



PUBLIC DISCLOSURE

December 18, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

F&M Community Bank, NA
24356

100 St Anthony Street North Preston, MN 55965

Office of the Comptroller of the Currency

Minneapolis Field Office
222 S. 9th St., 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.

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 2
Discriminatory or Other Illegal Credit Practices Review..... 3
State Rating..... 4
 State of Minnesota..... 5
 Lending Test 7
Appendix A: Scope of Examination..... A-1
Appendix B: Summary of MMSA and State Ratings..... B-1
Appendix C: Definitions and Common Abbreviations..... C-1
Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**

The lending test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent distribution of loans to businesses of different sizes and individuals of different income levels.
- The bank exhibits excellent geographic distribution of loans in the State of Minnesota.
- The bank originated a substantial majority of loans inside its assessment area (AA).
- There were no CRA-related complaints during the evaluation period.
- The bank's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of the AA. The average quarterly LTD ratio was 79.28 percent over the 19 quarters since the previous CRA evaluation. The ratio ranged from a low of 64.62 percent on March 31, 2022, to a high of 93.33 percent on June 30, 2018. The bank ranked third amongst four similarly situated institutions. Similarly situated institutions are defined as institutions with similar asset-size, headquartered in the AA.

Loan-to-Deposit (LTD) Ratio		
Institution (Headquarters)	Total Assets (\$000)	Average LTD Ratio (%)
F&M Community Bank, NA	\$191,703	79.28
First Security Bank	\$105,274	78.04
First Southeast Bank	\$127,823	93.95
ONB Bank	\$186,877	104.43

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated and purchased 85.3 percent of its total loans by number and 98 percent by dollar volume inside its AA during the evaluation period. This analysis was performed by reviewing all home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) loan application register (LAR) and a sample of 40 business loans originated and purchased during the evaluation period. The following table shows the bank's lending performance inside and outside its AAs:

Lending Inside and Outside of the Assessment Area										2020-2022
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	360	85.1	63	14.9	423	770,721	98.1	14,731	1.9	785,452
Small Business	35	87.5	5	12.5	40	4,811	85.2	834	14.8	5,645
Total	395	85.3	68	14.7	463	775,532	98.0	15,565	2.0	791,097

Description of Institution

F&M Community Bank (F&M) is a \$192 million single-state national bank headquartered in Preston, MN. F&M also has branches in Chatfield, MN and Rochester, MN. Each branch has an ATM that is available 24/7 for bank customers, non-of-which are deposit taking. The bank is 100 percent owned by F&M Financial Services, Inc., a single bank holding company located in Preston, MN. The Root River Insurance Agency, Inc. is the only affiliate of the bank. F&M does not have any subsidiaries. F&M simultaneously closed their branch in Rochester and opened another branch in Rochester. The branches opened and closed on consecutive days and did not alter the bank's ability to provide services to the community. The closure of their old Rochester branch and opening of the new branch resulted in the bank moving their primary banking location from an upper-income census tract to a moderate-income census tract. The bank has not had any mergers or acquisitions that have impacted the bank's AA.

F&M offers a variety of traditional, non-complex deposit and loan products and services. Business and home mortgage lending are the bank's primary focus. As of December 31, 2022, the bank's outstanding loan portfolio totaled \$125 million and comprised of 48 percent business loans, 28 percent home mortgage loans, 23 percent farm loans, and 1 percent consumer loans. Total loans and leases represented 62 percent of average assets and tier 1 capital totaled \$18.7 million.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The bank received an "Outstanding" rating at the prior CRA examination dated June 18, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank's CRA performance using the small bank performance standards, which consists of a Lending Test. The evaluation period for the LTD ratio analysis is March 31, 2018, to December 31, 2022, and the compliant review covers June 18, 2018, to December 31, 2022. The evaluation period for the remaining portions of the lending test is January 1, 2020, through December 31, 2022. We analyzed 2020-2021 loans separately from 2022 loans due to changes in the census data.

To determine the bank's lending performance in its AA, we selected primary loan products based on the number and dollar volume of loan originations and purchases during each assessment period. F&M's primary products were business and home mortgage loans for the 2020-2021 assessment period and the 2022 assessment period.

We also reviewed the financial, economic, and environmental factors in the AA to determine the bank's lending performance. Additionally, we contacted a local community member with knowledge of the economic conditions and demographics to understand the credit needs of the AA.

Selection of Areas for Full-Scope Review

The Rochester AA was selected for full-scope review since it's the bank's only AA. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs.

Ratings

F&M's overall rating is based on lending performance in the state of Minnesota rating area. The Minnesota state rating area performance is based on the performance in the Rochester AA. We evaluated

the bank's lending performance using the following performance criteria: the LTD ratio, lending within AA, distribution of loans to individuals of different income levels and businesses of different sizes, distribution of loans to geographies of different income levels, and responses to CRA-related complaints.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Minnesota

CRA rating for the State of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent distribution of loans to businesses of different sizes and individuals of different income levels.
- The bank exhibits excellent geographic distribution of loans.
- F&M did not receive any CRA-related complaints during the review period.

Description of Institution's Operations in Minnesota

F&M has one AA which consists of all census tracts (CT) in Fillmore and Olmstead Counties and one CT in western Winona County. Fillmore and Olmstead Counties are located within the Rochester, MN Metropolitan Statistical Area (MSA). The bank's AA reasonably excludes the majority of the Winona CTs as the bank does not have a presence in these areas and the area would otherwise be too large for the bank to reasonably serve. Winona County is not part of the Rochester MSA; however, given that this CT is not substantially beyond the MSA border, we elected to include it within our analysis of the Rochester MSA. The AA meets regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

Competition is moderate in the AA. There are 26 institutions operating within the AA. According to the June 30, 2022, FDIC Deposit Market Share Report, the bank is ranked 10th with \$170 million in deposits or 2.61 percent of the deposit market share. The top three competitors include Think Mutual, Wells Fargo Bank, NA, and U.S. Bank, NA with a combined deposit market share of 52.88 percent.

According to the U.S. Bureau of Labor Statistics, the 2021 unemployment rate in Fillmore County was 3.3 percent and the unemployment rate in Olmsted County was 3.1 percent. The unemployment rate in Minnesota ended 2021 at 3.8 percent, slightly higher than that of Fillmore and Olmsted Counties.

We contacted one individual from the local community to gain insight on economic conditions, credit needs, and involvement of local financial institutions in the area. The contact noted that the local industries remain strong and are largely dominated by the healthcare and manufacturing industries. Local banks continue to lend to the community. The contact noted housing, particularly affordable housing, continues to be a credit need in the community. The new homes being built cannot keep up with the demand for housing in Rochester and the surrounding communities.

The following table provides information on the demographic composition in the Rochester AA for the 2020-2021 assessment period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.0	27.5	45.0	27.5	0.0
Population by Geography	174,663	0.0	25.2	42.4	32.4	0.0
Housing Units by Geography	73,023	0.0	27.1	42.6	30.3	0.0
Owner-Occupied Units by Geography	50,643	0.0	21.0	43.2	35.8	0.0
Occupied Rental Units by Geography	17,442	0.0	42.0	40.8	17.1	0.0
Vacant Units by Geography	4,938	0.0	36.1	42.8	21.2	0.0
Businesses by Geography	15,043	0.0	24.7	43.1	32.2	0.0
Farms by Geography	1,037	0.0	26.5	51.3	22.2	0.0
Family Distribution by Income Level	45,449	18.5	17.7	23.4	40.3	0.0
Household Distribution by Income Level	68,085	23.2	15.8	18.6	42.4	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		\$81,036	Median Housing Value			\$180,801
Median Family Income Non-MSAs - MN		\$63,045	Median Gross Rent			\$835
			Families Below Poverty Level			5.7%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The following table provides information on the demographic composition in the Rochester AA for the 2022 assessment period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	4.8	21.4	42.9	31.0	0.0
Population by Geography	189,355	5.6	17.0	40.8	36.7	0.0
Housing Units by Geography	78,651	5.2	20.7	40.7	33.5	0.0
Owner-Occupied Units by Geography	54,457	3.3	15.0	43.6	38.2	0.0
Occupied Rental Units by Geography	19,596	9.5	33.0	33.5	24.0	0.0
Vacant Units by Geography	4,598	9.6	35.7	36.9	17.8	0.0
Businesses by Geography	17,243	3.2	22.5	39.9	34.4	0.0
Farms by Geography	1,121	1.1	19.6	56.4	22.9	0.0
Family Distribution by Income Level	48,021	17.8	17.9	23.1	41.3	0.0
Household Distribution by Income Level	74,053	21.9	16.5	19.2	42.4	0.0
Median Family Income MSA - 40340 Rochester, MN MSA		\$94,698	Median Housing Value			\$230,281
Median Family Income Non-MSAs - MN		\$74,737	Median Gross Rent			\$1,014

	Families Below Poverty Level	4.8%
<i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>		

Scope of Evaluation in Minnesota

The Minnesota state rating is based solely on the results from the Rochester AA. The two primary products, home mortgage loans and commercial loans were given equal weight in the analysis, but the 2020-2021 assessment period received more weight based on overall lending volume.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State of Minnesota.

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.

The geographic distribution of home mortgage loans in different income level CTs is excellent. For the 2020-2021 assessment period, the percentage of home mortgage loans originated in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

For the 2022 assessment period, the percentage of home mortgage loans originated in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in low-income geographies is similar to the percentage of owner-occupied housing units but below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of loans to small businesses.

The geographic distribution of loans to small businesses in different income CTs within the Rochester AA is excellent. For the 2020-2021 assessment period, the percentage of loans to small businesses made

in moderate-income geographies significantly exceeded the percentage of businesses operating in those CTs and the aggregate percentage of all reporting lenders.

For the 2022 assessment period, the percentage of loans to small businesses made in low and moderate-income geographies was below the percentage of businesses operating in those geographies. Small business aggregate lending data for 2022 was not available at the time this examination was completed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. For the 2020-2021 assessment period, the percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage for all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage for all reporting lenders.

For the 2022 assessment period, the percentage of home mortgage loans to low-income borrowers was similar to the percentage of low-income families but exceeded the aggregate percentage for all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but was below the aggregate percentage for all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small businesses.

The distribution of loans to businesses of different sizes in the Rochester AA is excellent. The percentage of loans to small businesses significantly exceeded the percentage of small businesses in the AA and significantly exceeded the aggregate percentage of all reporting lenders for the 2020-2021 assessment period. For the 2022 assessment period, the percentage of loans to small businesses significantly exceeded the percentage of small businesses in the AA. Small business aggregate lending data for 2022 was not available at the time this examination was completed.

Responses to Complaints

F&M 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:	(01/01/20 to 12/31/22)	
Bank Products Reviewed:	Home Mortgage Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Minnesota		
F&M Community Bank	Full-Scope	Fillmore County (full) Olmsted County (full) Winona County (partial), CT: 6710.00

Appendix B: Summary of MMSA and State Ratings

RATINGS		
F&M Community Bank		
Overall Bank:	Lending Test Rating	Overall Bank/State Rating
F&M Community Bank	Outstanding	Outstanding
State:		
Minnesota	Outstanding	Outstanding

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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

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 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Rochester AA	280	754,579	100.0	10,122	0.0	0.0	0.0	21.0	34.3	18.8	43.2	50.4	41.6	35.8	15.4	39.6	0.0	0.0	0.0	
Total	280	754,579	100.0	10,122	0.0	0.0	0.0	21.0	34.3	18.8	43.2	50.4	41.6	35.8	15.4	39.6	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 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 the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Rochester AA	80	16,142	100.0	5,306	3.3	2.5	4.0	15.0	23.8	14.6	43.6	53.8	40.8	38.2	20.0	40.6	0.0	0.0	0.0	
Total	80	16,142	100.0	5,306	3.3	2.5	4.0	15.0	23.8	14.6	43.6	53.8	40.8	38.2	20.0	40.6	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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Rochester AA	280	754,579	100.0	10,122	18.5	12.1	11.8	17.7	23.9	23.8	23.4	25.7	20.3	40.3	30.0	31.6	0.0	8.2	12.5	
Total	280	754,579	100.0	10,122	18.5	12.1	11.8	17.7	23.9	23.8	23.4	25.7	20.3	40.3	30.0	31.6	0.0	8.2	12.5	

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Rochester AA	80	16,142	100.0	5,306	17.8	17.5	12.8	17.9	20.0	25.2	23.1	23.8	20.0	41.3	25.0	28.2	0.0	13.8	13.9	
Total	80	16,142	100.0	5,306	17.8	17.5	12.8	17.9	20.0	25.2	23.1	23.8	20.0	41.3	25.0	28.2	0.0	13.8	13.9	

*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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Rochester AA	20	3,195	100	3,622	0.0	0	0.0	24.7	45.0	25.1	43.1	35.0	43.3	32.2	20.0	31.6	0.0	0	0.0		
Total	20	3,195	100	3,622	0.0	0.0	0.0	24.7	45.0	25.1	43.1	35.0	43.3	32.2	20.0	31.6	0.0	0.0	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$(000s)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Rochester AA	20	2,450	100	3.2	0.0	22.5	20.0	39.9	70.0	34.4	10.0	0.0	0.0		
Total	20	2,450	100	3.2	0.0	22.5	20.0	39.9	70.0	34.4	10.0	0.0	0.0		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21	
Assessment Area:	Total Loans to Small Businesses \$(000s)				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Rochester AA	20	3,195	100	3,622	85.7	90.0	57.6	3.9	10.0	10.4	0.0	
Total	20	3,195	100	3,622	85.7	90.0	57.6	3.9	10.0	10.4	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Rochester AA	20	2,451	100	3,622	87.2	100.0	NA	3.4	5.0	9.4	0.0	
Total	20	2,451	100	3,622	87.2	100.0	NA	3.4	5.0	9.4	0.0	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%