



V I S I O N B A N K

CRA PUBLIC FILE



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**VISIONBANK
3059 JOPPA AVE
SAINT LOUIS PARK, MINNESOTA 55416**

Open to assist your needs during the following hours:

**Monday – Friday
8:00 a.m. – 5:00 p.m.**

***VisionBank will be closed on some federal holidays. See bank staff for details.**

**MSA Code: 33480
State Code: 27
County Code: 053
Tract Code: 0228.02**



V I S I O N B A N K

The Bank's 2026 HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) website at www.consumerfinance.gov/hmda.

The bank has qualified as HMDA Reportable as of 12/31/2025 and will report its HMDA LAR by March 1, 2026.



V I S I O N B A N K

On January 14, 2019, VisionBank relocated its office originally located at 4725 Highway 7, Saint Louis Park, MN 55416 to its current location at 3059 Joppa Ave, Saint Louis Park, MN 55416.

2.00% APY on Premium Checking Accounts.

CALL 952-920-8400 TO OPEN



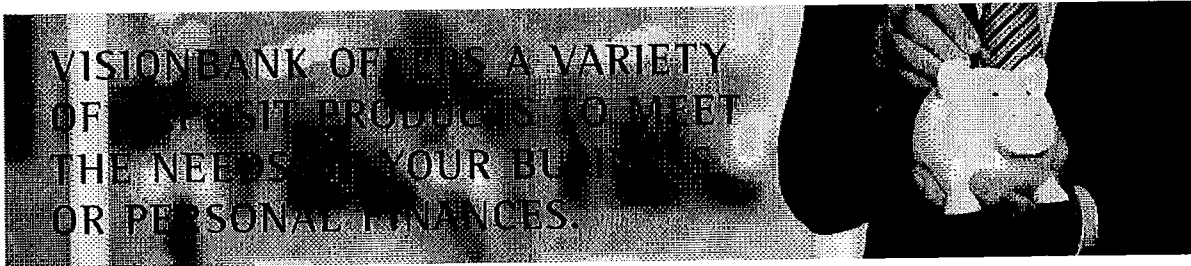
ATM LOCATOR &

952-920-8400

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DEPOSITS



VisionBank offers a wide variety of personal deposit accounts that allow you to manage your money and finances. From basic checking accounts to interest-bearing money market accounts. From savings accounts to CDs and IRAs.

VisionBank offers a variety of deposit products to meet the needs of your business or your personal finances. The accounts have been simplified so you don't have to worry about going through a checklist every month to avoid fees. The annual percentage yields (APYs) on the Money Market Savings, IRAs and Certificate products are highly competitive when compared to financial institutions in the area. Contact VisionBank to ask how to open your account today.

CHECKING ACCOUNTS

VisionBank offers two simple checking accounts. Our Basic Checking offers you free checking with only a \$50 opening balance.

Our Premium Checking has all of the same features as the basic checking but allow you to earn a yield on average balances between \$500 and \$500,000. An opening balance of \$500 is required.

All of our checking accounts have debit cards, online banking, Bill Pay, and mobile banking available. We want you to be able to do your banking whenever you need to and from wherever you are.

Contact us for business checking: (952) 920-8400.

To report a lost or stolen check card after hours, please call 800-264-5578.

[Create Premium Checking Account](#)

[Create Free Personal Checking Account](#)

PERSONAL SAVINGS

Savings accounts with VisionBank offer several ways to reach your financial goals – whether they include a major purchase, that long-anticipated vacation or a rainy-day fund. Personal (standard) Savings accounts are our most popular choice and require a \$50 opening deposit. Check current interest rates [HERE](#). Take advantage of these features:

- Competitive interest
- No monthly service fee

[Contact Us](#)

[Create Free Personal Savings Account](#)

MONEY MARKET SAVINGS

With a Money Market Savings account, you can take advantage of a competitive tiered interest rate based on your account balance. There is a small fee if the balance falls below a minimum average daily balance of \$1,000 for the monthly statement cycle.

Transfers from a Money Market Savings Account to another account or to third parties by preauthorized, automatic or telephone transfer are limited to six per statement cycle including checks, draft or similar order to third parties. Withdrawals made by mail, ATM or in person are unlimited. A per withdrawal fee may be charged for each withdrawal in excess of six during a statement cycle.

Money market accounts are insured by the Federal Deposit Insurance Corporation.

HEALTH SAVINGS ACCOUNTS

A Health Savings Account (HSA) is an excellent way to save money tax-free, pay health plan deductibles and non-covered health expenses, while providing for future health-care costs as well.

* Please consult your tax advisor for guidance on and usage of a Health Savings Account.

Benefits of an HSA

- Contributions you make are tax deductible, or if made through a payroll deduction, they are pretax. If your employer makes a contribution, there is also no tax to the employer.
 - All interest earned is tax-free.
 - All withdrawals are tax-free if used to pay qualified medical expenses.
 - HSA accounts are portable—you keep them even if you change jobs or quit working.
-

CERTIFICATE OF DEPOSIT (CDS)

A Certificate of Deposit (CD), is a type of federally insured savings account that has a fixed interest rate and fixed date of withdrawal, known as the maturity date. CDs offer higher interest rates than typical savings accounts and they have no monthly fees. CDs can also be opened as Individual Retirement Accounts (IRAs).

VisionBank offers a wide range of term lengths, but the standard range is between three months and five years. Check current interest rates [HERE](#).

Please call 952-920-8400 to speak with a Personal Banker about any of our Deposit Products. Or use our contact form:

Contact Form



The Power of Our Banking App

Our secure mobile banking app and online banking tools makes it easy to check your balance, make payments, and more.





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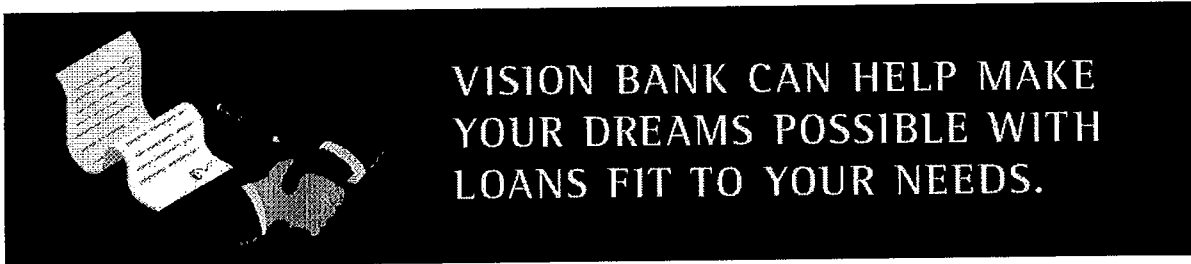
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LOANS



VisionBank is ready to help you bring your visions to life, whether it's starting a restaurant, investing in Real Estate or acquiring the business of your dreams; we're here to make your dream possible. VisionBank will help you decide your best financing options.

PERSONAL LOANS

If you are looking for competitive rates and flexible terms with online access to your loan information, we can help. We'll work with you to design an installment loan program that fits your financing needs. We provide personal loans for a variety of purposes – vacations, medical expenses, debt consolidation and more. Our bankers provide exceptional service and are here to help you.

AUTO LOANS

An auto loan is a loan taken out in order to purchase a motor vehicle. They are typically structured as installment loans and are secured by the value of car, truck, SUV, or motorcycle being purchased. Whether you are purchasing a new or used vehicle, VisionBank make the process simple. You may consider auto (or similar) loans for a variety of purchases:

- Car • Truck • Motorcycle • Boat • Snowmobile •
ATV • RV • Trailer

Contact Us

COMMERCIAL LOANS

VisionBank offers Loans and Financing to Develop Your Business, Your Way.

Business loans and other financing options from VisionBank provide the funds critical to your organization's growth. Whether you're starting a new business, or growing an existing one, we'll find the best loan products and options for you. We understand business and how to finance it. Our bankers value relationships, and will take the time to get to know you and your business.

• Business Loans • Business Acquisitions • Equipment Financing • Working Capital •

Debt Refinancing

COMMERCIAL LINES OF CREDIT

A business line of credit is a flexible financing option in which a lender extends a maximum amount of credit to a borrower from which the borrower can draw for access to cash to make purchases. VisionBank offers this working capital when you need it, so you can keep your business running smoothly, with a flexible line of credit.

Maintaining a line of credit in good standing may help build your business credit rating and position you for better loan terms if you seek future financing. Many small business experts suggest that first-time applicants should start a modest line of credit and pay off the debt quickly as a way of building a credit profile.

Keeping your small business finances running smoothly can often be a challenge in today's fast-paced world. Depending on your specific business needs, a small business line of credit could be the simple solution you need to meet your goals for growth – at a pace that's right for you.

COMMERCIAL REAL ESTATE LOANS

If your business is looking to buy, refinance or make improvements to commercial real estate, you'll likely need to get a commercial real estate loan. These loans are very different from other types of small business loans, functioning more similarly to a residential mortgage. Most commercial real estate loans require that the property be owner-occupied, meaning that the business needs to physically reside in at least 51% of the building.

Traditional Commercial Mortgage

Traditional commercial real estate loans are used for a variety of properties, including office buildings, industrial buildings, multi-family units and retail centers. In most cases, the property will need to be owner-occupied. Like a residential mortgage, the commercial loan will be secured by the property being purchased. Beyond that, terms vary widely depending on the type of purchase and the specific needs of your business.

SBA 7(a) Loans

The Small Business Administration's (SBA) flagship loan, the 7(a) loan, can be used to purchase land or buildings, construct new property, or renovate existing property, provided the real estate will be owner-occupied. Interest rates can be fixed, variable or a combination of the two. Repayment terms for 7(a) loans used for real estate can go up to 25 years. These loans are fully amortized, meaning each monthly payment will be the same until the loan is paid off.

SBA 504 Loans

Beyond the 7(a) program, the SBA offers loans specifically for owner-occupied real estate or long-term equipment purchases. These loans, called 504 loans, are actually composed of two different loans: one from a Certified Development Company (CDC) for up to 40% of the loan amount and one from VisionBank for 50% or more of the loan amount. You, as a borrower, will be responsible for putting at least 10% as a down payment. Interest rates on the CDC loans are based on U.S. Treasury rates and are fixed once you get the loan. Like the 7(a) loans, these loans are fully amortized.

Investment Property Loans

Investment property loans finance rehabilitation projects in which properties are fixed up and then either resold ("fix-and-flip" deals) or

rented out. The loans financing these projects are usually short-term, and they're sometimes called bridge loans. Investment properties can be residential or commercial, but they typically can't be the investor's primary residence.

VisionBank takes pride in the expertise of our staff. Call 952-920-8400 today to talk with a Personal Banker. Or use our contact form:

Contact Form



The Power of Our Banking App

Our secure mobile banking app and online banking tools makes it easy to check your balance, make payments, and more.





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Vision Bank Loan Products
1-4 FAMILY RE FIXED
1-4 FAMILY RE VARIABLE
MULTI FAMILY RE FIXED
MULTI FAMILY RE VARIABLE
RESI RE CONSTRUCTION
RESI RE-SECONDARY MARKET
COMMERCIAL RE FIXED
COMMERCIAL RE VARIABLE
COMMERCIAL RE CONSTRUCTION
AG RE FIXED
AG RE VARIABLE
SBA RE FIXED
SBA RE VARIABLE
COMMERCIAL RE PARTICIPATIONS PURCHASED
HELOC
CONSUMER INSTALLMENT FIXED
CONSUMER INSTALLMENT VARIABLE
CONSUMER SINGLE PAY FIXED
CONSUMER SINGLE PAY VARIABLE
CONSUMER LINE OF CREDIT FIXED
CONSUMER LINE OF CREDIT VARIABLE
COMMERCIAL FLOOR PLAN LINES
COMMERCIAL FIXED
COMMERCIAL VARIABLE
SBA FIXED
SBA VARIABLE
COMMERCIAL PARTICIPATIONS PURCHASED
AG FIXED
AG VARIABLE
TAX EXEMPT COMMERCIAL
TAX EXEMPT RE

2.00% APY on Premium Checking Accounts.

CALL 952-920-8400 TO OPEN



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[home / rates](#)

OUR CURRENT RATES

This Rate Chart contains information about interest rates and annual percentage yields for some of the accounts we offer. Rates are effective as of December 8, 2025.

(click [+](#) to see rates)

CERTIFICATE OF DEPOSIT**

This Rate Chart contains information about interest rates and annual percentage yields for some of the accounts we offer. Minimum deposit amount of \$1,000.00.

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)
3 Month ^{a,c} Create Account	3.45%	3.50%
6 Month ^{a,c} Create Account	3.50%	3.55%
9 Month ^{a,c} Create Account	3.55%	3.60%
12 Month ^{a,c} Create Account	3.70%	3.75%
15 Month ^{a,c} Create Account	3.70%	3.75%
18 Month ^{a,c} Create Account	3.70%	3.75%
24 Month ^{a,c} Create Account	3.70%	3.75%
30 Month ^{a,c} Create Account	3.70%	3.75%

36 Month ^{a,c}		
Create Account	3.70%	3.75%
48 Month ^{a,c}		
Create Account	3.70%	3.75%
60 Month ^{a,c}		
Create Account	3.70%	3.75%

a) A penalty may be imposed for early withdrawal.

c) Daily balance. The amount of the principal in the account each day.

**Individual Retirement Accounts Also Available

**Fees could reduce the earnings on the account.
Interest Rates and Annual Percentage Yields are current as of
12/08/2025.**

CONSUMER BANKING

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Vision Premium Checking ^{b,c,f}			\$500
Up to \$499.99	1.98%	2.00%	
\$500- 500,000.00	1.98%	2.00%	
\$500,000.01 and up	0.00%	0.00%	

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Vision Savings ^{b,c}	0.10%	0.10%	\$50

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Premium Money Market Personal ^{b,c,e}			\$1000
Up to \$3,000,000.00	2.96%	3.00%	
\$3,000,000.01 and up	1.75%	3.00- 2.14%	

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
HSA CHECKING ^{b,c}	3.69%	3.75%	\$100

- b) The interest rate and annual percentage yield may change after account opening.
- c) Daily balance. The amount of the principal in the account each day.
- f) Daily Balances above \$500,000 will not earn an annual percentage yield. i.e. Account with balance of \$750,000 will earn quoted interest rate of \$500,000 and 0.00% on the remaining \$250,000.
- e) Account is limited to six (6) debit transactions per month.

**Fees could reduce the earnings on the account.
Interest Rates and Annual Percentage Yields are current as of
12/08/2025.**

BUSINESS BANKING

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Premium Business Checking ^{b,c,f}			\$500
Up to \$499.99	1.98%	2.00%	
\$500-500,000.00	1.98%	2.00%	
\$500,000.01 and up	0.00%	0.00%	

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Business Savings ^{b,c}	0.05%	0.05%	\$100

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
Premium Money Market Business ^{b,c,e}			\$1000
Up to \$3,000,000.00	2.96%	3.00%	
\$3,000,000.01 and up	1.75%	3.00-2.14%	

	INTEREST RATES	ANNUAL PERCENTAGE YIELD (APY)	Minimum Opening Deposit Requirement
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Sky Checking - Non Profits ^{b,c}		\$1,000 ^d
Up to \$3,000,000.00	2.96%	3.00%
\$3,000,000.01 and up	1.75%	3.00- 2.14%

b) The interest rate and annual percentage yield may change after account opening.

c) Daily balance. The amount of the principal in the account each day.

e) Account is limited to six (6) debit transactions per month.

f) Daily Balances above \$500,000 will not earn an annual percentage yield. i.e. Account with balance of \$750,000 will earn quoted interest rate of \$500,000 and 0.00% on the remaining \$250,000.

**Fees could reduce the earnings on the account.
Interest Rates and Annual Percentage Yields are current as of
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VISIONBANK MISCELLANEOUS FEES

This disclosure contains information about terms, fees, and interest rates for some of the accounts we offer.

MISCELLANEOUS FEES AND CHARGES

Account Reconciliation:	\$30.00 per hour / \$10.00 minimum
Account Research:	\$30.00 per hour/\$10.00 minimum plus \$1.00 per page printed
Additional Statement:	\$5.00 per additional statement
Cashiers Check:	\$5.00 per check
Coin Counting:	\$20.00 per hour/\$5.00 minimum
Collections Items - Domestic:	\$25.00 per item plus third party processing costs
Collection Items - Foreign:	\$35.00 per item plus third party processing costs
Currency and Coin Order:	\$2.00 per order plus \$.10 per roll and \$.25 per strap
Garnishments and Levies:	\$75.00 per item Lost/Stolen
Check Book Fee:	\$20.00

Uncollected / Insufficient Funds

Items Returned (check, in-person withdrawal, or other electronic means) (Uncollected Funds) :	\$30.00 per item returned
Items Returned (check, in-person withdrawal, or other electronic means) (Insufficient Funds):	\$30.00 per item returned
Items Paid (check, in-person withdrawal, or other electronic means) :	\$35.00 per item paid

Safe Deposit Services

Lost Key Charge (one key lost):	\$25.00
Box Drilling Fee (both keys lost):	\$200.00
Safe Deposit Box Rental (5 x 5 - Direct Debit):	\$55.00
Safe Deposit Box Rental (5 x 5 - Billing Statement):	\$65.00
Safe Deposit Box Rental (3 x 10 - Direct Debit):	\$65.00
Safe Deposit Box Rental (3 x 10 - Billing Statement):	\$75.00
Safe Deposit Box Rental (5 x 10 - Direct Debit):	\$100.00
Safe Deposit Box Rental (5 x 10 - Billing Statement):	\$110.00
Safe Deposit Box Rental (10 x 10 - Direct Debit):	\$170.00
Safe Depoist Box Rental (10 x 10 - Billing Statement):	\$180.00

Wire Transfer Fees

Wire - Incoming:	\$10.00 per wire
Wire - Outgoing Domestic:	\$25.00 per wire
Wire - Outgoing Foreign:	\$60.00 per wire
Wire Transfer Research/Trace - Domestic:	\$10.00 per trace
Wire Transfer Research/Trace - Foreign:	\$25.00 per trace

Member
FDIC

FACTS**WHAT DOES VISIONBANK DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and credit history
- Credit scores and income assets
- Account balances

When you are *no longer* a customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons VisionBank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does VisionBank share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes- information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes- information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call 952-920-8400 or go to www.bankwithvision.com

Other Important Information (continued)

YOUR CHOICES REGARDING YOUR INFORMATION

- You have several choices regarding use of information on the Services.
- (a) How We Respond to Do Not Track Signals. Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.
- (b) Access, Update, or Correct Your Information. You can access, update or correct your information by changing preferences in your account. For additional requests, please contact us.
- (c) Opting Out of Email or SMS Communications. If you have signed-up to receive our email marketing communications, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting us at the contact information under "Contact Us" below. If you provide your phone number through the Services, we may send you notifications by SMS, such as provide a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through the Services.
- (d) Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.

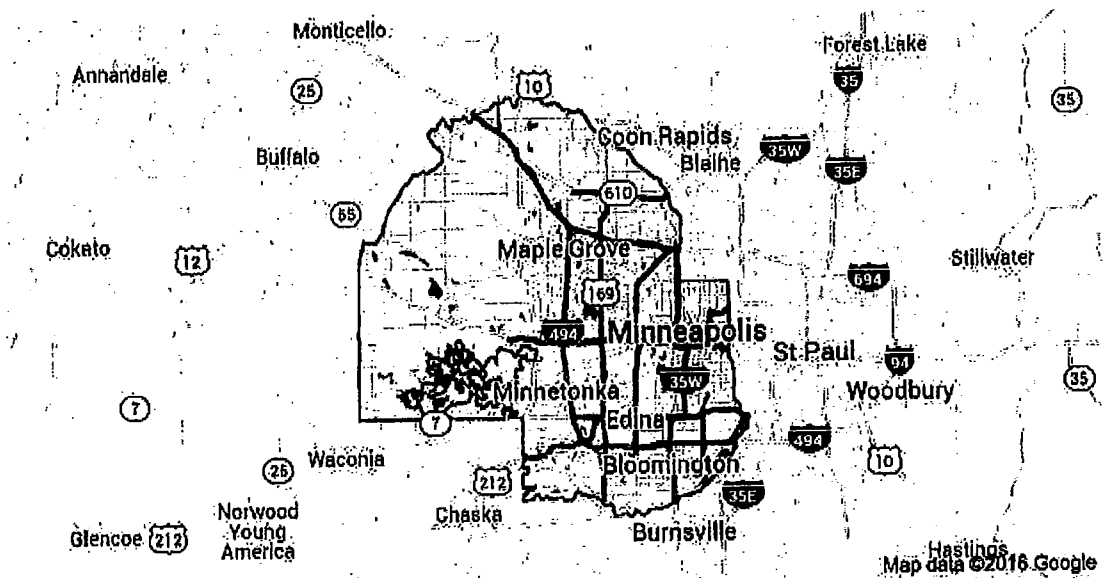


V I S I O N B A N K

Historical Loan-to-Deposit Ratio data

3/31/2024 LTDR:	127.09%
6/30/2024 LTDR:	119.49%
9/30/2024 LTDR:	117.46%
12/31/2024 LTDR:	121.53%
3/31/2025 LTDR:	119.51%
6/30/2025 LTDR:	120.83%
9/30/2025 LTDR:	111.40%
12/31/2025 LTDR:	119.86%
3/31/2026 LTDR:	120.76%

VisionBank Assessment Area



Hennepin County, MN

PUBLIC DISCLOSURE

October 21, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**VisionBank
Certificate Number 58063**

**4725 Highway 7
Saint Louis Park, Minnesota 55416**

**Federal Deposit Insurance Corporation
2345 Grand Boulevard, Suite 1200
Kansas City, Missouri 64108**

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, nor should it 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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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **VisionBank, Saint Louis Park, Minnesota** prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **October 21, 2010**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.

INSTITUTION RATING

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

VisionBank demonstrates a satisfactory record of helping to meet the credit needs of its assessment area,¹ including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The bank's rating is primarily based on lending performance and was determined by analyzing small business lending.² The evaluation revealed the following:

- A substantial majority of the small business loans the bank originated are within the assessment area.
- An analysis of the small business loans revealed a reasonable penetration among businesses of different sizes.
- The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area.
- The average net loan-to-deposit ratio is reasonable and demonstrates a willingness to extend credit in relation to its financial condition, size, and assessment area credit needs.
- The bank has not received any CRA-related complaints since the last evaluation; therefore, this performance criterion was not evaluated.

¹ An assessment area always consists of one or more whole census tracts, which are subdivisions of counties. The financial institution delineates the area to include the census tracts where the bank has its main office, its branches, and other deposit-taking remote service facilities, and the surrounding census tracts where the bank has originated or purchased a substantial portion of its loans.

² A small business loan is included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1,000,000 or less and are typically secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

SCOPE OF EXAMINATION

The CRA evaluation was conducted using Small Bank Evaluation procedures. The evaluation covers performance since the previous CRA evaluation dated September 12, 2007, through October 21, 2010, the date of this evaluation. Examiners based the analysis on small business loans originated between January 1, 2008, and September 30, 2010. Specifically, the universe consisted of 52 small business loans totaling approximately \$17,157,000. Commercial loans represent the largest number of loans (65 percent) in the loan portfolio. Residential lending was not evaluated because the bank did not meet the Home Mortgage Disclosure Act (HMDA) threshold reporting requirements in 2008 and 2009. Moreover, few consumer residential real estate loans were originated during the review period to provide a meaningful evaluation. Agricultural and consumer loans were not reviewed because these products are not a focus of the lending program. The bank does not have any affiliates that would be considered for this performance evaluation.

Examiners analyzed the loans to determine the amount of lending within the assessment area, the distribution of lending among businesses of different revenue sizes, and lending among different income geographies.

DESCRIPTION OF INSTITUTION

VisionBank is a community bank established in September 2005. It operates one office in Saint Louis Park, Minnesota. The office is located in a middle-income census tract. The bank's focus is on commercial lending to small and mid-sized businesses. The bank is wholly owned by Vision Bancshares, Inc., Saint Louis Park, Minnesota, a one-bank holding company.

VisionBank offers a range of deposit products to meet consumer and business banking needs including checking, savings, money market, certificates of deposit, and health savings accounts. Customers have access to online banking services.

VisionBank offers products for both business and consumer customers. Products for business customers include commercial real estate, construction financing, installment loans, and unsecured lines of credit. Consumer loan products include residential real estate loans for purchase, home improvement, and refinance, home equity lines of credit, vehicle secured loans, debt consolidation, and overdraft protection.

The June 30, 2010, Report of Condition lists total assets of \$43 million, total loans of \$30 million, and total deposits of \$39 million. The largest lending concentration is commercial lending,³ comprising 65 percent of gross loans. Table 1 provides a breakdown of the loan portfolio.

³ Total commercial loans include those listed in Table 1 under "Non-farm, Nonresidential Properties" and "Commercial and Industrial."

Loan Type	Dollar Amount (000s)	Percent of Total Loans
Construction and Land Development	\$2,062	7%
Secured by Farmland	\$2,078	7%
Residential (1-4 Family) - Open-End Loans	\$1,076	3%
Residential (1-4 Family) – Closed-End	\$3,803	13%
Multifamily (5 or more) Residential	\$262	<1%
Non-farm, Nonresidential Properties	\$15,804	53%
Total Real Estate Loans	\$25,085	84%
Commercial and Industrial	\$3,613	12%
Consumer	\$1,351	4%
Total Loans	\$30,049	100%

Source: June 30, 2010, Report of Condition

VisionBank does not have any apparent legal impediments that would preclude it from meeting the credit needs of its assessment area. The institution received a “Satisfactory” rating at the previous CRA Performance Evaluation, dated September 12, 2007.

DESCRIPTION OF ASSESSMENT AREA

Vision Bank’s assessment area includes 7 counties within the Minneapolis-Saint Paul metropolitan statistical area (MSA). Specifically, the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington are included in the assessment area. The assessment area includes 689 census tracts, which according to the 2000 Census is comprised of 47 low-, 143 moderate-, 319 middle-, and 176 upper-income tracts. There are 4 census tracts in the assessment area where no income level is designated. The bank’s only office is located in a middle-income census tract. The assessment area does not arbitrarily exclude any low- or moderate-income areas.

Table 2 provides the number and percentage of low-, moderate-, middle-, and upper-income census tracts in the assessment area, and the percentage of families living in each census tract.

Census Tract Income Level	Number of Tracts	Percentage of Tracts	Percentage of Families Living in the Tracts
Low	47	7%	4%
Moderate	143	21%	16%
Middle	319	46%	50%
Upper	176	25%	30%
NA	4	1%	0%
Totals	689	100%	100%

Source: Department of Housing and Urban Development and 2000 Census

According to the 2000 Census, the population of the assessment area is 2,642,056. The projected Census data for 2009 estimates the population has increased to 2,879,264. This reflects a population increase of 9 percent. Of the 662,720 families living in the assessment area, 4 percent are classified as low income,⁴ 16 percent are moderate income, 50 percent are middle income, and 30 percent are upper income.

The percentage of people in the assessment area living below the poverty level is slightly higher than the Minneapolis-Saint Paul MSA and lower than the overall state of Minnesota figure. As of the 2000 Census, the percentage of families below the poverty level in the assessment area was 4.39 percent compared to 4.24 percent for the MSA and 5.08 percent for the State of Minnesota. The Census Bureau updates the poverty level threshold annually which varies based on the size of the family unit. For example, a family of 4 (including 2 children under the age 18) earning less than \$21,756 in 2009 is considered to be below the poverty level.⁵

In conjunction with Community Reinvestment Act evaluations, regulatory agencies may interview representatives in the assessment area to gather perceptions on credit needs and the performance of local banks in meeting those needs. Examiners may also review pertinent local information available from previous interviews conducted by the FDIC or other regulatory agencies within 12 months of the evaluation. In addition to identifying credit needs, community members provide general economic and demographic information, as well as any other information impacting the banking environment in the assessment area.

⁴ A family's income level is determined by comparing the 2000 median family income (MFI) for each family with the 2000 MFI for the Minneapolis-St. Paul Minnesota MSA (\$64,885). The breakdown is as follows: Low Income: <50 percent of the MFI; Moderate Income: ≥50 percent and <80 percent of the MFI; Middle Income: ≥80 percent and <120 percent of the MFI; and Upper Income: ≥120 percent of the MFI.

⁵ Poverty information from U.S. Census Bureau, Housing and Household Economics Statistics Division at <http://www.census.gov/hhes/www/poverty/data/threshld/thresh09.html>.

Examiners did not conduct a community contact during the examination, but reviewed three completed community contacts. The contacts indicate the economic downturn has adversely affected small businesses within the assessment area. Additionally, one contact stated access to credit has tightened while another notes that small business owners seem reluctant to take on additional debt. One contact states a major credit need of the community continues to be access to small business loans. The contacts stated that banks are meeting the overall credit needs of the community.

According to the June 2010 Moody's Analytics, the Minneapolis-Saint Paul MSA is on course for recovery with most economic indicators pointing in that direction. There has been steady job growth in manufacturing and the unemployment rate has fallen to approximately 7 percent. The housing market has seen a sharp drop in sales recently. Bank management indicates the current economy has taken a toll on business owners and reduced the demand for loan products. Based on comments from the community contact and management, examiners ascertained the primary credit needs of the assessment area to be small business loans.

The assessment area includes a variety of industries due to its inclusion in a densely populated metropolitan area. Those industries include education, government, health service, manufacturing, and retail. According to community contacts, residents of the assessment area commute to employment throughout the MSA. According to the June 2010 Moody's Analytics, some of the top employers for the Minneapolis-Saint Paul MSA are 3M Corporation (16,500), Allina Health System (23,653), Fairview Health System (20,148), Federal Government (21,850), HealthPartners (9,980), Local Government (148,918), Northwest Airlines Corporation (11,512), State Government (69,742), Target Corporation (22,756), University of Minnesota (18,470), and Wells Fargo & Company (20,884). Overall, no specific concentration in any particular industry is noted.

As of September 2010, unemployment rates for the 7 counties comprising the assessment area are Anoka (7.1 percent), Carver (6.2 percent), Dakota (6.7 percent), Hennepin (6.7 percent), Ramsey (7.1 percent), Scott (6.2 percent), and Washington (6.4 percent). Unemployment rates are similar to the Minneapolis-Saint Paul MSA (6.7 percent) and state of Minnesota (6.7 percent), but lower than the national rate (9.2 percent). Anoka and Ramsey County's unemployment rates (7.1 percent) are higher than the Minneapolis-Saint Paul MSA and State of Minnesota according to the Minnesota Department of Economic Development.⁶

The bank operates in a competitive banking environment. The assessment area includes other community banks and multi-billion dollar national banking chains. Some of the largest competing institutions in the assessment area include Wells Fargo Bank, U.S. Bank, TCF National Bank M&I Bank, and Bremer Bank. These 5 banks operate 342 offices in the assessment area.

⁶ State of Minnesota web site at www.deed.state.mn.us/lmi/tools/laus/default.aspx.

Competition within the assessment area is evidenced by the June 30, 2010, FDIC Deposit Market Share Report. There are 134 institutions with 707 offices in the 7 county assessment area. These 134 institutions hold approximately \$86 billion in deposits. The Deposit Market Share Report for the 7 counties ranks VisionBank at number 99, with approximately 0.05 percent of the deposit market share.

CONCLUSIONS WITH RESPECT TO LENDING PERFORMANCE CRITERIA

Lending Within the Assessment Area

The bank originates a substantial majority of small business loans, by number and dollar volume, in the assessment area. The level of lending within the assessment area is reasonable given the size of the assessment area, lending opportunities, and competition from other financial institutions. Table 3 describes the specific findings.

Table 3 – Distribution of Loans Inside and Outside of the Assessment Area

Loan Sample	Number of Loans					Dollars in Loans				
	Inside		Outside		Total	Inside		Outside		Total \$ (000s)
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Small Business	47	90%	5	10%	52	\$15,154	88%	\$2,003	12%	\$17,157

Source: Bank Records

The bank’s performance demonstrates it is helping to meet the credit needs of its assessment area.

Lending to Businesses of Different Sizes

Distribution of lending among small businesses of different revenue sizes is reasonable. Examiners based the distribution on a sample of 47 small business loans located within the assessment area. Table 4 illustrates the distribution of these loans based on the gross annual revenue of the business. Additionally, the table shows the percentage of businesses by gross annual revenue located within the assessment area, based on D&B survey data.

The D&B data includes all businesses in a given area that voluntarily respond to a survey request, including a large number of very small businesses with limited or no credit needs. As a result, the business survey data regularly indicates a majority of the businesses in a given area are the smallest businesses. Therefore, D&B data is only used as an indicator of business demographics within the assessment area.

Gross Annual Revenues	Number of Loans		Dollar Volume of Loans		Percent of Assessment Area Businesses
	Number	Percentage	Amount \$ (000s)	Percentage	
< \$100,000	9	19%	\$1,441	10%	55%
\$100,000 - < \$250,000	6	13%	\$3,398	22%	26%
\$250,000 - < \$500,000	6	13%	\$2,279	15%	8%
\$500,000 - < \$1,000,000	5	11%	\$1,507	10%	5%
≥ \$1,000,000	21	44%	\$6,529	43%	6%
Totals	47	100%	\$15,154	100%	100%

Source: Bank Records and 2009 D&B Business Survey Data

Table 4 illustrates the majority of lending by number and dollar volume is to smaller businesses. The bank originated 56 percent by number and 57 percent by dollar volume of its small business loans to businesses with gross annual revenues under \$1,000,000. By comparison, business survey information provided by D&B shows that 94 percent of businesses within the assessment area have gross annual revenues of less than \$1 million.

VisionBank's lending performance to smaller businesses is reasonable. Current economic conditions have resulted in a decline in demand for small business loans. Furthermore, a lack of financing need can limit lending opportunities to smaller entities. Smaller businesses often utilize home equity or other personal loans to meet their credit needs. VisionBank's overall lending performance is reasonable and demonstrates a commitment to meeting the credit needs of small businesses within their assessment area.

Geographic Distribution of Lending

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. All loans originated within the assessment area between January 1, 2008, and September 30, 2010, were analyzed to determine the geographic distribution of small business lending. Table 5 provides the results of the small business analyses.

Census Tract Income Level	Percentage of Businesses	Number of Loans		Dollar Volume of Loans \$ (000s)	
		Number	Percentage	Amount	Percentage
Low	4%	0	0%	\$0	0%
Moderate	17%	3	6%	\$632	4%
Middle	49%	30	64%	\$11,713	77%
Upper	29%	14	30%	\$2,809	19%
NA	1%	0	0%	\$0	0%
Totals	100%	47	100%	\$15,154	100%

Source: Bank Records and 2009 D&B Business Survey Data

The bank did not originate any small business loans in low-income census tracts. The bank is located in a middle-income census tract surrounded by moderate-, middle-, and upper-income census tracts. The low-income tracts are located some distance from the bank's office in Saint Louis Park. Additionally, a large number of competing financial institutions operate within closer proximity to the low-income census tracts. The geographical analysis is reasonable given the distance of the low-income census tracts to the bank location, the bank location, and the presence of competing institutions.

Net Loan-to-Deposit Ratio

The average net loan-to-deposit (NLTD) ratio⁷ is reasonable and reflects a willingness and ability to provide credit given its size, financial condition, and community credit needs. According to June 30, 2010, Report of Condition data, the bank's net LTD ratio, averaged over the last 12 quarters is 99 percent. The NLTD ratio as of June 30, 2010, is 75 percent.

To evaluate the reasonableness of the bank's NLTD ratio, examiners compared it to the ratio of similarly situated banks (banks with similar asset size, banks that opened for business in the Minneapolis-Saint Paul MSA during 2003 – 2008, loan portfolio composition, and those that serve some portion of the assessment area). Table 6 provides the net LTD ratios of VisionBank and six other similarly situated banks. Institutions are listed in alphabetical order by city.

Bank Name Location (sorted by city name)	County	Total Assets as of 06/30/2010 \$(000)	Average Net LTD (Last 12 Quarters)	Net LTD Ratio as of 06/30/2010
Maple Bank Champlin	Hennepin	\$63,812	89%	70%
First Advantage Bank Coon Rapids	Anoka	\$51,673	106%	90%
First Western Bank & Trust Eden Prairie	Hennepin	\$44,597	133%	111%
Minnesota Bank & Trust Edina	Hennepin	\$55,722	99%	60%
Lakeview Bank Lakeville	Dakota	\$60,016	97%	88%
Summit Community Bank Maplewood	Ramsey	\$79,983	122%	65%
Vision Bank Saint Louis Park	Hennepin	\$43,269	99%	75%

Source: June 30, 2010, Report of Condition

As demonstrated in Table 6, VisionBank's ratio of 99 percent is in the mid-range of the other similarly situated banks. The 6 similarly situated institutions have an average NLTD ratio of 108 percent. Overall, the bank's NLTD ratio performance is reasonable and demonstrates a commitment to meet the credit needs of the assessment area.

⁷The *Net Loan to Deposit Ratio* is calculated by dividing total loans and leases minus the allowance for loan and lease losses, by total deposits.

Response to CRA-Related Complaints

Vision Bank has not received any CRA-related complaints since the previous examination; therefore, this performance criterion was not evaluated.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet the community needs was identified.