



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

May 13, 2002

### Community Reinvestment Act **Performance Evaluation**

Security National Bank of Omaha  
Charter Number: 15379

3500 Farnam Street  
Omaha, Nebraska 68131

#### Office of the Comptroller of the Currency

Omaha North Field Office  
13710 FNB Parkway, Suite 110  
Omaha, Nebraska 68154

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, 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 **Security National Bank of Omaha (SNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Security National Bank of Omaha 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:

- The geographic distribution of SNB’s reported loans reflect good penetration throughout the assessment area (AA).
- SNB’s reported loans reflect a good dispersion among borrowers of different income levels and businesses of different sizes.
- The bank provided an excellent volume of community development (CD) loans. Qualified CD loans totaled \$10.6 million.
- SNB provided an adequate level of qualified donations. The bank made \$173 thousand in donations to community development organizations and to programs of other organizations that specifically target the needs of low- and moderate-income (LMI) individuals. The bank did not have any qualified investment securities.
- SNB’s service delivery systems provided reasonable access to all geographies and individuals of different income levels in the Omaha Metropolitan Statistical Area (MSA).
- Bank personnel provided excellent responsiveness to the needs of the community through numerous CD services offered to local community development entities, including several organizations that primarily focus on affordable housing needs of the Omaha MSA.

## 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:** A loan 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:** 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 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:** 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

SNB is a full-service financial institution headquartered in Omaha, Nebraska. The bank offers a full range of credit products within its AA including commercial, real estate, and consumer loan products. The bank's primary business focus is commercial lending.

For purposes of the CRA evaluation, SNB is an intrastate bank with offices located only in Nebraska. As of May 13, 2002, the bank had 9 office locations and 53 automated teller machines (ATMs) in the Omaha MSA.

Security National Corporation (SNC) owns 100% of the bank. SNC is a one-bank holding company headquartered in Omaha, Nebraska. There were no acquisition or merger activities during the evaluation period.

As of December 31, 2001, SNB had total assets of \$371 million and Tier 1 capital of \$29 million. The bank's loan-to-deposit ratio was 86% and net loans represented 72% of total assets. By dollar amount, the loan portfolio consisted of 54% commercial and commercial real estate loans; 19% one- to four-family residential real estate loans; 12% consumer loans; 12% other real estate loans; and 3% other loans. There were no known legal, financial, or other impediments that hampered SNB's ability to help meet the credit needs of its AA.

SNB received a Satisfactory rating at the last CRA examination dated August 8, 1997. SNB was rated as a small bank during the last CRA examination.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans was January 1, 1998 through December 31, 2001. The evaluation period for small loans to businesses and farms was January 1, 2000 through December 31, 2001. The evaluation period for CD loans, the investment test, and the service test was from January 1, 2000 through May 13, 2002. The period of review for mortgage loans was longer since the bank has been subject to HMDA data collection longer than it has been subject to CRA loan data collection.

### Data Integrity

As part of the CRA evaluation, we tested the accuracy of the bank's publicly filed information on HMDA loans and small loans to businesses and farms. We found no significant errors in the collected data and determined publicly filed data was accurate.

We also reviewed CD loans, investments, and services submitted by SNB management to ensure they met a regulatory definition of CD. We excluded from this evaluation a few items submitted for consideration because they did not meet a CD definition.

### Selection of Areas for Full-Scope Review

SNB has only one AA. We performed a full-scope review of the bank's Omaha MSA 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 loan products to reflect SNB's loan volume by product type during the evaluation period. We weighted small loans to businesses more heavily than other reported loan products as small loans to businesses represented 52% of the total number of reported loans in the AA. In addition, the evaluation period for small loans to businesses was only two years versus four years for home loans due to a change in reporting requirements for the bank beginning January 1, 2000. Approximately 27% of the number of all reported loans were home improvement loans, 11% were home mortgage refinance loans, and 6% were home purchase loans.

Small loans to farms carried no weight in our analysis of lending performance. These loans represented less than 1% of the total number of reported loans. Also, community contacts did not list these loans as unmet credit needs in the AA.

### Other

Community contacts identified small business financing, affordable housing, and rehabilitation of (LMI) neighborhoods as primary needs in the Omaha MSA. We reviewed three community contacts completed in the Omaha AA in the six months prior to the start this CRA examination. Organizations contacted included a government office, an economic development

organization, and an affordable housing organization. The organizations focused on lending programs for small businesses, economic development, affordable housing for LMI individuals, and revitalizing properties and increasing homeownership in LMI neighborhoods.

## Fair Lending Review

An analysis of the most recent public comments, consumer complaint information, HMDA, and 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.

## 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 Omaha MSA AA.

#### Lending Activity

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

SNB's lending activity in the AA was good. The bank's volumes of small loans to businesses and home improvement loans were the primary factors supporting this conclusion.

To analyze SNB's lending activity, we compared the bank's deposit market share with its lending market share for each loan product. 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 a significant number of lenders who did not have deposit-taking facilities in the AA, as well as a large number of non-bank lenders. We did not expect SNB'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, 2001, there were 53 deposit taking financial institutions with one or more banking offices in the bank's AA. SNB was the seventh largest of these institutions with a 3% deposit market share.

The bank's volume of small loans to businesses and home improvement loans was good. There were 71 lenders reporting one or more small loans to businesses in the AA in 2000. SNB ranked tenth among these lenders with a 5% market share. Also, there were 83 lenders reporting one or more home improvement loans in the AA in 2000. SNB ranked ninth among these institutions with a 3% market share.

The bank's home mortgage refinance lending activity was adequate. SNB ranked 54th with a 0.41% market share. While this was below the bank's deposit market rank and share, we recognized the significant competition for these loans, as 204 lenders reported home mortgage refinance loans in 2000 in the AA. We also considered the fact that this loan product was not a primary business focus for the bank, as home mortgage refinance loans represented only 11% of all of the bank's reported loans during the evaluation period.

The bank's volume of home purchase loans was also adequate. For 2000, SNB ranked 77th with a 0.16% market share. While this was below the bank's deposit market rank and share, we again considered the significant competition for these loans, as 228 lenders reported one or more home purchase loans in the AA during 2000. We also considered the fact that this

loan product was not a primary business focus for the bank, as home purchase loans represented only 6% of all of the bank's reported loans during the evaluation period.

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

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

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in appendix C for facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's geographic distribution of home improvement loans was good. While SNB's percentage of loans originated in low-income census tracts was excellent, the percentage originated in moderate-income census tracts was well below the percentage of owner-occupied housing units in those tracts, but was still considered adequate. Market share performance was good, as SNB's market share of home improvement loans in LMI census tracts was comparable to the bank's overall market share for these products.

The bank's geographic distribution of home purchase loans, home mortgage refinance loans, and multifamily loans was excellent. SNB's percentage of loans in low-income and moderate-income tracts equaled or exceeded the percentage of owner occupied housing units in these tracts for home purchase and home mortgage refinance loans. SNB's percentage of multifamily loans equaled the percentage of multifamily units in low-income tracts and was nearly two and one-half times the percentage of multifamily units in moderate-income tracts. Market share performance was adequate for home purchase loans and home mortgage refinance loans at less than 1%, as these products were not the primary business focus of the bank. Market share for multifamily loans was excellent in moderate-income census tracts, as it exceeded the bank's overall multifamily market share.

### ***Small Loans to Businesses***

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

SNB's geographic distribution of small loans to businesses in the AA was good. The bank's percentage of loans made in low-income census tracts was below the percentage of businesses located in those tracts, but was still good. For moderate-income census tracts, the bank's percentage of small loans to businesses was below the percentage of businesses located in those tracts, but was also considered good. Market share performance was also good, as SNB's market share for small loans to businesses in low-income and moderate-income tracts nearly met the bank's overall market share for small loans to businesses in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in appendix C for facts and data regarding the geographic distribution of the bank's origination/purchase of small loans to farms. We did not analyze small loans to farms due to the small volume.

### ***Lending Gap Analysis***

Review of maps of SNB's home mortgage loans and small loans to businesses did not reveal any conspicuous gaps in the geographic distribution of loans in the Omaha AA. While SNB did not have a reported loan in every census tract, minor gaps were easily explained by the lack of an SNB branch and the presence of other banks in or near these tracts.

### ***Inside/Outside Ratio***

A substantial percentage of the bank's home mortgage loans and small loans to businesses were originated or purchased in the AA. By number of reported loans, SNB originated 89% of home purchase loans, 97% of home improvement loans, 87% of home mortgage refinance loans, 93% of multifamily loans, and 93% of small loans to businesses within the bank's AA. For all of these loan products combined, SNB originated 93% of the number of reported loans within its AA.

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

The borrower distribution of SNB's reported loans reflected a good dispersion among borrowers of different income levels in the AA. Performance was good for small loans to businesses and excellent for home improvement loans. Performance was adequate for home purchase loans and home mortgage refinance 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 improvement loans was excellent, and the distribution of home purchase and home mortgage refinance loans was adequate. SNB's percentage of home improvement loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and nearly matched the percentage of low-income families in the AA. The bank's percentage of home purchase and home mortgage refinance loans to low- and moderate-income borrowers was below the percentage of families in these income categories.

Market share for home improvement loans was also excellent and was adequate for home purchase and home mortgage refinance loans. SNB's market share for home improvement loans to low-income borrowers exceeded the bank's overall home improvement market share and matched the overall market share for moderate-income borrowers. The bank had less than 1% market share in home purchase and home mortgage refinance loans to low-income and moderate-income borrowers. This performance is considered adequate since home purchase and home mortgage refinance loans are not primary product lines for the bank.

### ***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.

The bank's borrower distribution of small loans to businesses was good. SNB'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, the bank's percentage was above the comparable percentage for all lenders reporting small loans to businesses in the AA in 2000. SNB's market share performance was excellent for small loans to businesses, with the bank's market share of loans to businesses with revenues of \$1 million or less exceeding the bank's overall market share of small loans to businesses. The bank's percentage of small loans to businesses in amounts of \$100 thousand or less was good at 77%.

### ***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. We did not analyze small loans to farms due to the small volume.

### **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. This table includes all CD loans, including multifamily loans that also qualified as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

SNB's CD lending had a positive impact on lending test conclusions. This was based primarily on the bank's excellent volume of CD loans originated in the Omaha AA. SNB originated 35 CD loans totaling \$10.6 million during the evaluation period. This dollar volume represented 36% of Tier 1 capital. While we did not consider any of the bank's CD loans complex, we noted that 91% of the number of these loans and 97% of the dollar volume were for affordable housing which was an identified need in the Omaha MSA AA.

### **Product Innovation and Flexibility**

During the evaluation period, SNB 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.

SNB 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, 1999, 2000, and 2001, the bank originated 62 NIFA loans totaling \$4.4 million.

SNB 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. During 1998, 1999, 2000, and 2001, SNB originated 52 loans under this program totaling \$407 thousand. The bank also participated in the City of Omaha's Reinvestment Area Program (RAP) during this period. 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. This program was not funded by the city during 2001. During 1999 and 2000, SNB originated 3 RAP loans totaling \$47 thousand. The bank did not have complete information for RAP loans originated during 1998.

The bank also participated in affordable housing loans through Omaha 100. This program works with a consortium of lenders to provide low cost home loans to LMI borrowers. During 1998, 1999, 2000, and 2001, SNB participated in 31 Omaha 100 loans. SNB's share of these loans totaled \$125 thousand.

## **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 Omaha MSA AA.

Refer to Table 13 in appendix C for facts and data used to evaluate the bank's level of qualified investments.

SNB extended an adequate level of qualified investments in the Omaha AA. During the evaluation period, SNB provided \$172,880 in contributions to 58 organizations whose primary purposes were to provide various community development services to LMI individuals in the Omaha AA. None of the donations were considered innovative or complex. Also, most donations were responsive to community development needs other than the most pressing needs identified in the AA; small business financing, affordable housing, and home rehabilitation needs. Even so, total qualified donation volume was adequate given the community development opportunities in the AA (refer to the market profile in appendix B). SNB 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 is based on a full scope review of the Omaha MSA AA.

#### **Retail Banking Services**

Refer to Table 14 in appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

SNB's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Omaha AA. The bank did not have any branches in low-income census tracts. In addition, the percentage of the bank's branches in moderate-income tracts was considerably below the percentage of the population that resided in these areas. These concerns were mitigated because two of the bank's branches are located in tracts that are surrounded by LMI census tracts. Thus, these two branches provided reasonable access for residents of several LMI census tracts in the Omaha MSA AA. SNB did not open or close any branches during the service test evaluation period.

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, including LMI geographies or individuals. SNB supplements its banking hours and services provided Monday through Friday with Saturday hours at all branches, except the main bank lobby. Office hours and services are comparable among locations regardless of the income level of the geography.

SNB offers good alternative retail banking delivery services. The bank had 53 ATMs that enhanced its branch banking network to better serve LMI individuals and geographies. Of the bank's ATMs, 2% were located in low-income tracts and 24% were located in moderate-income tracts, which compares favorably with the percentage of population in these geographies.

The bank also offered several other alternative delivery systems. These included: Tellie, a telephone banking service; SNBConnect - OnLine Banking Center; and direct deposit services. These delivery systems are generally available 24 hours a day, 7 days a week without customer usage fees. Tellie and SNBConnect allow customers to check account balances and transfer funds. 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**

The responsiveness of CD services provided by SNB employees was excellent. Fifteen SNB employees, including the President and other bank officers, provided CD services to 20 different community development organizations during the evaluation period. Thirty-five percent of the organizations benefiting from these services were primarily engaged in providing affordable housing, which was a primary need identified in the AA. Many of the CD services

involved leadership roles, including membership on Boards of Directors and officer positions. Other services involved grant writing and other types of fundraising.

## 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 a comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): Mortgage Loans: 01/01/1998 to 12/31/2001 CRA Business Loans: 01/01/2000 to 12/31/2001 Investment and Service Tests and CD Loans: 01/01/2000 to 05/13/2002	
		<b>Products Reviewed</b>
Security National Bank of Omaha (SNB) Omaha, Nebraska		Home mortgage loans, small loans to businesses, and community development loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
No affiliate products reviewed.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Omaha, NE MSA #5920	Full-Scope	Metropolitan AA consisting of Douglas, Sarpy, and Washington Counties

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

### Omaha, NE MSA #5920 (Douglas, Sarpy, and Washington Counties)

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)	134	11%	26%	39%	23%	1%
Population by Geography	535,634	6%	20%	44%	30%	NA
Owner-Occupied Housing by Geography	126,901	3%	16%	48%	33%	NA
Businesses by Geography	22,877	4%	13%	44%	39%	NA
Farms by Geography	1,084	1%	5%	68%	26%	NA
Family Distribution by Income Level	139,541	17%	18%	25%	40%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,421	11%	32%	43%	14%	NA
Median Family Income = \$36,011						
HUD Adjusted Median Family Income for 2001 = \$62,400						
Households Below the Poverty Level = 10%						
			Median Housing Value = \$60,345			
			Unemployment Rate (2001) = 3%			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

SNB designated all of Douglas, Sarpy, and Washington Counties as its AA. All of these counties are located in the State of Nebraska in the Omaha MSA, which consists of five counties, including one county in Iowa. SNB designated 134 contiguous census tracts within the MSA as its AA since this is where the majority of the bank's lending and banking services were available. SNB's head office, 8 branches, and 53 ATMs were located within the Omaha AA. Over the evaluation period, the bank derived 93% of its reported home mortgage loans and 93% of its reported small loans to businesses from the Omaha MSA AA. The bank excluded only those counties of the Omaha MSA where it could not reasonably serve the banking needs due to the distance from an SNB office. The bank did not arbitrarily exclude any LMI geographies. Other banking institutions serve the remaining areas of the Omaha MSA where SNB does not have offices.

The bank's deposits in the Omaha AA totaled approximately \$295 million as of June 30, 2001. Based on FDIC deposit market share data as of that date, this equated to a 3% deposit market share and ranked SNB as the seventh largest deposit taking financial institution in the AA. The six largest financial institutions were considerably larger than SNB with total deposits ranging from approximately \$400 million to \$3 billion. These banks had deposit market shares ranging from 4% to 32%.

Competition among financial institutions was strong. Over 50 deposit taking financial institutions operated over 240 banking offices in SNB's AA as of June 30, 2001. Major

competitors included First National Bank of Omaha, Wells Fargo, U.S. Bank, N.A., Commercial Federal Bank, Great Western Bank, and American National Bank. Numerous mortgage companies also competed for home mortgage loans.

The economy was strong. The Omaha MSA 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. A well-diversified economy helps the Omaha MSA maintain an unemployment rate below the national rate. The 2001 annual average unemployment rate for the metro Omaha area was 3.0%, compared to the U.S. unemployment rate of 4.8%. 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 reviewed 3 community 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. The contacts listed small business lending, affordable housing, and housing rehabilitation as the primary needs of the Omaha MSA.

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. However, movement to address these needs has been somewhat limited. For example, there is only one community development financial institution in the MSA.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: 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 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. 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 14. 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						<b>Evaluation Period:</b> January 1, 1998 to December 31, 2001 for HMDA Data January 1, 2000 to December 31, 2001 for CRA Business/Farm Data January 1, 2000 to May 13, 2002 for Community Development Loans						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Omaha, NE MSA #5920	100%	840	\$50,476	934	\$94,252	3	\$765	35	\$10,567	1,812	\$156,060	100%

\* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is January 1, 2000 to May 13, 2002.

\*\*\* Deposit Data as of June 30, 2001. 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, 1998 to December 31, 2001							
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 Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha, NE MSA #5920	110	100%	3%	6%	16%	21%	48%	39%	33%	34%	0%	1%	0%	0%	0%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT		Geography: NEBRASKA								Evaluation Period: January 1, 1998 to December 31, 2001					
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 Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha, NE MSA #5920	490	100%	3%	6%	16%	11%	48%	40%	33%	43%	3%	2%	3%	2%	4%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

\*\* 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, 1998 to December 31, 2001				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha, NE MSA #5920	199	100%	3%	3%	16%	18%	48%	35%	33%	44%	0%	0%	0%	0%	1%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: MULTIFAMILY		Geography: NEBRASKA								Evaluation Period: January 1, 1998 to December 31, 2001					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha, NE MSA #5920	41	100%	12%	12%	22%	54%	38%	27%	28%	7%	5%	0%	8%	5%	0%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

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

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

**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, 2001					
MA/Assessment Area:	Total Small Loans to Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Omaha, NE MSA #5920	934	100%	4%	3%	13%	11%	44%	41%	39%	45%	5%	4%	4%	5%	5%

<sup>\*</sup> Based on 2000 Peer Small Business Data: US.

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet 2001.

**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, 2001						
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
<b>Full Review:</b>															
Omaha, NE MSA #5920	3	100%	1%	0%	5%	0%	68%	67%	26%	33%	1%	0%	0%	1%	2%

\* Based on 2000 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 2001.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEBRASKA								Evaluation Period: January 1, 1998 to December 31, 2001					
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
<b>Full Review:</b>															
Omaha, NE MSA #5920	110	100%	17%	4%	18%	13%	25%	18%	40%	65%	0%	0%	0%	0%	0%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No income information was available for 5% of home purchase loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: NEBRASKA								Evaluation Period: January 1, 1998 to December 31, 2001					
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
<b>Full Review:</b>															
Omaha, NE MSA #5920	490	100%	17%	16%	18%	21%	25%	25%	40%	38%	3%	5%	3%	3%	3%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No income information was available for 1% of home improvement loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEBRASKA								Evaluation Period: January 1, 1998 to December 31, 2001					
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
<b>Full Review:</b>															
Omaha, NE MSA #5920	199	100%	17%	11%	18%	14%	25%	16%	40%	59%	0%	0%	0%	0%	1%

\* Based on 2000 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No income information was available for 5% of home mortgage refinance loans originated and purchased by the bank.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEBRASKA		Evaluation Period: January 1, 2000 To December 31, 2001				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1million 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
<b>Full Review:</b>									
Omaha, NE MSA #5920	934	100%	85%	67%	77%	12%	11%	5%	7%

\* Based on 2000 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 - 2001). Revenue information was not available for 4% of businesses in the rated area.

\*\*\*\* 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 5% of small loans to businesses originated and purchased by the bank.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: NEBRASKA			Evaluation Period: January 1, 2000 To December 31, 2001			
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
<b>Full Review:</b>									
Omaha, NE MSA #5920	3	100%	94%	100%	33%	33%	34%	1%	1%

\* Based on 2000 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 - 2001). Revenue information was not available for 1% of all farms in the rated area.

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. Revenue information was available for 100% of small loans to farms originated and purchased by the bank.

**Table 13. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEBRASKA				Evaluation Period: January 1, 2000 to May 13, 2002			
MA/Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Omaha, NE MSA #5920	0	\$0	58	\$173	58	\$173	100%	0	\$0

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

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

**Table 14. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEBRASKA																	
Evaluation Period: January 1, 2000 to May 13, 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
<b>Full Review:</b>																	
Omaha, NE MSA #5920	100%	9	100%	0%	11%	45%	44%	0	0	0	0	0	0	6%	20%	44%	30%