



**SMALL BANK**

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Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

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## **PUBLIC DISCLOSURE**

**January 29, 2004**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**The First National Bank and Trust Company of Minden  
Charter Number 3057**

**315 East Fourth Street  
Minden, NE 68959**

**Office of the Comptroller of the Currency  
Omaha South Field Office  
13710 FNB Parkway, Suite 110  
Omaha, NE 68154**

**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

## INSTITUTION'S CRA RATING

### **This institution is rated Satisfactory.**

- The bank had a reasonable record of lending to farms of different sizes.

The distribution of agricultural borrowers reflected reasonable penetration among farms of different sizes. Based on 20 borrowers sampled, we found that most of the bank's agricultural lending was to either farms with revenues of less than \$100 thousand, or farms with revenues ranging from \$250 thousand to \$500 thousand. This is reasonable, as information from the U.S. Census Bureau's 1997 Census of Agriculture indicates that many of the farms in the bank's Assessment Area (AA) are small, with revenues of less than \$100 thousand. Census information also indicates that the average farm in Kearney County, where the bank is located, has gross annual sales of \$400 thousand. Thus, the bank's lending helps meet the needs of both the smallest farms in the AA as well as the more moderate-sized farms that represent the average for the AA.

- The bank had a satisfactory record of lending to businesses of different sizes.

The distribution of commercial borrowers reflected good penetration among businesses of different sizes. Business demographic data from 2003 reveals that 62% of the businesses in the bank's AA are small, with revenues of less than \$1 million and 7% are large, with revenues over \$1 million. The remaining 31% of businesses did not report revenue information. Based on 20 borrowers sampled, the bank does a good job of lending to these small businesses, with 90% of loans made to businesses with revenues of less than \$1 million.

- The bank originated a majority of its loans in the AA. For commercial loans sampled, the bank originated 90% by number and 98% by dollar amount within its AA. For agricultural loans sampled, the bank originated 70% by number and 56% by dollar amount in the AA.
- The bank's average loan-to-deposit ratio since the last examination was reasonable. It averaged 73% over the past 17 quarters, and was comparable with the ratios of similarly situated banks in the AA. Competing banks' ratios ranged from 51% to 79%.
- A geographic analysis of the bank's lending was not meaningful, as the AA consists of only middle-income geographies.
- The bank did not receive any complaints about its performance in helping to meet AA credit needs during the evaluation period.
- We found no evidence of illegal discrimination or other illegal credit practices.

## **DESCRIPTION OF INSTITUTION**

The First National Bank and Trust Company of Minden (FNB&T) is a \$52MM institution located in south central Nebraska. The bank's primary loan products by dollar amount were agricultural and commercial loans. FNB&T received a "Satisfactory" rating at the last CRA examination, dated September 20, 1999. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the AA. Examiners contacted a member of the community involved with a local small business organization, who indicated that community credit needs include agricultural loans, small business loans, and home loans. FNB&T makes all of these types of loans, but concentrates on agricultural and commercial loans. Refer to the bank's CRA Public File for more information.

## **DESCRIPTION OF ASSESSMENT AREA**

The bank's AA encompassed four contiguous block numbering areas (BNAs), including both BNAs in Kearney County, the southernmost BNA in Buffalo County, and the northern BNA in Franklin County. The bank's AA meets the requirements of the regulation and does not arbitrarily exclude any low- and moderate-income areas. The four BNAs that comprise the AA are all designated middle-income. Refer to the bank's CRA Public File for more information.