



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bremer Bank, National Association
Charter Number: 23286

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Brainerd, MN 56401-3614

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.

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Overall CRA Rating

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

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Bremer's overall Lending Test performance is good. Bremer's lending activity reflects good responsiveness to assessment area (AA) credit needs. A substantial majority of loans are made in the AA. Bremer's geographic distribution of loans reflects adequate penetration throughout the AA. Bremer demonstrates good borrower distribution of home mortgage loans to individuals of all income levels and good borrower distribution of loans to small businesses and farms.
- Bremer's overall Investment Test performance is adequate. Bremer Bank and the Otto Bremer Foundation grants provide an adequate level of investments targeted to the specific needs of their community.
- Bremer's overall Service Test performance is adequate. Bremer's branch locations are reasonably accessible to all portions of the bank's assessment area. Employees provide an adequate level of Community Development (CD) services.

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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 additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and 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: 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

Bremer Bank, National Association (Bremer) is located in Brainerd, Minnesota. Other basic information includes:

- Bremer is a full-service intrastate bank, offering loan, deposit, trust, investment and insurance products and services through its intrastate banking facilities. Three full-service stand-alone banking branches are located in Brainerd, Baxter, and Aitkin, Minnesota. Two limited services branches are located in two grocery stores in Brainerd and Baxter.
- Other key financial information, as of September 30th, 2011:
 - Total Assets of \$348 Million
 - Net Loans to Assets ratio of 69%
 - \$243 million loan portfolio (58% commercial, 30% residential real estate, 7% consumer and 5% other)
 - Tier One Capital of \$34.3 Million
- Bremer is owned by Bremer Financial Corporation (BFC), a \$7.8 billion holding company headquartered in St. Paul, MN. BFC affiliates have more than 100 locations throughout Minnesota, North Dakota, and Wisconsin. Non-bank affiliates include trust and insurance companies. BFC is owned by the Otto Bremer Foundation (Foundation) and its employees. A majority of the Foundation's assets are invested in BFC. Earnings generated by BFC and other investments support local nonprofit activities through the grant-making activities of the Foundation. At the bank's request, we considered qualified investments of the Foundation in the evaluation of the bank's Investment Test Performance.
- There were no mergers, acquisitions, branch openings or closings during the evaluation period
- Bremer's last CRA examination was April 21, 2008 and the bank received a "Satisfactory" rating.
- There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its Assessment Area (AA).

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Bremer's home mortgage, small business, and small farm lending data for the period starting January 1, 2008 and ending December 31, 2010. Market comparisons for small business and farm lending are based on 2010 peer data. For community development loans, investments, and services the evaluation period was January 1, 2008 through September 30, 2011. For the investment test, we evaluated both the bank's equity investments and donations. For the service test, we evaluated retail services and CD services.

We evaluated performance with consideration given to each product's weight. Home mortgage loans represented 53% of loans originated during the evaluation period, while small business and small farm loans represented 44% and 3% respectively. Home mortgage lending received the greatest weight followed by small business lending and then small farm lending. For Home mortgage loans, we gave most weight to refinance loans which represented 67% of the total, while purchase loans, which represented 30%, received less weight. We gave the least amount of weight to home improvement loans which represented 3% of total home mortgage loans. As loans for multifamily dwellings represented less than 1% of total home mortgage loans, an analysis of that product would not be meaningful and therefore was not done. Peer data for home mortgage lending is not available since the bank is not subject to HMDA reporting.

Data Integrity

Bremer is not required to collect HMDA data on loans that it originates; however, it does gather HMDA data for internal use. The validity of that data was verified and used to draw conclusions about the bank's home mortgage lending activities. Prior to conducting this evaluation, we also tested the accuracy of the bank's small business and small farm loan data. We found the data to be accurate and used the data in this evaluation.

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

Selection of Areas for Full Scope Review

Bremer has one AA which is located in a non-metropolitan statistical area (MSA). The AA includes the entire Minnesota counties of Aitkin, Cass, and Crow Wing. We conducted a full scope review of this AA.

Ratings

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

Other

One community contact interview was conducted as part of our review to determine opportunities for financial institutions to help meet local credit needs and gain an understanding of the community's perception of financial institutions in meeting those needs. This community contact noted home mortgage refinances as the primary credit need and indicated financial institutions have been meeting this need.

Fair Lending or Other Illegal Credit Practices Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

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

Bremer's lending activity is good. Lending levels reflect good responsiveness in relation to identified credit needs and the bank's deposit market share. Bremer reports the third highest market share of those banks within the AA reporting CRA data for small business loans. Bremer ranks first in the AA for small business loans by dollar volume. Bremer ranks first for small loans to farms by both number and dollar volumes. Since Bremer is not required to report mortgage information under the Home Mortgage disclosure Act, market share information for home mortgage lending is not available.

Distribution of Loans by Income Level of the Geography

Bremer's geographic distribution of loans is adequate. Consideration was weighted towards home mortgage loans and loans to small businesses as they represent 80% of all loans originated in the AA.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Bremer's geographic distribution of home mortgage loans is adequate. Bremer's geographic distribution of home mortgage loans reflects adequate penetration throughout the AA, particularly to moderate-income geographies. Moderate-income geographies contain 20% of the AA's owner-occupied housing units. Home mortgage refinance loans represented the largest category of home mortgage lending during the evaluation period, while home mortgage purchase lending represented the second largest category. As a result, home mortgage refinance and purchase lending received greater weight than home improvement lending which was very limited during the evaluation period.

Bremer's geographic distribution of home purchase loans is good. The percentage of home purchase loans in moderate-income geographies approximates the demographic.

Bremer's geographic distribution of home improvement loans is excellent. The percentage of home improvement loans in moderate-income geographies exceeds the demographic.

Bremer's geographic distribution of home refinance loans is poor. The percentage of home refinance loans in moderate-income geographies is lower than the demographic. The poor penetration is attributed to the lack of market share and branch locations in Cass County. Three of the seven moderate-income geographies are located in northeastern Cass County with the nearest Bremer branch location being over 40 miles away. Furthermore, these three census tracts are comprised primarily of the Chippewa National Forest and the Leech Lake Band of Ojibwe Indian Reservation. Additionally, there are numerous other banks in closer proximity to these three particular geographies.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Bremer's geographic distribution of small loans to businesses throughout the AA is good. The percentage of small loans to businesses in moderate-income geographies approximates the demographic.

Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Bremer's geographic distribution of small loans to farms throughout the AA is excellent. The percentage of small loans to farms in moderate-income geographies exceeds the demographic.

Lending Gap Analysis

We did not identify any lending gaps, specifically within the moderate-income geographies.

Inside/Outside Ratio

A substantial majority of the bank's loans were originated inside the AA. Bremer originated 91% by number of all loans during the evaluation period inside the AA. This ratio excludes affiliate lending and is calculated at the bank level. We viewed this as a positive characteristic in our analysis of lending performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of Bremer's home mortgage loans reflects good penetration among individuals of different income levels. Bremer's distribution of home mortgage loans to borrowers of different income levels is good. Home mortgage refinance loans represented the largest category of home mortgage lending during the evaluation period, while home mortgage purchase lending represented the second largest category. As a result, home mortgage refinance and purchase lending received greater weight than home improvement lending which was very limited during the evaluation period. Performance of lending to low-income individuals takes a moderate poverty level of 11% into consideration. Twenty one percent of the AA families are low-income families and twenty one percent are moderate income families.

Bremer's distribution of home purchase loans to borrowers of different income levels is excellent. The percent of home purchase loans to low-income borrowers approximates the demographic. The percentage of home purchase loans to moderate-income borrowers exceeds the demographic.

Bremer's distribution of home improvement loans to borrowers of different income levels is adequate. The percentage of home improvement loans to low-income families exceeds the demographic. The percentage of loans to moderate-income families is significantly below the demographic.

Bremer's distribution of home refinance loans to borrower's of different income levels is good. The percentage of home refinance loans to low-income families is somewhat lower than the demographic. The percentage of home refinance loans to moderate income families approximates the demographic.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Bremer's distribution of small loans to small businesses is adequate. The percentage of loans to small businesses is less than the demographic information for AA. Although the bank does not meet the AA demographics for small business lending, they rank third highest by number of loans and first by dollar volume for small business lending. Additionally, Bremer's market share of small loans to small businesses exceeds its overall market share.

Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Bremer's distribution of loans to small farms is good. The percentage of loans to small farms approximates the demographic.

Community Development Lending

Bremer had no community development lending activities during the evaluation period.

Product Innovation and Flexibility

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

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the AA is adequate.

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

Bremer's performance under the investment test was evaluated with consideration given to the community development investment opportunities available within the AA. We noted there are fewer opportunities compared to those found in larger, metropolitan areas. The bank has actively sought opportunities within, and adjacent to its AA, that benefit low- to moderate-income individuals and/or small businesses within the AA.

The level of investments is adequate given the bank's size and available investment opportunities in the AA. Bremer funded \$442 thousand of qualified investments within the AA during the evaluation period. In addition, \$91 thousand was funded in counties adjacent to the AA, and \$6 thousand within the state of Minnesota, representing 1.57% of Tier One Capital (as of September 30, 2011). The investments are responsive to community needs. Considerable weight was given to investments funded within the AA, as they would benefit the AA the most. Reasonable consideration was given to the investments funded adjacent to the AA, as they provide positive effect in the AA as well. We did not identify any investment that would be considered innovative or complex.

Qualified investments consist of both investments and grants. The Otto Bremer Foundation made several investments and grants within the AA, in addition to the qualified investments made at the bank level. Bremer supports organizations that promote economic growth to businesses and affordable housing to low- and moderate-income persons such as the Initiative Foundation, Habitat for Humanity, and Bridges of Hope.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the assessment area is adequate

Retail Banking Services

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

The bank's retail banking services are adequate and provide convenient access to available credit and non-credit services. Bremer has two branch offices and two automated-teller machines (40%) located in moderate-income census tracts, with the remainder in middle-income census tracts. Bremer has not opened or closed any branch locations during the evaluation period. Hours of operations are appropriate to meet the banking needs of low- or moderate-income individuals. Alternative delivery systems are similar to industry standards. Bremer offers traditional online banking, phone bank, ATMs and bank by mail to all clients. The bank does not track the impact of these products and services to low- or moderate-income individuals. As a result, alternative delivery systems were not heavily considered in our evaluation.

Community Development Services

Bremer's community development services activities is adequate. Seven bank employees provide financial services expertise to eight organizations that promote community development initiatives such as teaching financial literacy to low- or moderate-income individuals and serving as the chairmen or director of several organizations that promote economic development inside the AA.

The bank also works with the Otto Bremer Foundation to fund a full-time Non-Profit Resource Specialist. This person is responsible for working with non-profit organizations in the local community to provide training, education, and business opportunities. They assist with obtaining funding for organizations that provide services to low- or moderate-income individuals or promote economic development. Additional responsibilities include identifying opportunities that can positively affect the financial needs of the community.

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): (01/01/08 to 12/31/10) Investment and Service Tests and CD Loans: (01/01/08 to 09/30/11)	
Financial Institution	Products Reviewed	
Bremer Bank, National Association Brainerd, Minnesota	Home mortgage, small loans to businesses, small loans to farms, multi-family and CD loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Otto Bremer Foundation	Owner	Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Aitkin, Cass & Crow Wing Counties in Minnesota	Full Scope	

Appendix B: Market Profiles for Full-Scope Areas

(Aitkin, Cass, Crow Wing Counties Nonmetropolitan Assessment Area)

Demographic Information for Full-Scope Area: (Aitkin, Cass, Crow Wing Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	26	0	27	73	0	0
Population by Geography	97,550	0	22	78	0	0
Owner-Occupied Housing by Geography	32,751	0	20	80	0	0
Businesses by Geography	10,220	0	20	80	0	0
Farms by Geography	409	0	14	86	0	0
Family Distribution by Income Level	27,510	21	21	24	34	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,463	0	27	73	0	0
Median Family Income = \$45,608			Median Housing Value = \$105,591			
HUD Adjusted Median Family Income for XXXX = \$58,700			Unemployment Rate = 2.94%			
Households Below the Poverty Level = 4,481 / 11%						

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

Bremer’s assessment area (AA) contains 26 contiguous census tracts encompassing all of Aitkin, Cass, and Crow Wing counties in Minnesota. The bank’s AA includes nineteen middle- and seven moderate-income tracts. There are no upper- or low-income tracts in the AA. The AA meets the requirement of the regulation and does not arbitrarily exclude any low- or moderate-income geographies. Cities in the AA include, but are not limited to Brainerd, Baxter, Pequot Lakes, Cross Lake and Aitkin.

The AA is unique in regards to the high level of seasonal residents due to the large lake population. There is a concentration in second home purchases of lakeshore properties. The 2000 census data shows that up to 42% of all housing units are seasonal or occasionally occupied. Seasonal residents are primarily comprised of Twin Cities residents.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. 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 over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.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 2010		Geography: BREMER BRAINERD AA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31,				
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bremer Brainerd	100.00	844	121,224	707	120,699	47	2,639	0	0	1,598	244,562	0.00

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

^{**} The evaluation period for Community Development Loans is from January 01, 2008 to September 30, 2011

^{***} Deposit Data as of December 31, 2010. 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 DECEMBER 31, 2010		Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO					
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	Up
Full Review:															
Bremer Brainerd	251	100.00	0.00	0.00	19.87	16.73	80.13	83.27	0.00	0.00	100.00	0.00	100.00	100.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2010			Geography: BREMER BRAINERD AA						Evaluation Period: JANUARY 1, 2008 TO						
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	Overa II	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	23	100.00	0.00	0.00	19.87	47.83	80.13	52.17	0.00	0.00	100.00	0.00	100.00	100.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2010			Geography: BREMER BRAINERD AA						Evaluation Period: JANUARY 1, 2008 TO						
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***	% BANK Loans****	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	569	100.00	0.00	0.00	19.87	9.49	80.13	90.51	0.00	0.00	100.00	0.00	100.00	100.00	0.00

* Based on 2009 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 31, 2010		Geography: BREMER BRAINERD AA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER							
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	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	1	100.00	0.00	0.00	23.05	0.00	76.95	100.00	0.00	0.00	100.0 0	0.00	100.0 0	100.0 0	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2010		Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	707	100.00	0.00	0.00	19.72	18.10	80.28	81.90	0.00	0.00	13.42	0.00	17.89	15.06	0.00

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2010			Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO				
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:															
Bremer Brainerd	47	100.00	0.00	0.00	13.69	23.40	86.31	76.60	0.00	0.00	37.84	0.00	33.33	40.00	0.00

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE DECEMBER 31, 2010		Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO					
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 ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	251	100.00	20.57	17.41	21.10	22.27	24.21	24.29	34.12	36.03	100.00	100.00	100.00	100.00	100.00

* Based on 2009 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 1.6% of loans originated and purchased by bank.

¹ 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 DECEMBER 31, 2010		Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO					
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 ²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	23	100.00	20.57	25.00	21.10	6.25	24.21	12.50	34.12	56.25	100.00	100.00	100.00	100.00	100.00

* Based on 2009 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 30.4% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2010		Geography: BREMER BRAINERD AA								Evaluation Period: JANUARY 1, 2008 TO					
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 ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans*** *	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Bremer Brainerd	569	100.00	20.57	10.97	21.10	18.17	24.21	26.08	34.12	44.78	100.00	100.00	100.00	100.00	100.00

* Based on 2009 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 2.3% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2010			Geography: BREMER BRAINERD AA				Evaluation Period: JANUARY 1, 2008 TO		
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****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bremer Brainerd	707	100.00	82.62	63.37	55.87	25.32	18.81	13.42	16.31

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2010).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.56% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2010		Geography: BREMER BRAINERD AA				Evaluation Period: JANUARY 1, 2008 TO			
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:									
Bremer Brainerd	47	100.00	97.31	93.62	91.49	8.51	0.00	37.84	43.33

* Based on 2009 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.38% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 31, 2010		Geography: BREMER BRAINERD AA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
AA	0	0	69	441.7	69	441.7	82	0	0
Adjacent to AA	0	0	5	91	5	91	17	0	0
Within Minnesota	0	0	3	6.4	3	6.4	1	0	0
Total	0	0	77	539.1	77	539.1	100	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2008 TO DECEMBER 31, 2010								Geography: BREMER BRAINERD CRA A				Evaluation Period:					
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bremer Brainerd	100	5	100	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	21.53	78.47	0.00