# **PUBLIC DISCLOSURE**

August 12, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Moose Lake Charter Number: 12947

> 400 Elm Avenue Moose Lake, MN 55767

Office of the Comptroller of the Currency

222 South 9<sup>th</sup> Stret, Suite 800 Minneapolis, MN 55402

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

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# **Overall CRA Rating**

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

#### The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank demonstrated excellent distribution of loans to individuals of different income levels.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- The bank did not receive any CRA related complaints during the evaluation period.
- The majority of the bank's loans by number are in the assessment area.

### Loan-to-Deposit Ratio

The bank's loan-to-deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs of the assessment area (AA). The bank's quarterly LTD ratio ranged from approximately 74 percent to 89 percent from March 31, 2019, through December 31, 2023, with a quarterly average of 81 percent. The bank's quarterly average is the highest when compared against three similarly situated community banks that have a presence within the bank's AA. The average LTD ratio of the three similarly situated institutions was 68 percent. The asset size of the competitor banks ranged from \$122 million to \$443 million, with an average asset size of \$261 million. Out of the four financial institutions in the peer group, FNB Moose Lake ranks as the third largest in asset size.

#### Lending in Assessment Area

A majority of the bank's loans are inside the AA.

We analyzed all Home Mortgage Disclosure Act-Loan Application Register (HMDA-LAR) home mortgage loans and a random sample of 40 consumer loans originated or purchased during the evaluation period to determine the bank's lending in its AA. The bank originated and purchased 56.4 percent of its total loans by number and 41.5 percent by dollar volume inside the bank's AA during the evaluation period. These results are partially negatively skewed by the fact that all HMDA reportable home mortgage loans are included in the analysis but only a sample of 40 consumer loans. Management stated that there has also been strong loan demand for 1-4 family rental homes, primarily outside of the bank's AA. Given this performance context, lending within the bank's AA is reasonable. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

		Lendin	g Inside ar	nd Outsie	de of the A	ssessment Ar	ea			
	N	lumber o	of Loans			Dollar Ar	nount o	of Loans \$(0	00s)	
Loan Category	Insic	le	Outsi	de	Total	Inside		Outside	e	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	114	48.8	122	51.2	236	19,985,793	40.4	30,991,686	59.6	50,977,479
Consumer	33	82.5	7	17.5	40	545,142	82.7	114,374	17.34	659,516
Total	147	56.4	129	49.4	276	20,530,935	41.5	31,106,060	59.4	51,636,995

## **Description of Institution**

First National Bank of Moose Lake (FNB Moose Lake) is a \$129 million, single-state national bank headquartered in Moose Lake, Minnesota. The bank operates one primary location and one branch location with appointment only access, both located in Moose Lake. The bank does not own or operate any deposit taking ATMs. The bank has not opened or closed any branches since the prior CRA examination. Additionally, no merger or acquisition activities affected the bank during the evaluation period. The bank is owned by First National Bank Moose Lake Profit Sharing and ESOP. We did not consider any subsidiaries or affiliate activity in this evaluation.

FNB Moose Lake is a full service, small community bank that offers traditional banking products and services. The bank's primary lending focus is home mortgage, business, and consumer lending. As of December 31, 2023, outstanding and total committed loan balances total \$105 million, or approximately 77 percent of total assets. The loan portfolio consisted of approximately 47 percent residential home mortgage loans, 45 percent business loans, 4 percent consumer loans, and 3 percent agricultural loans. As of December 31, 2024, the bank's tier one capital totaled \$18.9 million.

The bank operates within one single assessment area titled the FNB Moose Lake AA. The AA is comprised of all census tracts in Carlton County and northern census tracts within Pine County. The AA is located within the Duluth MN-WI Metropolitan Statistical Area (MSA); however, the bank does not consider the AA to be within the MSA. The AA is legal given the census tracts located in Pine County are in close proximity to the bank's branches and do not extend substantially beyond the Duluth MN-WI MSA boundary. The bank excludes the Duluth and Wisconsin portions of the MSA as they do not have a presence in those areas and would not be able to reasonably serve the entire MSA. FNB Moose Lake's AA does not arbitrarily exclude any low- or moderate-income geographies.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA. FNB Moose Lake was previously rated Outstanding at the previous CRA examination dated April 1, 2019.

## Scope of the Evaluation

### **Evaluation Period/Products Evaluated**

We evaluated FNB Moose Lake's CRA performance using small bank performance standards, which consists of the Lending Test. The lending test evaluates the bank record of meeting the credit needs of its AA through its lending activities. The evaluation period for the LTD ratio of the lending test analyzed information from March 31, 2019, through March 31, 2024. The evaluation period for CRA-

related complaints was April 1, 2019, to December 31, 2023. The evaluation period for the remaining portion of the Lending Test covered January 1, 2021, to December 31, 2023. We analyzed 2021 data separately from 2022 and 2023 data. Carlton County had two CTs that split into four CTs beginning in 2022. The county expanded from seven to nine CTs. Therefore, the overall AA expanded from nine to eleven CTs given these changes.

Lending tests focused on the bank's primary loan products, which we determined based on the number of loans and total dollar amount of loan originations or purchases from 2021 through 2023. During this time, the bank originated 1,300 loans totaling \$113.6 million. We determined that home mortgage and consumer loans are the bank's primary loan products. Home mortgage loans represent 25 percent of loans originated by number and 56 percent by dollar volume. While consumer loans only represent 9 percent of the dollar volume, they represented 48 percent of all loans originated by number.

### **Data Integrity**

We completed a data integrity examination for the loans reported on the HMDA-LAR from January 1, 2019, through December 31, 2023, and determined the data was accurate. We used information from the HMDA-LAR to complete the lending tests for home mortgage loans. We also selected a random sample of consumer loans to complete our review. The sample included 20 consumer loans originated during the 2021 evaluation period and 20 consumer loans originated during the 2022/2023 evaluation period. We randomly sampled additional loans as needed to complete the lending tests.

### Selection of Areas for Full-Scope Review

The bank has one AA, which received a full-scope review. Refer to Appendix A for an outline of the examination scope and Appendix B for a full description of the AA and community profile.

## Ratings

The bank's overall rating is based on its performance within the AA. Our rating put more weight on the 2022/2023 period as more loans were originated compared to the 2021 period. While the bank originated 57 home loans in both the 2021 and the 2022/2023 time periods, it originated 358 consumer loans in the 2022/2023 timeframe compared to 269 in 2021.

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

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

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

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next

performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

## **State of Minnesota**

### CRA rating for the State of Minnesota: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank demonstrated excellent distribution of loans to individuals of different income levels.
- The bank's loan-to-deposit ratio is more than reasonable.
- The bank did not receive any CRA related complaints during the evaluation period.
- The majority of the bank's loans by number are inside its assessment area.

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

The FNB Moose Lake AA includes two branches, one being appointment only access. The bank does not own or operate deposit taking ATMs.

Competition within the AA is strong. As of July 17, 2024, there were 20 institutions in the FNB Moose Lake AA. According to the deposit market share report, FNB Moose Lake ranked second with \$102 million, or 16.07 percent of the deposit market share. The top deposit market shareholder is Northwoods Bank with \$155 million, or 24.33 percent of the total market share. The top five deposit market shareholders include Northwoods Bank, FNB Moose Lake, Wells Fargo Bank, Northview Bank, and Frandsen Bank and Trust.

We contacted a representative from Carlton County to better understand the local economy and financing needs within the Moose Lake AA. The contact indicated that the communities' need for housing continues to grow. Multiple large employers within the area are looking to hire additional staff. Individuals not residing in the Moose Lake AA struggle to find housing due to the limited availability. The contact stated that apartments as well as senior living facilities typically have a waiting list that can take substantial time to find an available vacancy. The contact noted that the community is always looking to develop; however, could not provide detail on how financial institutions are assisting in furthering growth.

Table A –	Demographic II	nformation	of the Assessn	nent Area		
As	sessment Area:	FNB Mo	ose Lake A	4		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	40,594	0.0	0.0	87.2	12.8	0.0
Housing Units by Geography	19,865	0.0	0.0	90.6	9.4	0.0

## FNB Moose Lake AA 2021

Charter Number: 12947

			Families Belo	ow Poverty Le	vel	8.2%
			Median Gros	s Rent		\$687
Median Family Income MSA - 20260 Duluth, MN-WI MSA		\$64,033	Median Hous	sing Value		\$155,872
Household Distribution by Income Level	15,471	22.5	14.6	18.5	44.5	0.0
Family Distribution by Income Level	10,306	17.9	18.3	24.9	38.9	0.0
Farms by Geography	133	0.0	0.0	88.0	12.0	0.0
Businesses by Geography	2,729	0.0	0.0	88.0	12.0	0.0
Vacant Units by Geography	4,394	0.0	0.0	98.5	1.5	0.0
Occupied Rental Units by Geography	3,141	0.0	0.0	95.4	4.6	0.0
Owner-Occupied Units by Geography	12,330	0.0	0.0	86.5	13.5	0.0

## FNB Moose Lake AA 2022/2023

Assess	ment Area:	FNB Mo	ose Lake AA	<b>\</b>		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	0.0	90.9	9.1	0.0
Population by Geography	41,507	0.0	0.0	86.5	13.5	0.0
Housing Units by Geography	20,292	0.0	0.0	89.3	10.7	0.0
Owner-Occupied Units by Geography	12,897	0.0	0.0	84.5	15.5	0.0
Occupied Rental Units by Geography	2,992	0.0	0.0	96.3	3.7	0.0
Vacant Units by Geography	4,403	0.0	0.0	98.5	1.5	0.0
Businesses by Geography	2,916	0.0	0.0	87.9	12.1	0.0
Farms by Geography	146	0.0	0.0	84.9	15.1	0.0
Family Distribution by Income Level	10,720	17.6	17.8	23.9	40.6	0.0
Household Distribution by Income Level	15,889	18.6	14.8	20.5	46.1	0.0
Median Family Income MSA - 20260 Duluth, MN-WI MSA		\$77,796	Median Housi	ng Value		\$184,074
		•	Median Gross	Rent		\$83.
			Families Belov	w Poverty Le	vel	5.1%

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

## Scope of Evaluation in Minnesota

FNB Moose Lake's main office and one branch location are located in Moose Lake, which is within the Duluth MN-WI MSA. FNB Moose Lake has one AA that consists of all nine CTs within Carlton County, which is within the Duluth MN-WI MSA. Carlton County was made up of seven CTs in 2021 and split into nine beginning in 2022/2023. The AA also includes two CTs from Pine County, which are not in the Duluth MN-WI MSA. The AA is reasonable and does not extend substantially beyond the Duluth MN-WI MSA boundary.

The AA complies with regulatory requirements and does not arbitrarily exclude any low-or moderateincome geographies. The AA also does not reflect illegal discrimination. In 2021, the AA consisted of eight middle-income CTs and one upper-income CT. In 2023/2023, the AA consisted of ten middle-income CTs and one upper-income CT. We included separate tables for 2021 and 2022/2023 given these CT changes.

In 2021, the AA had a population of 40,594. The 2023 population increased by roughly 1,000 individuals. The 2021 median family income for the MSA was \$64,033, while the 2023 median family income increased to \$77,796. In 2021, families below the poverty level totaled 8.2 percent, while the number of 2023 families below the poverty level decreased to 5.1 percent.

## LENDING TEST

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

Based on full scope review of the bank's performance in the state of Minnesota is excellent.

## Distribution of Loans by Income Level of the Geography

The distribution of loans by income level of geography does not provide meaningful analysis given the AA does not contain any low- or moderate-income census tracts.

### Home Mortgage Loans

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

### **Consumer** Loans

Refer to Table U in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

## Distribution of Loans by Income Level of the Borrower

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

#### Home Mortgage Loans

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

The distribution of home mortgage loans to borrowers of different income levels are reasonable after considering performance context. The proportion of loans to low-income families are below the percentage of low-income families in the AA and below the aggregate percentage of all reporting lenders in 2021. The proportion of loans to moderate-income families exceeds both the percentage of moderate-income families and the aggregate performance of all reporting lenders in 2021. The proportion of loans to moderate-income families exceeds both the percentage of moderate-income families and the aggregate performance of all reporting lenders in 2021. The proportion of loans to low-income borrowers are below the percentage of low-income families in the AA, but and in line with the aggregate comparator for 2022-2023 evaluation period. The 2022-2023 proportion of loans to moderate-income borrowers exceeds both the demographic and aggregate comparator.

#### **Consumer** Loans

The overall distribution of the bank's consumer loans to low- and moderate-income borrowers is excellent.

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

During the 2021 evaluation period, the distribution of the bank's consumer loans is excellent. The proportion of consumer loans to moderate-income households significantly exceeded the proportion of moderate-income households, and the proportion of consumer loans to low-income borrowers was in line with the proportion of low-income households.

During the 2022/2023 evaluation period, the distribution of the bank's consumer loans is excellent. The proportion of consumer loans to low-income households significantly exceeded the proportion of low-income households, and the proportion of consumer loans to moderate-income borrowers was in line with the proportion of moderate-income households.

#### **Responses to Complaints**

FNB Moose Lake did not receive any CRA related complaints during the evaluation period.

# **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 MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	01/01/2021-12/31/20	023
<b>Bank Products Reviewed:</b>	Home Mortgage and	Consumer Loans
List of Assessment Areas and T	Type of Examination	
<b>Rating and Assessment Areas</b>	Type of Exam	Other Information
MMSA(s)		
Duluth MN/WI MSA	Full Scope	Carlton County and the census tracts of 9501.00 and 9502.00 of Pine County that do not extend significantly beyond the Duluth MSA.

# **Appendix B: Summary of MMSA and State Ratings**

	RATINGS	The Fir	st National Bank of Moose Lake
			Lending Test Rating
Overall Bank:			Excellent
State:			
Minnesota			Excellent

## **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**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.

## **Content of Standardized Tables**

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

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

- Table O.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those geographies. The<br/>table also presents aggregate peer data for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of families by income level in each MMSA/assessment area. The<br/>table also presents aggregate peer data for the years the data is available.
- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

Table ( the Geo		Assessn raphy	ient	Area	Distri	ibut	ion of 1	Home	Mo	rtgage	Loans	s by	Incom	e Cate	egor	y of			2021
	Т	otal Home Mo	ortgage	Loans	Low-I	ncome	Tracts	Moderat	te-Inco	me Tracts	Middle	-Incom	e Tracts	Upper-	Incom	e Tracts	Not Av	ailable Tracts	-Income
Assessment Area:	#	\$	% of Total	Overal l Marke t	Occupie	Loan	Aggregat e	% of Owner- Occupie d Housing Units	Loan	Aggregat e	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner- Occupie d Housing Units	Loan	Aggregat e
FNB Moose Lake AA	5 7	10,482,26 8	100. 0	2,209	0.0	0.0	0.0	0.0	0.0	0.0	86.5	96.5	84.3	13.5	3.5	15.7	0.0	0.0	0.0
Total	5 7	10,482,26 8	100. 0	2,209	0.0	0.0	0.0	0.0	0.0	0.0	86.5	96.5	84.3	13.5	3.5	15.7	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

#### Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of 2022/2023 the Geography

	То	otal Home M	ortgage	Loans	Low-I	ncome	Tracts	Moderat	e-Incor	ne Tracts	Middle	-Incom	e Tracts	Upper-	Income	e Tracts	Not Av	ailable- Tracts	Income
Assessmen t Area:	#	\$	% of Total	Overal l Marke t	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner- Occupie d Housing Units	Loan	Aggregat e	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e	% of Owner- Occupie d Housing Units	% Bank Loan s	Aggregat e
FNB Moose Lake AA	3 0	5,394,45 2	100. 0	1,312	0.0	0.0	0.0	0.0	0.0	0.0	84.5	93.3	85.3	15.5	6.7	14.7	0.0	0.0	0.0
Total	3 0	5,394,45 2	100. 0	1,312	0.0	0.0	0.0	0.0	0.0	0.0	84.5	93.3	85.3	15.5	6.7	14.7	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 1 the Bo		Assessm wer	nent	Area	Distr	ibut	ion of ]	Home	Mo	rtgage	Loan	s by	Incom	e Cat	egor	y of			2021
	Т	`otal Home Mo	ortgage	Loans	Low-In	come B	orrowers		lerate-I Borrow		Middle-l	ncome	Borrowers	Upper-I	ncome	Borrowers		vailable Borrow	e-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB Moose Lake AA	57	10,482,268	100.0	2,209	17.9	0.0	6.7	18.3	21.1	17.8	24.9	28.1	25.0	38.9	40.4	33.6	0.0	10.5	16.9
Total	57	10,482,268	100.0	2,209	17.9	0.0	6.7	18.3	21.1	17.8	24.9	28.1	25.0	38.9	40.4	33.6	0.0	10.5	16.9
		S; 01/01/2021 - totals may not			x Data, 202	21 HME	A Aggregat	e Data, "	" data n	ot available	2.								

# Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022-23

	Т	otal Home M	ortgage	Loans	Low-In	come B	orrowers		erate-I Borrow		Middle-l	ncome	Borrowers	Upper-I	ncome	Borrowers		vailable Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB Moose Lake AA	57	9,503,525	100.0	1,312	17.6	7.0	7.9	17.8	26.3	25.2	23.9	22.8	23.6	40.6	24.6	30.3	0.0	19.3	13.1
Total	57	9,503,525	100.0	1,312	17.6	7.0	7.9	17.8	26.3	25.2	23.9	22.8	23.6	40.6	24.6	30.3	0.0	19.3	13.1
		. Census; 01/0 totals may not			)23 Bank I	Data, 20	22 HMDA A	ggregate l	Data, "-	-" data not a	wailable.								

	Tota	al Consumer L	oans	Low-Incom	e Tracts	Moderate-Inco	ome Tracts	Middle-Incor	ne Tracts	Upper-Incon	ne Tracts	Not Availabl Trac	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans						
FNB Moose Lake AA	269	4,385,482	45%	0.0	0.0	0.0	0.0	88.3	100	11.7	0.0	0.0	

# Table U: Assessment Area Distribution of Consumer Loans by Income Category of theGeography

2022/2023

	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Moose Lake AA	358	5,726,273	51	0.0	0.0	0.0	0.0	86.7	100	13.3	0.0	0.0	3.3
Source: 2020 U.S. C Due to rounding, tota				Data.									

	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Moose Lake AA	269	4,385,482	100%	22.5	23.5	14.6	41.2	18.5	23.5	44.5	11.8	0.0	
Total	269	4,385,482	100%	22.5	23.5	14.6	41.2	18.5	23.5	44.5	11.8	0.0	

# Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower2022/2023

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate- Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available- Income Borrowers	
	#	\$	% of Total	% of Household s	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Household s	% Bank Loans	% of Household s	% Bank Loans
FNB Moose Lake AA	358	5,726,273	100%	18.6	43.3	14.8	16.7	20.5	20	46.1	16.7	0.0	3.3
Total	358	5,726,273	100%	18.6	43.3	14.8	16.7	20.5	20	46.1	16.7	0.0	3.3
Source: 2015 U.S Ce 12/31/2023 Bank Da totals may not equal	ta. Due to ro		1	1	1	1	1	1	1	1	1	1	1