



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**First National Bank & Trust Company of Columbus
Charter Number: 8328
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Columbus, Nebraska 68601**

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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 **First National Bank & Trust Company of Columbus** (FNB&T) with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank & Trust Company of Columbus 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:

- FNB&T’s lending levels reflected good responsiveness to assessment area (AA) credit needs. FNB&T’s volume of small loans to farms was excellent, and the bank’s volume of small loans to businesses was good.
- FNB&T had a good distribution of loans to borrowers of different income levels during the evaluation period. Performance was good for small loans to farms, small loans to businesses, home improvement loans, and home mortgage refinance loans. Performance was excellent for home purchase loans.
- FNB&T extended an adequate level of qualified investments. During the evaluation period, FNB&T provided \$163 thousand in qualified donations to 12 organizations. The bank did not have any qualified investment securities.
- FNB&T’s service delivery systems are reasonably accessible to individuals of different income levels in the AA.
- FNB&T employees provided a relatively high level of community development (CD) services to qualifying organizations in the AA.

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.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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 (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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 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 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).

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

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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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

FNB&T is a full-service financial institution headquartered in Columbus, Nebraska. The bank offers a full range of credit products within its AA including agricultural, commercial, residential real estate, and consumer loan products. The bank primarily focuses on agricultural and commercial lending. For purposes of the CRA evaluation, FNB&T is an intrastate bank with offices located only in Nebraska. As of July 21, 2003, the bank had four office locations and 14 automated teller machines (ATMs) in the Columbus/Norfolk AA. FNB&T is a subsidiary of First National Nebraska, Inc. (FNNI), a \$10.6 billion holding company that also owns nine other national banks and 2 state-chartered banks. There were no acquisition or merger activities related to FNB&T during the CRA evaluation period.

As of June 30, 2003, FNB&T had total assets of \$385 million and Tier 1 capital of \$32 million. The bank's loan-to-deposit ratio was 92 percent, and net loans represented 80 percent of total assets. By dollar amount, the loan portfolio consisted of 20 percent agricultural and agricultural real estate loans; 20 percent commercial and commercial real estate loans; 8 percent residential real estate loans; and 7 percent consumer loans. Credit card participations purchased from an affiliate bank represented the remaining 45 percent of the bank's loan portfolio. FNB&T sells a significant volume of residential real estate loans on the secondary market. These loans are not reflected in the above portfolio breakdown, but are included in the tables in appendix C. There were no known legal, financial, or other impediments that hampered FNB&T's ability to help meet the credit needs of its AA.

FNB&T received a Satisfactory rating at the last CRA examination dated May 15, 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans was January 1, 2000, through December 31, 2002. The evaluation for small loans to businesses and farms was January 1, 2000, through December 31, 2002. The evaluation period for CD loans, the investment test, and the service test was from May 16, 2000, through December 31, 2002.

Even though credit card participations represented the largest portion of the bank's loan portfolio, we did not include these loans in the borrower and geographic loan distribution analyses. An affiliate bank offers credit card loans nationwide. As a result, the vast majority of credit card borrowers are located outside FNB&T's AA. While analyzing lending activity, we considered whether the bank adequately met the needs of borrowers in the AA prior to acquiring credit card participations.

Data Integrity

As part of the CRA evaluation, we tested the accuracy of the bank's publicly filed information for small loans to businesses and farms, and the bank's voluntarily collected home mortgage data. We found no significant errors in the data.

We also reviewed CD loans, investments, and services submitted by FNB&T management to ensure they met a regulatory definition of CD. We found nearly all items presented for consideration qualified under one or more CD definition.

Selection of Areas for Full-Scope Review

FNB&T has only one AA. We performed a full-scope review of the bank's Columbus/Norfolk AA.

Ratings

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

In determining conclusions for the lending test, we weighted FNB&T's small loans to farms and businesses more heavily than home mortgage loans. The bank has historically focused on agricultural and commercial lending as its primary loan types in the AA. Please refer to Table 1 in appendix C for details.

Other

Community contacts identified affordable housing as the primary need in the Columbus/Norfolk AA. We interviewed representatives from two organizations during the examination; one from an affordable housing entity and one from an economic development organization. These organizations primarily focus on providing low-cost housing in the area, attracting new businesses to the AA, and on growth of existing businesses.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated High Satisfactory. This is based on a full-scope review of the Columbus/Norfolk AA.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for facts and data used to evaluate the bank's lending activity.

FNB&T's lending activity in the AA was good. The bank's volume of small loans to farms and small loans to businesses were the primary factors supporting this conclusion.

To analyze FNB&T's lending activity, we compared the bank's deposit market share with its lending market share for each loan product, where information was available. In comparing the market share percentages, we considered the fact that the deposit market share analysis included only deposit-taking financial institutions with one or more branches located in the AA. The lending market share calculations included lenders who did not have deposit-taking facilities in the AA, as well as some non-bank lenders. We did not expect FNB&T's deposit market share and lending market share percentages to match in order for performance to be considered good.

Based on FDIC deposit market share data as of June 30, 2002, there were 28 deposit-taking financial institutions with 62 offices in the five counties where FNB&T's AA is located. FNB&T was the largest of these institutions with a 19 percent deposit market share.

FNB&T's volume of small loans to farms was excellent, and the bank's volume of small loans to businesses was good. There were 14 lenders reporting one or more small loans to farms in the AA in 2001. FNB&T ranked second with a 32 percent market share. Also, there were 39 lenders reporting one or more small loans to businesses in the AA in 2001. FNB&T ranked second among these lenders with a 17 percent market share.

Market share data was not available for home mortgage lending since the bank was not a HMDA reporter.

FNB&T addresses local credit needs before purchasing credit card participations. During the evaluation period, FNNI policy required all affiliate banks to first help meet credit needs of their local AA. FNNI then made available credit card participations for affiliate banks to purchase with their excess liquidity.

Distribution of Loans by Income Level of the Geography

A comparison of FNB&T's lending activities to BNA demographics by tract income category is not meaningful. The AA includes only one low-income BNA and no moderate-income BNAs. The low-income BNA contains only thirty-one people, five LMI families, eleven owner-occupied housing units, and no businesses or farms. Refer to the Market Profile in appendix B for additional information regarding AA demographics.

Lending Gap Analysis

There were no conspicuous geographic gaps in the bank's small loans to businesses, small loans to farms, and home mortgage loans. This conclusion was determined by plotting FNB&T's loans on maps of the AA.

Inside/Outside Ratio

A high percentage of the bank's small loans to businesses, small loans to farms, and home mortgage loans were made in the AA. By number, FNB&T made 92 percent of small loans to businesses, 76 percent of small loans to farms, 83 percent of home purchase loans, 93 percent of home improvement loans, and 91 percent of home mortgage refinance loans within the AA. For all of these loan products combined, FNB&T made 82 percent of the number of loans within the AA.

Distribution of Loans by Income Level of the Borrower

FNB&T had a good distribution of loans to borrowers of different income levels during the evaluation period. Performance was good for small loans to farms, small loans to businesses, home improvement loans, and home mortgage refinance loans. Performance was excellent for home purchase loans.

Home Mortgage Loans

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

The borrower distribution of home purchase loans was excellent, and the distribution of home improvement and home mortgage refinance loans was good. FNB&T's percentage of home purchase loans to moderate-income borrowers was 1.5 times the percentage of moderate-income families in the AA. The bank's percentage of home improvement loans to moderate-income borrowers was below, but close to the percentage of moderate-income families in the AA. And, the percentage of home mortgage refinance loans to low-income borrowers nearly matched the percentage of low-income families in the AA.

Small Loans to Businesses

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

FNB&T's distribution of small loans to businesses with different revenues was good. The bank's percentage of reported loans to businesses with gross annual revenues of \$1 million or less was below the percentage of businesses in the AA with revenues of \$1 million or less. However, FNB&T's market share of small loans to businesses with revenues of \$1 million or less exceeded the bank's overall market share of small loans to businesses. Also, the bank made a substantial majority of small loans to businesses in amounts of \$100 thousand or less.

Small Loans to Farms

Refer to Table 12 in appendix C for facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

FNB&T's distribution of small loans to farms with different revenues was good. The bank's percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of farms in the AA with revenues of \$1 million or less. However, FNB&T's market share of small loans to farms with revenues of \$1 million or less matched the bank's overall market share of small loans to farms. Also, the bank made a substantial majority of small loans to farms in amounts of \$100 thousand or less.

Community Development Lending

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

FNB&T did not originate or purchase any CD loans during the evaluation period. Therefore, CD lending had a neutral impact on the Lending Test conclusions.

Even though the bank did not have any CD loans, FNB&T did provide one letter of credit in the amount of \$100 thousand to facilitate the financing of a 60 unit LMI elderly housing complex in Columbus in 2002. Although this letter of credit was not drawn upon, it facilitated the successful underwriting of the project by other creditors.

Product Innovation and Flexibility

FNB&T's participation in several flexible lending affordable housing programs had a positive impact on lending test conclusions. Loans made under these programs were considered as a part of the tables in appendix C.

During the evaluation period, FNB&T participated in the following flexible loan programs:

Rural Development Guaranteed Rural Housing 503 Program (RD) – FNB&T made 135 loans totaling \$8.3 million. RD loans offer 100 percent financing, no borrower closing costs, and monies for the rehabilitation of the property being purchased.

Nebraska Investment Finance Authority (NIFA) – FNB&T made 127 loans totaling \$6.9 million under the NIFA program. The NIFA 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.

First Down Nebraska/Federal Home Loan Bank – FNB&T made 105 loans totaling \$6.1 million under this program. First Down Nebraska is a program that was developed by an affiliate of FNB&T to make use of grant monies from the Federal Home Loan Bank to assist first time homebuyers with closing costs, down payments, and home rehabilitation costs. These grants represent forgivable second liens. The FNB&T affiliate that developed this loan program is responsible for verifying applicant qualifications and for obtaining grant monies from the Federal Home Loan Bank. The above loan totals represent loans made through the First Down Nebraska program and loans with direct Federal Home Loan Bank grants.

Federal Housing Administration (FHA) – FNB&T made 53 FHA loans totaling \$4 million. These loans offer low down payments, low closing costs, and generally more liberal underwriting than conventional mortgage loans.

Veterans Administration (VA) – The bank made 11 VA loans totaling \$1 million. This is a loan program sponsored by the federal government that offers 100 percent financing and low closing costs.

Northeast Economic Development, Inc. and Elkhorn Valley Community Development Down Payment Assistance Programs – FNB&T made 8 loans under these programs totaling \$487 thousand. These programs are offered to assist LMI homebuyers with down payment monies at 0 percent interest and no payments until the first mortgage is paid in full.

Rural Development Direct Leverage Guaranteed Program – FNB&T made 15 loans totaling \$367 thousand under this program. These loans are offered with second mortgages directly from Rural Development, with subsidized payments.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated low satisfactory. This is based on a full-scope review of the Columbus/Norfolk AA.

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

FNB&T extended an adequate level of qualified investments in the AA. During the evaluation period, FNB&T provided \$163 thousand in contributions to 12 organizations whose primary purposes were, affordable housing, CD services for LMI individuals, and economic development in the AA and in the statewide/regional area that includes the bank's AA. None of the donations were considered innovative or complex. Even so, the total qualified donation volume was adequate given the low level of CD opportunities in the AA (refer to the Market Profile in appendix B). FNB&T provided three donations to organizations addressing affordable housing, which was the most pressing CD need identified in the AA. FNB&T did not have any qualified investment securities during the evaluation period or any qualified investments from the prior evaluation period still outstanding.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated High Satisfactory. This based on a full-scope review of the Columbus/Norfolk AA.

Retail Banking Services

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

FNB&T's service delivery systems are reasonably accessible to individuals of different income levels in the AA. A map of FNB&T's offices revealed that there are no significant gaps in branch locations that would negatively impact LMI individuals in the AA. Sixty-nine percent of LMI families in the AA reside in either the BNAs where the bank's branches are located or in adjoining BNAs. The bank has not opened or closed any branches in the AA since the last CRA examination.

The bank's hours and services offered throughout the AA are good. Hours and services do not vary in a way that inconveniences the AA, including LMI individuals. FNB&T supplements its banking hours and services provided Monday through Friday with Saturday hours at all office locations. Services are comparable among locations.

FNB&T offers several alternative service delivery systems. The bank offers: Touch Tone Banking, a telephone banking service; Internet banking; 14 ATMs; direct deposit service; and banking by mail. No information was available on the effectiveness of these services in reaching LMI individuals. We did not place significant weight on these alternative delivery systems when drawing conclusions under the service test.

Community Development Services

FNB&T employees provided a relatively high level of CD services to qualifying organizations in the AA. Nine FNB&T associates, including the President and other bank officers, provided services to eleven CD organizations during the evaluation period. Bank associates provided the following CD services:

- A bank officer provided CD services to five affordable housing organizations. Services ranged from funding raising assistance to qualifying applicants for targeted loan programs. Through these services, FNB&T was able to help address the affordable housing needs of the AA.
- Bank associates provided financial expertise to four entities primarily offering CD services to LMI individuals in the AA. One FNB&T employee acted as the President of a CD organization, while others provided financial expertise in the form of financial management training to program clients, and through fund raising efforts.
- Two bank employees provided financial expertise to entities primarily involved in economic development in the AA. These activities involved membership on a council and assistance with client business plans.

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.

Time Period Reviewed	Lending Test (excluding CD Loans): 01/01/2000 to 12/31/2002 Investment Test: 05/16/2000 to 12/31/2002 Service Test: 05/16/2000 to 12/31/2002 CD Loans: 05/16/2000 to 12/31/2002	
Financial Institution		Products Reviewed
First National Bank & Trust Company of Columbus		Home Mortgage Loans, Small Loans to Businesses, Small Loans to Farms, and Community Development Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
First National Bank of Omaha	Affiliate Bank	Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Columbus/Norfolk	Full-Scope	The assessment area includes 19 BNAs in Butler, Colfax, Madison, Platte, and Polk Counties in Nebraska.

Appendix B: Market Profile for Full-Scope Area

Columbus/Norfolk Assessment Area

Demographic Information for Full-Scope Area: (Name of MA or Non-metropolitan Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	5%	NA	79%	16%	NA
Population by Geography	70,141	0%	NA	77%	23%	NA
Owner-Occupied Housing by Geography	18,196	0%	NA	77%	23%	NA
Businesses by Geography	4,566	0%	NA	81%	19%	NA
Farms by Geography	1,021	0%	NA	91%	9%	NA
Family Distribution by Income Level	18,578	13%	18%	25%	44%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,714	0%	NA	86%	14%	NA
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$27,623 = \$45,800 = 10%	Median Housing Value Unemployment Rate **				= \$45,690 = 4.7%

* The NA category consists of geographies that have not been assigned an income classification.

** Nebraska Department of Labor (average for the five counties in the bank's AA for July 2003)

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

FNB&T designates 19 contiguous BNAs in Butler, Colfax, Madison, Platte, and Polk Counties, Nebraska as its AA. FNB&T's head office, three branches, and 14 ATMs were located within this AA. Only one of the AA BNAs is low-income and none are moderate-income. We consider the low-income BNA insignificant to our CRA analysis since it contains only thirty-one people, five LMI families, eleven owner-occupied housing units, and no businesses or farms. There are no opportunities to make small loans to businesses or farms and very limited opportunities to make mortgage loans.

The bank's deposits in the Columbus/Norfolk AA totaled approximately \$346 million as of June 30, 2002. Based on FDIC deposit market share data as of that date, this equated to a 19 percent deposit market share and ranked FNB&T as the largest deposit taking financial institution in the AA.

Competition among financial institutions in the AA is strong. Twenty-eight deposit taking financial institutions operated 62 banking offices in the five counties that include FNB&T's AA as of June 30, 2002. Major competitors included Pinnacle Bank, Elkhorn Valley Bank & Trust, and U.S. Bank, N.A.

The AA economy has declined since the last CRA examination in 2000. The unemployment rate for the bank's AA has increased from 2.8 percent to 4.7 percent. While this still compares favorably with the national unemployment rate of 6.2 percent for July 2003, it reveals an overall slowdown in the economy that coincided with the national slowdown. Major employers in the area include: Appleton Electric, BD Medical Supplies, Behlen Manufacturing, Dale Electronics, and Lindsay Manufacturing.

A low level of resources and opportunities exist to facilitate activities to address unmet credit and community development needs in the AA. Examiners conducted two community contacts during this CRA examination. These contacts included one economic development entity and one affordable housing entity. Community contacts identified a lack of affordable housing as the primary unmet need in the Columbus/Norfolk AA, but identified few resources addressing this need.

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 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/AA. 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/AA.
- 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 AA.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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 AA.
- 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/AA. 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 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 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/AA.

- 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.
- 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		Geography: NEBRASKA						Evaluation Period: January 1, 2000 to December 31, 2002				
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)	
Full Review:												
Columbus/Norfolk	100%	482	33,357	1,179	87,077	2,073	125,591	0	\$0	3,734	246,025	100%

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is May 16, 2000 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to 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, 2002							
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	Upp
Full Review:															
Columbus/Norfolk	291	100%	0%	0%	NA	NA	77%	72%	23%	28%	NA	NA	NA	NA	NA

* Market share data is not available since FNB&T is not a HMDA reporter.

** 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.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEBRASKA				Evaluation Period: January 1, 2000 to December 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Improvement 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	Upp	
Full Review:																
Columbus/Norfolk	63	100%	0%	0%	NA	NA	77%	54%	23%	46%	NA	NA	NA	NA	NA	

* Market share data is not available since FNB&T is not a HMDA reporter.

** 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.

*** 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.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEBRASKA				Evaluation Period: January 1, 2000 to December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Columbus/Norfolk	128	100%	0%	0%	NA	NA	77%	62%	23%	38%	NA	NA	NA	NA	NA	

* Market share data is not available since FNB&T is not a HMDA reporter.

** 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.

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, 2002							
MA/Assessment Area:	Total Small Loans to Businesses		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	Overall	Low	Mod	Mid	Upp
Full Review:															
Columbus/Norfolk	1,179	100%	0%	0%	NA	NA	81%	64%	19%	36%	17%	0%	NA	14%	35%

^{*} Based on 2001 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 2002.

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, 2002						
MA/Assessment Area:	Total Small Loans to Farms		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	Mid	Upp
Full Review:															
Columbus/Norfolk	2,073	100%	0%	0%	NA	NA	91%	73%	9%	27%	32%	0%	NA	27%	76%

* Based on 2001 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 2002.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: NEBRASKA						Evaluation Period: January 1, 2000 to December 31, 2002						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Columbus/Norfolk	291	100%	13%	9%	18%	28%	25%	31%	44%	32%	NA	NA	NA	NA	NA

* Market share data is not available since FNB&T is not a HMDA reporter.

** 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 Families is based on the 1990 Census information.

**** As a percentage of loans with borrower income information available. Income information was not available for 2% of home purchase loans originated and purchased by the bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: NEBRASKA				Evaluation Period: January 1, 2000 to December 31, 2002									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp	
Full Review:																
Columbus/Norfolk	63	100%	13%	5%	18%	16%	25%	38%	44%	41%	NA	NA	NA	NA	NA	

^{*} Market share data is not available since FNB&T is not a HMDA reporter.

^{**} 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.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} As a percentage of loans with borrower income information available. Income information was not available for 1% of home improvement loans originated and purchased by the bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEBRASKA				Evaluation Period: January 1, 2000 to December 31, 2002									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Columbus/Norfolk	128	100%	13%	12%	18%	9%	25%	26%	44%	53%	NA	NA	NA	NA	NA	

* Market share data is not available since FNB&T is not a HMDA reporter.

** 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 Families is based on the 1990 Census information.

**** As a percentage of loans with borrower income information available. Income information was not available for 9% of home mortgage refinance loans originated and purchased by the bank.

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, 2002				
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 *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Columbus/Norfolk	1,179	100%	78%	70%	84%	9%	7%	17%	19%

* Based on 2001 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.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** 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 9% 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, 2002				
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 *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Columbus/Norfolk	2,073	100%	96%	87%	85%	10%	5%	32%	32%

* Based on 2001 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.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** 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 7% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEBRASKA				Evaluation Period: May 16, 2000 to December 31, 2002			
MA/Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Columbus/Norfolk	0	\$0	11	\$33	11	\$33	20%	0	\$0
Statewide/Regional	0	\$0	1	\$130	1	\$130	80%	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: May 16, 2000 to December 31, 2002									
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	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbus/Norfolk	100%	4	100%	0%	NA	75%	25%	0	0	0	NA	0	0	0%	NA	77%	23%