



PUBLIC DISCLOSURE

September 26, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American National Bank
Charter Number 15435

8990 West Dodge Road
Omaha, NE 68114

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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General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of American National Bank (ANB or bank) issued by the OCC, the institution’s supervisory agency, for the evaluation period starting January 1, 2012 and ending September 26, 2016. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

The following table indicates the performance level of American National Bank with respect to the lending, investment, and service tests:

Performance Levels	American National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			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 bank originates a high percentage of loans inside its assessment areas (AAs) after excluding loans from the bank’s indirect auto program;
- The bank’s lending activity is good;
- A good geographic distribution of loans as evidenced by good distribution of home mortgage loans, excellent distribution of small loans to businesses, poor distribution of small loans to farms, and adequate distribution of motor vehicle loans;
- A good distribution, based on borrower income levels, of loans as evidenced by excellent distribution of home mortgage and motor vehicle loans, adequate distribution of small loans to businesses, and good distribution of small loans to farms;

- Community Development (CD) lending had a significant, positive impact on the lending test in the Omaha-Council Bluffs NE-IA Multistate Metropolitan Statistical Area (MMSA). CD lending supported affordable housing, community services targeted to LMI individuals, and promoted activities that revitalize and stabilize LMI geographies;
- The bank has an overall adequate level of qualified CD investments that are responsive to community needs;
- Bank branches are readily accessible to people and geographies of different income levels. Hours are adequate with a few differences between branches located in different income levels. The bank offers an adequate level of services through alternate delivery systems. The record of opening or closing offices has not adversely impacted access to banking services to LMI individuals and geographies; and
- ANB provided a relatively high level of CD services that were responsive to identified community needs.

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.

Census Tract (CT) – 2010 Census: Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into ‘male householder’ (a family with a male householder’ 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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) – 2010 Census: The median income derived from the United States Census Bureau’s American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is 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.

Description of Institution

ANB is a \$2.96 billion interstate institution headquartered in Omaha, Nebraska. ANB is a wholly owned subsidiary of a one bank holding company, American National Corporation (ANC), also located in Omaha, Nebraska. The assessment areas and scope for this examination were adjusted to reflect the bank's merger activity during the evaluation period. During the evaluation period, ANC merged Western Bank, NA (WB), which was purchased on October 5, 2012 into ANB. The merger of ANB and WB was effective September 1, 2015. This merger expanded the bank's presence into the Minneapolis-St. Paul-Bloomington, MN-WI Multistate Metropolitan Statistical Area (MMSA). However, since the merger was effective for less than six months of the evaluation period, we did not assess the bank's performance in the Minneapolis-St. Paul-Bloomington, MN-WI MMSA in this evaluation.

Affiliate activities were considered when evaluating CD loans, investments, and services. The review included an assessment of the affiliate's ability to lend or invest in ANB's assessment areas. We considered WB's CD activities performed since the last WB CRA performance evaluation dated March 3, 2014. In addition, we considered activities performed by the American National Community Development Corporation (ANCDC) during the evaluation period. ANCDC was established by ANC in 2004 to promote public welfare by making investments designed primarily to benefit LMI areas or individuals through the development of affordable housing, fostering revitalization or stabilization of LMI areas.

ANB operated in Nebraska and Iowa during the evaluation period. ANB has two rating areas comprised of the Omaha-Council Bluffs NE-IA MMSA and the state of Nebraska. As of the start date of this examination, the bank had 25 office locations and 58 automated teller machines (ATMs) in the Omaha-Council Bluffs NE-IA MMSA AA. In the Nebraska nonmetropolitan (Non-MSA) AA, ANB had six offices and nine ATMs located in Jefferson, Johnson, Otoe, and Richardson Counties. In the Lincoln MSA AA, the bank had one office and four ATMs. In addition, the bank had 23 non-deposit-taking ATMs not located in any of the AAs. Six of the out of AA ATMs are associated with the WB merger. Refer to the MMSA or State rating sections of this evaluation for details on the bank's performance by area.

The bank offers a full range of credit products within its AAs, including agricultural, commercial, consumer, and real estate loans. ANB has developed well-established niche markets in automobile dealer paper, commercial relationship banking, truck financing, and residential mortgage originations. ANB offers a full range of deposit products to businesses and individuals, including alternative retail services, such as direct deposit and access to electronic banking services (bill payment, mobile banking, telephone banking, and electronic statements).

While ANB's strategy is not limited to one business endeavor, its primary focus is on commercial banking with an emphasis on growing within urban markets for all lending products. According to the June 30, 2015 FDIC Deposit Market Share Report, ANB had total deposits of \$1.88 billion. ANB ranks fifth for deposit market share in the Omaha-Council Bluffs NE-IA MMSA and ranks thirtieth for deposit market share in the state of Nebraska. As of December 31, 2015 the bank's loan-to-deposit ratio was 90.41 percent and net loans represented 73.65 percent of total assets. Commercial and industrial loans comprised 55.48 percent of the total loan portfolio. Approximately 27.28 percent of the bank's loan portfolio was comprised of consumer loans, of which a large portion are motor vehicle loans. The remaining loan portfolio was comprised of 12.23 percent residential real estate (including multi-family and home equity loans), 4.05 percent agricultural (including agricultural real estate), and 0.96 percent

other loans. The loan-to-deposit ratio and loan portfolio mix do not reflect the volume of home purchase and refinance mortgage loans originated and sold on the secondary market. There were 5,112 such loans totaling over \$769.92 million recorded on the Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) during the evaluation period. ANB had tier one capital of \$268.20 million as of December 31, 2015 and \$272.83 million as of June 30, 2016.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The prior ANB CRA performance was last evaluated on April 22, 2013, at which time the bank received a rating of Outstanding.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms reported under the Community Reinvestment Act (CRA), and motor vehicle loans for the period of January 1, 2012 through December 31, 2015. The evaluation period for CD loans, the investment test, and the service test was April 23, 2013 through September 26, 2016. These periods are representative of the bank's activities since the previous CRA examination.

In order to perform a meaningful analysis in an AA, a minimum of 20 loans was needed in each loan product and analysis period. Refer to the applicable lending test narratives under each Rating area section for details on loan products that did not have a sufficient volume to perform a meaningful analysis. Additionally, the bank only originated or purchased a sufficient volume of multi-family loans in the Omaha-Council Bluffs NE-IA MMSA. Although ANB did not originate a sufficient volume of multifamily loans in all AAs to perform an analysis, we considered multifamily loans meeting the CD definition as part of the evaluation of CD lending.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included testing of CD loans to determine if they qualify as CD as defined in the CRA regulation. Our testing indicated no substantive data inaccuracies. Therefore, we concluded that the home mortgage loans, small loans to businesses, small loans to farms, motor vehicle loans, and CD loan data was reliable.

Selection of Areas for Full-Scope Review

We completed a full-scope review for one AA in the state of Nebraska. We selected the Nebraska Non-MSA AA as it represented a significant portion of the bank's deposit base in the state of Nebraska. We also completed a full-scope review of performance within the Omaha-Council Bluffs NE-IA MMSA. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors. The Lincoln MSA AA was analyzed using limited-scope evaluation procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under the State and MMSA section for details regarding how we selected the areas for review.

Ratings

The bank's overall rating is a consolidation of the MMSA rating and state rating. The Omaha-Council Bluffs NE-IA MMSA received the greatest weight in our evaluation of the overall rating. This AA accounts for 78.13 percent of the branch network, 88.09 percent of total deposits, and 79.15 percent of the loans originated or purchased during the evaluation period. Areas receiving full-scope reviews received the primary weight when establishing the ratings in the state rating area. Refer to the "Scope" section under the state and MMSA rating section for details regarding the applicable weightings used in arriving at the respective ratings.

Inside/Outside Ratio

ANB originated a high percentage (86.33 percent) of loans inside the AAs during the evaluation period after excluding the nationwide motor vehicle lending products. HMDA reportable loans originated within the AAs were reported at 90.82 percent. CRA reportable small business and farm loans originated within the AAs were reported at 77.30 percent. When including the motor vehicle loans, ANB only originated 49.06 percent of loans within the AAs during the evaluation period. ANB only originated 39.86 percent of motor vehicle loans within the AAs due to the indirect motor vehicle loan program which makes up a significant number of loans evaluated. Motor vehicle loans made up 80.21 percent by number but only 30.45 percent by dollar of the loans originated during the evaluation period. The Inside/Outside ratio is a bank-wide calculation and not calculated for individual rating areas or AAs. The analysis is limited to bank loan originations and purchases and does not include affiliate data.

Other Factors Considered in our Analysis under Each Performance Test

Lending Test

When evaluating the bank's performance under the lending test, we weighted the distribution of home mortgage loans, consumer loans, and small loans to businesses and farms by the level of lending activity in each Rating Area. Consideration was given to the number of loans and dollar volume of loans originated in each category. Home mortgage loans received the most weight followed by motor vehicle, small business, and small farm. Home purchase loans received the greatest weight, followed by home refinance and home improvement loans in our conclusions regarding the bank's home mortgage loan origination performance. We included multifamily lending in our analysis of the Omaha-Council Bluffs NE-IA MMSA only as the other AAs did not generate a sufficient volume of loans for analysis.

The analysis of the distribution of loans to geographies with different income levels placed more weight on the bank's performance in moderate-income census tracts (CTs) if there was a limited volume of owner-occupied housing units or businesses in the low-income census tracts.

The borrower distribution analysis considered the impact of poverty levels on the demand for mortgages from low- or moderate-income individuals. We also considered the average housing costs and housing age in some markets and the difficulty experienced by low- or moderate-income applicants to qualify for home loans in those markets.

Innovative and Flexible Loan Programs

ANB offers a standard mix of loan products including home mortgage, consumer loans, and products targeting small businesses and farms (i.e. loans, lines of credit, and credit cards) throughout all of its AAs. ANB also offers flexible home loan programs targeted to LMI borrowers that enhance lending performance, including FHA, VA, USDA loans, and is a partner with government and state agencies originating loans through other individual homebuyer programs. Specifically, ANB originates loans sponsored by the Iowa Finance Authority, Nebraska Investment Finance Authority, and Minnesota Housing Finance Agency. ANB originated 2,659 loans totaling \$372.77 million under these programs during the evaluation period. In addition, ANB serviced over 300 residential loans for Habitat for Humanity during the evaluation period. This includes collecting payments, tracking loan history, and maintaining the escrow accounts.

ANB is a Preferred Lender with the Small Business Administration's (SBA) 7(a) and 504 loan programs and originated 77 SBA loans totaling \$45.68 million during the evaluation period of which 32 loans totaling \$16.52 million were within the AAs. Through the bank's Cash Finder program, small businesses are assisted with their accounts receivable either through their purchase and/or processing which includes providing monthly statements to customers. This program helps meet the cash flow needs of small and rapidly growing businesses. Loans originated under these programs are included in the bank's home mortgage and loans to small businesses and farm data and analyzed under the lending test.

Community Development Loans – Broader Regional Area

In addition to qualified loans made within the bank's AAs, ANB originated three broader regional loans totaling \$3 million during the evaluation period. The loans were made to an organization that provides and maintains affordable housing communities and support services to LMI families, seniors, and people living with disabilities in Minnesota, Wisconsin, and Iowa. These loans were considered in the analysis of the bank's overall lending test performance.

Investment Test

In addition to qualified investments made within the AAs, ANB purchased a \$1.66 million Ginnie Mae (GNMA) mortgage-backed security (MBS) that benefited a broader regional area that included the Omaha-Council Bluffs NE-IA MMSA and the Lincoln MSA. ANB had a prior period GNMA MBS with a book value of \$982 thousand that also benefited the same broader regional area. Of the total \$2.64 million broader regional investments, \$1.54 million directly benefited the bank's AA and will be considered under the investment test for each rating area. The remaining \$1.11 million portion of the broader regional investment was considered in the analysis of the bank's overall investment test performance.

Service Test

In addition to qualified CD services made within the bank's AAs and broader statewide areas that include the bank's AAs, ANB partnered with Heartland Family Services that provide CD services in the broader regional area that includes the bank's AAs. ANB offers a checking account through this relationship to provide account services to those who may be unbanked. Services include financial education and budget mentoring to those that open the Smart Start Checking product. ANB opened 83 accounts with an outstanding balance of \$33 thousand during the evaluation period. This CD service was considered in the analysis of the overall bank's service test performance.

Alternative Delivery Systems

ANB offers mobile and online banking services as an alternative delivery system. However, the bank does not track the dispersion of users that activated access to these delivery systems, in LMI geographies compared to the percentage of LMI households in these designated census tracts. Without this analysis we did not attribute significant weight when reaching our accessibility of delivery systems conclusions.

ANB installed two Interactive Teller Machines (ITM) in 2016. These ITMs provided extended service hours to the two branch locations in which they are located. These branches are located in middle-income geographies.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), in determining a national bank's (bank) CRA rating the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 Consumer Financial Protection Bureau.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

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

Multistate Metropolitan Area Rating

Omaha-Council Bluffs NE-IA Multistate Metropolitan Area

CRA rating for the MMSA¹:	Satisfactory
The lending test is rated:	Outstanding
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- A good level of lending for home mortgage loans and small loans to businesses, and an excellent level of lending for small loans to farms;
- A good geographic distribution of loans as evidenced by good distribution of home mortgage loans, excellent distribution of small loans to businesses, poor distribution of small loans to farms, and adequate distribution of motor vehicle loans;
- A good distribution, based on borrower income levels, of loans as evidenced by excellent distribution of home mortgage and motor vehicle loans, adequate distribution of small loans to businesses, and good distribution of small loans to farms;
- A significantly positive level of CD loans that were responsive to community needs;
- An adequate investment performance, when considering the strong competition for CD investments in the MMSA;
- A branch distribution that was readily accessible to LMI individuals and geographies; and,
- A good level of CD services that were adequately responsive to community needs.

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

The bank's AA consists of a portion of the Omaha-Council Bluffs NE-IA MMSA and includes Cass, Douglas, and Sarpy Counties in Nebraska, and Harrison and Pottawattamie Counties in Iowa. ANB offers a full range of banking services in the AA through its 25 branches and two deposit-taking ATMs. These branches account for 78.13 percent of the bank's total branch network. ANB closed two branches that were located in an upper and a middle-income geography and opened one branch that was located in a middle-income geography during the service test evaluation period. Banking in the AA is competitive with 56 deposit-taking financial institutions. Based on June 30, 2015 FDIC Deposit Market Share data,

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

ANB ranks fifth, with a deposit market share of 5.92 percent. First National Bank of Omaha, Wells Fargo Bank, N.A., Mutual of Omaha Bank, and US Bank N.A. rank above ANB and account for 65.80 percent of total deposits in the AA. ANB's 1.66 billion in deposits in this AA account for 88.09 percent of the bank's total deposits. Refer to the market profile for the Omaha-Council Bluffs NE-IA MMSA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

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

ANB has one AA in the Omaha-Council Bluffs NE-IA MMSA. As a result, we performed a full-scope review of the AA. In performing our analysis, we placed greater weight on the bank's home mortgage loan performance, as it represented the majority of the bank's reportable lending activity.

As part of this performance evaluation, we reviewed two economic development organization community contacts conducted within the AA. The contacts cited a need for financial education, business planning assistance, and access to affordable capital for small business owners and entrepreneurs. Additionally, we completed an affordable housing community contact. The contact stated additional affordable rental units for low- and moderate-income families are a need, especially in rural areas. Urban areas are relatively stable in terms of supply and demand for affordable housing to LMI, both rental and homeownership.

Refer to the tables in Appendix A for more information on the Omaha-Council Bluffs NE-IA MMSA AA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Omaha-Council Bluffs NE-IA MMSA is rated "Outstanding". Based on a full-scope review, the bank's performance in the Omaha-Council Bluffs NE-IA MMSA is excellent.

Lending Activity

The bank's overall lending activity is good, considering the strong competition for all types of loans in the Omaha-Council Bluffs NE-IA MMSA. The bank's good performance in originating home mortgage loans and small loans to businesses, and excellent performance in originating small loans to farms supports this conclusion. Market share data for consumer loans was not available for this CRA evaluation so we could not conclude on lending levels for motor vehicle loans in comparison to competitors within the Omaha-Council Bluffs NE-IA MMSA.

Refer to Tables 1 Lending Volume and 1 Other in the Omaha- Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ANB achieved a 5.92 percent market share of deposits, ranking fifth among 56 financial institutions in the AA and placing them in the top 8.93 percent of total depository banks. According to 2014 peer mortgage data, ANB achieved a 3.52 percent market share for home purchase lending. The bank was ranked sixth out of 257 lenders in home

purchase lending, which is equivalent to being in the top 2.33 percent of lenders in the AA. ANB achieved an 8.43 percent market share in home improvement lending, and was ranked fourth out of 103 lenders. This is equivalent to being in the top 3.88 percent of lenders in the AA. ANB's home refinance market share was 2.52 percent, and was ranked 8th out of 241 refinancing lenders in the AA. ANB's refinance ranking places them in the top 3.32 percent of refinance lenders in the AA. ANB's multifamily market share was 4.14 percent, and was ranked 8th out of 42 multifamily lenders. This is equivalent to being in the top 19.05 percent of lenders in the AA. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, overall home mortgage lending activity is good.

Based upon 2014 peer small business data, ANB achieved a 2.93 percent market share of small business loans, and was ranked tenth among 72 reporting small business lenders. This is equivalent to being in the top 13.89 percent of lenders. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, the small business lending activity is good.

ANB's small farm lending activity is excellent. The bank achieved a 26.85 percent market share for lending to small farms, ranking first among 24 reporting lenders. The top five lenders for small farms collectively had 78.96 percent of the market share. The small farm lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small farm lending competition within the AA.

Distribution of Loans by Income Level of the Geography

ANB's geographic distribution of loans in the Omaha-Council Bluffs NE-IA MMSA is good. Good performance was evidenced in overall home mortgage loans. Excellent performance was evidenced in small loans to businesses and poor performance was evidenced in small loans to farms. Adequate performance was evidenced in motor vehicle lending.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans is good. In evaluating the geographic distribution of home loans in the AA, it is important to note that low-income geographies contain a low percent of owner-occupied housing units and make up a smaller portion of the AA. This coupled with significant competition, opportunities for home mortgage lending in low-income geographies within this AA are limited. According to the 2010 U.S. Census data, only 5.55 percent of the AA's owner-occupied housing units are in the low-income tracts compared to 17.12 percent in the moderate-income geographies. Of the total housing units in low-income geographies, rental, and vacant units account for a total of 64.23 percent compared to 51.92 percent in moderate-income geographies. Moreover, low-income CTs represent 12.08 percent of the total geographies (29 of the AA's 240 CTs) compared to moderate-income CTs representing 21.25 percent of the total geographies (51 CTs).

The geographic distribution of home purchase loans reflects good penetration throughout the AA. The percentage of loans in low-income geographies was significantly lower than the percentage of owner-occupied units in those geographies, which reflected very poor performance. However, ANB's market

share in low-income census tracts was good and was near to the overall market share for home purchase loans. The portion of loans made in moderate-income geographies exceeded the percentage of owner-occupied units in those CTs, and was considered excellent performance. The bank's market share in moderate-income census tracts was also excellent and exceeded the overall market share for home purchase loans.

The geographic distribution of home improvement loans reflects good penetration throughout the AA. The percentage of loans in both the low- and moderate-income geographies was near to the percentage of owner-occupied units in these geographies. ANB's market share in both the low- and moderate-income CTs was excellent and exceeded the overall market share.

The geographic distribution of home refinance loans reflects adequate penetration throughout the AA. The percentage of loans in low-income geographies was significantly lower than the percentage of owner-occupied units in those geographies, which reflected very poor performance. However, ANB's market share in low-income CTs was good and was near to the overall market share for home refinance loans. The portion of loans made in moderate-income CTs was somewhat lower than the percentage of owner-occupied units in those geographies, and was considered adequate. ANB's market share in moderate-income census tracts was excellent and exceeded the overall market share for home refinance loans.

The geographic distribution of multifamily loans reflects excellent penetration throughout the AA. The percentage of loans in low-income geographies was near to the percentage of multifamily units in those geographies, which reflected good performance. The percentage of loans made in moderate-income geographies exceeded the percentage of multifamily units in those geographies, which reflected excellent performance. ANB's market share in both the low- and moderate-income CTs was excellent and exceeded the multifamily loan overall market share.

Small Loans to Businesses

Refer to Table 6 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses reflects excellent penetration throughout the AA. The percentage of loans made in both the low- and moderate-income geographies exceeded the percentage of businesses in those geographies, which reflected excellent performance. ANB's market share in low-income census tracts was excellent and exceeded the overall market share for small loans to businesses. ANB's market share in moderate-income census tracts was good and was near to the overall market share for small loans to businesses.

Small Loans to Farms

Refer to Table 7 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms reflects poor penetration throughout the AA. When performing the analysis, the very low number of farms in LMI geographies was considered. According

to 2010 Census data, there were 49 farms (1.65 percent) and 193 farms (6.51 percent) in the low- and moderate-income geographies, respectively, out of 2,965 farms in the AA. The bank originated one loan in the low-income CTs and none in the moderate-income geographies. These distributions were significantly lower than the percentage of farms in those respective geographies, and were considered very poor. However, the bank's market share for small loans to farms in the low-income CTs was good and was near to the overall market share for small loans to farms. ANB's market share in the moderate-income geographies was very poor and significantly lower than the overall market share for small loans to farms.

Consumer Loans

Refer to Table 13 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of motor vehicle loans reflects adequate penetration throughout the AA. The percentage of loans in low-income geographies was lower than the percentage of households in those geographies, which reflected poor performance. The percentage of loans made in moderate-income geographies was somewhat lower than the percentage of households in those geographies, which reflected adequate performance. Market share data for motor vehicle loans was not available. Based on the fewer number of low-income CTs, greater emphasis was placed on the bank's performance in the moderate-income geographies when determining the overall geographic distribution conclusion for motor vehicle loans.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed ANB's home mortgage, small business and small farm, and motor vehicle lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower income distribution of the bank's lending is good. Excellent performance was evidenced in overall home mortgage and motor vehicle loans. Adequate performance was evidenced in small loans to businesses and good performance was evidenced in small loans to farms.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is excellent. In performing our analysis, we considered the level of families below the poverty level, as well as the general affordability of housing to LMI borrowers.

Refer to Tables 8, 9, and 10 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans to moderate-

income borrowers exceeded the percentage of moderate-income families. ANB's market share of loans to both low- and moderate-income borrowers was excellent and exceeded the overall market share of home purchase loans.

The borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. ANB's market share of loans to both low- and moderate-income borrowers was excellent and exceeded the overall market share of home improvement loans.

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. ANB's market share of loans to both low- and moderate-income borrowers was excellent and exceeded the overall market share of home refinance loans.

Small Loans to Businesses

Refer to Table 11 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was lower than the percentage of small businesses. The bank's market share of loans to small businesses was excellent and exceeded the overall market share of loans to small businesses.

Small Loans to Farms

Refer to Table 12 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The borrower distribution of small loans to farms is good. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was near to the percentage of small farms. The bank's market share of loans to small farms was excellent and exceeded the overall market share of loans to small farms.

Consumer Loans

Refer to Table 13 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of motor vehicle loans is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income households. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households. Market share data for motor vehicle loans was not available.

Community Development Lending

Refer to Table 1 Lending Volume in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a significant, positive impact on lending performance in the Omaha-Council Bluffs NE-IA MMSA, when considering the impact of responsiveness and initiatives. During the evaluation period, ANB originated 10 CD loans totaling \$34.51 million, or 14.36 percent of tier 1 capital allocated to the AA. These loans represented excellent responsiveness to identified needs in the area.

Three of these loans totaling \$18.87 million addressed identified needs in the AA for combined use facilities that offer affordable housing and community services, reflecting excellent responsiveness.

- A \$3.42 million loan financed the construction of a campus in a low-income CT that includes 44 units of affordable housing for LMI seniors with a community center, a children's emergency shelter, and a health clinic located in a low-income geography. The loan was supported by using a New Markets Tax Credit structure.
- A \$7 million loan financed the construction of an emergency homeless shelter and 62 housing units for LMI individuals and families located in a low-income CT. The project included the use of low income housing tax credits (LIHTC).
- An \$8.45 million loan financed the construction of 24 housing units, an addiction treatment center, and a day care center located in a moderate-income CT to assist LMI women. The project included the use of LIHTC.

Six CD loans financed affordable housing for LMI individuals and families. Three of the loans were facilitated through the Omaha chapter of Habitat for Humanity. The other three loans were used for the construction and permanent financing of two 27 housing units that are restricted to LMI individuals and families.

ANB provided a \$4.80 million bridge loan to revitalize a neighborhood in a low-income CT located in north Omaha. The project included an accelerator campus that focuses on community programs. Mixed income housing will be constructed in the future as part of the project.

Community Development Loans – Broader Regional Area

When considering the CD loans made in the broader regional area, CD loans originated during the evaluation period totaled \$37.51 million representing 13.75 percent of total tier 1 capital. WB, an affiliate of ANB, originated three CD loans totaling \$3 million during the evaluation period in the broader regional area that had a purpose/mandate/function (P/M/F) to serve the Omaha-Council Bluffs MMSA. The \$1 million working capital line of credit helps maintain affordable housing communities with on-site support services to LMI families, seniors, and people living with disabilities. The loan was renewed annually three times during the evaluation period.

Product Innovation and Flexibility

Flexible and innovative loan programs had a positive impact on the bank's lending performance in the Omaha-Council Bluffs MMSA. During the evaluation period, ANB originated 30 SBA 7(a), Express, and 504 loans totaling \$15.05 million in the AA. Refer to the summary of innovative and flexible loan programs in the Other Factors – Lending Test section for additional information on ANB's lending programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Omaha-Council Bluffs NE-IA MMSA is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Omaha-Council Bluffs NE-IA MMSA is adequate.

Refer to Table 14 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, ANB made investments, grants, and donations totaling \$2.45 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on two prior period investments as of the date of our examination was \$821 thousand. When considering both current and prior period investments, the total of \$3.27 million represents 1.36 percent of allocated Tier One Capital for the AA. This level is considered poor, when considering the three-year evaluation period. However, we did consider the very strong competition for CD investments in the AA from nationwide and large local institutions in the AA. These institutions have much greater capacity and expertise to secure qualifying investments. With this competition, the level of investments is considered adequate.

ANB's responsiveness to CD needs in the AA is adequate. A significant portion of the bank's CD investments and donations were allocated to support organizations that provide services and affordable housing to LMI individuals, which are identified needs in the AA. ANB's investments consisted of three GNMA MBS that are comprised of mortgages to LMI individuals within the AA and one Housing Authority Series bond that supports an assisted living center that primarily services LMI individuals in the AA. ANB made 214 donations totaling \$670 thousand to organizations in the AA. Of these donations, 193 totaling \$603 thousand were to organizations that provide services primarily to LMI individuals and 14 donations totaling \$53 thousand were to organizations that provide affordable housing. The bank does not use innovative or complex investments to support CD initiatives.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Omaha-Council Bluffs NE-IA MMSA is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Omaha-Council Bluffs NE-IA MMSA is good.

Retail Banking Services

Refer to Table 15 in the Omaha-Council Bluffs NE-IA MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ANB's branch distribution in the AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. The bank had three branches in the 29 low-income CTs in the AA. The percentage of ANB's branches in low-income geographies exceeded the percentage of population living in these geographies. The bank had four branches in the 51 moderate-income CTs. The percentage of branches in moderate-income geographies was near to the percentage of population living in these geographies.

ANB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or individuals. The bank closed one branch located in a middle-income CT and relocated another branch from an upper-income CT to a middle-income CT. The branch changes were due to lack of profitability and the bank's strategic plan to place more focus on the core urban markets it serves.

ANB's hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography. One branch located in a moderate-income census tract did not provide Saturday hours due to low customer traffic; however, the location does have an ATM. In addition, upon request, bank officers accommodated customers after hours to take loan applications, close loans, and open accounts.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

ANB's performance in providing CD services in the Omaha - Council Bluffs NE-IA MMSA is good. The institution provides a relatively high level of CD services that are responsive to identified needs in the AA. Bank personnel provided their expertise to 22 organizations with nearly three thousand service hours during the evaluation period. Organizations benefiting from the bank's CD services were involved in a variety of CD activities including community services targeted to LMI individuals, economic development activities, and affordable housing programs.

The following are examples of some of the CD services provided in the Omaha-Council Bluffs NE-IA MMSA:

- The bank served as a sponsor to seven different organizations with projects under Federal Home Loan Bank (FHLB) affordable housing grants. The majority of the affordable housing projects directly benefited the MMSA or statewide area.
- One employee served as a Board member for an organization that promoted economic development in LMI census tracts in the AA.
- One employee served as a Board member of an affordable housing organization. The organization provides financial and down payment assistance to LMI individuals.
- One employee served as Chairman of the Board for an organization providing community services to the AA.

State Rating

State of Nebraska

CRA Rating for Nebraska²:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- A good level of lending for home mortgage loans, an adequate level of lending for small loans to businesses, and an excellent level of lending for small loans to farms;
- An adequate geographic distribution of loans as evidenced by excellent distribution of small loans to businesses, good distribution of motor vehicle loans, and poor distribution of home mortgage loans and small loans to farms;
- A good distribution, based on borrower income levels, of all lending products;
- No CD lending in the state, resulting in an overall neutral performance in the lending test rating;
- Overall adequate investment performance in the state, when considering investment performance in all AAs;
- A branch distribution that was readily accessible to LMI individuals and geographies; and
- An adequate level of CD services that were responsive to community needs.

Description of Institution's Operations in Nebraska

ANB has two AAs within the State of Nebraska. These AAs include the Non-MSA Counties AA, comprised of four counties: Jefferson, Johnson, Otoe, and Richardson counties and the Lincoln MSA, comprised of Lancaster County.

ANB provides a full range of loan and deposit products to all AAs. ANB has seven branches within the state, representing 21.88 percent of the bank's total branch network. There were no branch openings or closing in the state during the evaluation period. As of June 30, 2015, the bank ranked 30th in the state in deposits, representing a 0.67 percent market share. ANB's statewide deposits totaled

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

\$223.88 million. The Nebraska Non-MSA AA is the bank's most significant AA in the state, accounting for 82.21 percent of the state's deposits.

Nebraska Non-MSA AA

The banking industry is moderately competitive in the AA with 20 financial institutions, comprised of national and regional banks, local community banks, and other nonbank financial institutions. ANB ranked first in the AA with \$184.04 million in deposits, representing a 16.59 percent market share according to the June 30, 2015 FDIC Market Share Report. The five largest competitors in the AA include Richardson County Bank & Trust Company, F&M Bank, The First National Bank of Fairbury, Arbor Bank, and FirstBank of Nebraska. Refer to the market profile for the Omaha-Council Bluffs NE-IA MMSA in Appendix C for detailed demographics and other performance context information for this AA.

Lincoln MSA

The banking industry is competitive in the AA and includes branches of national and regional banks, local community banks, and other nonbank financial institutions. In the AA, ANB had a deposit market share of 0.58 percent, as of June 30, 2015 FDIC Market Share Report, and ranked 19th among 24 depository institutions. ANB had total deposits of \$39.84 million, representing 17.79 percent of the total deposits in the state and 2.12 percent of the bank's total deposits. The five largest competitors in the AA include Union Bank & Trust Company, Wells Fargo Bank, N.A., US Bank N.A., Pinnacle Bank, and Cornhusker Bank.

Scope of Evaluation in Nebraska

We completed a full-scope review of the Nebraska Non-MSA AA due to the high percentage of deposits in the area (82.21 percent). The AA also had the largest volume of HMDA and CRA reportable small business and small farm loans in the state (69.20 percent). The Lincoln MSA received a limited-scope review. Branch distribution within the state shows the Nebraska Non-MSA AA with 85.71 percent (six branches) and Lincoln MSA with 14.29 percent (one branch). Ratings are based primarily on results of the full-scope area. The volume of multifamily loans was not significant enough to provide a meaningful analysis.

We reviewed two community contacts conducted in the state of Nebraska. The community contact in the Lincoln MSA was a local housing agency, which indicated a need for affordable housing for low- and moderate-income individuals. The community contact conducted in the Nebraska Non-MSA AA was to a regional nonprofit organization, which indicated a need for low down payment mortgage lending, as well as quality affordable housing and CD activities in the LMI areas.

Refer to the tables in Appendix A for more information on the Nebraska AAs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Nebraska is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is good.

Lending Activity

The bank's overall lending activity is good, considering the competition for all types of loans in the AA and the bank's business strategy. The bank's good performance in originating home mortgage loans, adequate performance in originating small loans to businesses, and excellent performance in originating small loans to farms supports this conclusion. Market share data for consumer loans was not available for this CRA evaluation so we could not conclude on lending levels for motor vehicle loans in comparison to competitors within the Nebraska Non-MSA AA.

Refer to Tables 1 Lending Volume and 1 Other in the state of (name of state) section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Based upon FDIC Deposit Market Share data as of June 30, 2015, ANB achieved a 16.59 percent market share of deposits, ranking first among 20 financial institutions in the AA and placing them in the top 5.00 percent of total depository banks. According to 2014 peer mortgage data, ANB achieved an 8.36 percent market share for home purchase lending. The bank was ranked third out of 54 lenders in home purchase lending, which is equivalent to being in the top 5.56 percent of lenders in the AA. ANB achieved a 49.46 percent market share in home improvement lending, and was ranked first out of 19 lenders. This is equivalent to being in the top 5.26 percent of lenders in the AA. ANB's home refinance market share was 5.06 percent, and was ranked fifth out 60 refinancing lenders in the AA. ANB's refinance ranking places them in the top 8.33 percent of refinance lenders in the AA. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, overall home mortgage lending activity is good.

Based upon 2014 peer small business data, ANB achieved a 4.38 percent market share of small business loans, and was ranked eighth among 28 reporting small business lenders. This is equivalent to being in the top 28.57 percent of lenders. Given the competition from the other reporting lenders in the AA and the bank's higher lender rankings for each product, the small business lending activity is adequate.

ANB's small farm lending activity is excellent. The bank achieved a 24.60 percent market share for lending to small farms, ranking second among 14 reporting lenders. The top five lenders for small farms collectively had 91.14 percent of the market share. The small farm lending activity is excellent given the bank's market share and ranking when compared to the deposit market share and small farm lending competition within the AA.

Distribution of Loans by Income Level of the Geography

ANB's geographic distribution of loans in the Nebraska Non-MSA AA is adequate. Poor performance was evidenced in overall home mortgage loans and small loans to farms. However, excellent performance was evidenced in small loans to businesses and good performance was evidenced in motor vehicle loans.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Overall, the geographic distribution of home mortgage loans is poor. In evaluating the geographic distribution of home loans in the AA, it is important to note, that opportunities for home mortgage lending in LMI geographies are limited. According to the 2010 U.S. Census data, of the 13 CTs in the AA, none are low-income and only one is moderate-income. Only 3.07 percent of the AA's owner-occupied housing units are in the moderate-income tract. Of the total housing units in the moderate-income geography, rental and vacant units account for a total of 53.66 percent.

The geographic distribution of home purchase loans reflects poor penetration throughout the AA. The percentage of loans made in the moderate-income geography was significantly lower than the percentage of owner-occupied units in that geography, which reflected very poor performance. However, ANB's market share in the moderate-income geography was excellent and exceeded the overall market share for home purchase loans.

The geographic distribution of home improvement loans reflects good penetration throughout the AA. The percentage of loans in the moderate-income geography exceeded the percentage of owner-occupied units in that geography, which reflected excellent performance. ANB's market share in the moderate-income geography was very poor and significantly lower than the overall market share for home improvement loans.

The geographic distribution of home refinance loans reflects poor penetration throughout the AA. The percentage of loans made in the moderate-income geography was significantly lower than the percentage of owner-occupied units in that geography, which reflected very poor performance. However, ANB's market share in the moderate-income geography was excellent and exceeded the overall market share for home refinance loans.

Small Loans to Businesses

Refer to Table 6 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses reflects excellent penetration throughout the AA. The percentage of loans made in the moderate-income geography exceeded the percentage of businesses in that geography, which reflected excellent performance. ANB's market share in the moderate-income census tract was excellent and exceeded the overall market share for small loans to businesses.

Small Loans to Farms

Refer to Table 7 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms reflects poor penetration throughout the AA. When performing the analysis, the very low number of farms in LMI geographies was considered. According to 2010 Census data, there were only five farms (0.56 percent), out of 892 farms in the AA located in the moderate-income CT. The bank originated no loans in this geography ANB's market share in the moderate-income geography was very poor and significantly lower than the overall market share for small loans to farms. However, when considering the limited opportunities in the AA the bank's performance is poor.

Consumer Loans

Refer to Table 13 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of motor vehicle loans reflects good penetration throughout the AA. The percentage of loans made in the moderate-income geography was near to the percentage of households in that geography, which reflected good performance. Market share data for motor vehicle loans was not available.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed ANB's home mortgage, small business and small farm, and motor vehicle lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower income distribution of the bank's lending is good. Good performance was evidenced in all loan products.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower distribution of home mortgage loans is good. In performing our analysis, we considered the level of families below the poverty level, as well as the general affordability of housing to LMI borrowers.

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. ANB's market share of loans to low-income borrowers was good and was near to the overall market share of home purchase loans. ANB's market share of loans to moderate-income borrowers was excellent and exceeded the overall market share of home purchase loans.

The borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. ANB's market share of loans to low-income borrowers was excellent and exceeded its overall market share of home improvement loans. ANB's market share of loans to moderate-income borrowers was adequate and was somewhat lower than the overall market share of home improvement loans.

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families. ANB's market

share of loans to low-income borrowers was excellent and exceeded its overall market share of home refinance loans. ANB's market share of loans to moderate-income borrowers was very poor and was significantly lower than its overall market share of home refinance loans.

Small Loans to Businesses

Refer to Table 11 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was near to the percentage of small businesses. The bank's market share of loans to small businesses was excellent and exceeded the overall market share of loans to small businesses.

Small Loans to Farms

Refer to Table 12 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to farms is good. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was near to the percentage of small farms. The bank's market share of loans to small farms was excellent and exceeded the overall market share of loans to small farms.

Consumer Loans

Refer to Table 13 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of motor vehicle loans is good. The percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income households. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households. Market share data for motor vehicle loans was not available.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Nebraska section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify 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.

CD lending had a neutral impact on the lending test for the Nebraska Non-MSA AA. The bank made no CD loans during the evaluation period in this AA.

Product Innovation and Flexibility

Flexible and innovative loan programs had a neutral impact on the bank's lending performance in the Nebraska Non-MSA. During the evaluation period, ANB originated two SBA 7(a) loans totaling \$1.47 million in the AA. Refer to the summary of innovative and flexible loan programs in the Other Factors – Lending Test section for additional information on ANB's lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the Lincoln MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Nebraska. Refer to the Tables 1 through 13 in the state of Nebraska section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Nebraska is rated "Low Satisfactory," when considering performance in all AAs in the state. Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is poor.

Refer to Table 14 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, ANB made nine donations totaling \$8 thousand. This level is considered very poor, when considering the three-year evaluation period. However, we did consider the limited opportunities in the AA for CD investments. With this consideration, the level of investments is considered poor.

ANB's responsiveness to CD needs in the AA is adequate. ANB's donations went to organizations that provide services to LMI individuals in the AA. ANB does not use innovative or complex investments to support CD initiatives.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Lincoln MSA was stronger than the bank's overall "Low Satisfactory" performance under the investment test in Nebraska. The stronger performance was due to the excellent level of CD investments within the AA. Performance in the limited-scope area did have a positive impact on the service test rating in the state. Refer to the Table 14 in the state of Nebraska section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Nebraska is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is good.

Retail Banking Services

Refer to Table 15 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ANB's branch distribution in the AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. The bank had one branch in the one moderate-income CT in the AA. The percentage of ANB's branches in moderate-income geographies exceeded the percentage of population living in these geographies. Four of the nine ATMs operated by ANB in the AA are located in middle-income census tracts that were designated as underserved or distressed during the evaluation period.

ANB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or individuals. The bank did not close or open any branches in the Nebraska Non-Non MSA AA during the evaluation period.

ANB's hours and services offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography. Upon request, bank officers accommodated customers after hours to take loan applications, close, loans, and open accounts.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking. These delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

ANB's performance in providing CD services in the Nebraska Non-MSA AA is adequate. The institution provides an adequate level of CD services that are responsive to identified needs in the AA. Bank personnel provided their expertise by serving as Board members to three organizations serving the AA during the evaluation period. One organization provides down payment assistance and homebuyer education services to LMI individuals in the AA. Another organization promotes state-and region-wide affordable housing. The final organization provides food services to LMI individuals. The limited opportunities available to provide technical assistance on financial and banking related matters to organizations within the AA was considered when evaluating the bank's performance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the Lincoln MSA is weaker than the bank's overall "High Satisfactory" performance under the service test in Nebraska. The weaker performance was due to branch distribution. Performance in the limited-scope area did not have an impact on the service test rating in the state. Refer to Table 15 in the state of Nebraska section of Appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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	Lending Test (excludes CD loans): 1/1/2012 to 12/31/2015 Investment and Service Tests and CD Loans: 4/23/2013 to 9/26/2016	
Financial Institution	Products Reviewed	
American National Bank (ANB) Omaha, NE	Home Purchase, Home Improvement, and Home Refinance Loans; Motor Vehicle Loans; Small Business and Small Farm Loans; Community Development Loans, Qualified Investments, and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Western Bank, NA (WB) American National Community Development Corporation (ANCDC)	Sister Financial Institution Holding Company Subsidiary	Community Development Loans, Investments, and Services Community Development Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Omaha-Council Bluffs NE-IA MMSA	Full-Scope	NE: Cass, Douglas, and Sarpy Counties IA: Harrison and Pottawattamie Counties
Nebraska: Nebraska Non-MSA	Full-Scope	Jefferson, Johnson, Otoe, and Richardson Counties
Lincoln MSA	Limited-Scope	Lancaster County

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		AMERICAN NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
American National Bank	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Omaha-Council Bluffs NE-IA MMSA	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Nebraska	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Omaha-Council Bluffs NE-IA MMSA

Demographic Information for Full Scope Area: Omaha-Council Bluffs (NE-IA) MMSA - 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	240	12.08	21.25	40.42	25.83	0.42
Population by Geography	809,277	8.99	20.73	40.73	29.24	0.32
Owner-Occupied Housing by Geography	207,288	5.55	17.12	44.84	32.49	0.00
Business by Geography	53,433	6.86	17.25	44.63	30.81	0.45
Farms by Geography	2,965	1.65	6.51	66.95	24.86	0.03
Family Distribution by Income Level	201,909	20.75	17.43	22.67	39.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	77,101	15.81	29.37	41.07	13.75	0.00
Median Family Income		69,538	Median Housing Value	146,730		
FFIEC Adjusted Median Family Income for 2015		72,800	Unemployment Rate	3.18%		
Households Below Poverty Level		11%	(2010 US Census)			

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Omaha-Council Bluffs NE-IA MMSA AA includes Cass, Douglas, and Sarpy Counties in Nebraska and Harrison and Pottawattamie Counties in Iowa. The Omaha-Council Bluffs NE-IA MMSA is comprised of eight counties, three in Iowa (Harrison, Mills and Pottawattamie) and five in Nebraska (Cass, Douglas, Sarpy, Saunders, and Washington). However, ANB limited their AA to the five counties they were reasonably able to serve. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. According to the U.S. Census data, the AA consists of 240 census tracts of which, 29 are low-income, 51 are moderate-income, 97 are middle-income, and 62 are upper-income, and one unclassified.

The 2015 FFIEC Updated MFI was \$72,800. This represents a 1.82 percent increase compared to the MFI of \$71,500 at the beginning of the evaluation period (2012 HUD Updated MFI). According to the 2010 U.S. Census, the total population of the AA was 809,277. The distribution of families by income level was 20.75 percent low-income, 17.43 percent moderate-income, 22.67 percent middle-income, and 39.14 percent upper-income. According to the American Community Survey the AA population increased 29,195, or 3.52 percent during the evaluation period. The AA population totaled 830,009 as of July 1, 2012 and 859,204 as of July 1, 2015. The AA includes the city of Omaha, which is the state of Nebraska's most populated city.

Strong competition to provide financial services exists within the bank's AA. The June 30, 2015 FDIC Deposit Market Share Report shows ANB ranked fifth of 56 depository financial institutions, with a 5.92 percent market share. Competitors include several branches of national, regional, and local community banks operating in the AA. ANB's top five competitors, in order of market share rank, are First National Bank of Omaha, Wells Fargo Bank, N.A., Mutual of Omaha Bank, US Bank N.A, and Bank of the West. These competitors control 70.38 percent of the deposit market share in the AA. ANB's deposits in the AA as of June 30, 2015, totaled \$1.66 billion, representing 88.09 percent of total

deposits. The competition maintains 267 offices in the AA. As of September 26, 2016, ANB had 25 branches in the AA. The bank supplemented its branch network with two deposit-taking ATMs.

Employment and Economic Factors

The economic condition of the AA has improved over the evaluation period as unemployment rates declined and remained lower than the national average. According to the U.S. Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment rates for the AA improved from 5.01 percent as of January 2012 to 3.05 percent as of December 2015. As of December 2015, the Nebraska, Iowa, and nationwide unemployment rates were 3.00 percent, 3.60 percent, and 5.00 percent, respectively. According to Moody's Analytics, employment in the AA is most concentrated within education and health, professional and business services, government, retail trade, and leisure and hospitality services sectors. Major employers include Offutt Air Force Base, CHI Health, Nebraska Medical Center, The Methodist Health System, First Data Corp, University of Nebraska Medical Center, First National Bank of Omaha, Wal-Mart Stores Inc., and Creighton University among others. The AA exhibits market strengths including low business costs, a skilled workforce and a population growth that is attractive to businesses, a stable housing market, above average per capita income, and a high concentration of major companies.

Housing

There are limited opportunities for home mortgage lending in this AA's LMI geographies due to the number of housing units is much lower in LMI geographies than middle- and upper-income geographies. According to the 2010 U.S. Census, 5.55 percent of owner-occupied units were located in low-income census tracts and 17.12 percent in moderate-income. Of the total housing units in low-income geographies, 15.61 percent were occupied rental units and 30.83 percent were occupied rental units in moderate-income geographies.

Home ownership in LMI geographies is difficult due to the poverty rate in the AA. According to the National Association of REALTORS median sales price report of historical median prices for the MSA, the median housing price for the AA was \$159,100 at year-end 2014. Based on this median family income, low- and moderate-income families earned at most \$36,400 and \$58,240 respectively. These income levels make owner-occupied housing affordable in this AA for LMI individuals when comparing the average monthly income available for housing payments for an LMI family to an average 30-year mortgage payment. However, median home prices are relatively high in low- and moderate-income census tracts within the AA when considering a household poverty rate of 11.00 percent. Families living in low-income and moderate-income census tracts are significantly impacted more by poverty than families living in middle- and upper-income census tracts. According to the 2010 U.S. Census, the family poverty rate is 7.97 percent with 28.76 percent of families in low-income census tracts and 14.29 percent of families in moderate-income census tracts that live below poverty levels. In contrast 5.82 percent of in middle-income census tracts and 1.98 percent of families in upper-income census tracts live below poverty levels.

According to the 2010 U.S. Census, the median age of housing stock is higher in LMI geographies than middle- and upper-income geographies. Older housing typically has lower purchase prices, but often has higher maintenance costs. Per the 2010 U.S. Census, the median age of housing for low- and moderate-income geographies was 63 years and 53 years, respectively. In comparison, the median age of middle- and upper-income geographies was much lower at 39 years and 21 years, respectively. Due

to the older age of housing stock in LMI geographies, we would expect a higher average maintenance cost, thus making it more difficult to afford owner-occupied housing in this AA for LMI individuals.

Community Contact

Three community contacts conducted in the AA were reviewed as part of this performance evaluation. Two contacts were economic development organizations. These contacts cited a need for financial education, business planning assistance, and access to affordable capital for small business owners and entrepreneurs. The third contact was an affordable housing organization. They cited a need for more affordable rental units for low- and moderate-income families, especially in rural areas. The contact stated that urban areas are relatively stable in terms of supply and demand for affordable housing.

State of Nebraska

Nebraska Non-MSA AA

Demographic Information for Full Scope Area: Nebraska Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0.00	7.69	76.92	15.38	0.00
Population by Geography	36,867	0.00	3.58	76.11	20.32	0.00
Owner-Occupied Housing by Geography	11,748	0.00	3.07	77.73	19.19	0.00
Business by Geography	2,957	0.00	6.05	75.72	18.23	0.00
Farms by Geography	892	0.00	0.56	87.89	11.55	0.00
Family Distribution by Income Level	9,919	17.27	18.88	24.62	39.23	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,586	0.00	4.77	78.19	17.04	0.00
Median Family Income		54,221	Median Housing Value	87,973		
FFIEC Adjusted Median Family Income for 2015		60,500	Unemployment Rate (2010	2.85%		
Households Below Poverty Level		12%	US Census)			

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Non-MSA Counties AA includes the four counties ANB is reasonably able to serve within the state of Nebraska. These include Jefferson, Johnson, Otoe, and Richardson counties. According to the U.S. Census data, the AA consists of 13 census tracts of which, none are low-income, one is moderate-income, 10 are middle-income, and two are upper-income. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies.

The 2015 FFIEC Updated MFI was \$60,500. This represents a 6.14 percent increase compared to the MFI of \$57,000 at the beginning of the evaluation period (2012 HUD Updated MFI). According to the 2010 U.S. Census, the total population of the AA was 36,867. The distribution of families by income level was 17.27 percent low-income, 18.88 percent moderate-income, 24.62 percent middle-income, and 39.23 percent upper-income. According to the American Community Survey the AA population declined by 100, or 0.27 percent during the evaluation period. The AA population totaled 36,614 as of July 1, 2012 and 36,514 as of July 1, 2015.

In the Nebraska non-MSA AA, the bank offers a full range of commercial and consumer loan and deposit products and services. The banking industry is moderately competitive in the AA. The June 30, 2015 FDIC Deposit Market Share Report shows ANB ranked first of 20 depository financial institutions, with a 16.59 percent market share. Competitors include several branches of national, regional, and local community banks operating in the AA. ANB's top five competitors, in order of market share rank, are Richardson County Bank & Trust Company, F&M Bank, The First National Bank of Fairbury, Arbor Bank, and FirstBank of Nebraska. These competitors control 43.21 percent of the deposit market share in the AA. ANB's deposits in the AA as of June 30, 2015, totaled \$184.04 million, representing 9.79 percent of total deposits. The competition maintains 30 offices in the AA. As of September 26, 2016, ANB had six branches in the AA.

Employment and Economic Factors

The economic condition of the AA was strong during the evaluation period. According to the Bureau of Labor Statistics, unemployment in this AA improved during the evaluation period, and remained lower than the national and state average. As of December 2015, the Nebraska and nationwide unemployment rates were 3.00 percent and 5.00 percent, respectively. The unemployment rate for the counties within the AA ranged from 2.70 percent to 3.30 percent, and the AA average unemployment rate was 2.96 percent. Unemployment in the AA fell since January 2012 when levels were 5.30 percent and remained below the national unemployment rate of 8.30.

The AA benefited from a strong agricultural economy. Farmers experienced record high corn and soybean prices in 2012, high yields in 2013, and record high cattle prices in 2014. Employment in the AA is most concentrated within agricultural, education and health, and manufacturing. Major employers include schools, hospitals, agricultural related businesses, and various small businesses among others. The AA exhibits market strengths including low business costs, a skilled workforce, low cost of living, and low unemployment.

Housing

There are limited opportunities for home mortgage lending in this AA's LMI geographies due to the limited LMI designated geographies and the number of housing units is much lower in LMI geographies than middle- and upper-income geographies. According to the 2010 U.S. Census, 3.07 percent of owner-occupied units were located in moderate-income census tracts. Of the total housing units in moderate-income geographies, 28.37 percent were occupied rental units and 25.29 percent were vacant units.

Home ownership in LMI geographies is difficult due to the poverty rate in the AA. According to the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates, the median housing price for houses not in MSAs within the state of Nebraska was \$130,100 at year-end 2014. Based on this median family income, low- and moderate-income families earned at most \$30,250 and \$48,400, respectively. These income levels make owner-occupied housing affordable in this AA for LMI individuals when comparing the average monthly income available for housing payments for an LMI family to an average 30-year mortgage payment. However, median home prices are relatively high in low- and moderate-income census tracts within the AA when considering a household poverty rate of 12.00 percent. Families living in low-income and moderate-income census tracts are significantly impacted more by poverty than families living in middle- and upper-income census tracts. According to the 2010 U.S. Census, the family poverty rate is 8.07 percent with 15.89 percent of families in moderate-income census tracts that live below poverty levels. In contrast 7.68 percent of in middle-income census tracts and 8.33 percent of families in upper-income census tracts live below poverty levels.

According to the 2010 U.S. Census, the median age of housing stock is higher in LMI geographies than middle- and upper-income geographies. Older housing typically has lower purchase prices, but often has higher maintenance costs. Per the 2010 U.S. Census, the median age of housing for moderate-income geographies was 71 years. In comparison, the median age of middle- and upper-income geographies was lower at 62 years and 39 years, respectively. Due to the older age of housing stock in LMI geographies, we would expect a higher average maintenance cost, thus making it more difficult to afford owner-occupied housing in this AA for LMI individuals.

Community Contact

One community contact conducted in the AA was reviewed as part of this performance evaluation. They are a southeast Nebraska regional nonprofit organization that helps LMI individuals in the AA

through a number of social services and educational programs. In addition, they assist with obtaining affordable housing projects. The contract expressed the need for low down payment mortgage lending due to banks tightening credit standards during the economic downturn making it harder for individuals and small business to qualify for loans. In addition, there is a need for quality affordable housing and CD activities in the LMI areas.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 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/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market 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 assessment area.
- 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/assessment area. 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 \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For

borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

Tables provided cover the bank's performance from January 1, 2012 through December 31, 2015

Omaha-Council Bluffs NE-IA MMSA

State of Nebraska

Table 1. Lending Volume

LENDING VOLUME		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Omaha-Council Bluffs NE-IA MMSA	100.00	5,953	870,701	1,616	342,587	724	92,910	10	34,510	8,303	1,340,708	100.00

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 23, 2013 to September 26, 2016.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Total Loans		Small Business Real Estate Secured		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Rated Area Deposits in AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Omaha-Council Bluffs NE-IA MMSA	100.00	13,028	225,353	0	0	0	0	13,028	225,353	0	0	0	0	100.00

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015								
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
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	2,602	100.00	5.55	2.19	17.12	18.83	44.84	49.04	32.49	29.94	3.52	3.26	5.64	4.23	2.18

* Based on 2014 Peer Mortgage Data -- US and PR

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015							
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
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	788	100.00	5.55	5.08	17.12	15.48	44.84	45.81	32.49	33.63	8.43	12.62	9.48	8.70	7.07

* Based on 2014 Peer Mortgage Data -- US and PR

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
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									
Full Review:																								
Omaha-Council Bluffs NE-IA MMSA	2,522	100.00	5.55	2.42	17.12	13.12	44.84	43.58	32.49	40.88	2.52	2.14	3.26	2.65	2.07									

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Omaha-Council Bluffs NE-IA MMSA	41	100.00	12.73	12.20	29.80	43.90	40.86	41.46	16.61	2.44	4.76	6.67	7.41	0.00	0.00									

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015							
Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	1,615	100.00	6.86	11.70	17.25	16.59	44.63	45.02	30.81	26.69	2.96	5.56	2.92	3.11	2.41

* Based on 2015 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015								
Assessment Area	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	724	100.00	1.65	0.14	6.51	0.00	66.95	88.67	24.86	11.19	21.96	20.00	0.00	23.16	17.86

* Based on 2015 Peer Small Business Data -- US and PR

** 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015							
Assessment Area	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	2,602	100.00	20.75	18.10	17.43	30.59	22.67	22.29	39.14	29.02	4.23	7.18	5.24	3.76	3.04

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015							
Assessment Area	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Omaha-Council Bluffs NE-IA MMSA	788	100.00	20.75	11.89	17.43	21.61	22.67	23.79	39.14	42.71	8.88	9.09	9.25	9.01	8.57

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
AA1 Omaha-Council Bluffs NE-IA MMSA	2,522	100.00	20.75	10.41	17.43	20.14	22.67	26.14	39.14	43.32	3.10	3.95	3.45	3.04	2.74									

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Omaha-Council Bluffs NE-IA MMSA	1,616	100.00	76.71	53.16	48.76	25.06	26.18	2.96	3.20

* Based on 2015 Peer Small Business Data -- US and PR

** 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 - 2015).

**** 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 1.55% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Omaha-Council Bluffs NE-IA MMSA	724	100.00	97.91	94.06	55.39	30.66	13.95	21.96	34.88

* Based on 2015 Peer Small Business Data -- US and PR

** 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 - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA										Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015								
Assessment Area	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Full Review:																		
Omaha-Council Bluffs NE-IA MMSA	13,028	100.00	8.81	5.33	21.57	16.99	43.06	47.24	26.51	30.40	23.35	19.08	16.98	22.93	18.37	23.46	41.31	34.53

* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.
 ** Percentage of households is based on 2010 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA				Evaluation Period: APRIL 23, 2013 TO SEPTEMBER 26, 2016			
Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Omaha-Council Bluffs NE-IA MMSA	2	821	216	2,450	218	3,271	100.00	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: OMAHA-COUNCIL BLUFFS NE-IA MMSA				Evaluation Period: APRIL 23, 2013 TO SEPTEMBER 26, 2016			
Assessment Area	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
Omaha-Council Bluffs NE-IA MMSA	100.00	25	100.00	12.00	16.00	60.00	12.00	1	2	0	0	0	-1	8.99	20.73	40.73	29.24						

Table 1. Lending Volume

LENDING VOLUME		Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Nebraska Non-MSA	69.20	391	26,445	90	9,013	274	24,116	0	0	755	59,574	82.21
Limited Review:												
Lincoln MSA	30.80	245	39,008	87	24,410	4	1,215	0	0	336	64,633	17.79

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 23, 2013 to September 26, 2016.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: NEBRASKA														
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015														
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Total Loans		Small Business Real Estate Secured		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Rated Area Deposits in AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Nebraska Non-MSA	19.66	890	13,892	0	0	0	0	890	13,892	0	0	0	0	82.21
Limited Review:														
Lincoln MSA	80.34	3,637	54,297	0	0	0	0	3,637	54,297	0	0	0	0	17.79

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** Deposit Data as of June 30, 2015. Rated Area refers to either 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, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography				
Assessment Area	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Limited Review:																
Lincoln MSA	117	50.87	4.96	5.13	14.03	19.66	40.58	35.90	40.43	39.32	0.74	0.00	1.14	0.58	0.84	
Full Review:																
Nebraska Non-MSA	113	49.13	0.00	0.00	3.07	0.88	77.73	76.99	19.19	22.12	8.36	0.00	20.00	10.33	3.23	

* Based on 2014 Peer Mortgage Data -- US and PR

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEBRASKA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Limited Review:																
Lincoln MSA	51	24.17	4.96	1.96	14.03	9.80	40.58	41.18	40.43	47.06	2.85	0.00	2.20	2.93	3.20	
Full Review:																
Nebraska Non-MSA	160	75.83	0.00	0.00	3.07	3.75	77.73	70.63	19.19	25.62	49.46	0.00	20.00	49.28	57.89	

* Based on 2014 Peer Mortgage Data -- US and PR

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: NEBRASKA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
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									
Limited Review:																								
Lincoln MSA	75	39.27	4.96	4.00	14.03	12.00	40.58	34.67	40.43	49.33	0.16	0.72	0.00	0.20	0.13									
Full Review:																								
Nebraska Non-MSA	116	60.73	0.00	0.00	3.07	0.86	77.73	62.93	19.19	36.21	5.06	0.00	20.00	3.41	7.89									

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															
Geography: NEBRASKA															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015															
Assessment Area	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Limited Review:															
Lincoln MSA	2	50.00	24.90	0.00	28.17	0.00	31.76	50.00	15.17	50.00	0.00	0.00	0.00	0.00	0.00
Full Review:															
Nebraska Non-MSA	2	50.00	0.00	0.00	12.56	0.00	67.77	100.00	19.67	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: NEBRASKA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Limited Review:																					
Lincoln MSA	87	49.15	7.67	14.94	22.77	10.34	32.27	48.28	36.82	26.44	0.57	2.40	0.41	0.46	0.49						
Full Review:																					
Nebraska Non-MSA	90	50.85	0.00	0.00	6.05	8.89	75.72	78.89	18.23	12.22	4.33	0.00	10.34	4.71	1.47						

* Based on 2015 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: NEBRASKA															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015															
Assessment Area	Total Small Farm Loans		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
Limited Review:															
Lincoln MSA	4	1.44	1.67	0.00	7.98	0.00	20.22	0.00	70.13	100.00	0.38	0.00	0.00	0.00	0.45
Full Review:															
Nebraska Non-MSA	274	98.56	0.00	0.00	0.56	0.00	87.89	97.08	11.55	2.92	22.30	0.00	0.00	23.22	10.53

* Based on 2015 Peer Small Business Data -- US and PR

** 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEBRASKA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share				
Assessment Area	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Limited Review:																
Lincoln MSA	117	50.87	19.40	15.18	18.18	34.82	23.30	21.43	39.12	28.57	0.95	1.80	1.84	0.42	0.45	
Full Review:																
Nebraska Non-MSA	113	49.13	17.27	11.82	18.88	32.73	24.62	22.73	39.23	32.73	9.85	9.38	14.93	10.17	6.60	

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEBRASKA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015					Market Share				
Assessment Area	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Limited Review:																
Lincoln MSA	51	24.17	19.40	5.88	18.18	19.61	23.30	35.29	39.12	39.22	3.05	2.33	0.92	1.90	4.84	
Full Review:																
Nebraska Non-MSA	160	75.83	17.27	16.98	18.88	21.38	24.62	20.75	39.23	40.88	51.11	80.00	38.46	31.58	62.86	

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEBRASKA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
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	
Limited Review:																
Lincoln MSA	75	39.27	19.40	7.25	18.18	26.09	23.30	20.29	39.12	46.38	0.22	0.00	0.00	0.44	0.25	
Full Review:																
Nebraska Non-MSA	116	60.73	17.27	9.35	18.88	21.50	24.62	20.56	39.23	48.60	5.66	12.50	2.78	11.11	2.83	

* Based on 2014 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 7.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEBRASKA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Limited Review:									
Lincoln MSA	87	49.15	77.36	35.63	33.33	26.44	40.23	0.57	0.40
Full Review:									
Nebraska Non-MSA	90	50.85	77.98	70.00	72.22	17.78	10.00	4.33	7.37

* Based on 2015 Peer Small Business Data -- US and PR

** 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 - 2015).

**** 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 0.56% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: NEBRASKA									
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
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
Limited Review:									
Lincoln MSA	4	1.44	98.79	50.00	0.00	50.00	50.00	0.38	0.00
Full Review:									
Nebraska Non-MSA	274	98.56	98.88	85.40	76.64	16.06	7.30	22.30	28.00

* Based on 2015 Peer Small Business Data -- US and PR

** 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 - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.72% of small loans to farms originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: NEBRASKA																		
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																		
Assessment Area	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Limited Review:																		
Lincoln MSA	3,637	80.34	11.58	7.89	20.06	19.25	38.13	40.06	30.23	32.80	24.09	20.59	16.66	26.75	18.77	22.93	40.48	29.72
Full Review:																		
Nebraska Non-MSA	890	19.66	0.00	0.00	3.77	3.60	77.83	78.76	18.40	17.64	23.78	11.24	17.72	21.12	17.63	24.38	40.86	43.26

* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.
 ** Percentage of households is based on 2010 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: NEBRASKA		Evaluation Period: APRIL 23, 2013 TO SEPTEMBER 26, 2016				
Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Nebraska Non-MSA	0	0	9	8	9	8	1.26	0	0
Limited Review:									
Lincoln MSA	1	393	11	237	12	629	98.74	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: NEBRASKA				Evaluation Period: APRIL 23, 2013 TO SEPTEMBER 26, 2016									
Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nebraska Non-MSA	82.21	6	85.71	0.00	16.67	83.33	0.00	0	0	0	0	0	0	0.00	3.58	76.11	20.32
Limited Review:																	
Lincoln MSA	17.79	1	14.29	0.00	0.00	0.00	100.00	0	0	0	0	0	0	11.91	18.93	36.83	31.79

Table 1. Lending Volume

LENDING VOLUME		Geography: REGIONAL						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Broader Regional Area with P/M/F to serve an AA(s)	0.00	0	0	0	0	0	0	3	3,000	3	3,000	0.00

* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 23, 2013 to September 26, 2016.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: REGIONAL				Evaluation Period: APRIL 23, 2013 TO SEPTEMBER 26, 2016			
Assessment Area	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Broader Regional Area with P/M/F to serve an AA(s)	1	88	1	1,018	2	1,106	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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.