



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

March 13, 2000

Community Reinvestment Act Performance Evaluation

**American National Bank
Charter Number: 15435**

**8890 West Dodge
Omaha, Nebraska 68114**

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

The following table indicates the performance level of **American National Bank (ANB)** 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
Low Satisfactory		X	
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:

- Lending levels reflected an excellent responsiveness by ANB to the credit needs of the Omaha assessment area (AA).
- ANB achieved an excellent dispersion of loans among borrowers of different income levels and businesses of different sizes.
- The geographic distribution of ANB’s reported loans reflected good penetration throughout the Omaha AA geographies.
- The bank provided an adequate volume of community development loans.
- Investments reflected an adequate responsiveness by ANB to the needs of the Omaha AA. The bank had \$420 thousand in qualified investments.
- ANB’s offices reflected good accessibility to geographies and individuals of different income levels.
- The bank achieved a good performance in providing community development (CD) services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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 by 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.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

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

Geography - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

Upper-Income - Income levels that are 120% or more of the MFI.

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 (AAs) including consumer, commercial, and real estate loan products. The bank's primary business focus is indirect automobile lending and commercial relationship banking. ANB has an extensive indirect automobile paper operation with relationships with 60 active dealers. Indirect auto lending comprises about 30% of ANB's loans. ANB does not have any subsidiaries.

For purposes of CRA evaluation, ANB is an intrastate bank with offices located in Nebraska only. As of December 31, 1999, the bank had 14 office locations and 33 automated teller machines (ATMs) in the Omaha Metropolitan Statistical Area (MSA). In southeastern Nebraska, ANB had one office and one ATM in Jefferson County, two offices and one ATM in Johnson County, one office and two ATMs in Otoe County, and two offices in Richardson County.

American National Corporation (ANC) owns 100% of the bank. ANC is a one-bank holding company headquartered in Omaha, Nebraska. ANC owned four banks in Omaha and southeastern Nebraska but merged them into ANB in the third quarter of 1998. There were no acquisition activities during the evaluation period.

As of December 31, 1999, ANB had \$678 million in total assets and Tier 1 capital of \$50 million. The bank's loan-to-deposit ratio on that date was 89% and net loans represented 70% of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 39% consumer; 29% commercial and commercial real estate; 18% one- to four-family residential real estate; 5% agricultural and agricultural real estate; 5% other real estate; and 4% other loans. The loan-to-deposit ratio 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 795 such loans totaling \$79 million. There were no known legal, financial, or other impediments that hampered ANB's ability to help meet the credit needs of its assessment areas.

The bank previously attained an Outstanding rating at the last CRA examination dated November 4, 1996. The rating assigned in the current evaluation does not reflect a negative change in the bank's CRA performance. Rather, it reflects performance under the revised CRA regulation requirements.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The most recent CRA examinations for American National Bank (ANB) and its former affiliate banks were November 4, 1996 for the Omaha bank; November 25, 1996 for the Sarpy County bank; February 12, 1998 for the Nebraska City bank; and September 25, 1996 for the Fairbury bank. ANB did not become subject to CRA evaluation under the lending, investment, and service tests until January 1, 1998. The bank was not required to collect data for these tests prior to this date. The former Sarpy County, Nebraska City, and Fairbury banks were not subject to CRA evaluation under the lending, investment, and service tests until they merged into the Omaha bank during the third quarter of 1998. These banks began voluntarily collecting data for the lending, investment, and service tests on January 1, 1998.

For home mortgage loans, the evaluation period was January 1, 1997 through December 31, 1999. We considered all Home Mortgage Disclosure Act (HMDA) data collected during this period by ANB and its former affiliates, provided it was not already considered in prior CRA evaluations. This included all HMDA loans reported by ANB and the former Sarpy County bank for all three years. For the former Nebraska City bank, it included all HMDA-reportable loans for calendar years 1998 and 1999. This bank voluntarily collected HMDA data for 1998 prior to its merger with ANB. For the former Fairbury bank, the evaluation period included all HMDA-reportable loans for calendar year 1999, as the bank was not required to collect HMDA data prior to 1999.

For small loans to businesses and farms, the evaluation period was from January 1, 1998 through December 31, 1999. We evaluated ANB's origination of small loans to farms in the non-metropolitan AAs. These loans were not evaluated in the Omaha AA, as the volume was not significant enough to perform a meaningful analysis (only 1% of the number of loan originations in the AA over the evaluation period). For community development loans and the service test, the evaluation period was from January 1, 1998 through March 13, 2000. For the investment test, the evaluation period was from January 1, 1998 through February 27, 2002.

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 found no significant errors in the HMDA data; however, we did note significant errors in the business and farm loan data. Errors included incorrect census tract and revenue information. Bank management corrected the data. We tested the accuracy of the corrected data and found it acceptable. We noted a few errors regarding loan type and incorrect census tract designations; however, these errors did not impact our ability to analyze the bank's CRA performance. The errors were isolated to loans located outside the bank's AAs. We used the corrected data for the examination. Due to the timing of the corrections, publicly filed data for 1998 remains inaccurate; however, publicly filed data for 1999 is accurate.

We reviewed CD 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 by ANB for consideration because they did not meet the definition or purpose of community development.

Selection of Area for Full-Scope Review

The bank has five AAs. We performed a full-scope review for the Omaha AA. This AA represents ANB's major market and accounts for 74% of the bank's deposit activity and 80% of the bank's reported lending activity over the evaluation period.

For purposes of analyzing performance and presenting data in this evaluation, we combined the non-metropolitan AAs in Jefferson, Johnson, Otoe, and Richardson Counties. These AAs are geographically proximate in southeastern Nebraska and have similar performance contexts. Refer to appendix A for additional information regarding which areas received full-scope and limited-scope reviews.

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 AA, we weighted home improvement loans and small loans to businesses more heavily than other reported loans as each loan product represented 35% of total number of reported loans. Approximately 20% of the number of reported loans were home purchase loans, 9% were home mortgage refinance loans, and 1% were small loans to farms. As previously mentioned, we did not evaluate small loans to farms in the Omaha AA.

In the non-metropolitan AAs, we weighted small loans to farms more heavily than small loans to businesses and home mortgage loans. Approximately 44% of the number of reported loans were small loans to farms, 28% were small loans to businesses, 14% were home improvement loans, 8% were home purchase loans, and 6% were home mortgage refinance loans.

Other

We performed one community contact during the examination and reviewed 14 contacts completed in the Omaha AA since the bank's last CRA examination. Organizations contacted included a mixture of government officials, economic development organizations, housing organizations, and trade associations. The organizations focused on affordable housing and homeowner counseling for low- and moderate-income (LMI) individuals, economic development by attracting and financing small businesses, revitalization and stabilization of LMI neighborhoods, and real estate services within the Omaha Metropolitan Statistical Area (MSA).

In the Omaha MSA, contacts stated the primary needs relate to affordable housing and financing for small businesses. The need for affordable housing was significant as the majority of contacts noted a limited supply of housing units in the Omaha MSA that are affordable to LMI persons.

To promote business growth and development, especially in LMI areas of the MSA, many contacts noted a need for equity or venture capital financing for small business start-ups. We considered the needs for affordable housing and small business financing throughout the AA in our evaluation of ANB's performance under the lending, investment, and service tests. Refer to the Market Profile in appendix B of this evaluation for more information.

Fair Lending Review

An analysis of 1998 and 1999 public comments, consumer complaint information, HMDA, small business and small farm lending data 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 in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 2000.

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 AA, 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 AA. The bank's excellent volume of home improvement 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 AA. Over 240 lenders reported one or more HMDA loans and over 70 lenders reported one or more small business loans in the Omaha AA in 1998. These reporters included many non-bank lenders. To analyze ANB's lending activity, we determined the bank's market share of deposits and loan originations among depository financial institutions that had banking offices within the AA and their mortgage company affiliates.

Based on FDIC deposit market share data as of June 30, 1999, there were almost 40 deposit-taking financial institutions with one or more banking offices in ANB's AA. ANB was the sixth largest of these institutions with a 4% deposit market share. The bank's market share for home improvement loans and small loans to businesses was considerably higher. A review of 1998 aggregate HMDA data showed ANB ranked fifth among these institutions for home

improvement loans with a 14% market share. Based on 1998 aggregate CRA data, ANB ranked sixth for small loans to businesses with a market share of 10%.

ANB's home purchase lending activity was good. Based on 1998 aggregate HMDA data, the bank was the seventh largest originator of home purchase loans in the AA with a 4% market share. This was consistent with the bank's deposit market share and rank.

The bank's home mortgage refinance lending activity was adequate. The bank ranked ninth with a 1% market share. While this was below the bank's deposit market rank and share, we took into consideration the significant competition for these loans and the fact that this loan product was not a primary business focus for the bank. Three financial institutions and their mortgage company affiliates dominated the market with 74% of all reported home mortgage refinance loans.

Distribution of Loans by Income Level of the Geography

The geographic distribution of ANB's reported loans reflected good penetration throughout the AA. Performance was excellent for home improvement loans and adequate for home purchase loans, home mortgage refinance loans, and small loans to businesses. We identified no conspicuous gaps in the geographic distribution of loans. ANB originated a high percentage of its reported loans within its AAs.

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.

The bank achieved an adequate geographic distribution of home purchase and home mortgage refinance loans throughout the Omaha AA. For both products, ANB'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 home purchase and home mortgage refinance loans in LMI census tracts was comparable to the bank's overall market share for these products.

Geographic distribution of home improvement loans was excellent. The percentage of ANB's home improvement loans in low-income geographies was twice the percentage of owner-occupied housing units that were within those geographies. The portion of the bank's home improvement loans in moderate-income tracts met the percentage of owner-occupied housing units that were within those geographies. For both LMI geographies, the bank's market share of home improvement loans made in these geographies exceeded the bank's overall market share of home improvement loans in the Omaha AA.

Small Loans to Businesses

Refer to Table 5 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 AA was adequate. The bank's percentage of small loans to businesses made in LMI geographies was below the percentage of businesses within those geographies. Market share performance was stronger as ANB's market share for small loans to businesses in both LMI geographies was near to or met the bank's overall market share for small loans to businesses in the AA.

Small Loans to Farms

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 farms. We did not analyze small loans to farms in the Omaha AA due to the small volume.

Lending Gap Analysis

We reviewed maps and reports of ANB's home mortgage loans and small loans to businesses in the Omaha AA to identify gaps in the geographic distribution of these loans. We did not identify any conspicuous gaps in lending in the Omaha AA.

Inside/Outside Ratio

A good percentage of the bank's home mortgage loans, small loans to businesses, and small loans to farms were within its AAs. By number of reported loans, the bank originated 88% of home purchase loans, 89% of home improvement loans, 88% of home mortgage refinance loans, 93% of small loans to businesses, and 62% of small loans to farms within the bank's AAs. For all loan products combined, ANB originated 86% of the number of reported loans within its AAs. We performed this analysis at the bank level instead of the AA level.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of ANB's home mortgage loans and small loans to businesses reflected an excellent dispersion among borrowers of different income levels throughout the Omaha AA. This was based on the bank's excellent performance for home improvement loans and small loans to businesses.

When evaluating the borrower distribution of ANB's home mortgage loans in the Omaha AA, we considered the limited supply of homes in the market that were affordable to LMI borrowers. We recognized the shortage of affordable housing could make it difficult for the bank to originate home mortgage loans to LMI borrowers, especially low-income borrowers. Refer to "Scope of the Evaluation" and appendix B for details on the availability of housing affordable to LMI borrowers in the Omaha AA.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 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. For moderate-income borrowers, ANB's percentage of home purchase loans to these borrowers slightly exceeded the portion of families in the Omaha AA that were moderate-income. The bank's percentage of refinance loans to moderate-income borrowers was near to the portion of families in the Omaha AA 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 AA area that were low-income. Performance was still considered good given the housing shortage for low-income persons. Market share data also showed good performance. ANB's market shares for these loans to both LMI borrowers were near to the bank's overall market shares for home purchase and home mortgage refinance loans.

The bank's borrower distribution of home improvement loans was excellent in the Omaha AA. ANB's percentage of loans to moderate-income borrowers exceeded the percentage of families in the AA that were moderate-income. The bank's portion of home improvement loans to low-income borrowers was consistent with the portion of families in the AA that were low-income. Meeting the demographic for low-income families was considered excellent given the limited availability of affordable housing for low-income persons. The shortage of affordable housing resulted in fewer low-income individuals owning a home, which in turn limited the bank's opportunity to make home improvement loans to low-income persons.

Performance was also excellent when looking at market share data for home improvement loans. The bank's market share of these loans to both LMI borrowers exceeded the bank's overall market share of home improvement loans in the AA.

Small Loans to Businesses

Refer to Table 10 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 excellent. The bank's percentage of reported loans to businesses with gross annual revenues of \$1 million or less was greater than the percentage of businesses in the AA with revenues of \$1 million or less. Also, the bank's market share of loans to businesses with revenues of \$1 million or less was significantly above its overall market share of small loans to businesses.

Another indication of the bank's strong performance 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 74% of its reported loans to businesses in amounts of \$100 thousand or less, regardless of the revenue size of the business.

Small Loans to Farms

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 farms. We did not analyze small loans to farms in the Omaha AA due to the small volume.

Community Development Lending

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank's level of community development (CD) lending was adequate. During the evaluation period, ANB originated 26 qualified CD loans in the Omaha AA totaling \$570 thousand. The loans included:

- \$170 thousand for loans to LMI persons for affordable housing. ANB participated in a lending consortium that provided funds to a nonprofit community development intermediary serving the Omaha MSA. The intermediary provided nonprofit developers of affordable housing for LMI with access to capital and technical assistance. A consortium of financial institutions worked with the organization to provide a pool of loan funds for home mortgages for LMI applicants. The number of financial institutions participating in the consortium and each bank's proportionate share can change each year. For example, seven financial institutions participated in the consortium in 1999, and ANB's proportionate share was 5%.

During the evaluation period, ANB participated in several loans originated by the intermediary to LMI individuals in the Omaha MSA. ANB's proportionate share of these loans was \$170 thousand. Data on the number of loans originated was not available. These loans were considered complex, primarily due to the structure of the consortium and the involvement of several financial institutions and the nonprofit developer.

- \$350 thousand line of credit to a nonprofit organization that renovated vacant houses for sale to LMI families in LMI areas of North Omaha. The organization also provided financial counseling to LMI families and down payment assistance through non-interest second loans.
- \$50 thousand operating line of credit to a nonprofit organization that built and renovated affordable housing for LMI applicants in LMI geographies, primarily in North Omaha.

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 AA. 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 data on HMDA loans contained in the tables in appendix C.

ANB actively participated in housing loan programs sponsored by the federal government. These loan programs generally have reduced down payment requirements and more liberal underwriting criteria than conventional loans. During 1998 and 1999, the bank originated 131 loans totaling \$10.2 million under Federal Housing Authority (FHA) loan programs and 69 loans totaling \$8.1 million under Veteran's Administration (VA) loan programs.

The bank participated in the Nebraska Investment Finance Authority (NIFA) loan program. NIFA's Homebuyer Assistance program provides financing to qualified LMI borrowers throughout Nebraska. The program offers reduced interest rates and lower down payment requirements than traditional mortgage loan programs. During 1998 and 1999, the bank originated 62 NIFA loans totaling \$3.9 million.

ANB participated in two flexible lending programs that provide funds to LMI borrowers for home improvements. Under the Nebraska Low Interest Energy Loan Program, LMI applicants receive funds at reduced interest rates to make energy-efficient improvements to their homes and businesses. In 1998 and 1999, ANB originated 123 loans under this program totaling \$930 thousand. The City of Omaha's Reinvestment Area Program (RAP) is a subsidized loan program designed to help LMI borrowers obtain funds for home improvement and rehabilitation of their residences. The program is targeted to specific LMI geographies of Omaha. The City of Omaha provides up to 40% of project costs from community development block grant funds. During the evaluation period, the City of Omaha budgeted \$150 thousand for the program annually. No information was available on the number of loans ANB originated under the RAP program during 1998. From January 1, 1999 through March 13, 2000, the bank originated six loans totaling \$75 thousand under this program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the non-metropolitan areas was not inconsistent with the bank's overall "High Satisfactory" performance under the lending test. Refer to Tables 1 through 11 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full-Scope Review

The bank's performance under the investment test is rated "Low Satisfactory." This is based primarily on ANB's adequate performance in the Omaha AA, which received a full-scope review.

Refer to Table 12 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

ANB extended an adequate level of qualified investments in the Omaha AA. During the evaluation period, ANB purchased \$300,000 in qualified community development investment securities. In addition, the bank provided \$119,788 in grants and contributions to 30 organizations whose primary purposes were community development activities in the Omaha AA. Total investment volume was adequate given the community development opportunities in the AA (refer to the market profile in appendix B.) None of the investments were considered innovative or complex.

ANB demonstrated a limited responsiveness to identified community development needs in the Omaha AA. Affordable housing and small business development were the primary community development needs identified during interviews conducted by federal financial institution regulators. ANB made only three contributions totaling \$23 thousand to entities providing affordable housing and had no qualifying investments promoting economic development by financing small businesses. These investments had a minimal impact on the primary needs of the AA. The majority of the bank's qualified investments supported revitalization of an LMI area in South Omaha or organizations providing services to LMI individuals and families.

The following highlights some of the bank's most significant qualified investments:

- \$300 thousand in City of Omaha Special Tax Revenue Redevelopment Bonds. The bonds will be used to help revitalize a blighted LMI area in South Omaha as part of the Stockyards East Redevelopment Plan.

- \$24 thousand to an organization that provides rehabilitation services to individuals recovering from mental illness. Over 85% of the organization's clients are LMI.
- \$16 thousand to a nonprofit community development intermediary serving the Omaha MSA. The intermediary provides nonprofit developers of affordable housing for LMI with access to capital and technical assistance. The organization also provides homeowner workshops on maintenance and repairs, credit fairs on home ownership, and several other affordable housing services targeted to LMI.
- \$16 thousand to an organization that raises funds for numerous nonprofit entities that primarily provide community development services to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the non-metropolitan assessment areas was weaker than the bank's overall "Low Satisfactory" performance under the investment test. Refer to Table 12 in Appendix C for the facts and data that support these conclusions.

The weaker performance in the non-metropolitan assessment areas was due to the considerably lower volume of investments. This did not negatively impact the overall conclusion for the investment test. We took into consideration the limited opportunities for investment in these rural 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 AA, which received a full-scope review.

Retail Banking Services

Refer to Table 13 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.

ANB's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Omaha AA. The percentage of the bank's branches in LMI census tracts was considerably below the percentage of the population that resided in those areas. The concern was mitigated because three branches located in middle-income geographies provided reasonable access for residents of several nearby LMI census tracts. The vast majority of LMI geographies in the AA were within two miles of an ANB bank branch.

ANB's record of opening and closing branches did not adversely affect the accessibility of its

delivery systems in LMI geographies or to LMI individuals in the Omaha AA. During the evaluation period, the bank opened one branch in a middle-income tract and one branch in an upper-income tract. The bank also relocated one branch a few blocks within the same middle-income tract.

The bank's hours and services offered throughout the Omaha AA were good. Hours and services did not vary in a way that inconvenienced the AA, in particular LMI geographies or individuals. ANB supplemented its banking hours and services provided Monday through Friday with Saturday hours at all branches, except one located in a middle-income census tract. Office hours and services, including the availability of loan officers for all loan products, were comparable among locations regardless of the income level of the geography.

The bank's ATM network offered a reasonably effective alternative system for delivering retail banking services in LMI geographies and to LMI individuals. ANB operated 33 ATMs throughout the Omaha AA, of which 3% were located in low-income geographies and 30% in moderate-income geographies. This was below the percentage of the population located in low-income geographies, but significantly higher than the portion of the population located in moderate-income tracts.

The bank also offered several other alternative delivery systems. These included BankLink, a telephone banking service; banking services by mail; On-Line Banking; and direct deposit services. These delivery systems are generally available 24 hours a day, 7 days a week without customer usage fees. BankLink and On-Line Banking allow customers to check account balances, transfer funds, and make loan payments. No information was available on the effectiveness of these services in reaching LMI geographies or individuals. We did not place significant weight on these alternative delivery systems when drawing conclusions under the Service Test.

Community Development Services

ANB provided a relatively high level of community development services in the Omaha AA. This was based primarily on the number of services provided. Also, bank representatives often served in leadership roles, including executive officers, Board members, members of finance and loan review committees, and overseers of fund-raising activities. Organizations assisted were involved in a variety of community development activities, including affordable housing, community services targeted to LMI individuals, and economic development activities targeted to small businesses.

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

- A bank employee served in leadership roles for two affordable housing organizations. The employee served on the Boards of Directors, and loan review and finance committees.
- ANB conducted over 30 first-time homebuyer seminars at the bank and at a local affordable housing organization. Through these seminars, participants gained a better understanding of financing options to help the make informed decisions with regard to purchasing a home.

Bank management estimates that the majority of mortgage loans originated as a result of the first-time homebuyer seminars were to LMI applicants.

- A bank employee served in a leadership capacity for an entity that promotes economic development by providing financing for start-up businesses. The bank employee sits on the Board of the organization and on the loan review committee. In addition, ANB provided servicing for small business loans originated by this entity.
- A bank employee served on the Board and was the treasurer for an organization that provides a variety of social services primarily to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the non-metropolitan AAs was not inconsistent with the bank's overall "High Satisfactory" performance under the service test. Refer to Table 13 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*).

Time Period Reviewed	Lending Test (Excluding CD Loans): 1/1/97 to 12/31/99 CD Loans and Service Test: 1/1/98 to 3/13/00 Investment Test: 1/1/98 to 2/27/02	
Financial Institution	Products Reviewed	
American National Bank (ANB) Omaha, Nebraska	Home mortgage loans, small loans to businesses and farms, and community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA - No affiliate products reviewed.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Omaha, NE MSA #5920	Full-Scope	Metropolitan AA consisting of Douglas County, Sarpy County, and the eastern portion of Cass County
Elk Creek and Tecumseh, NE (Johnson County)	Limited-Scope	All limited-scope assessment areas located in southeastern Nebraska and combined for analysis and discussion in Performance Evaluation
Fairbury, NE (Jefferson County)	Limited-Scope	
Falls City and Humboldt, NE (Richardson County)	Limited-Scope	
Nebraska City, NE (Otoe County)	Limited-Scope	

Appendix B: Market Profile for Full-Scope Area

Omaha, NE MSA # 5920 Assessment Area

Demographic Information for Full-Scope Area: Omaha, NE MSA # 5920						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	135	11%	26%	39%	23%	1%
Population by Geography	533,332	6%	20%	43%	31%	0%
Owner-Occupied Housing by Geography	126,287	3%	16%	48%	33%	0%
Businesses by Geography	20,112	5%	13%	43%	39%	0%
Farms by Geography	796	1%	6%	65%	28%	0%
Family Distribution by Income Level	138,953	17%	18%	25%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,360	11%	32%	43%	14%	0%
Median Family Income		Median Housing Value				\$60,192
HUD Adjusted Median Family Income for 1999	\$36,011	Unemployment Rate (1996)				2.88%
Households Below the Poverty Level	\$53,600 9.85%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated median family income.

ANB designated all of Douglas and Sarpy Counties and eastern portion of Cass County as their AA within the Omaha, NE-IA MSA #5920. The MSA consists of five counties, including one county in Iowa. ANB designated 135 contiguous census tracts within the MSA as its AA since this was where the majority of its lending and banking services were available. The metro Omaha area comprises the significant majority of the AA. Excluded geographies were all middle-income. The census tracts were excluded because they were geographically not close to any ANB branch. Including these geographies in the bank's AA would have made the area too large for the bank to reasonably serve. The excluded areas were served by local community banks.

ANB's head office, 13 branches, and 33 ATMs were located within the Omaha AA. As of June 30, 1999, 74% of the bank's deposits were attributed to this area. Over the evaluation period, the bank derived 90% of its reported home mortgage loans and 84% of its reported small loans to businesses from the Omaha AA.

The bank's deposits in the Omaha AA totaled approximately \$376 million as of June 30, 1999. Based on FDIC deposit market share data as of that date, this equated to a 4% deposit market share and ranked ANB as the sixth largest deposit taking financial institution in the AA. The four largest financial institutions were considerably larger than ANB with total deposits ranging from approximately \$800 million to \$3 billion. These banks had deposit market shares ranging from 9% to 36%.

Competition among financial institutions was strong. Over 40 deposit-taking financial institutions operated almost 200 banking offices in ANB's AA as of June 30, 1999. Major competitors included First National Bank of Omaha, Wells Fargo, U.S. Bank, N.A., Commercial Federal Bank, and Great Western Bank. Numerous mortgage companies also competed for home mortgage loans.

The economy was strong. While Omaha serves as a regional service and trade center, diversification exists through agriculture and related processing, industries, communications, telemarketing, medical, data processing, and insurance related businesses. The well-diversified economy kept the area's annual unemployment rate well under the national rate throughout the past decade. The 1998 annual average unemployment rate for the metro Omaha area was 2.0%, compared to the U.S. unemployment rate of 4.5%. The low unemployment often makes it difficult for businesses to attract and retain skilled labor. Major employers include Offutt Air Force Base, Alegent Health, First Data Card Services Group, Omaha Public Schools, and the University of Nebraska Medical Center.

We performed one community contact during the examination and reviewed 14 contacts completed in the Omaha AA 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, the contacts stated primary needs relate to affordable housing and financing for small businesses.

The need for affordable housing was significant as the majority of contacts noted a shortage of homes in the Omaha MSA that are affordable to LMI persons. Contact estimates on the maximum home value low-income families could afford in the Omaha MSA ranged from \$55,000 to \$80,000. The estimates were based on current interest rates, the updated HUD median family income, and traditional lending standards. Data from a local realtor association indicated only about 15% of area homes sold for \$80,000 or less in 1998. Only 9% of area homes sold for \$55,000 or less.

The average selling price of homes in the Omaha metro area has been steadily creeping up. Between 1993 and 1999, the average selling price climbed almost 48%. In 1999, the average selling price of homes was over \$118,000.

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 geographies.

Contacts also stated a need for revitalization in the downtown Omaha area. This included a mix

of large business, small business, and housing in all price ranges, but especially for LMI persons. One contact stated unemployment in the inner city was four times the metro average and there was a shortage of affordable, safe homes (both owner-occupied and rental) for working poor of the inner city.

A moderate level of resources and opportunities existed to facilitate activities to address unmet credit and community development needs in the AA. 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 encourage partnerships with community development organizations.

Actual partnerships to date have been somewhat limited. For example, there is only one community development financial institution in the MSA. Several contacts noted there are no small business investment companies, community development corporations, or shared loan pools for small business lending serving the Omaha MSA. However, qualified investments of approximately \$10 million were available during the evaluation period. This included \$2.7 million in low-income housing tax credits available from the NIFA and \$7.1 million in bonds issued by the City of Omaha as part of the Downtown Northeast Redevelopment Plan. This plan is a city-sponsored project to revitalize a low-income area that the city declared blighted. The area is also part of a HUD Enterprise Community, is a State of Nebraska Enterprise Zone, and is recognized as a Distressed Community under the U.S. Treasury Department's Community Development Financial Institution Fund.

Appendix C: Tables of Performance Data

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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

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 MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches and ATMs in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME													State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999	
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Deposits in MSA/AA****				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Review:																
Omaha, NE MSA # 5920	80%	1,987	100,641	1,103	116,904	39	2,074	26	570	3,155	220,189	74%				
Limited-Review:																
Non-MSA Assessment Areas	20%	226	6,465	219	10,654	344	9,213	0	0	789	26,332	26%				

(*) Rated area refers to either the state or multistate MSA rating area.

(**) The evaluation period for Small Loans to Businesses and Small Loans to Farms is January 1, 1998 to December 31, 1999.

(***) The evaluation period for Community Development Loans is January 1, 1998 to March 13, 2000.

(****) Deposit data as of June 30, 1999. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																	State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans					
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**				
Full-Review:																				
Omaha, NE MSA # 5920	3%	2%	16%	12%	48%	45%	33%	41%	18	2%	2%	2%	2%	1%	613	90%				
Limited-Review:																				
NonMSA Assessment Areas	Geographic analysis not meaningful - all middle-income geographies.														65	10%				

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full-Scope:																	
Omaha, NE MSA # 5920	3%	6%	16%	16%	48%	49%	33%	29%	5	10%	17%	12%	11%	7%	1,083	91%	
Limited-Scope:																	
NonMSA Assessment Areas	Geographic analysis not meaningful - all middle-income geographies.														111	9%	

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full-Scope:																	
Omaha, NE MSA # 5920	3%	2%	16%	10%	48%	48%	33%	40%	34	<1%	1%	1%	<1%	<1%	282	87%	
Limited-Scope:																	
NonMSA Assessment Areas	Geographic analysis not meaningful - no middle-income geographies.														44	13%	

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES										State: Nebraska		Evaluation Period: January 1, 1998 to December 31, 1999					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full-Scope:																	
Omaha, NE MSA # 5920	5%	3%	13%	10%	43%	44%	39%	43%	6	8%	7%	8%	8%	7%	1,103	83%	
Limited-Scope:																	
NonMSA Assessment Areas	Geographic analysis not meaningful - all middle-income geographies.														219	17%	

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS										State: Nebraska		Evaluation Period: January 1, 1998 to December 31, 1999					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans		
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**	
Full-Scope:																	
Omaha, NE MSA # 5920	1%	0%	6%	0%	65%	90%	28%	10%	8	5%	0%	0%	6%	4%	39	10%	
Limited-Scope:																	
NonMSA Assessment Areas	Geographic analysis not meaningful - all middle-income geographies.														344	90%	

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE																	State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans					
	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***				
Full-Scope:																				
Omaha, NE MSA # 5920	17%	7%	18%	19%	25%	34%	40%	40%	18	2%	1%	2%	2%	1%	613	90%				
Limited-Scope:																				
NonMSA Assessment Areas	17%	8%	21%	18%	27%	42%	35%	32%	1	34%	22%	29%	55%	24%	65	10%				

(*) As a percentage of loans with borrower income information available. No information was available for less than 1% of loans originated by the bank in the Omaha, NE AA.

Income information was available for all loans in the nonMSA AAs.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																	State: Nebraska		Evaluation Period: January 1, 1997 to December 31, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans					
	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***				
Full-Scope:																				
Omaha, NE MSA # 5920	17%	17%	18%	21%	25%	28%	40%	34%	5	10%	15%	11%	9%	9%	1,083	91%				
Limited-Scope:																				
NonMSA Assessment Areas	17%	12%	21%	21%	27%	33%	35%	34%	1	61%	88%	53%	64%	56%	111	9%				

(*) As a percentage of loans with borrower income information available. Information was available for all loans originated by the bank in the Omaha, NE AA and the nonMSA AAs.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				State: Nebraska				Evaluation Period: January 1, 1997 to December 31, 1999				Total Home Mortgage Refinance Loans				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					#	% of Total***
	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overall	Low	Mod	Mid	Upp		
Full-Scope:																
Omaha, NE MSA # 5920	17%	8%	18%	14%	25%	25%	40%	53%	34	<1%	1%	<1%	1%	1%	282	87%
Limited-Scope:																
NonMSA Assessment Areas	17%	9%	21%	12%	27%	52%	35%	27%	3	10%	0%	7%	20%	8%	44	13%

(*) As a percentage of loans with borrower income information available. Information was available for all loans originated by the bank in the Omaha, NE AA and in the nonMSA AAs.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		State: Nebraska		Evaluation Period: January 1, 1998 to December 31, 1999					
MSA/Assessment Area:	Businesses with Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Market Share***		Total Small Loans to Businesses	
	% of Businesses*	% Bank Loans**	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less	#	\$ of Total ****
Full-Scope:									
Omaha, NE MSA # 5920	68%	69%	74%	16%	10%	8%	11%	1,103	83%
Limited-Scope:									
NonMSA Assessment Areas	74%	80%	89%	8%	3%	50%	57%	219	17%

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(**) 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 3% of small loans to businesses originated and purchased by the bank in the Omaha, NE AA and 5% in the nonMSA AAs.

(***) Based on 1998 Aggregate Small Business Data only.

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

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		State: Nebraska		Evaluation Period: January 1, 1998 to December 31, 1999					
MSA/Assessment Area:	Farms with Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Farm Size			Market Share***		Total Small Loans to Farms	
	% of Farms*	% Bank Loans**	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Revenues \$1 Million or Less	#	\$ of Total****
Full-Scope									
Omaha, NE MSA # 5920	95%	95%	87%	10%	3%	5%	6%	39	10%
Limited-Scope									
NonMSA Assessment Areas	97%	95%	95%	5%	0%	67%	68%	344	90%

(*) Farms with revenues of \$1 million or less as a percentage of all farms.

(**) 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 3% of small loans to farms originated and purchased by the bank in the Omaha, NE AA and 4% in the nonMSA AAs.

(***) Based on 1998 Aggregate Small Farm Data only.

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

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		State: Nebraska		Evaluation Period: January 1, 1998 to February 27, 2002					
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Omaha, NE MSA # 5920	0	\$0	31	\$420	31	\$420	99%	0	\$0
Limited-Scope:									
NonMSA Assessment Areas	0	\$0	3	\$2	3	\$2	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 bank's financial reporting system.

Table 13. Distribution of Branch and ATM Delivery Systems

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEMS				State: Nebraska				Evaluation Period: January 1, 1998 to March 13, 2000									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Omaha, NE MSA # 5920	74%	14	70%	0%	7%	72%	21%	1	3	NA	NA	+1	+1	6%	20%	43%	31%
Limited-Scope:																	
NonMSA Assessment Areas	26%	6	30%	NA	NA	100%	NA	1	0	NA	NA	-1	NA	NA	NA	100%	NA

Source: Bank Records.