	6.67

* Based on 2011 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 25.0% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011								
Assessment Area:	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 6	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	0	0.00	15.02	0.00	16.37	0.00	22.19	0.00	46.43	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	1	1.30	19.09	0.00	18.51	0.00	21.75	0.00	40.65	100.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	10	12.99	16.14	40.00	19.23	30.00	23.84	10.00	40.79	20.00	0.26	2.04	0.56	0.13	0.09
St Cloud MSA (MN)	50	64.94	16.15	7.69	19.14	28.21	27.5842	28.21	37.19	35.90	1.17	0.86	1.50	1.06	1.15
Limited Review:															
Chattanooga MSA (GA)	0	0.00	22.70	0.00	22.33	0.00	26.32	0.00	28.66	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	17.76	0.00	19.28	0.00	22.72	0.00	40.24	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	20.85	0.00	18.17	0.00	20.48	0.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	1.30	17.45	0.00	18.61	0.00	22.24	100.00	41.70	0.00	0.01	0.00	0.00	0.07	0.00
MN NonMSA (MN)	11	14.29	17.96	20.00	22.94	30.00	31.21	40.00	27.89	10.00	0.28	0.48	0.30	0.36	0.09
Minneapolis AA (MN)	4	5.19	19.17	0.00	19.86	0.00	25.69	0.00	35.28	100.00	0.51	0.00	0.00	0.00	1.16

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 16.9% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STEARNS 2011			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta MSA (GA)	16	4.01	69.75	18.75	93.75	6.25	0.00	0.11	0.04
Phoenix MSA (AZ)	65	16.29	66.50	23.08	61.54	18.46	20.00	0.08	0.04
Sarasota MSA (FL)	35	8.77	71.87	54.29	60.00	28.57	11.43	0.45	0.55
St Cloud MSA (MN)	160	40.10	71.23	40.00	72.50	20.00	7.50	5.07	4.62
Limited Review:									
Chattanooga MSA (GA)	0	0.00	72.28	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	64.96	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	16	4.01	70.49	6.25	93.75	6.25	0.00	0.04	0.01
Tampa MSA (FL)	31	7.77	65.23	6.45	77.42	16.13	6.45	0.17	0.03
MN NonMSA (MN)	28	7.02	76.76	53.57	82.14	14.29	3.57	1.04	1.02
Minneapolis AA (MN)	48	12.03	75.25	72.92	85.42	10.42	4.17	11.48	16.43

* Based on 2011 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 36.59% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STEARNS 2011			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total **	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta MSA (GA)	0	0.00	95.71	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	0	0.00	95.17	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	0	0.00	97.31	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	145	78.80	98.45	62.76	90.34	9.66	0.00	50.70	48.40
Limited Review:									
Chattanooga MSA (GA)	0	0.00	99.40	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	97.60	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	97.37	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	98.00	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	10	5.43	98.33	90.00	70.00	30.00	0.00	20.41	28.13
Minneapolis AA (MN)	29	15.76	97.59	100.00	75.86	24.14	0.00	65.91	78.38

* Based on 2011 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 29.89% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlanta MSA (GA)	0	0	0	0	0	0	0.00	0	0
Phoenix MSA (AZ)	0	0	0	0	0	0	0.00	0	0
Sarasota MSA (FL)	0	0	0	0	0	0	0.00	0	0
St Cloud MSA (MN)	6	0	1	8	7	578	64.00	0	0
Limited Review:									
Chattanooga MSA (GA)	0	0	0	0	0	0	0.00	0	0
Dalton MSA (GA)	0	0	0	0	0	0	0.00	0	0
Ft Lauderdale MSA (FL)	0	0	0	0	0	0	0.00	0	0
Tampa MSA (FL)	0	0	0	0	0	0	0.00	0	0
MN NonMSA (MN)	0	320	0	0	10	320	36.00	0	0
Minneapolis AA (MN)	0	0	1	0	1	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STEARNS 2011																	
Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Atlanta MSA (GA)	0.00	1	100	0.00	0.00	0.00	100.00	0	1	0	0	0	1	0.80	17.68	42.48	39.04
Phoenix MSA (AZ)	100.00	1	100.00	0.00	100.00	0.00	0.00	0	2	0	0	1	1	4.88	28.69	36.78	29.64
Sarasota MSA (FL)	61.76	2	66.66	0.00	50.00	50.00	0.00	0	0	0	0	0	0	1.20	20.05	53.82	24.93
St Cloud MSA (MN)	94.29	2	50.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.66	9.93	71.05	18.36
Limited Review:																	
Chattanooga MSA (GA)	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	24.98	70.23	4.78
Dalton MSA (GA)	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	24.38	59.85	15.76
Ft Lauderdale MSA (FL)	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	3.57	26.43	43.13	26.88
Tampa MSA (FL)	38.24	1	33.34	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.15	17.57	56.61	24.67
MN NonMSA (MN)	0.00	1	25.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	1.96	98.04	0.00
Minneapolis AA (MN)	0.00	1	0.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	Geography: STEARNS 2011				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
MA/Assessment Area:	Deposits	Branches						ATMs						Population										
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
Atlanta MSA (GA)	0.00	1	11.00	0	0	0	100	1	7.69	0	0	0	100	0.80	17.68	42.48	39.04							
Phoenix MSA (AZ)	12.64	1	11.00	0	100	0	0	1	7.69	0	100	0	0	4.88	28.69	36.78	29.64							
Sarasota MSA (FL)	7.81	2	22.00	0	50	50	0	2	0.00	0	50	50	0	1.20	20.05	53.82	24.93							
St Cloud MSA (MN)	67.62	2	23.00	0	50	50	0	5	38.46	0	40	40	20	0.66	9.93	71.05	18.36							
Limited Review:																								
Chattanooga MSA (GA)	0.00	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0.00	24.98	70.23	4.78							
Dalton MSA (GA)	0.00	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0.00	24.38	59.85	15.76							
Ft Lauderdale MSA (FL)	0.00	0	0.00	0	0	0	0	0	0.00	0	0	0	0	3.57	26.43	43.13	26.88							
Tampa MSA (FL)	4.83	1	11.00	0	0	100	0	1	7.69	0	0	100	0	1.15	17.57	56.61	24.67							
MN NonMSA (MN)	1.01	1	11.00	0	100	0	0	2	15.38	0	50	50	0	0.00	1.96	98.04	0.00							
Minneapolis AA (MN)	3.09	1	11.00	0	0	100	0	1	7.69	0	0	100	0	0.00	0.00	100.00	0.00							

Table 1. Lending Volume

LENDING VOLUME		Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area (2014):	% of Rated Area Loans (#) in AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Atlanta MSA (GA)	8.69	114	11,261	123	8,948	6	518	1	1,315	243	20,727	0.00
Phoenix MSA (AZ)	14.28	65	21,290	333	37,704	1	93	12	51,931	399	59,087	0.00
Sarasota MSA (FL)	4.83	76	12,452	59	8,593	0	0	1	1,065	135	21,045	0.00
St Cloud MSA (MN)	38.07	268	41,334	429	48,531	367	13,994	3	7,516	1,064	103,859	0.00
Limited Review:												
Chattanooga MSA (GA)	0.47	8	944	5	647	0	0	0	0	13	1,591	0.00
Dalton MSA (GA)	0.47	2	175	11	1,337	0	0	0	0	13	1,512	0.00
Ft Lauderdale MSA (FL)	5.15	7	1,729	137	6,816	0	0	0	0	144	8,545	0.00
Tampa MSA (FL)	3.51	8	1,087	90	9,971	0	0	0	0	98	11,058	0.00
MN NonMSA (MN)	12.31	153	17,042	107	6,706	84	5,260	0	0	344	29,008	0.00
Minneapolis AA (MN)	12.24	198	28,617	93	8,636	51	5,304	0	0	342	42,557	0.00

* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2014.

*** Deposit Data as of July 17, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	25	4.73	0.00	0.00	28.91	24.00	48.75	68.00	22.35	8.00	0.05	0.00	0.13	0.10	0.01
Phoenix MSA (AZ)	57	10.78	3.61	0.00	20.72	15.79	35.76	33.33	39.91	50.88	0.02	0.00	0.04	0.02	0.02
Sarasota MSA (FL)	48	9.07	0.45	0.00	17.00	6.25	51.25	54.17	31.31	39.58	0.20	0.00	0.15	0.27	0.12
St Cloud MSA (MN)	132	24.95	0.00	0.00	12.52	3.79	79.97	86.36	7.51	9.85	1.76	0.00	0.28	1.90	2.46
Limited Review:															
Chattanooga MSA (GA)	2	0.38	0.00	0.00	38.41	50.00	56.97	50.00	4.62	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	2	0.38	2.15	0.00	9.35	0.00	49.68	50.00	38.82	50.00	0.11	0.00	0.00	0.00	0.26
Ft Lauderdale MSA (FL)	4	0.76	1.73	0.00	27.32	25.00	37.11	0.00	33.84	75.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	0.19	0.93	0.00	16.77	0.00	49.68	100.00	32.62	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	99	18.71	0.00	0.00	6.97	3.03	93.03	96.97	0.00	0.00	6.53	0.00	3.92	6.76	0.00
Minneapolis AA (MN)	159	30.06	0.00	0.00	5.97	9.43	91.19	90.57	2.84	0.00	1.53	0.00	1.96	1.55	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement 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:															
Atlanta MSA (GA)	7	35.00	0.00	0.00	28.91	57.14	48.75	28.57	22.35	14.29	0.13	0.00	1.19	0.00	0.00
Phoenix MSA (AZ)	0	0.00	3.61	0.00	20.72	0.00	35.76	0.00	39.91	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	1	5.00	0.45	0.00	17.00	0.00	51.25	100.00	31.31	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	3	15.00	0.00	0.00	12.52	0.00	79.97	100.00	7.51	0.00	0.44	0.00	0.00	0.55	0.00
Limited Review:															
Chattanooga MSA (GA)	1	5.00	0.00	0.00	38.41	0.00	56.97	100.00	4.62	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	2.15	0.00	9.35	0.00	49.68	0.00	38.82	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	1.73	0.00	27.32	0.00	37.11	0.00	33.84	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	5.00	0.93	0.00	16.77	100.00	49.68	0.00	32.62	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	5	25.00	0.00	0.00	6.97	0.00	93.03	100.00	0.00	0.00	3.70	0.00	0.00	4.29	0.00
Minneapolis AA (MN)	2	10.00	0.00	0.00	5.97	0.00	91.19	100.00	2.84	0.00	0.35	0.00	0.00	0.37	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: STEARNS 2012-2014				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	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:															
Atlanta MSA (GA)	82	23.84	0.00	0.00	28.91	47.56	48.75	37.80	22.35	14.63	0.06	0.00	0.12	0.12	0.03
Phoenix MSA (AZ)	7	2.03	3.61	14.29	20.72	0.00	35.76	28.57	39.91	57.14	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	24	6.98	0.45	0.00	17.00	16.67	51.25	45.83	31.31	37.50	0.05	0.00	0.12	0.02	0.07
St Cloud MSA (MN)	133	38.66	0.00	0.00	12.52	3.01	79.97	85.71	7.51	11.28	0.80	0.00	0.00	0.89	0.94
Limited Review:															
Chattanooga MSA (GA)	5	1.45	0.00	0.00	38.41	0.00	56.97	100.00	4.62	0.00	0.26	0.00	0.00	0.41	0.00
Dalton MSA (GA)	0	0.00	2.15	0.00	9.35	0.00	49.68	0.00	38.82	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	3	0.87	1.73	0.00	27.32	33.33	37.11	33.33	33.84	33.33	0.00	0.00	0.00	0.01	0.00
Tampa MSA (FL)	6	1.74	0.93	0.00	16.77	16.67	49.68	66.67	32.62	16.67	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	48	13.95	0.00	0.00	6.97	2.08	93.03	97.92	0.00	0.00	1.85	0.00	0.00	1.95	0.00
Minneapolis AA (MN)	36	10.47	0.00	0.00	5.97	13.89	91.19	86.11	2.84	0.00	0.12	0.00	0.35	0.12	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	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	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	0	0.00	0.00	0.00	62.11	0.00	37.34	0.00	18.71	0.00	0.00	0.00	0.00	0.00	0.00
Phoenix MSA (AZ)	1	16.67	15.31	0.00	37.05	100.00	28.83	0.00	18.81	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	3	50.00	0.78	0.00	14.20	100.00	31.59	0.00	53.43	0.00	7.14	0.00	11.11	0.00	0.00
St Cloud MSA (MN)	0	0.00	0.00	0.00	38.41	0.00	57.06	0.00	4.54	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Chattanooga MSA (GA)	0	0.00	0.00	0.00	73.43	0.00	21.77	0.00	4.80	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	9.00	0.00	43.35	0.00	19.60	0.00	28.05	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	4.53	0.00	36.14	0.00	41.64	0.00	17.69	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	1.95	0.00	23.43	0.00	38.77	0.00	35.86	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	1	16.67	0.00	0.00	13.68	0.00	86.32	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Minneapolis AA (MN)	1	16.67	0.00	0.00	27.73	0.00	71.43	100.00	0.84	0.00	5.00	0.00	0.00	5.56	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STEARNS 2012-2014				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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:																
Atlanta MSA (GA)	123	8.87	0.00	1.63	52.53	40.65	37.38	22.76	10.09	34.96	0.35	1.01	0.89	0.28	0.17	
Phoenix MSA (AZ)	332	23.95	6.44	11.14	15.40	18.07	29.68	32.83	47.96	37.95	0.17	0.32	0.17	0.22	0.13	
Sarasota MSA (FL)	59	4.26	0.49	0.00	20.19	23.73	42.63	30.51	36.70	45.76	0.22	0.00	0.35	0.12	0.25	
St Cloud MSA (MN)	429	30.95	0.00	0.00	18.50	14.22	72.71	77.39	8.79	8.39	4.62	0.00	2.79	5.54	4.31	
Limited Review:																
Chattanooga MSA (GA)	5	0.36	0.00	0.00	42.51	0.00	52.21	100.00	5.28	0.00	0.25	0.00	0.00	0.47	0.00	
Dalton MSA (GA)	11	0.79	5.56	0.00	25.83	27.27	38.72	63.64	29.89	9.09	0.35	0.00	0.00	0.65	0.30	
Ft Lauderdale MSA (FL)	137	9.88	3.44	5.11	24.56	28.47	33.75	28.47	38.25	37.96	0.11	0.12	0.12	0.11	0.10	
Tampa MSA (FL)	90	6.49	1.05	0.00	17.03	17.78	45.28	57.78	36.64	24.44	0.15	0.00	0.13	0.21	0.11	
MN NonMSA (MN)	107	7.72	0.00	0.00	8.69	1.87	91.31	98.13	0.00	0.00	9.30	0.00	3.57	10.34	0.00	
Minneapolis AA (MN)	93	6.71	0.00	0.00	6.03	23.66	90.99	76.34	2.98	0.00	1.07	0.00	4.83	0.92	0.00	

* Based on 2013 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 (2014).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STEARNS 2012-2014								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Atlanta MSA (GA)	6	1.18	0.00	0.00	55.67	100.00	38.14	0.00	6.19	0.00	4.88	0.00	28.57	0.00	0.00
Phoenix MSA (AZ)	1	0.20	5.69	0.00	15.89	0.00	32.48	100.00	45.60	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	0	0.00	0.67	0.00	17.17	0.00	48.50	0.00	33.67	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	367	72.10	0.00	0.00	12.72	4.09	85.71	95.91	1.58	0.00	33.68	0.00	14.81	35.67	0.00
Limited Review:															
Chattanooga MSA (GA)	0	0.00	0.00	0.00	33.97	0.00	64.74	0.00	1.28	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	1.86	0.00	8.70	0.00	60.87	0.00	28.57	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	3.70	0.00	28.50	0.00	33.05	0.00	34.74	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	1.32	0.00	18.04	0.00	51.10	0.00	29.54	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	84	16.50	0.00	0.00	10.28	1.19	89.72	98.81	0.00	0.00	28.04	0.00	0.00	29.13	0.00
Minneapolis AA (MN)	51	10.02	0.00	0.00	4.68	1.96	93.55	98.04	1.77	0.00	15.74	0.00	0.00	19.77	0.00

* Based on 2013 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 (2014).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STEARNS 2012-2014								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 7	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	25	4.73	23.07	31.82	20.56	31.82	21.57	22.73	34.81	13.64	0.06	0.11	0.09	0.12	0.02
Phoenix MSA (AZ)	57	10.78	20.93	12.50	17.44	0.00	20.15	0.00	41.48	87.50	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	48	9.07	18.22	9.52	18.66	9.52	21.32	16.67	41.80	64.29	0.23	0.34	0.00	0.32	0.26
St Cloud MSA (MN)	132	24.95	19.07	12.61	17.04	24.32	26.14	31.53	37.74	31.53	1.82	0.96	1.73	2.27	1.84
Limited Review:															
Chattanooga MSA (GA)	2	0.38	23.86	0.00	22.99	50.00	20.81	50.00	32.35	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	2	0.38	22.47	0.00	16.21	50.00	20.03	0.00	41.29	50.00	0.13	0.00	0.00	0.00	0.45
Ft Lauderdale MSA (FL)	4	0.76	22.03	0.00	17.44	0.00	19.79	0.00	40.73	100.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	0.19	19.23	0.00	18.39	0.00	20.86	0.00	41.53	100.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	99	18.71	21.25	15.38	22.17	38.46	23.11	28.57	33.47	17.58	6.47	9.38	8.84	4.76	4.32
Minneapolis AA (MN)	159	30.06	17.94	32.26	21.21	39.35	29.16	16.77	31.70	11.61	1.68	2.45	1.81	1.23	1.08

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 17.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families 8	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ***	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	7	35.00	23.07	42.86	20.56	28.57	21.57	14.29	34.81	14.29	0.14	1.89	0.00	0.00	0.00
Phoenix MSA (AZ)	0	0.00	20.93	0.00	17.44	0.00	20.15	0.00	41.48	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	1	5.00	18.22	0.00	18.66	0.00	21.32	0.00	41.80	100.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	3	15.00	19.07	33.33	17.04	33.33	26.14	0.00	37.74	33.33	0.48	4.00	0.00	0.00	0.00
Limited Review:															
Chattanooga MSA (GA)	1	5.00	23.86	0.00	22.99	0.00	20.81	100.00	32.35	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	22.47	0.00	16.21	0.00	20.03	0.00	41.29	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	22.03	0.00	17.44	0.00	19.79	0.00	40.73	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	1	5.00	19.23	0.00	18.39	0.00	20.86	0.00	41.53	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	5	25.00	21.25	0.00	22.17	0.00	23.11	50.00	33.47	50.00	1.28	0.00	0.00	0.00	4.17
Minneapolis AA (MN)	2	10.00	17.94	0.00	21.21	0.00	29.16	0.00	31.70	100.00	0.36	0.00	0.00	0.00	1.39

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 20.0% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	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 9	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta MSA (GA)	82	23.84	23.07	28.21	20.56	30.77	21.57	23.08	34.81	17.95	0.08	0.17	0.31	0.09	0.01
Phoenix MSA (AZ)	7	2.03	20.93	0.00	17.44	0.00	20.15	50.00	41.48	50.00	0.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	24	6.98	18.22	4.35	18.66	21.74	21.32	21.74	41.80	52.17	0.06	0.00	0.09	0.00	0.08
St Cloud MSA (MN)	133	38.66	19.07	8.26	17.04	23.14	26.14	23.97	37.74	44.63	0.85	0.65	0.91	1.32	0.54
Limited Review:															
Chattanooga MSA (GA)	5	1.45	23.86	25.00	22.99	25.00	20.81	0.00	32.35	50.00	0.32	0.94	0.45	0.00	0.30
Dalton MSA (GA)	0	0.00	22.47	0.00	16.21	0.00	20.03	0.00	41.29	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	3	0.87	22.03	33.33	17.44	0.00	19.79	33.33	40.73	33.33	0.00	0.00	0.00	0.02	0.00
Tampa MSA (FL)	6	1.74	19.23	0.00	18.39	0.00	20.86	40.00	41.53	60.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	48	13.95	21.25	10.64	22.17	23.40	23.11	31.91	33.47	34.04	1.97	5.56	1.79	2.46	0.65
Minneapolis AA (MN)	36	10.47	17.94	25.00	21.21	27.78	29.16	25.00	31.70	22.22	0.14	0.16	0.15	0.13	0.14

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.7% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STEARNS 2012-2014			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta MSA (GA)	123	8.87	76.40	36.59	82.11	12.20	5.69	0.35	0.29
Phoenix MSA (AZ)	333	24.01	72.42	17.42	73.27	12.61	14.11	0.17	0.06
Sarasota MSA (FL)	59	4.25	73.93	40.68	64.41	16.95	18.64	0.22	0.15
St Cloud MSA (MN)	429	30.93	75.06	42.42	72.49	16.55	10.96	4.62	5.09
Limited Review:									
Chattanooga MSA (GA)	5	0.36	73.24	40.00	60.00	20.00	20.00	0.25	0.55
Dalton MSA (GA)	11	0.79	67.54	45.45	72.73	9.09	18.18	0.35	0.57
Ft Lauderdale MSA (FL)	137	9.88	72.30	10.95	87.59	10.95	1.46	0.11	0.03
Tampa MSA (FL)	90	6.49	68.16	13.33	76.67	7.78	15.56	0.15	0.05
MN NonMSA (MN)	107	7.71	76.83	71.96	90.65	5.61	3.74	9.30	11.45
Minneapolis AA (MN)	93	6.71	79.49	50.54	70.97	18.28	10.75	1.07	0.96

* Based on 2013 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 - 2014).

**** 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 46.94% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STEARNS 2012-2014			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total **	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta MSA (GA)	6	1.18	96.91	83.33	66.67	33.33	0.00	4.88	9.09
Phoenix MSA (AZ)	1	0.20	94.44	0.00	100.00	0.00	0.00	0.00	0.00
Sarasota MSA (FL)	0	0.00	97.80	0.00	0.00	0.00	0.00	0.00	0.00
St Cloud MSA (MN)	367	72.10	98.53	70.03	90.19	8.17	1.63	33.68	37.50
Limited Review:									
Chattanooga MSA (GA)	0	0.00	98.72	0.00	0.00	0.00	0.00	0.00	0.00
Dalton MSA (GA)	0	0.00	95.65	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale MSA (FL)	0	0.00	97.46	0.00	0.00	0.00	0.00	0.00	0.00
Tampa MSA (FL)	0	0.00	97.98	0.00	0.00	0.00	0.00	0.00	0.00
MN NonMSA (MN)	84	16.50	98.20	77.38	75.00	23.81	1.19	28.04	24.71
Minneapolis AA (MN)	51	10.02	98.54	86.27	62.75	27.45	9.80	15.74	21.43

* Based on 2013 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 - 2014).

**** 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 23.97% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STEARNS 2012-2014				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlanta MSA (GA)	0	0	0	6	10	6	2.00	0	0
Phoenix MSA (AZ)	0	0	3	5	3	5	2.00	0	0
Sarasota MSA (FL)	0	0	2	3	2	3	1.00	0	0
St Cloud MSA (MN)	0	0	29	329	29	329	92.00	0	0
Limited Review:									
Chattanooga MSA (GA)	0	0	2	0	2	0	0.00	0	0
Dalton MSA (GA)	0	0	3	1	3	1	0.00	0	0
Ft Lauderdale MSA (FL)	0	0	0	0	0	0	0.00	0	0
Tampa MSA (FL)	0	0	1	2	1	2	1.00	0	0
MN NonMSA (MN)	0	0	5	4	5	4	1.00	0	0
Minneapolis AA (MN)	0	0	4	2	4	2	1.00	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 & BRANCH OPENINGS/CLOSINGS																Geography: STEARNS 2012-2014				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014			
MA/Assessment Area:	Deposits		Branches					Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
Atlanta MSA (GA)	86.68	2	40.00	0.00	100.00	0.00	0.00	2	0	0	2	0	0	1.27	23.36	29.63	45.74						
Phoenix MSA (AZ)	100.00	1	100.00	0.00	100.00	0.00	0.00	0	1	0	-1	0	0	8.42	24.46	33.25	33.69						
Sarasota MSA (FL)	51.64	2	50.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	1.01	19.74	50.64	28.60						
St Cloud MSA (MN)	94.74	2	50.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	16.74	74.67	8.60						
Limited Review:																							
Chattanooga MSA (GA)	11.01	1	20.00	0.00	0.00	100.00	0.00	1	1	0	0	0	0	0.00	42.22	53.36	4.43						
Dalton MSA (GA)	2.31	2	40.00	0.00	100.00	0.00	0.00	2	2	0	0	0	0	4.14	15.37	47.88	32.61						
Ft Lauderdale MSA (FL)	22.44	1	25.00	0.00	0.00	100.00	0.00	1	1	0	0	0	0	4.13	28.90	35.76	31.21						
Tampa MSA (FL)	25.92	1	25.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	1.93	20.57	48.50	28.99						
MN NonMSA (MN)	3.62	1	25.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.97	89.03	0.00						
Minneapolis AA (MN)	0.00	1	25.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	8.03	89.20	2.77						

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: STEARNS 2012-2014						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Atlanta MSA (GA)	12.81	2	14.00	0	100	0	0	4	21.05	0	100	0	0	1.27	23.36	29.63	45.74
Phoenix MSA (AZ)	7.12	1	8.00	0	100	0	0	1	5.26	0	100	0	0	8.42	24.46	33.25	33.69
Sarasota MSA (FL)	6.09	2	15.00	0	50	50	0	2	10.53	0	50	50	0	1.01	19.74	50.64	28.60
St Cloud MSA (MN)	62.82	2	15.00	0	50	50	0	5	26.32	0	40	40	20	0.00	16.74	74.67	8.60
Limited Review:																	
Chattanooga MSA (GA)	1.63	1	8.00	0	0	100	0	1	5.26	0	0	100	0	0.00	42.22	53.36	4.43
Dalton MSA (GA)	0.34	1	8.00	0	100	0	0	1	5.26	0	100	0	0	4.14	15.37	47.88	32.61
Ft Lauderdale MSA (FL)	2.65	1	8.00	0	0	100	0	1	5.26	0	0	100	0	4.13	28.90	35.76	31.21
Tampa MSA (FL)	3.06	1	8.00	0	100	0	0	1	5.26	0	100	0	0	1.93	20.57	48.50	28.99
MN NonMSA (MN)	2.40	1	8.00	0	0	100	0	1	5.26	0	0	100	0	0.00	10.97	89.03	0.00
Minneapolis AA (MN)	1.09	1	8.00	0	100	0	0	2	10.53	0	50	50	0	0.00	8.03	89.20	2.77