



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**March 22, 2005**

# **Community Reinvestment Act Performance Evaluation**

**American National Bank  
Charter Number: 15435**

**8990 West Dodge Road  
Omaha, NE 68114**

**Office of the Comptroller of the Currency**

**Omaha North Field Office  
13710 FNB Parkway, Suite 110  
Omaha, NE 68154**

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, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>6</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>7</b>
<b>FAIR LENDING REVIEW .....</b>	<b>9</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS .....</b>	<b>10</b>
LENDING TEST .....	10
INVESTMENT TEST .....	16
SERVICE TEST .....	16
<b>APPENDIX A: SCOPE OF EXAMINATION .....</b>	<b>A-1</b>
<b>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

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

The following table indicates the performance level of **American National Bank** with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The bank's lending levels reflected excellent responsiveness to the credit needs of the Omaha Metropolitan Statistical Area (MSA) assessment area.
- The bank's distribution of loans to borrowers of different income levels and businesses of different sizes was good.
- The geographic distribution of ANB's loans reflected adequate penetration throughout the Omaha MSA assessment area geographies.
- The bank provided a relatively high volume of community development loans. During the evaluation period, ANB originated \$12 million in community development loans in its assessment areas.
- Investments reflected a good responsiveness by ANB to the needs of the Omaha MSA assessment area. The bank had \$1.2 million in qualified investments that directly benefited the assessment area during the evaluation period.
- Service delivery systems were accessible to geographies and individuals of different income levels, especially throughout the Omaha MSA assessment area.
- The bank achieved good performance in providing community development services.
- Variances in performance in the Lincoln MSA and the non-metropolitan assessment areas were not significant enough to negate generally good performance in the Omaha MSA assessment area.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

American National Bank (ANB) is a full-service financial institution headquartered in Omaha, Nebraska. The bank offers a full range of credit products within its assessment areas including consumer, commercial, and real estate loan products. However, the bank has well-established niche markets in automobile dealer paper, commercial relationship banking, and residential mortgage originations. Indirect auto lending comprises about 30 percent of ANB's loans.

For purposes of this CRA evaluation, ANB is an intrastate bank with offices located in Nebraska only. As of the start date of this examination, the bank had 15 office locations and 54 automated teller machines (ATMs) in the Omaha MSA. In the Lincoln MSA, the bank had one office and one ATM. In nonmetropolitan southeastern Nebraska, ANB had six offices and three ATMs located in Jefferson, Johnson, Otoe, and Richardson Counties.

American National Corporation (ANC) owns 100 percent of the bank and is headquartered in Omaha, Nebraska. In 2001, ANC acquired a bank in Council Bluffs, IA and chartered a de novo bank in Lincoln, NE. ANC merged the Lincoln bank into ANB in 2003. As of December 31, 2004, ANC was a two-bank holding company.

ANB has one subsidiary. American National Community Development Corporation (ANCDC), established in 2004, focuses on lending and investing in LMI areas within the bank's assessment areas. The bank's investment in ANCDC and the subsidiary's activities were considered in this evaluation of the bank's CRA performance.

As of December 31, 2004, ANB had \$1 billion in total assets and Tier I capital of \$85 million. The bank's loan-to-deposit ratio on that date was 99 percent and net loans represented 81 percent of total assets. By dollar amount, the loan portfolio consisted on the following types of credit: 36 percent consumer; 29 percent commercial and commercial real estate; 19 percent residential real estate; 8 percent construction real estate; 5 percent agricultural and agricultural real estate; and 3 percent other loans. The loan-to-deposit ration and loan portfolio mix do not reflect the volume of home purchase and refinance mortgage loans originated by ANB and sold on the secondary market. During the evaluation period, there were 3,477 such loans totaling \$477 million. There were no legal, financial, or other impediments that hampered ANB's ability to help meet the credit needs of its assessment areas.

The bank previously obtained a Satisfactory rating at the last CRA examination dated March 13, 2000.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans, small loans to businesses, and small loans to farms was from January 1, 2000 to December 31, 2004. We based market comparisons on 2004 peer data, which was the most recently available data at the time of this evaluation. For community development loans and the Service Test, the evaluation period was from March 14, 2000 to March 22, 2005. For the Investment Test, the evaluation period was from February 28, 2002 to March 22, 2005. For the Lincoln MSA assessment area, the start date of the evaluation period for the Lending, Investment, and Service Tests was January 1, 2003. The ending dates were the same as those mentioned above.

We evaluated ANB's origination of small loans to farms in the nonmetropolitan assessment areas only. These loans were not evaluated in the Omaha or Lincoln MSA assessment areas because the loan volume was not significant enough to perform a meaningful analysis (approximately one percent of the number of loan originations in each assessment area over the evaluation period).

The CRA regulation also gives consideration to a bank's multifamily mortgage lending. We did not include multifamily lending in our analysis of any assessment area as the volume of these loans during the evaluation period represented one percent or less of total reported loans in each area.

### Data Integrity

As part of the CRA evaluation, we tested the accuracy of ANB's publicly filed information on HMDA loans, small loans to businesses, and small loans to farms. We noted only isolated errors in the collected loan data. The errors did not impact our ability to analyze the bank's CRA performance.

We also reviewed community development loans, investments and services submitted by ANB management to ensure they met the regulatory definition for community development. We excluded from this evaluation some items submitted for consideration because they did not meet the definition or purpose of community development.

### Selection of Areas for Full-Scope Review

The bank had six assessment areas. We performed a full-scope review of the Omaha MSA assessment area. This area represented ANB's major market and accounted for 80 percent of its deposit activity and 81 percent of its reported loan activity during the evaluation period.

We performed limited-scope reviews of the bank's CRA performance in the Lincoln MSA assessment area and the four nonmetropolitan assessment areas in southeastern Nebraska. For purposes of analyzing performance and presenting data in this evaluation, we combined the nonmetropolitan assessment areas. These areas were geographically proximate and had similar performance contexts and demographic information. Refer to Appendix A for additional information.

### Ratings

The bank's overall rating is based primarily on the area that received a full-scope review.



When determining conclusions for the lending test, we weighted loan products to be reflective of ANB's loan volume by product type over the evaluation period. In the Omaha MSA assessment area, we weighted home mortgage loans more heavily than small loans to businesses. During the evaluation period, home mortgage loans represented 69 percent of total reported loans in the assessment area, while small loans to businesses represented 30 percent of the total. Among HMDA loan categories, home mortgage refinance, home improvement and home purchase loans represented 34 percent, 18 percent, and 16 percent of total reported loans, respectively. Multifamily loans and small loans to farms each comprised only one percent of total reported loans.

In the Lincoln MSA assessment area, we also weighted home mortgage loans more heavily than small loans to businesses. During the evaluation period, home mortgage loans represented 83 percent of total reported loans, while small loans to businesses represented 16 percent. Among HMDA loan categories, approximately 51 percent of reported loans were home mortgage refinance loans, 25 percent were home purchase loans, and 7 percent were home improvement loans. Only one percent of reported loans were small loans to farms.

In the nonmetropolitan assessment areas, home mortgage loans slightly exceeded the volume of other loan types. Approximately 45 percent of reported loans were home mortgage, 32 percent were loans to small farms, and 23 percent were loans to small businesses. Among HMDA loan categories, 21 percent were home mortgage refinance loans, 13 percent were home improvement loans, and 11 percent were home purchase loans.

## **Other**

We performed two community contacts during the examination and reviewed seven contacts completed in the Omaha MSA assessment area since the bank's last CRA examination. Contacts included government officials, economic development organizations, housing organizations, and trade associations. The organizations focused on affordable housing and homeowner counseling for LMI individuals, economic development by attracting and financing small businesses, revitalization and stabilization of LMI neighborhoods, and real estate services within the Omaha MSA.

Contacts state the primary needs in the Omaha MSA related to affordable housing and financing for small businesses. They noted a need for affordable housing stock and a variety of residential mortgage loan products. Various groups reported the need for financing and technical support for small businesses. Contacts were complimentary of local banks' responsiveness to area credit needs and participation with community development initiatives. Refer to the Market Profile in Appendix B for more information.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Lending Test is rated "High Satisfactory". This is based primarily on ANB's good performance in the Omaha MSA assessment area, which received a full-scope review.

#### Lending Activity

*(Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.)*

ANB's lending activity was excellent in the Omaha MSA assessment area. The bank's volume of home improvement loans, home mortgage refinance loans, and small loans to businesses were the primary factors supporting this conclusion.

Competition for home mortgage and small business loans was significant within the Omaha MSA assessment area. During 2004, almost 400 lenders reported one or more HMDA loan and over 80 lenders reported one or more small business loan in the Omaha MSA assessment area. These reporters included many non-bank lenders. To analyze ANB's lending activity, we determined the bank's market share of deposits and loans among depository financial institutions that had banking offices within the assessment area.

Based on FDIC deposit market share data as of June 30, 2004, there were 42 deposit-taking financial institutions with one or more banking offices in ANB's assessment area. ANB was the sixth largest of these institutions with a 5 percent deposit market share. The bank's market share for home improvement loans was significantly higher and considered excellent. A review of 2004 aggregate HMDA data showed ANB ranked third among reporting institutions with a 16 percent market share for home improvement loans.

ANB's home mortgage refinance lending activity was also excellent. In 2004, ANB ranked fourth with a 6 percent market share. The bank's performance was especially strong when considering the significant competition for these loans and the fact that three large financial institutions dominated the Omaha MSA market with 67 percent of all reported home mortgage refinance loans in 2004.

ANB's market share of small loans to businesses exceeded its deposit market share in 2004 and was considered excellent. ANB ranked fifth among reporting financial institutions with a 6 percent market share.

The bank's home purchase lending activity was good. Based on 2004 aggregate HMDA data, the bank was the fifth largest originator of home purchase loans in the Omaha MSA assessment area with a 5 percent market share. This was consistent with the bank's deposit market share and rank.

#### Distribution of Loans by Income Level of the Geography

The bank's distribution of loans by geography income level in the Omaha MSA assessment area was adequate. This was primarily due to the bank's distribution of home purchase loans, home mortgage refinance loans, and small loans to businesses.

### **Home Mortgage Loans**

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

ANB achieved an adequate geographic distribution of home purchase and home mortgage refinance loans throughout the Omaha MSA assessment area. For both products, the bank's percentage of loans originated in LMI census tracts was below the percentage of owner-occupied housing units that were within those geographies. Market share performance was stronger, as ANB's market share of these loan products in LMI census tracts was generally comparable to the bank's overall market share for these products.

In concluding performance was adequate, we took into consideration the bank's involvement with a nonprofit community development intermediary serving the Omaha MSA. A consortium of financial institutions worked with the intermediary to provide a pool of loan funds for home mortgages for LMI applicants who resided primarily in LMI geographies. During the evaluation period, ANB provided approximately \$307 thousand to assist in funding 44 loans to LMI applicants. The bank's participation in these loans was not included in reported HMDA data.

The bank's geographic distribution of home improvement loans was good. The percentage of the bank's loans originated in moderate-income tracts was generally slightly below the percentage of owner-occupied housing units that were within those geographies. Similarly, ANB's market share of home improvement loans in moderate-income geographies was slightly below its overall market share for these loans. Performance was stronger in low-income tracts. The percentage of the bank's loans originated in low-income areas exceeded the percentage of owner-occupied housing units that were within those geographies. Also, ANB's market share of home improvement loans in low-income tracts exceeded its overall market share for home improvement loans.

### **Small Loans to Businesses**

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

ANB's geographic distribution of small loans to businesses in the Omaha MSA assessment area was adequate. The bank's percentage of small loans to businesses made in LMI geographies was somewhat below the percentage of businesses within those geographies. Similarly, ANB's market share for small loans to businesses in LMI geographies was somewhat below its overall market share for small loans to businesses in the assessment area.

### **Lending Gap Analysis**

We reviewed maps and reports of ANB's lending in the Omaha MSA assessment area to identify gaps in the geographic distribution of loans. We did not identify any conspicuous gaps in lending. During the evaluation period, ANB originated one or more reportable home mortgage or small business loan in every census tract in the assessment area.

### **Inside/Outside Ratio**

A good percentage of the bank's reported loans during the evaluation period were within its assessment areas. During the evaluation period, the bank originated 84 percent of the total number of reported home mortgage loans, small loans to businesses, and small loans to farms within its assessment areas. This factored favorably in the overall conclusions regarding the geographic distribution of loans. We performed this analysis at the bank level instead of the assessment area level.

## **Distribution of Loans by Income Level of the Borrower**

The bank's distribution of loans by borrower income level was good. ANB's distributions of home purchase loans, home mortgage refinance loans, and small loans to businesses were the primary factors supporting this conclusion.

When evaluating the borrower distribution of the bank's home mortgage lending, we took into consideration the percentage of families throughout the Omaha MSA assessment area living below the poverty level. According to 2000 U.S. Census information, six percent of families in the assessment area were below the poverty level. These families would have had a more difficult time qualifying for residential mortgage loans due to their limited income. Also, the lack of moderately-priced housing throughout the assessment area limited the number of low-income families seeking home mortgage loans. Refer to the Market Profile in appendix B for more information on the lack of affordable housing for LMI families.

### **Home Mortgage Loans**

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

Borrower distribution of home purchase and home mortgage refinance loans was good. ANB's percentage of home purchase and home mortgage refinance loans generally met or exceeded the percentage of families in the Omaha MSA assessment area that were moderate-income. For both loan products, the bank's portion of reported loans to low-income borrowers was below the percentage of families in the assessment area that were low-income. However, performance was still considered good given the number of families below poverty level and the limited supply of affordable housing in the assessment area. Market share data also indicated good performance. For both home purchase and home mortgage refinance loans, ANB's market share of loans to LMI borrowers generally met the bank's overall market share for these products.

The bank's borrower distribution of home improvement loans in the Omaha MSA assessment area was excellent. ANB's percentage of loans to moderate-income borrowers exceeded the portion of families in the area that were moderate-income. ANB's percentage of home improvement loans to low-income borrowers was near to or exceeded the portion of families in the assessment area that were low-income. Market share performance was also strong, with the bank's percentage of home improvement loans to LMI borrowers near to or exceeding its overall market share for home improvement loans.

### **Small Loans to Businesses**

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

The bank's borrower distribution of small loans to businesses was good. ANB's percentage of reported loans to businesses with gross annual revenues of \$1 million or less was generally below the percentage of businesses in the assessment area with revenues of \$1 million or less. Performance was stronger when looking at market share. ANB's market share of loans to businesses with revenues of \$1 million or less exceeded its overall market share of small loans to businesses.

Another indication of the bank's good distribution of small loans to businesses was the percentage of loans originated in amounts of \$100 thousand or less. Loan size often loosely correlates to the size of the business. During the evaluation period, ANB originated a good majority of its reported loans to businesses in amounts of \$100 thousand or less.

## Community Development Lending

*(Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.)*

CD lending had a positive impact on Lending Test conclusions as ANB originated a relatively high volume of CD loans. The bank originated 60 loans totaling \$9 million in the Omaha MSA assessment area during the evaluation period. This dollar volume represented 10 percent of Tier 1 capital.

CD loans originated by ANB were responsive to community needs. Over \$7 million of the reported loans funded nonprofit organizations dedicated to providing community services targeted to area LMI. An additional \$1.5 million of the reported loans helped provide affordable housing for LMI persons in primarily LMI census tracts.

## Product Innovation and Flexibility

During the evaluation period, ANB participated in several flexible lending programs to help meet the credit needs of borrowers in the Omaha MSA assessment area. The bank's participation in these programs received positive consideration in our analysis of Lending Test performance. We included the loans discussed below in the applicable tables in Appendix C.

ANB was an active participant in loan programs sponsored by the federal government that primarily served LMI home mortgage or small farm loan applicants. These loan programs generally had reduced down payment requirements, lower interest rates, and more liberal underwriting criteria than conventional loans. During the evaluation period, the bank originated 225 loans totaling \$21 million under Federal Housing Authority (FHA) loan programs, 169 loans totaling \$23 million under Veteran's Administration (VA) loan programs, and 25 loans totaling \$4 million under Farm Service Agency (FSA) loan programs.

The bank also participated in loan programs sponsored and administered by the State of Nebraska. The Nebraska Investment Finance Authority (NIFA) Homebuyer Assistance loan program provides financing to qualified LMI borrowers with reduced interest rates and lower down payment requirements than traditional mortgage loan programs. During the evaluation period, ANB originated 66 NIFA loans totaling \$4 million. The bank also participated in the Nebraska Low Interest Energy Loan Program. This program is targeted to LMI and provides loans with below-market interest rates for home or business energy improvements. ANB originated 269 loans under this program totaling over \$1 million.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lincoln MSA assessment area and the non-metropolitan assessment areas was not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Area Receiving Full-Scope Review

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

The bank's performance under the Investment Test is rated "High Satisfactory". This is based primarily on a full-scope review of performance in the Omaha MSA assessment area.

ANB extended a significant level of qualified investments in the Omaha MSA assessment area. During the evaluation period, the bank made \$945 thousand in qualified investments directly benefiting the assessment area; \$310 thousand in qualified investments directly benefiting all the bank's assessment areas; and \$23 thousand in investments benefiting statewide or regional areas that had the potential to benefit all of the bank's assessment areas. In addition, the bank had \$300 thousand in prior period investments from the Omaha MSA assessment area still outstanding as of this examination. The volume of investments benefiting the Omaha MSA assessment area was considered significant given the bank's size and the moderate level of community development opportunities available in the area. (Refer to the Market Profile in Appendix B for more information.)

ANB demonstrated good responsiveness to identified community development needs in the Omaha MSA assessment area. Affordable housing and small business development were the primary community development needs identified during interviews conducted by federal financial institution regulators. Almost 70 percent of the bank's investments in the Omaha MSA assessment area addressed these identified needs. The remainder of the bank's qualified investments primarily supported organizations providing community services to LMI individuals and families.

ANB's qualified investments in the Omaha MSA assessment area included:

- \$593 thousand in Douglas County Housing Authority Housing Revenue Bonds used to finance construction of a senior assisted living facility in Douglas County. Residents of the facility were primarily LMI.
- \$352 thousand in grants and contributions to over 70 organizations that had community development activities as their primary purpose.

During the evaluation period, ANB formed the American National Community Development Corporation to develop affordable housing, provide equity or debt financing for small businesses, and create permanent jobs. The targeted service area for the CDC consists of all ANB's assessment areas in Nebraska. The bank's initial investment in the CDC was \$310 thousand.

Prior period investments consisted of City of Omaha Special Tax Revenue Redevelopment Bonds used to help revitalize a blighted LMI area in South Omaha as part of the Stockyards East Redevelopment Plan.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lincoln MSA and the non-metropolitan assessment areas was weaker than the bank's overall "High Satisfactory" performance under the Investment Test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

The weaker performance in the Lincoln MSA and non-metropolitan assessment areas was due to the considerably lower volume of investments. Also, while the American National CDC was established to serve all of the bank's assessment areas, activities conducted by the CDC to date have only benefited the Omaha MSA assessment area. This did not negatively impact the overall conclusions for the Investment Test as we took into consideration the limited opportunities for investment in the Lincoln MSA and rural assessment areas.

## SERVICE TEST

### Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Service Test is rated "High Satisfactory". This is based primarily on ANB's good performance in the Omaha MSA assessment area, which received a full-scope review.

#### Retail Banking Services

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

The bank's service delivery systems were reasonably accessible to geographies and individuals of different income levels throughout the Omaha MSA assessment area. The percentage of the bank's branches in LMI census tracts was considerably below the percentage of the population that resided in those areas. However, concern was mitigated because four branches located in middle-income geographies provided reasonable access for residents of several nearby LMI census tracts.

ANB's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. During the evaluation period, the bank opened one new branch in the Omaha MSA assessment area in a middle-income tract. It also relocated two branches a few blocks from the original branch sites. One branch relocated from a middle-income geography to another middle-income tract, while the other branch relocated from an upper-income geography to another upper-income tract.

The bank's hours and services offered throughout the Omaha MSA assessment area were good. Hours and services did not vary in a way that inconvenienced the assessment area, including LMI areas. Office hours varied slightly among locations based upon customer needs; however, all offices were open at least 10 hours per day Monday through Friday. In addition, all branches were open on Saturday. Upon request, bank officers accommodated customers after hours to take loan applications, close loans, and open accounts. The bank's complete line of products and services were generally available at each branch location.

The bank's ATM network offered a good alternative system for delivering retail banking services to LMI individuals and geographies. ANB operated 54 ATMs throughout the Omaha MSA assessment area. By geography income level, two percent of the ATMs were in low-, 28 percent were in moderate-, 42 percent were in middle-, and 28 percent were in upper-income census tracts. This was comparable to the distribution of total population throughout the assessment area.

ANB offered other alternative delivery systems during the evaluation period, including banking by telephone, mail, and Internet. No information was available regarding the effectiveness of these services in reaching LMI individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

#### Community Development Services

ANB representatives provided a relatively high level of community development services to numerous organizations serving the Omaha MSA assessment area. Bank associates, including executive management, provided services to 25 organizations during the evaluation period. Organizations benefiting from these services were involved in a variety of community development activities, including affordable housing for LMI persons, community services targeted to LMI individuals, and economic development activities targeted to small businesses. Bank representatives often served in leadership roles, including membership on Boards of Directors and officer positions. Other services involved grant application assistance and various types of fundraising activities.



The following are examples of community development services ANB representatives provided in the Omaha MSA assessment area during the evaluation period:

- The bank provided no-cost loan servicing to a nonprofit organization providing financing for affordable housing to LMI families. Servicing includes collecting loan payments, tracking loan status, and escrow accounting. The number of loans serviced annually increased from 15 to 55 during the evaluation period.
- Mortgage loan officers conducted ongoing first-time homebuyer seminars targeted to LMI persons. Through these seminars, participants gained a better understanding of budgeting assistance, financial responsibility, and financing options to help them make informed decisions with regard to purchasing a home.
- Bank personnel acted in several capacities for organizations providing a broad range of community development services to LMI individuals, including education, job training, day care, emergency food and shelter assistance, domestic abuse assistance, and medical care.
- A bank employee served on the Board of Directors and reviewed investment requests for an organization that operates a revolving loan fund for small business start-up and the expansion of existing small businesses in North Omaha.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Lincoln MSA assessment area and the non-metropolitan assessment areas was not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): CD Loans and Service Test: Investment Test:	1/1/2000 to 12/31/2004 3/14/2000 to 3/22/2005 2/28/2002 to 3/22/2005
<b>Financial Institution</b>		<b>Products Reviewed</b>
American National Bank (ANB) Omaha, Nebraska		Home mortgage loans, small loans to businesses and farms, and community development loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA – No affiliate products reviewed.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Omaha, NE MSA # 36540	Full-Scope	Metropolitan AA consisting of Douglas County, Sarpy County, and the eastern portion of Cass County
Lincoln, NE MSA # 30700	Limited-Scope	Metropolitan AA consisting of census tracts in the southern portion of Lincoln, NE
Jefferson County	Limited-Scope	Nonmetropolitan AA in southeast NE
Johnson County	Limited Scope	Nonmetropolitan AA in southeast NE
Otoe County	Limited-Scope	Nonmetropolitan AA in southeast NE
Richardson County	Limited-Scope	Nonmetropolitan AA in southeast NE

## Appendix B: Market Profile for Full-Scope Area

### Omaha MSA Assessment Area

Demographic Information for Full-Scope Area: Omaha, NE MSA # 36540 Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	184	4%	26%	43%	27%	0%
Population by Geography	602,716	2%	25%	45%	28%	0%
Owner-Occupied Housing by Geography	150,117	1%	19%	48%	32%	0%
Businesses by Geography	32,157	3%	20%	49%	28%	0%
Farms by Geography	1,170	< 1%	10%	55%	34%	0%
Family Distribution by Income Level	154,089	17%	19%	24%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	54,710	4%	40%	44%	12%	0%
Median Family Income	\$53,955	Median Housing Value				\$106,823
HUD Adjusted Median Family income for 2004	\$63,000	Unemployment Rate (December 2004)				4.6%
Households Below the Poverty Level	8.00%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2004 HUD updated MFI.

ANB designated all of Douglas and Sarpy Counties and the eastern portion of Cass County as their assessment area within the Omaha, NE-IA MSA # 36540. The MSA consists of five counties in Nebraska and three counties in Iowa. ANB designated 184 contiguous census tracts within the MSA as its assessment area since this was where the majority of its lending and banking services were available. The metro Omaha area comprised the significant majority of the assessment area. The census tracts excluded from the bank's assessment area were not geographically close to any ANB branch. Including these geographies in the bank's assessment area would have made the area too large for the bank to reasonably serve.

ANB's main office, 14 branches, and 54 ATMs were located within the Omaha MSA assessment area. As of June 30, 2004, 80 percent of the bank's deposits were attributed to this area. Over the evaluation period, the bank originated 81 percent of its reported loans within the Omaha MSA assessment area.

The bank's deposits in the Omaha MSA assessment area totaled approximately \$636 million as of June 30, 2004. Based on FDIC deposit market share data as of that date, this equated to a five percent deposit market share and ranked ANB as the sixth largest deposit-taking financial institution in the assessment area. The four largest financial institutions were considerably larger than ANB with total deposits ranging from approximately \$1.2 billion to \$4.4 billion. These banks had deposit market shares ranging from 10 percent to 36 percent.

Competition among financial institutions was strong. Over 40 deposit-taking financial institutions operated 222 banking offices in ANB's Omaha MSA assessment area as of June 30, 2004. Major competitors included First National Bank of Omaha, U.S. Bank, N.A., Wells Fargo Bank, N.A., Commercial Federal Bank, and Great Western Bank. Credit unions, finance companies, and mortgage companies also competed for loan production throughout the assessment area.

The local economy has remained relatively stable. While Omaha serves as a regional service and trade center, diversification exists through agriculture and related processing, industries, communication, telemarketing, medical, data processing, and insurance related businesses. The well-diversified economy kept the area's unemployment rate under the national rate throughout the past decade. The 2004 annual average unemployment rate for the metro Omaha area was 4.3 percent, compared to the U.S. unemployment rate of 5.4 percent. Major employers in the area include Offutt Air Force Base, Alegen Health, First Data Corporation, Omaha Public Schools, and Methodist Health System.

We performed two community contacts during the examination and reviewed seven contacts completed in the area since the bank's last CRA examination. Refer to "Scope of the Evaluation" for details on the types of organizations contacted and their primary focus. In the Omaha MSA assessment area, the contacts stated primary needs related to affordable housing and financing for small businesses.

The most pressing need in the community was for affordable housing. The majority of contacts noted a shortage of homes in the Omaha MSA that were affordable to LMI persons. Information obtained from the Omaha Area Board of Realtors showed the average sales price for single-family homes in the Omaha area was \$163,000 in 2004. Using traditional underwriting criteria and market interest rates, LMI families would generally have a difficult time qualifying for mortgage loans of this size. Additional information from the Omaha Area Board of Realtors showed only 24 percent of homes sold in 2005 were under \$100,000.

The most significant business-related credit needs were for equity or venture capital financing for small businesses. Contacts stressed attracting, retaining, and expanding small businesses was vital to promote business growth and development, especially in LMI areas.

A moderate level of resources and opportunities existed to facilitate activities to address unmet credit and community development needs in the assessment area. Various LMI portions of North and South Omaha were designated as Enterprise Communities by HUD, an Enterprise Zone by the State of Nebraska, a Distressed Community under the U.S. Treasury Department's Community Development Financial Institution Fund, or blighted areas by the City of Omaha. These designations provided incentives to lend or invest in the targeted areas and encouraged partnerships with community development organizations.

Actual partnerships to date have been somewhat limited. Contacts noted there was only one community development financial institution in the MSA and there were few, if any, small business investment companies or shared loan pools for small business lending serving the Omaha MSA. Qualified investments were limited to low-income housing tax credits and occasional bonds issued by the City of Omaha for specific community development projects.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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

Table 1. Lending Volume

LENDING VOLUME												
Evaluation Period: January 1, 2000 to December 31, 2004												
Geography: Nebraska												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
2004 Omaha, NE MSA # 36540	81%	1,103	109,768	540	64,640	13	826	16	2,782	1,672	178,016	80%
2003 Omaha, NE MSA # 5920		1,719	205,753	515	61,490	7	308	12	2,602	2,253	270,153	
2000-2002 Omaha, NE MSA # 5920		2,786	242,482	1,441	151,132	44	1,625	32	3,485	4,303	398,724	
<b>Limited Review:</b>												
2004 Lincoln, NE MSA # 30700	1%	24	2,643	4	674	1	20	2	1,439	31	4,776	3%
2003 Lincoln, NE MSA # 4360		51	6,451	10	955	0	0	1	600	62	8,006	
2004 NonMSA Assessment Areas	18%	120	6,786	85	5,910	113	3,002	3	831	321	16,529	17%
2003 NonMSA Assessment Areas		225	14,808	64	2,523	97	2,879	2	328	388	20,538	
2002 NonMSA Assessment Areas		454	24,454	255	12,941	369	10,932	0	0	1,078	48,327	

\* Loan Data as of 2000 – 2004. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is March 14, 2000 to March 22, 2005.

\*\*\* Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE												Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
2004 Omaha, NE MSA # 36540	373	86%	1%	1%	19%	10%	48%	47%	32%	42%	2%	3%	1%	2%	2%	
2003 Omaha, NE MSA # 5920	285		3%	1%	17%	9%	48%	41%	32%	49%	NA	NA	NA	NA	NA	
2000-2002 Omaha, NE MSA # 5920	678		3%	2%	16%	7%	48%	47%	33%	44%	NA	NA	NA	NA	NA	
<b>Limited Review:</b>																
2004 Lincoln, NE MSA # 30700	10	1%	NA	NA	6%	10%	61%	30%	33%	60%	<1%	NA	1%	<1%	1%	
2003 Lincoln, NE MSA # 4360	13		NA	NA	9%	0%	58%	62%	33%	38%	NA	NA	NA	NA	NA	
2004 NonMSA Assessment Areas	41	13%	NA	NA	6%	2%	94%	98%	NA	NA	18%	NA	13%	18%	NA	
2003 NonMSA Assessment Areas	44		NA	NA	6%	2%	94%	98%	NA	NA	NA	NA	NA	NA	NA	
2002 NonMSA Assessment Areas	114		Geographic analysis not meaningful – all middle-income geographies													

\* Based on 2004 Peer Mortgage Data: Western Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area.

Based on 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT Evaluation Period: January 1, 2000 to December 31, 2004		Geography: Nebraska													
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	% Owner Occupied Units <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Middle	Upper
<b>Full Review:</b>															
2004 Omaha, NE MSA # 36540	269	86%	1%	3%	19%	14%	48%	44%	32%	39%	10%	21%	7%	9%	12%
2003 Omaha, NE MSA # 5920	243		3%	5%	17%	18%	48%	33%	32%	44%	NA	NA	NA	NA	NA
2000-2002 Omaha, NE MSA # 5920	939		3%	4%	16%	10%	48%	51%	33%	35%	NA	NA	NA	NA	NA
<b>Limited Review:</b>															
2004 Lincoln, NE MSA # 30700	3	<1%	NA	NA	6%	33%	61%	67%	33%	0%	1%	NA	6%	2%	0%
2003 Lincoln, NE MSA # 4360	3		NA	NA	9%	0%	58%	67%	33%	33%	NA	NA	NA	NA	NA
2004 NonMSA Assessment Areas	30	14%	NA	NA	6%	7%	94%	93%	NA	NA	38%	NA	25%	40%	NA
2003 NonMSA Assessment Areas	49		NA	NA	6%	10%	94%	90%	NA	NA	NA	NA	NA	NA	NA
2000-2002 NonMSA Assessment Areas	148		Geographic analysis not meaningful – all middle-income geographies												

<sup>\*</sup> Based on 2004 Peer Mortgage Data: Western Region.

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

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area. Based on 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE Evaluation Period: January 1, 2000 to December 31, 2004												Geography: Nebraska				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Over all	Low	Mod	Middl e	Uppe r	
<b>Full Review:</b>																
2004 Omaha, NE MSA # 36540	461	87%	1%	1%	19%	13%	48%	40%	32%	46%	2%	2%	2%	2%	3%	
2003 Omaha, NE MSA # 5920	1,172		3%	<1%	17%	6%	48%	39%	32%	55%	NA	NA	NA	NA	NA	
2000-2002 Omaha, NE MSA # 5920	1,143		3%	2%	16%	3%	48%	44%	33%	51%	NA	NA	NA	NA	NA	
<b>Limited Review:</b>																
2004 Lincoln, NE MSA # 30700	11	1%	NA	NA	6%	9%	61%	46%	33%	45%	<1%	NA	1%	<1%	<1%	
2003 Lincoln, NE MSA # 4360	35		NA	NA	9%	9%	58%	48%	33%	43%	NA	NA	NA	NA	NA	
2004 NonMSA Assessment Areas	49	12%	NA	NA	6%	4%	94%	96%	NA	NA	14%	NA	12%	14%	NA	
2003 NonMSA Assessment Areas	131		NA	NA	6%	7%	94%	93%	NA	NA	NA	NA	NA	NA	NA	
2000-2002 NonMSA Assessment Areas	188		Geographic analysis not meaningful – all middle-income geographies.													

\* Based on 2004 Peer Mortgage Data: Western Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area. Based on 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: Nebraska													
Evaluation Period: January 1, 2000 to December 31, 2004															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Middle	Upper
<b>Full Review:</b>															
2004 Omaha, NE MSA # 36540	0	90%	2%	NA	29%	NA	53%	NA	16%	NA	0%	0%	0%	0%	0%
2003 Omaha, NE MSA # 5920	19		5%	0%	26%	53%	53%	47%	16%	0%	NA	NA	NA	NA	NA
2000-2002 Omaha, NE MSA # 5920	26		12%	11%	22%	46%	38%	35%	28%	8%	NA	NA	NA	NA	NA
<b>Limited Review:</b>															
2004 Lincoln, NE MSA # 30700	0	0%	NA	NA	11%	NA	64%	NA	25%	NA	0%	NA	0%	0%	0%
2003 Lincoln, NE MSA # 4360	0		NA	NA	19%	NA	55%	NA	26%	NA	NA	NA	NA	NA	NA
2004 NonMSA Assessment Areas	0	10%	NA	NA	18%	NA	82%	NA	NA	NA	0%	NA	0%	0%	NA
2003 NonMSA Assessment Areas	1		NA	NA	18%	0%	82%	100%	NA	NA	NA	NA	NA	NA	NA
2000-2002 NonMSA Assessment Areas	4		Geographic analysis not meaningful – all middle-income geographies												

\* Based on 2004 Peer Mortgage Data: Western Region.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area. Based on 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004																
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Middle
<b>Full Review:</b>																
2004 Omaha, NE MSA # 36540	540	86%	3%	1%	20%	14%	49%	52%	28%	33%	3%	<1%	2%	3%	3%	
2003 Omaha, NE MSA # 5920	515		4%	3%	19%	14%	49%	50%	28%	33%	NA	NA	NA	NA	NA	
2000-2002 Omaha, NE MSA # 5920	1,441		4%	3%	13%	9%	43%	49%	40%	39%	NA	NA	NA	NA	NA	
<b>Limited Review:</b>																
2004 Lincoln, NE MSA # 30700	4	< 1%	NA	NA	10%	0%	64%	75%	26%	25%	<1%	NA	<1%	<1%	<1%	
2003 Lincoln, NE MSA # 4360	10		NA	NA	16%	20%	59%	60%	25%	20%	NA	NA	NA	NA	NA	
2004 NonMSA Assessment Areas	85	14%	NA	NA	11%	22%	89%	78%	NA	NA	9%	NA	18%	10%	NA	
2003 NonMSA Assessment Areas	64		NA	NA	11%	6%	89%	94%	NA	NA	NA	NA	NA	NA	NA	
2000-2002 NonMSA Assessment Areas	255		Geographic analysis not meaningful – all middle-income geographies													

\* Based on 2004 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet: 2004 for 2004 assessment areas, 2003 for 2003 assessment areas, and 2002 for 2000-2002 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Middle	Upper	
<b>Full Review:</b>																
2004 Omaha, NE MSA # 36540	13	10%	<1%	0%	10%	0%	55%	38%	34%	62%	4%	0%	0%	3%	7%	
2003 Omaha, NE MSA # 5920	7		1%	0%	10%	0%	56%	71%	33%	29%	NA	NA	NA	NA	NA	
2000-2002 Omaha, NE MSA # 5920	44		1%	0%	5%	0%	64%	82%	30%	18%	NA	NA	NA	NA	NA	
<b>Limited Review:</b>																
2004 Lincoln, NE MSA # 30700	1	< 1%	NA	NA	5%	0%	60%	0%	35%	100%	1%	NA	0%	1%	2%	
2003 Lincoln, NE MSA # 4360	0		NA	NA	11%	NA	54%	NA	35%	NA	NA	NA	NA	NA	NA	
2004 NonMSA Assessment Areas	113	90%	NA	NA	1%	0%	99%	100%	NA	NA	44%	NA	0%	45%	NA	
2003 NonMSA Assessment Areas	97		NA	NA	1%	0%	99%	100%	NA	NA	NA	NA	NA	NA	NA	
2000-2002 NonMSA Assessment Areas	369		Geographic analysis not meaningful – all middle—income geographies.													

\* Based on 2004 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet: 2004 for 2004 assessment areas, 2003 for 2003 assessment areas, and 2002 for 2000-2002 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE											Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Middle	Upper
<b>Full Review:</b>															
2004 Omaha, NE MSA # 36540	373	86%	17%	8%	19%	16%	24%	21%	40%	55%	2%	2%	1%	2%	4%
2003 Omaha, NE MSA # 5920	285		17%	9%	19%	24%	24%	23%	40%	44%	NA	NA	NA	NA	NA
2000-2002 Omaha, NE MSA # 5920	678		17%	8%	18%	20%	25%	33%	40%	39%	NA	NA	NA	NA	NA
<b>Limited Review:</b>															
2004 Lincoln, NE MSA # 30700	10	1%	13%	0%	18%	40%	27%	0%	42%	60%	<1%	0%	1%	0%	1%
2003 Lincoln, NE MSA # 4360	13		13%	0%	18%	46%	26%	23%	43%	31%	NA	NA	NA	NA	NA
2004 NonMSA Assessment Areas	41	13%	18%	5%	20%	23%	26%	35%	36%	37%	18%	9%	20%	25%	27%
2003 NonMSA Assessment Areas	44		18%	9%	20%	18%	26%	25%	36%	48%	NA	NA	NA	NA	NA
2000-2002 NonMSA Assessment Areas	114		17%	11%	21%	32%	27%	27%	35%	30%	NA	NA	NA	NA	NA

<sup>\*</sup> Based on 2004 Peer Mortgage Data: Western Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2% of loans originated and purchased by Bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT											Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Middle	Upper
<b>Full Review:</b>															
2004 Omaha, NE MSA # 36540	269	86%	17%	18%	19%	22%	24%	19%	40%	41%	10%	12%	9%	7%	12%
2003 Omaha, NE MSA # 5920	243		17%	14%	19%	22%	24%	25%	40%	39%	NA	NA	NA	NA	NA
2000-2002 Omaha, NE MSA # 5920	939		17%	15%	18%	19%	25%	28%	40%	38%	NA	NA	NA	NA	NA
<b>Limited Review:</b>															
2004 Lincoln, NE MSA # 30700	3	< 1%	13%	0%	18%	34%	27%	33%	42%	33%	1%	0%	2%	2%	2%
2003 Lincoln, NE MSA # 4360	3		13%	0%	18%	0%	26%	67%	43%	33%	NA	NA	NA	NA	NA
2004 NonMSA Assessment Areas	30	14%	18%	10%	20%	17%	26%	28%	36%	45%	38%	38%	31%	38%	45%
2003 NonMSA Assessment Areas	49		18%	25%	20%	15%	26%	29%	36%	31%	NA	NA	NA	NA	NA
2000-2002 NonMSA Assessment Areas	148		17%	10%	21%	19%	27%	34%	35%	37%	NA	NA	NA	NA	NA

<sup>\*</sup> Based on 2004 Peer Mortgage Data: Western Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by Bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

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



**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004																
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>					
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Middl e	Uppe r	
<b>Full Review:</b>																
2004 Omaha, NE MSA # 36540	461	87%	17%	8%	19%	16%	24%	25%	40%	51%	2%	2%	2%	3%	4%	
2003 Omaha, NE MSA # 5920	1,172		17%	4%	19%	17%	24%	24%	40%	55%	NA	NA	NA	NA	NA	
2000-2002 Omaha, NE MSA # 5920	1,143		17%	7%	18%	17%	25%	28%	40%	48%	NA	NA	NA	NA	NA	
<b>Limited Review:</b>																
2004 Lincoln, NE MSA # 30700	11	1%	13%	9%	18%	18%	27%	18%	42%	55%	<1%	<1%	<1%	<1%	1%	
2003 Lincoln, NE MSA # 4360	35		13%	9%	18%	17%	26%	34%	43%	40%	NA	NA	NA	NA	NA	
2004 NonMSA Assessment Areas	49	12%	18%	10%	20%	25%	26%	18%	36%	47%	14%	18%	21%	11%	23%	
2003 NonMSA Assessment Areas	131		18%	4%	20%	18%	26%	27%	36%	51%	NA	NA	NA	NA	NA	
2000-2002 NonMSA Assessment Areas	188		17%	6%	21%	21%	27%	26%	35%	47%	NA	NA	NA	NA	NA	

<sup>\*</sup> Based on 2004 Peer Mortgage Data: Western Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by Bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information for 2000-2002 assessment areas and 2000 Census information for 2003 and 2004 assessment areas.

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

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
<b>Full Review:</b>									
2004 Omaha, NE MSA # 36540	540	86%	64%	55%	71%	15%	14%	3%	4%
2003 Omaha, NE MSA # 5920	515		63%	59%	68%	18%	14%	NA	NA
2000-2002 Omaha, NE MSA # 5920	1,441		76%	62%	75%	13%	12%	NA	NA
<b>Limited Review:</b>									
2004 Lincoln, NE MSA # 30700	4	< 1%	71%	100%	75%	0%	25%	<1%	<1%
2003 Lincoln, NE MSA # 4360	10		70%	40%	80%	20%	0%	NA	NA
2004 NonMSA Assessment Areas	85	14%	64%	62%	82%	10%	8%	9%	18%
2003 NonMSA Assessment Areas	64		62%	80%	89%	9%	2%	NA	NA
2000-2002 NonMSA Assessment Areas	255		77%	79%	89%	7%	4%	NA	NA

<sup>\*</sup> Based on 2004 Peer Small Business Data: US.

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

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B: 2004 for 2004 assessment areas, 2003 for 2003 assessment areas, and 2002 for 2000-2002 assessment areas).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12% of small loans to businesses originated and purchased by the Bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Geography: Nebraska				
Evaluation Period: January 1, 2000 to December 31, 2004									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of <sup>***</sup> Farms	% BANK <sup>****</sup> Loans	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Revenues \$1 Million or Less
<b>Full Review:</b>									
2004 Omaha, NE MSA # 36540	13	10%	91%	92%	92%	0%	8%	4%	5%
2003 Omaha, NE MSA # 5920	7		93%	86%	86%	14%	0%	NA	NA
2000-2002 Omaha, NE MSA # 5920	44		94%	89%	91%	7%	2%	NA	NA
<b>Limited Review:</b>									
2004 Lincoln, NE MSA # 30700	1	< 1%	85%	0%	100%	0%	0%	1%	1%
2003 Lincoln, NE MSA # 4360	0		89%	NA	NA	NA	NA	NA	NA
2004 NonMSA Assessment Areas	113	90%	98%	79%	96%	4%	0%	44%	41%
2003 NonMSA Assessment Areas	97		99%	82%	93%	6%	1%	NA	NA
2000-2002 NonMSA Assessment Areas	369		98%	94%	92%	8%	0%	NA	NA

<sup>\*</sup> Based on 2004 Peer Small Business Data: US.

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

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B: 2004 for 2004 assessment areas, 2003 for 2003 assessment areas, and 2002 for 2000-2002 assessment areas).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Nebraska							
Evaluation Period: February 28, 2002 to March 22, 2005									
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Omaha, NE MSA	1	300	76	945	77	1,245	78%	0	0
<b>Limited Review:</b>									
Lincoln, NE MSA	NA	NA	4	16	4	16	1%	0	0
NonMSA Assessment Areas	0	0	1	3	1	3	0%	0	0
Investment Directly Benefiting All ANB Assessment Areas	0	0	1	310	1	310	20%	0	0
Statewide or Regional Investments with Potential Benefit to One or More Assessment Areas	0	0	6	23	6	23	1%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: Nebraska							
Evaluation Period: March 14, 2000 to March 22, 2005																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Middle	Upper			Low	Mod	Middle	Upper	Low	Mod	Middle	Upper
<b>Full Review:</b>																	
Omaha, NE MSA	80%	15	68%	0%	13%	67%	20%	3	2	NA	NA	+1	NA	2%	25%	45%	28%
<b>Limited Review:</b>																	
Lincoln, NE MSA	3%	1	5%	NA	0%	100%	0%	1	0	NA	NA	+1	NA	NA	9%	61%	30%
NonMSA Assessment Areas	17%	6	27%	NA	17%	83%	NA	0	0	NA	NA	NA	NA	NA	6%	94%	NA