



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 10, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Security National Bank of Omaha
Charter Number 15379

1120 S. 101st Street
Omaha, NE 68124

Office of the Comptroller of the Currency

13710 FNB Parkway
Suite 110
Omaha, NE 68154-5298

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 Outstanding.

The lending test is rated: Outstanding

The community development test is rated: Outstanding

The major factors that support this rating include:

- Security National Bank of Omaha's (SNB) loan-to-deposit ratio (LTD) is reasonable when considering the bank's size, financial condition, and the credit needs of its assessment area (AAs).
- Management originates and purchases a substantial majority of its loans to customers in the bank's AAs.
- SNB's distribution of loans to businesses of different sizes is satisfactory.
- SNB's geographic distribution of loans to census tracts (CTs) of different income levels is outstanding.
- There were no complaints regarding the bank's performance in meeting the credit needs of its AA.
- Community development (CD) activities represent excellent responsiveness to AA needs and opportunities.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. SNB's average LTD ratio was 77 percent for the 12 quarters from March 31, 2018, to December 31, 2020. The ratio ranged from a quarterly low of 60 percent and a quarterly high of 94 percent.

SNB's average LTD ratio is comparable to the average LTD ratio of other community banks operating in SNB's AAs. The average quarterly LTD ratio for competitor banks was 96 percent for the 12 quarters from March 31, 2018 to December 31, 2020. The ratio ranged from an average quarterly low of 93 percent to an average quarterly high of 99 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 90 percent of its loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Business Loans	18	90.0	2	10.0	20	9,900	99.0	51	1.0	9,951

Description of Institution

SNB is a multistate financial institution headquartered in Omaha, Nebraska. SNB had total assets of \$1.1 billion and tier 1 capital of \$116 million as of December 31, 2020. SNB is wholly owned by Security National Corporation, a one-bank holding company in Omaha, Nebraska. As of December 31, 2020, Security National Corporation had total assets of \$125 million.

SNB maintains operations in Nebraska, Iowa, and Texas. SNB operates 12 branch locations, including their main branch. Branches are in Omaha, Nebraska, Council Bluffs and West Des Moines, Iowa, and Dallas, Texas. SNB operates 45 automated teller machines (ATMs), of which 11 are deposit-taking. All ATMs are within the bank's three assessment areas, with 43 in the Omaha-Council Bluffs NE-IA MMSA, one in the Des Moines-West Des Moines IA MSA, and one in the Dallas-Plano-Irving TX MSA. SNB did not merge with or acquire any banking institutions during the evaluation period.

SNB's primary business focus is consistent with the traditional community bank model. SNB offers a full range of credit products within its AAs, including commercial, home mortgage, and consumer loans. As of December 31, 2020, total loans were \$724 million and represented 68 percent of total assets. The December 31, 2020 call report identifies \$603 million in business loans, \$74 million in home mortgage loans, \$44 million in consumer loans, and \$2 million in agricultural loans.

In addition to lending products, SNB offers a wide range of retail deposit products including free online and mobile banking, free debit cards, and free mobile deposit with all checking accounts.

There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. SNB received a satisfactory rating in its last Performance Evaluation dated December 3, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

SNB was evaluated under the Intermediate Small Bank examination procedures, which include a Lending Test and a CD Test for the Omaha-Council Bluffs NE-IA multi-state MSA, the State of Iowa, and the State of Texas. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD test evaluates the bank's record of

responding to the CD needs of its AAs through CD lending and providing qualified investments, donations, and services.

The Lending Test covers SNB's performance from January 1, 2018 to December 31, 2020. The Lending Test evaluated business loans originated during the evaluation period for all three AAs. Business loans are the primary loan product originated by SNB from each of their AAs during the evaluation period. The following table summarizes the percentage of loan originations by loan type over the evaluation period.

Loan Originations		
Loan Type	% by Number	% by Dollar
Business Loans	65%	84%
Consumer Loans	30%	13%
Home Loans	5%	3%
Agricultural Loans	0%	0%

Source: Bank-provided loan origination reports; 2018-2020

To evaluate lending performance, we selected a sample of business loans originated and purchased during the evaluation period. The CD Test covers SNB's performance from January 1, 2018 to December 31, 2020. We reviewed all CD loans, investments, donations, and services submitted by SNB management to ensure they met the regulatory definition of CD. We excluded some items submitted for consideration because they did not meet the definition or purpose of CD.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The rating for the Omaha-Council Bluffs NE-IA MMSA was weighted more heavily than the rating for the State of Iowa or the State of Texas because the MMSA accounts for the largest portion of SNB's branch locations, deposit activity, and loan volume.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Omaha-Council Bluffs NE-IA MMSA

CRA rating for the Omaha-Council Bluffs NE-IA MMSA: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes is reasonable.
- The distribution of loans to CTs of different income levels is excellent.
- SNB's CD activities demonstrated excellent responsiveness to the CD needs and opportunities in the AA.

Description of Institution's Operations in Omaha-Council Bluffs NE-IA MMSA

SNB operates one AA in the Omaha-Council Bluffs NE-IA MMSA.

The Omaha-Council Bluffs IA-NE MMSA AA includes all of Sarpy County and Douglas County in Nebraska, along with all of Pottawattamie County in Iowa. SNB operates 10 branches and 43 ATMs in the Omaha-Council Bluffs IA-NE MMSA AA. Of the 43 ATMs in the AA, nine are deposit-taking. This AA represents the substantial majority of SNB's market and banking activities. SNB reported \$804 million in deposits in the Omaha-Council Bluffs IA-NE MMSA AA as of June 30, 2020, representing 97 percent of SNB's total deposits as of that date. According to the FDIC market share information as of June 30, 2020, SNB ranked eighth in deposit market share in the AA with a market share of 2.62 percent. Management originated \$1.1 billion in loans out of the Omaha-Council Bluffs NE-IA MMSA AA branches during the evaluation period. This represents 74 percent of SNB's loan originations by dollar during the evaluation period.

The Omaha-Council Bluffs NE-IA MMSA AA includes 229 CTs. Thirty CTs are low-income, 53 are moderate-income, 87 are middle-income, and 59 are upper-income. The Omaha-Council Bluffs NE-IA MMSA AA had a population of 800 thousand according to the 2015 ACS U.S. Census. The population included 199 thousand families and 307 thousand households. Twenty-one percent of families are low-income, 18 percent are moderate-income, 21 percent are middle-income, and 40 percent were upper-income. The median family income was \$73,632. Nine percent of households lived below the poverty level.

There were 329 thousand housing units in the Omaha-Council Bluffs NE-IA MMSA AA in 2020. Sixty percent of the total housing units are owner-occupied, and 33 percent are renter-occupied. The median age of housing units in the AA is 93 years, and the

weighted-average of median housing costs is \$152 thousand. The weighted-average monthly gross rent is \$831.

Competition in the Omaha-Council Bluffs NE-IA MMSA AA is moderate. As of June 30, 2020, there were 46 institutions operating 257 banking branches in the AA. Competition in the AA is diverse, and includes large national institutions, larger regional banks, and small community banks.

We relied on a community representative to gain additional insight of the AA to conduct the examination. The community contact indicated that local economic conditions were strong with a lot of opportunity for environmental development and growth. The contact indicated the primary and secondary needs of the community are affordable housing and small and micro business financing, respectively. The contact stated that the local financial institutions are generally doing well at serving the community but there is opportunity to do more.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Omaha-Council Bluffs NE-IA MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	229	13.1	23.1	38.0	25.8	0.0
Population by Geography	800,060	9.8	22.4	38.6	29.1	0.0
Housing Units by Geography	329,464	10.3	23.1	40.4	26.2	0.0
Owner-Occupied Units by Geography	197,463	5.2	19.7	40.5	34.5	0.0
Occupied Rental Units by Geography	109,744	16.7	28.4	41.4	13.4	0.0
Vacant Units by Geography	22,257	23.0	26.8	34.3	16.0	0.0
Businesses by Geography	62,291	6.8	16.6	43.7	32.9	0.0
Farms by Geography	2,360	3.3	10.2	49.4	37.0	0.0
Family Distribution by Income Level	199,434	21.0	17.8	21.1	40.1	0.0
Household Distribution by Income Level	307,207	23.7	16.8	18.2	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE- IA MSA		\$73,632	Median Housing Value			\$151,805
			Median Gross Rent			\$831
			Families Below Poverty Level			9.0%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Omaha-Council Bluffs NE-IA MMSA

SNB operates one AA in the Omaha-Council Bluffs NE-IA MMSA. The rating for the MMSA is based solely on a full-scope review of this area.

Conclusions in Respect to Performance Tests in Omaha-Council Bluffs NE-IA MMSA

Lending Test

The bank's performance under the Lending Test in the Omaha-Council Bluffs NE-IA MMSA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's lending performance in the Omaha-Council Bluffs NE-IA MMSA is outstanding.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Our sample of 20 business loans indicated SNB originated 70 percent of its loans by number to small businesses. Small businesses are those with gross annual revenues equal to or less than \$1 million.

The demographic data for the AA shows approximately 84 percent of businesses within the AA reporting revenue data have gross annual revenues of \$1 million dollars or less. However, only 45 percent of aggregate market loans reported by other financial institutions in the area were originated to small businesses. SNB's performance in comparison to demographic and aggregate market data reflects satisfactory performance.

Refer to Table R in the "MMSA" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the MMSA.

Small Loans to Businesses

Fifteen percent of SNB’s business loans were made to businesses in low-income CTs, compared to seven percent of businesses within the AA in low-income CTs and six percent aggregate market data. Twenty percent of SNB’s business loans were made to businesses in moderate-income CTs, compared to 17 percent of businesses within the AA in moderate-income CTs and 14 percent aggregate market data. The bank’s performance exceeds demographic and aggregate market data and reflects excellent distribution to lending to low and moderate-income CTs.

Refer to Table Q in the “MMSA” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

Responses to Complaints

There were no complaints related to SNB’s CRA performance in the Omaha-Council Bluffs NE-IA MMSA AA during the evaluation period.

Community Development Test

The bank’s performance under the Community Development Test in the Omaha-Council Bluffs NE-IA MMSA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The following table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Omaha-Council Bluffs NE-IA MSA	288	100	87,905	100

SNB’s CD lending consisted of 288 loans totaling \$87.9 million representing 78 percent of allocated tier 1 capital in the AA.

During the evaluation period, SNB originated 32 CD loans totaling \$39.6 million to organizations that provide community services to low and moderate-income individuals and households in the bank’s AA. Examples of the bank’s CD loans include:

- A \$750 thousand line of credit to a community service organization that provides a variety of programs for low and moderate-income individuals and families focused on educational achievement, alternatives to teen violence, health/wellness, childcare, and family programs.
- A \$2 million loan to complete a campus expansion of an organization that provides academic and social skills development to low and moderate-income young men.
- A \$2.5 million loan for the renovation of a community center serving low and moderate-income elders.
- A \$35 thousand loan to a non-profit organization that provides educational and workforce development training to low and moderate-income youth.

The bank also originated an additional 256 loans totaling \$48.3 million under the Small Business Administration’s (SBA) Paycheck Protection Program (PPP) that met a CD purpose. These 256 loans either provided support for the stabilization of low- and moderate-income CTs or the retention of low and moderate-income jobs.

Number and Amount of Qualified Investments

SNB’s investment activity consisted entirely of charitable donations. During the evaluation period, the bank made 214 donations totaling \$581.3 thousand to 30 non-profit and CD organizations that support educational and social programing for low-income youth, access to affordable housing, technical assistance for small businesses, assistance for low-income elders, access to medical and legal services for low and moderate-income individuals, and other community services in the AA. The following table includes all qualified investments.

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Omaha-Council Bluffs NE-IA MMSA	-	--	214	\$581	214	100	\$581	100	--	--

* *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.

* *Prior Period Investments*’ means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, 41 employees provided 1,578 service hours to 30 qualified organizations. Examples of CD services provided by bank staff include:

- Board service for an organization that provides affordable housing and health services to low-income elders.
- Finance committee member for organization that provides homeownership opportunities for low and moderate-income families.
- Board service for an organization that provides educational services for low and moderate-income youth.
- Board service with an organization focused on helping community residents overcome poverty and access affordable housing.
- Fundraising committee member for community center that serves low-income elders.
- Multiple employees providing fundraising and technical assistance for an organization providing flood disaster relief.

State Rating

State of Iowa

CRA rating for the State of Iowa: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes is reasonable.
- The distribution of loans to CTs of different income levels is reasonable.
- SNB's CD activities demonstrated adequate responsiveness to the CD needs and opportunities in the AA.

Description of Institution's Operations in Iowa

SNB operates one AA in the State of Iowa, referred to as Des Moines-West Des Moines IA MSA.

The Des Moines-West Des Moines IA MSA includes all of Dallas, Polk, and Warren Counties in Iowa. SNB operates one branch and one deposit-taking ATM in the Des Moines-West Des Moines IA MSA. SNB reported \$1.4 million in deposits in the Des Moines-West Des Moines IA MSA as of June 30, 2020, representing 0.2 percent of SNB's total deposits as of that date. According to the FDIC market share information as of June 30, 2020, SNB ranked 42nd in deposit market share in the AA with a market share of 0.01 percent. Management originated \$36 million in loans out of the Des Moines-West Des Moines IA MSA branch during the evaluation period. This represents 2 percent of SNB's loan originations by dollar during the evaluation period.

The Des Moines-West Des Moines IA MSA includes 125 CTs. Nine CTs are low-income, 31 are moderate-income, 54 are middle-income, and 30 are upper-income. The Des Moines-West Des Moines IA MSA had a population of 575 thousand according to the 2015 ACS U.S. Census. The population included 147 thousand families and 223 thousand households. Twenty-one percent of families are low-income, 17 percent are moderate-income, 22 percent are middle-income, and 40 percent were upper-income. The median family income was \$75,653. Eight percent of households lived below the poverty level.

There were 238 thousand housing units in the Des Moines-West Des Moines IA MSA in 2020. Sixty-five percent of the total housing units are owner-occupied, and 29 percent are renter-occupied. The median age of housing units in the AA is 66 years, and the weighted-average median housing cost is \$165 thousand. The weighted-average monthly gross rent is \$826.

Competition in the Des Moines-West Des Moines MSA is moderate. As of June 30, 2020, there were 43 institutions operating 193 banking branches in the AA. Competition in the AA is diverse, and includes large national institutions, larger regional banks, and small community banks.

We relied on a community representative to gain additional insight of the AA to conduct the examination. The community contact indicated that local economic conditions were strong, and the area is currently expanding at a rate of 1.5-2 percent per year. The contact indicated there is a shortage of housing in the area contributed to the current growth rates. The contact stated there was a shortage of financing for start-up companies recently but believes that trend appears to be reversing. The contact was not aware of any discriminatory practices by financial institutions in the local area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Des Moines-West Des Moines IA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	125	7.2	24.8	43.2	24.0	0.8
Population by Geography	574,803	5.3	20.9	42.5	31.3	0.0
Housing Units by Geography	237,528	4.7	21.2	44.1	30.0	0.0
Owner-Occupied Units by Geography	154,653	2.5	18.1	44.7	34.7	0.0
Occupied Rental Units by Geography	67,998	8.6	26.9	42.6	21.9	0.0
Vacant Units by Geography	14,877	9.0	27.8	45.2	18.0	0.0
Businesses by Geography	58,481	3.5	13.5	48.5	34.4	0.1
Farms by Geography	2,161	1.0	8.9	55.0	35.0	0.0
Family Distribution by Income Level	147,387	20.5	17.3	21.7	40.4	0.0
Household Distribution by Income Level	222,651	23.0	16.3	19.4	41.2	0.0
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$75,653	Median Housing Value			\$164,843
			Median Gross Rent			\$826
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Iowa

SNB operates one AA in the State of Iowa. The rating for the State of Iowa is based solely on a full-scope review of this area.

Conclusions in Respect to Performance Tests in Iowa

Lending Test

The bank's performance under the Lending Test in Iowa is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's lending performance in the state of Iowa is satisfactory.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Our sample of 20 business loans indicated SNB originated 60 percent of loans by number to small businesses. Small businesses are those with gross annual revenues equal to or less than \$1 million.

The demographic data for the AA shows approximately 86 percent of businesses within the AA reporting revenue data have gross annual revenues of \$1 million dollars or less. However, only 41 percent of aggregate market loans reported by other financial institutions in the area were originated to small businesses. SNB's performance in comparison to demographic and aggregate market data reflects satisfactory performance.

Refer to Table R in the state of Iowa section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Businesses

None of SNB's business loans were made to businesses in low-income CTs, compared to four percent of businesses within the AA in low-income CTs and three percent of aggregate market data. Five percent of SNB's business loans were made to businesses in moderate-income CTs, compared to fourteen percent of businesses within the AA in moderate-income CTs and twelve percent aggregate market data. While the SNB's performance is below demographic and aggregate market data, SNB only operated in this AA for eight months during the evaluation period. SNB's branch location in West Des Moines opened in April 2020, and full operations were impacted by COVID-19 restrictions. After consideration of this context, we found SNB's performance to reflect reasonable distribution to lending to low and moderate-income CTs.

Refer to Table Q in the state of Iowa section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Responses to Complaints

There were no complaints related to SNB's CRA performance in the Des Moines-West Des Moines IA MSA AA during the evaluation period.

Community Development Test

The bank's performance under the CD Test in the state of Iowa is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Des Moines-West Des Moines, IA MSA	5	100	607	100

During the evaluation period, the bank originated 5 CD loans, totaling \$607 thousand in the AA. These loans are PPP loans and either provided support for the stabilization of low and moderate-income CTs or the retention of low and moderate-income jobs.

Number and Amount of Qualified Investments

SNB did not make any qualified investments or donations in the AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, one bank employee provided 51 hours of financial expertise and board service to two organizations focused on affordable housing and economic development for small businesses.

State Rating

State of Texas

CRA rating for the State of Texas: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes is reasonable.
- The distribution of loans to CTs of different income levels is reasonable.
- SNB's CD activities demonstrated adequate responsiveness to the CD needs and opportunities in the AA.

Description of Institution's Operations in Texas

SNB operates one AA in the State of Texas, referred to as Dallas-Plano-Irving TX MSA.

The Dallas-Plano-Irving TX MSA includes all of Dallas County and portions of Denton and Collin Counties in Texas. SNB operates one branch and one deposit-taking ATM in the Dallas-Plano-Irving TX MSA. SNB reported \$23 million in deposits in the Dallas-Plano-Irving TX MSA as of June 30, 2020, representing 3 percent of SNB's total deposits as of that date. According to the FDIC market share information as of June 30, 2020, SNB ranked 115th in deposit market share in the AA with a market share of less than 0.01 percent. Management originated \$115 million in loans out of the Dallas-Plano-Irving TX MSA during the evaluation period. This represents seven percent of SNB's loan originations by dollar during the evaluation period.

The Dallas-Plano-Irving TX MSA includes 721 CTs. One hundred fifteen CTs are low-income, 211 are moderate-income, 158 are middle-income, and 231 are upper-income. The Dallas-Plano-Irving TX MSA had a population of 3.5 million according to the 2015 ACS U.S. Census. The population included 835 thousand families and 1.3 million households. Twenty-six percent of families are low-income, 17 percent are moderate-income, 17 percent are middle-income, and 40 percent were upper-income. The median family income was \$71,149. Thirteen percent of households lived below the poverty level.

There were 1.4 million housing units in the Dallas-Plano-Irving TX MSA in 2020. Fifty percent of the total housing units are owner-occupied, and 43 percent are renter-occupied. The median age of housing units in the AA is 81 years, and the weighted-average median housing cost is \$189 thousand. The weighted-average monthly gross rent is \$985.

Competition in the Dallas-Plano-Irving TX MSA is considerable. As of June 30, 2020, there were 134 institutions operating 1,009 banking branches in the AA. Competition in the AA is

diverse and includes a significant number of large national institutions, along with larger regional banks, and small community banks.

We relied on a community representative to gain additional insight of the AA to conduct the examination. The community contact indicated that the geography is divided by Interstate 30, with areas north of the interstate receiving improved infrastructure, established communities, and access to credit for both consumers and businesses. However, for the areas south of the interstate, most CTs are low and moderate-income and may lack access to the same financial resources.

The contact indicated that the greatest needs in the area include education of financial literacy and access to business loans for small business owners. The contact stated that some of the larger banks are active participants in south Dallas County, but in general, the area is underserved by local financial institutions.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas-Plano-Irving TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	721	16.0	29.3	21.9	32.0	0.8
Population by Geography	3,505,669	14.5	30.4	23.3	31.5	0.2
Housing Units by Geography	1,358,740	15.1	27.7	23.9	32.9	0.4
Owner-Occupied Units by Geography	674,049	6.9	24.6	25.0	43.4	0.2
Occupied Rental Units by Geography	579,959	22.8	31.0	23.4	22.3	0.5
Vacant Units by Geography	104,732	25.4	29.2	20.3	24.7	0.5
Businesses by Geography	421,549	8.2	19.7	25.2	45.8	1.1
Farms by Geography	5,678	7.4	21.6	25.1	44.9	1.0
Family Distribution by Income Level	835,151	26.3	17.0	17.1	39.6	0.0
Household Distribution by Income Level	1,254,008	25.7	17.3	17.5	39.5	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$189,062
			Median Gross Rent			\$985
			Families Below Poverty Level			12.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Texas

SNB operates one AA in the State of Texas. The rating for the State of Texas is based solely on a full-scope review of this area.

Conclusions in Respect to Performance Tests in Texas

Lending Test

The bank's performance under the Lending Test in Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's lending performance in the state of Texas is satisfactory.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Our sample of 20 business loans indicated SNB originated 55 percent of its loans by number to small businesses. Small businesses are those with gross annual revenues equal to or less than \$1 million.

The demographic data for the AA shows approximately 88 percent of businesses within the AA reporting revenue data have gross annual revenues of \$1 million dollars or less. However, only 38 percent of aggregate market loans reported by other financial institutions in the area were originated to small businesses. SNB's performance in comparison to demographic and aggregate market data reflects satisfactory performance.

Refer to Table R in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Businesses

Our sample of 20 business loans indicated that SNB did not make any business loans to low or moderate-income CTs. The percentage of bank loans originated to low and moderate-income CTs is significantly lower than both demographic and aggregate market data. Demographic data indicates eight percent of businesses are in low-income CTs, while aggregate market data reflects approximately eight percent of market loans were originated to low-income CTs. Demographic data indicates 20 percent of businesses are operating in moderate-income CTs, while aggregate market data reflects approximately 19 percent of market loans were originated to moderate-income CTs. SNB's low level of lending to low and moderate-income CTs as assessed in our

sample is impacted by its small size of only 20 business loans. A review of bank origination reports indicate that the bank originated approximately five percent of their business loans to low-income CTs and nine percent to moderate-income CTs. While SNB’s performance is still below demographic and aggregate market data, SNB only operated in this AA for six months during the evaluation period. SNB’s branch location in Dallas was opened in June 2020, and full operations were impacted by COVID-19 pandemic restrictions. After consideration of the above mentioned performance context, we found SNB’s performance to reflect reasonable distribution to lending to low and moderate-income CTs.

Refer to Table Q in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

Responses to Complaints

There were no complaints related to SNB’s CRA performance in the Dallas-Plano-Irving TX MSA AA during the evaluation period.

Community Development Test

The bank’s performance under the Community Development Test in the state of Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Dallas-Plano-Irving TX MSA	34	100	3,271	100

During the evaluation period, the bank originated 34 CD loans, totaling \$3.3 million in the AA. These loans are PPP loans and either provided support for the stabilization of low and moderate-income CTs or the retention of low and moderate-income jobs.

Number and Amount of Qualified Investments

SNB did not make any qualified investments or donations in the AA during the evaluation period as it did not enter the AA until June 2020.

Extent to Which the Bank Provides Community Development Services

SNB did not provide any CD services in the AA during the evaluation period as it did not enter the AA until June 2020.

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

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Business Loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Omaha-Council Bluffs NE-IA MMSA	Full-scope	All of Douglas County in NE, Sarpy County in NE, and Pottawattamie County in IA.
State of Iowa		
Des Moines- West Des Moines IA MSA	Full-scope	All of Dallas, Polk, and Warren Counties.
State of Texas		
Dallas-Plano-Irving TX MSA	Full-scope	All of Dallas County, and parts of Collin and Denton Counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS: Security National Bank of Omaha			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Security National Bank of Omaha	Outstanding	Outstanding	Outstanding
MMSA or State:			
Omaha-Council Bluffs NE-IA MMSA	Outstanding	Outstanding	Outstanding
State of Iowa	Satisfactory	Satisfactory	Satisfactory
State of Texas	Satisfactory	Satisfactory	Satisfactory

*The Lending Test and Community Development Test carry equal weight.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low and moderate-income areas, 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, 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 householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope 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 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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of 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: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate 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 assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** 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 households by income level in each MMSA/assessment area.

2018-20																		
Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha-Council Bluffs NE-IA MMSA	20	10,389	100.0	6.8	15.0	6.2	16.6	20.0	13.9	43.7	45.0	44.1	32.9	20.0	35.5	0.0	0.0	0.3
Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.																		

2020																		
Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Des Moines-West Des Moines IA MSA	20	6,478	100	3.5	0.0	2.5	13.5	5.0	11.5	48.5	50.0	48.1	34.4	45.0	37.4	0.1	0.0	0.6
Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.																		

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Dallas-Plano-Irving TX MSA	20	18,848	100.0	117,583	8.2	0.0	7.7	19.7	0.0	18.6	25.2	35.0	23.3	45.8	65.0	49.0	1.1	0.0	1.4

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018-20

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM			Businesses with Revenues Not Available				
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans
Omaha-Council Bluffs NE-IA MMSA	20	10,389	100.0	16,939	84.2	70.0	44.7	5.6	20.0	10.2	10.0			

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2020	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Des Moines-West Des Moines IA MSA	20	6,478	100	11,379	86.2	60.0	40.6	4.5	40.0	9.3	0.0

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2020	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas-Plano-Irving TX MSA	20	18,848	100.0	117,583	88.0	55.0	37.9	4.2	30.0	7.8	15.0

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.