



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

December 3, 2001

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The City National Bank of Greeley
Charter Number 13461
123 S. Galway
Greeley, NE 68842**

**Comptroller of the Currency
Omaha South Field Office
13710 FNB Parkway #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, 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.

INSTITUTION'S CRA RATING: The CNB of Greeley (CNB) is rated Satisfactory.

- The bank had a satisfactory record of lending to farms of different sizes and to consumer borrowers of different incomes.

The distribution of agricultural borrowers reflected fair penetration among farms of different sizes. Based on 20 borrowers sampled, the bank's distribution of loans to farms with different revenues was comparable to demographic information on farms located in the assessment area (AA) obtained from the U.S. Census Bureau's 1997 Census of Agriculture.

The distribution of the bank's loans to consumer borrowers of different incomes is reasonable. Based on the 20 borrowers sampled, the bank's distribution of loans to consumers was comparable to the breakdown of the percentage of households at each income level.

- The bank originated a majority of its loans in the AA.

CNB originated a majority of its loans in the assessment area. For agricultural and consumer loans sampled, the bank originated 78% by number and 84% by dollar amount within its assessment area.

- CNB's average loan-to-deposit ratio since the last examination was reasonable.

CNB's average loan-to-deposit ratio of 50% over the past nineteen quarters is reasonable when compared to similarly situated banks in the assessment area. The average ratios of the two competing bank's were 49% and 50%.

- An analysis of the geographic distribution of loans was not applicable as the AA did not have any low-or moderate-income geographies.
- An analysis of the 1999 and 2000 public comments and consumer complaint information was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted with the Community Reinvestment Act (CRA) evaluation this year. The latest comprehensive fair lending exam was performed in 1996.
- CNB did not receive any complaints about its performance in helping to meet the AA credit needs during the evaluation period.

DESCRIPTION OF INSTITUTION

CNB is a \$18MM institution located in central Nebraska. The bank's primary loan products by both number and dollar amount were agricultural and consumer loans. There were no legal or financial factors that impeded the bank's ability to help meet the credit needs of the assessment

area. Refer to the bank's CRA Public File for more information.

DESCRIPTION OF CITY NATIONAL BANK'S ASSESSMENT AREA

The bank's AA encompassed all of Greeley County, which is comprised of one middle income block numbering area. Refer to the bank's CRA Public File for more information.