

# LARGE BANK

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## PUBLIC DISCLOSURE

July 07, 2009

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First National Bank**  
**Charter Number: 3496**

**201 North Dewey**  
**North Platte, NE 69101-0000**

**Office of the Comptroller of the Currency**

**Midsized Bank Supervision**  
**440 South LaSalle Street, Suite 2700**  
**Chicago, IL. 60605-1073**

**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.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>1</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>2</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>6</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>7</b>
<b>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>9</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS .....</b>	<b>10</b>
LENDING TEST .....	10
INVESTMENT TEST .....	15
SERVICE TEST .....	15
<b>APPENDIX A: SCOPE OF EXAMINATION .....</b>	<b>A-1</b>
<b>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

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

The following table indicates the performance level of **First National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflected good responsiveness by First National Bank, North Platte (FNB) to the credit needs of the bank’s assessment area (AA).
- The geographic distribution of FNB’s loans reflected adequate penetration throughout AA census tracts.
- The bank’s distribution of loans to borrowers of different income levels and businesses of different sizes was good.
- The bank provided a good volume of community development (CD) loans that had a positive impact on the lending test.
- Investments reflected an adequate responsiveness by FNB to the needs of the AA.
- The bank’s service delivery systems were accessible to geographies and individuals of different income levels throughout the AA.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income census tracts.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income census tracts;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income census tracts designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on 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):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any 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

First National Bank (FNB) is a full-service financial institution headquartered in North Platte, Nebraska. FNB offers a full range of credit products within its AA including real estate, agricultural, commercial, and consumer loans.

For purposes of CRA evaluation, FNB is an intrastate bank with offices located in Nebraska only. The bank is an intermediate small bank that opted to be examined as a large bank for CRA. As of July 7, 2009, the bank's main office and one branch office were located in North Platte, which is in west-central Nebraska. The bank had four additional branches located in the western Nebraska communities of Alliance, Chadron, Gering, and Scottsbluff. None of the offices were located in a Metropolitan Statistical Area (MSA). The bank had seven automated teller machines (ATMs) and five cash dispensing machines disbursed throughout the assessment area. The bank had no subsidiaries and no merger or acquisition activities during the evaluation period.

First National of Nebraska, Inc. (FNNI) owns 93.3 percent of the bank stock. FNNI is a \$16 billion multibank holding company headquartered in Omaha, Nebraska. In addition to FNB, FNNI owns eight national banks and one state-chartered bank located in Nebraska, Colorado, Illinois, Kansas, and South Dakota.

As of June 30, 2009, FNB had \$482 million in total assets and Tier 1 capital of \$37 million. The bank's loan-to-deposit ratio on that date was 86 percent and net loans represented 78 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 32 percent agricultural (including agricultural real estate); 25 percent commercial (including commercial real estate); 7 percent consumer; 12 percent residential real estate; 3 percent other real estate; and 5 percent other. The remaining 16 percent of the bank's portfolio was comprised of credit card participations purchased from an affiliate bank. FNB sold a significant volume of its home purchase and refinance mortgage loans on the secondary market. The loan-to-deposit ratio and loan portfolio mix do not reflect these loans. From January 1, 2006 to December 31, 2008, the bank originated and sold 462 residential mortgage loans totaling \$46 million. There were no known legal, financial, or other impediments that hampered FNB's ability to help meet the credit needs of its AA.

The bank previously attained an "Outstanding" rating at the last CRA examination dated March 1, 2006.

# Scope of the Evaluation

## Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans, small loans to businesses, and small loans to farms was from January 1, 2006 to December 31, 2008. Lending analysis conducted to analyze geographic distribution and borrower distribution were compared against 2000 Census demographic data. We based market comparisons on 2007 peer data. For community development loans, the Investment Test, and the Service Test, the evaluation period was from March 1, 2006 to July 6, 2009.

While credit card loan participations comprised a moderate portion of the bank's loan portfolio, we did not include these loans in the analysis of borrower and geographic distribution of loans. The participations represented a loan product offered nationwide by an affiliate bank. As a result, the vast majority of credit card borrowers were outside FNB's AA. When analyzing lending activity, we took into consideration whether credit card loan participations were purchased to the detriment of borrowers within the AA.

## Data Integrity

We tested the accuracy of the bank's publicly filed information for small loans to businesses and farms as part of the CRA evaluation. We found the accuracy of the collected data to be satisfactory.

The bank was not required to collect and report data on home mortgage loans under the Home Mortgage Disclosure Act (HMDA). FNB did collect and maintain some data on home mortgage loans internally. We tested the accuracy of this data to determine whether we could use it for CRA analysis. We found that the collected data on loans maintained in-house did not specifically identify loan type and for the loans sold to an affiliate bank, there was no data collected. Therefore, we used random samples of home purchase and home mortgage refinance loans to evaluate the bank's lending performance. Our conclusions are based on reliable data within the sampled loans. We did not include home improvement loans in our analysis of home mortgage related loans as they made up only one percent of home mortgage loans by number and dollar amount. Analysis would not have a meaningful impact on the banks' CRA rating given the limited volume.

We also reviewed CD loans, investments, and services submitted by FNB to ensure they met the regulatory definition for CD. We excluded from this evaluation some items submitted for consideration because they did not meet the definition or purpose of CD.

## Selection of Areas for Full-Scope Review

FNB has only one AA. We performed a full-scope review of this area. Refer to the table in Appendix A for more information.

## Ratings

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

In determining conclusions for the lending test, we weighted loan products to be reflective of FNB's loan volume by product type during the evaluation period. The four loan products we evaluated were small loans to businesses, small loans to farms, home purchase loans, and home mortgage refinance loans. We weighted small loans to farms and small loans to businesses more heavily than other reported loan products as they represented 43 percent and 37 percent of the total number of originated loans during the evaluation period. Home purchase and home mortgage refinance loans combined represented 19 percent of the total volume of loans. Home improvement loans represented one percent of the total loan volume and therefore were not analyzed.

The CRA regulation also gives consideration to a bank's multi-family mortgage lending. We did not include multifamily lending in our analysis as FNB's loan volume for this product was minimal. As of June 30, 2008, multifamily mortgage loans represented just one percent of the bank's total loans.

## **Other**

We performed one community contact during the examination. The organization contacted was an affordable housing developer. This organization focused on providing affordable housing for low- and moderate-income (LMI) individuals. We also reviewed two community contacts which had been recently completed for other banks in the community. These contacts were conducted for organizations focused on small business development and community development.

The contacts stated the primary needs in the AA related to economic development, particularly loans for small businesses. Contacts also noted that affordable housing continues to be a need in the area. We considered the needs noted by our contacts in our evaluation of the bank's performance under the lending, investment, and service tests.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

# Conclusions with Respect to Performance Tests

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

#### Lending Activity

FNB's lending activity in the AA was good. To analyze FNB's lending activity, we compared the bank's deposit market share with its lending market share for small loans to farms and businesses. In comparing the market share percentages, we took into consideration deposit market share information and included only deposit-taking financial institutions that had one or more branches located in the AA regardless of size. Lending market share information included lenders who did not have deposit-taking facilities in FNB's AA, but reported one or more business or farm loans in the area in 2007. Lending market share data included primarily larger banks. During 2007, CRA reporting requirements for business and farm loans included only banks with total assets exceeding \$250 million or more, or banks of any size that were part of a holding company with total assets of \$1 billion or more. Due to the different geographic populations of financial institutions included in the data, we did not expect FNB's deposit market share and lending market share percentages to match in order for performance to be considered good.

Based on FDIC deposit market share data as of June 30, 2008, there were 15 deposit-taking financial institutions with one or more banking offices in the bank's AA. FNB was the largest of these institutions with a 25 percent deposit market share.

The bank originated the following loan volumes in the assessment area during the evaluation period:

FNB's volume of small loans to businesses was good accounting for 1,145 small loans to businesses totaling \$94 million. This represented 11 percent of all reported small loans to businesses in the assessment area, ranking fifth among 27 lenders.

The bank's volume of small loans to farms was excellent accounting for 1,319 small loans to farms totaling \$104 million. This represented 38 percent of all reported small loans to farms in the assessment area, ranking first among 18 lenders.

Similar comparisons were difficult to make for home mortgage loans because comprehensive market share data is not readily available in nonmetropolitan areas. Also, FNB was not required to collect and report data on home mortgage loans under the Home Mortgage Disclosure Act (HMDA). During the evaluation period, FNB made 613 home mortgage loans. This level of mortgage lending activity is considered good.

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

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

The geographic distribution of FNB's loans reflected adequate penetration throughout the AA. Performance was adequate for small loans to farms and businesses but home mortgage lending performance was considered poor. We identified no conspicuous gaps in the geographic distribution of loans. FNB originated a moderate percentage of its loans within its AA.

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

The bank achieved a poor geographic distribution of home purchase and home mortgage refinance loans during the evaluation period. The bank's lending to moderate income census tracts was below the percentage of owner-occupied homes located in these census tracts. The demographic data notes six percent of owner occupied units are located in the moderate income census tracts, indicating lending opportunities were low. However, for home purchase and home mortgage refinance loans, our sample identified no loans in these census tracts.

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

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

FNB's geographic distribution of small loans to businesses in the AA was adequate. During the evaluation period, the bank's percentage of loans made in moderate-income census tracts was less than the percentage of businesses that were located in these census tracts. In concluding performance was adequate, we took into consideration that three of the moderate-income census tracts were in communities that ranged from 33 to 95 miles from the nearest FNB branch.

Market share performance for the evaluation period was adequate as FNB's market share for small loans to businesses in moderate-income census tracts was below the bank's overall market share for all small loans to business throughout the AA. In concluding performance was adequate, we gave less consideration to the bank's market share performance, as the majority of banks competing in FNB's AA were not required to collect and report data on small loans to businesses.

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

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

The bank's distribution of small loans to farms by geography income level was adequate. For the evaluation period, FNB's percentage of small loans to farms in moderate-income census tracts was somewhat below the percentage of farms in the AA that were located in those census tracts.

Market share performance was adequate, as FNB's market share for small loans to farms in moderate-income census tracts was below the bank's overall market share for small loans to

farms in the AA. In concluding performance was adequate, we gave less consideration to the bank's market share performance, as the majority of bank's in FNB's AA were not required to collect and report data on small loans to farms.

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

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

We reviewed maps and reports of FNB's home mortgage loans, small loans to businesses, and small loans to farms in the AA to identify gaps in the geographic distribution of these loans. We did not identify any conspicuous gaps in lending. During the evaluation period, of the 32 census tracts in the bank's AA, FNB originated one or more home mortgage, small business, or small farm loans in each tract with the exception of no home mortgage lending identified in two middle-income and two moderate income census tracts. The two moderate income census tracts are in communities that range from 33 to 95 miles from the nearest FNB branch.

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

By number of home loans sampled, 100 percent were within FNB's AA. By number of reported loans, the bank originated 82 percent of small loans to businesses, and 54 percent of small loans to farms within its AA.

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

The bank's distribution of loans by borrower income level was good. Performance was excellent for small loans to businesses and good for small loans to farms and home purchase loans. Performance was adequate for home mortgage refinance loans.

When evaluating the borrower distribution of the bank's home mortgage lending throughout the AA, we took into consideration the significant percentage of families throughout the AA living below the poverty level. According to the 2000 U.S. Census, 12 percent of families in FNB's AA were below the poverty level. These families would have a more difficult time qualifying for residential mortgage loans due to their limited income. Also, rising housing costs, increased interest rates, and eventually tighter underwriting standards made it difficult for low-income families to purchase a home. The 2000 median housing value for the AA was \$68,864. Updated published data showed this number increased significantly throughout the AA. For example, the average price of single-family homes sold in North Platte in 2007 and 2008 was \$110,739. In Scottsbluff, the average price of single-family homes sold in 2007 and 2008 was \$96,000.

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

The distribution of FNB's home purchase loans by borrower income level was good. FNB's percentage of home purchase lending to low-income borrowers was adequate. FNB's percentage of lending to low-income borrowers for home purchases was less than the percentage of families in the AA that were low-income however, due to the level of poverty in the AA, it is likely many of these families would be unable to afford purchasing a home. FNB's

home purchase lending to moderate income borrowers was excellent. FNB's home purchase lending to moderate income borrowers was above the percentage of families in the AA that were moderate-income.

FNB achieved an adequate distribution of home mortgage refinance loans to borrowers of different income levels. FNB's percentage of mortgage refinance lending to low-income borrowers was adequate. FNB's percentage of mortgage refinance lending to low-income borrowers was generally below the percentage of low-income families in the AA. FNB's percentage of mortgage refinance lending to moderate income borrowers was adequate. FNB's percentage of mortgage refinance lending to moderate income borrowers was generally below the percentage of moderate income families in the AA. Performance was considered adequate given the significant percentage of families in the AA that were below the poverty level.

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

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

The bank's distribution of loans to businesses of different sizes was excellent. FNB's percentage of reported loans to businesses with gross annual revenues of \$1 million or less significantly exceeded the percentage of businesses in the AA with revenues of \$1 million or less. Performance was also excellent when looking at market share data. FNB's market share of loans to businesses with revenues of \$1 million or less exceeded the bank's overall market share of small loans to businesses.

Another indication of the bank's excellent performance was the percentage of loans originated in amounts of \$100,000 or less. Loan size often loosely correlates to the size of the business. During the evaluation period, FNB originated 81 percent of its reported loans to businesses in amounts of \$100,000 or less, regardless of the size of the business.

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

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

FNB's distribution of loans to farms of different sizes was good. The bank's percentage of reported loans to farms with gross annual revenues of \$1 million or less was near to the percentage of farms in the AA with revenues of \$1 million or less. Market share performance was also good. FNB's market share of loans to farms with revenues of \$1 million or less slightly exceeded the bank's overall market share of small loans to farms.

Another indication of the bank's performance was the large percentage of loans originated in amounts of \$100,000 or less. Loan size often loosely correlates to the size of the farm. FNB originated 76 percent of its reported loans to farms in amounts of \$100,000 or less during the evaluation period.

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

## **Community Development Lending**

CD lending had a positive impact on lending test conclusions. This was based primarily on the bank's volume of CD loans originated throughout the AA. FNB originated 14 CD loans totaling \$4.2 million during the evaluation period. This dollar volume represented 11 percent of Tier 1 capital. We did not consider any of the loans to be complex. The loans were responsive to community needs as 93 percent of the total dollar amount of CD loans provided financing for community services and helped to stabilize the underserved and distressed portions of the assessment area. The following summarizes some of the bank's qualified CD loans:

- Nearly \$1.6 million to finance the construction of a medical office that houses the primary care physicians, which is located in the distressed and underserved CT in Alliance, Nebraska.
- \$1.5 million to finance the construction of a hospital in the underserved CT in Chadron, Nebraska.
- Nearly \$850,000 to various non-profit organizations providing affordable housing to LMI individuals in the AA.

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

## **Product Innovation and Flexibility**

FNB participated in a variety of flexible loan programs during the evaluation period. The bank's participation in these programs helped to meet the credit needs of LMI borrowers in the assessment area. FNB received positive consideration in our analysis of the Lending Test performance due to their participation in these programs.

FNB participated in several loan programs sponsored by the federal government that primarily serve LMI applicants. These housing programs generally offered reduced down payment requirements, lower closing costs, lower interest rates, and more liberal underwriting criteria than conventional loans. From 2006 to 2008, FNB originated one Veterans Administration (VA) loan for \$189,000 and 25 United States Department of Agriculture (USDA) Rural Development loans for \$1.6 million. FNB also offered borrowers Farm Service Agency (FSA) loans during the evaluation period. Management originated 17 FSA loans for \$7.3 million during the evaluation period.

In addition to the programs noted above, management participated in the Nebraska Investment Finance Authority (NIFA) loan programs. NIFA loan programs provide financing to qualified LMI borrowers throughout Nebraska. These loans generally offer reduced interest rates and lower down payment requirements than traditional mortgage loan programs. FNB originated 60 NIFA loans for \$4 million during the evaluation period.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the AA is adequate.

In total, FNB made \$1.6 million in qualified investments and donations during the evaluation period. This accounts for 4.21 percent of Tier 1 Capital at June 30, 2009. The bank's assessment area directly benefited from \$537,000 of the qualified investments. Investments included a \$410,000 bond to support a hospital in an underserved portion of the assessment area. Management also made \$127,000 in donations to eleven local organizations that have community development as their primary purpose.

FNB demonstrated a good responsiveness to community needs in their assessment area. All of FNB's donations provided assistance to organizations specializing in providing affordable housing for LMI individuals, economic development for small businesses, or community services such as day care, job training, and emergency shelter to LMI persons.

FNB's qualified investments included two prior period investments in subsidiaries of affiliated organizations. Management invested \$770,000 in the First National of Nebraska Community Development Corporation, which provides loans to LMI persons and areas targeted for redevelopment. Management also invested \$250,000 in First National Bank of Omaha's Access Capital Fund, which purchases debt securities that support community development. Neither of these investments had a direct impact on the bank's assessment area during the evaluation period.

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

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory." This is based on a full-scope review of the bank's AA.

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

### **Retail Services**

FNB's service delivery systems were accessible to census tracts and individuals of different income levels throughout its AA. During the evaluation period, the percentage of the bank's branches located in middle-income and upper-income census tracts was comparable to the percentage of the population residing in those areas. The bank does not have any branches located in moderate-income census tracts. However, only seven percent of AA population resided in moderate-income tracts. The Alliance branch is located in a census tract that has

been designated by Federal Agencies as distressed and underserved. The Chadron branch is located in a census tract that has been designated by Federal Agencies as underserved.

The bank did not open or close any branches during the evaluation period.

The bank's hours and services offered throughout the AA were good. Hours and services did not vary in a way that inconvenienced its AA, in particular moderate-income census tracts or LMI individuals. FNB supplemented its banking hours and services offered Monday through Friday with Saturday hours at all branches except the Gering branch (located in a middle-income tract). In addition, the bank offered Sunday afternoon hours at the North Platte - South branch. Office hours and services, including the availability of loan officers for all loan products, were comparable among locations with one exception. The Gering branch did not have lending personnel onsite, but loan officers were available by appointment. The Gering branch is located in a middle-income tract. Gering is adjacent to Scottsbluff and that branch has lending staff onsite.

The bank's ATM network offered a reasonably effective alternative system for delivering retail banking services to LMI individuals. FNB operated 7 deposit taking ATMs throughout the AA. By geography income level, 58 percent were in middle-income tracts, and 42 percent were in upper-income tracts.

FNB also offered other alternative delivery systems. These included banking by telephone, Internet, and mail services. Banking by telephone services were available in English or Spanish 24 hours per day via a toll-free phone number. The service allowed customers to access checking and savings balances, transfer funds, and obtain loan information. Internet banking allowed customers to access account balances, transfer funds, download account transaction information, and pay bills. The bank also employs bilingual employees at its Scottsbluff, Gering, and North Platte branches. No information was available on the effectiveness of these services in reaching moderate-income census tracts or LMI individuals. We did not place significant weight on these systems when drawing conclusions under the service test.

Refer to Table 15 in Appendix C for the distribution of population by geography income level.

## **Community Development Services**

FNB's performance in providing CD services is adequate. This was based on the number of organizations to which FNB provided CD services, the responsiveness of the services to the needs of the community, and the leadership roles bank representatives assumed in with these organizations. In total, bank personnel provided services to 14 organizations serving the AA, donating over 1800 hours to these activities. Organizations assisted were involved primarily in community services, followed by affordable housing and economic development programs. The most significant needs identified by community contacts were affordable housing and economic development. Bank representatives provided leadership to these organizations serving as board and finance committee chairs. In these roles, FNB employees provided planning, budgeting, fundraising, and administrative services.

The following are examples of community development services FNB representatives provided in the AA during the evaluation period:

- One employee worked with a local development corporation and assisted in developing an affordable housing program which allows LMI individuals the opportunity to be homeowners or finance improvements on homes they currently own. Another employee served on an ongoing basis as the Secretary and President on the Board of Directors for the same organization.
- Two bank employees served in leadership roles for two local chapters of Habitat for Humanity. One employee provided leadership to the organization by serving as a director and treasurer of the chapter. Another employee served on the family selection committee. In these roles, bank employees assisted in selecting families for housing projects and providing ongoing support for families, such as assisting borrowers in the completion of home loan applications.
- Several bank employees provided leadership to nonprofit organizations which provide community services targeted to LMI individuals and families in the community. These services included operating the only 24-hour homeless shelter in western Nebraska. Employees provided leadership to these organizations by serving on the Board of Directors and Finance Committees. Another employee also provided bookkeeping and accounting services for an organization.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 1/1/2006 to 12/31/ 2008 Investment and Service Tests and CD Loans: 3/1/ 2006 to 7/6/2009	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank (FNB) North Platte, NE	Home mortgage loans, small loans to businesses, small loans to farms, community development loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A – no affiliate products reviewed		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Assessment Area</b>
FNB AA	Full-Scope	Rural AA consisting of the following counties in Nebraska: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas.

## Appendix B: Market Profiles for Full-Scope Areas

### FNB North Platte AA

Demographic Information for Full-Scope Area: FNB North Platte AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0%	13%	75%	12%	0%
Population by Geography	104,453	0%	7%	78%	15%	0%
Owner-Occupied Housing by Geography	28,565	0%	6%	78%	16%	0%
Businesses by Geography	10,731	0%	7%	74%	19%	0%
Farms by Geography	1,492	0%	8%	75%	17%	0%
Family Distribution by Income Level	28,519	20%	18%	23%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,782	0%	11%	79%	10%	0%
Median Family Income = \$41,920			Median Housing Value = \$68,864			
HUD Adjusted Median Family Income for 2009 = \$53,700			Unemployment Rate = 2.4%			
Households Below the Poverty Level = 12%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2009 HUD updated MFI.

FNB designated the following contiguous counties in western Nebraska as its AA: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas. The bank's head office, five branches, and all deposit-taking ATMs were located within the AA.

The AA was very large as it contained over 13,000 square miles. This was comparable to the States of Connecticut, Massachusetts, and Rhode Island, combined. FNB's AA was also predominantly rural and very sparsely populated, with an average of eight persons per square mile. In counties where FNB did not have a branch facility, the population averaged less than two persons per square mile.

Based on June 30, 2008 deposit market share data compiled by the Federal Deposit Insurance Corporation, FNB was ranked the largest deposit-taking financial institution in the AA with a market share of 25 percent. Six financial institutions reported deposits in excess of \$100 million and had market shares ranging from 6 percent to 13 percent.

The bank operated in a competitive environment. There were 15 deposit-taking financial institutions in the bank's AA. Primary financial institutions competitors included Wells Fargo, US Bank, Platte Valley Bank, Nebraska National Bank, First State Bank, Tier One Bank

and Bank of the West. Credit unions, finance companies, and mortgage companies also competed for loan production throughout the assessment area.

Local economic conditions were good. Agriculture and related industries dominated the AA; however, there was some employment diversification. Major employers in the AA included railroads, regional medical centers, and public schools. The June 2009 state unemployment rate was 5.1 percent while the AA unemployment rate (by county) ranged from 3.0 percent to 5.9 percent for the same time period. For comparison, the national unemployment rate was 9.4 percent in June 2009.

According to community contacts, the primary credit needs in the AA related to economic development, particularly loans for small businesses. Contacts also noted that affordable housing continues to be a need in the area. We considered the needs noted by our contacts in our evaluation of the bank's performance under the lending, investment, and service tests.

## Appendix C: Tables of Performance Data

---

### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (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 census tracts 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. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/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.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's 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 (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/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.

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

# Table 1. Lending Volume

LENDING VOLUME		Geography: Nebraska						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
FNB North Platte AA	100%	120	11,020	1,145	93,769	1,319	103,775	14	4,200	2,464	197,544	100%

<sup>\*</sup> Loan Data as of December 31, 2008. Rated area refers to either the state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is to March 1, 2006 to July 6, 2009.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2008. 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, 2006 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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					
<b>Full Review:</b>															
FNB North Platte AA	60	100%	N/A	N/A	6%	0%	78%	72%	16%	28%	N/A	N/A	N/A	N/A	N/A

\* Based on NA Peer Mortgage Data: NA Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

# Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: Nebraska				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
FNB NP AA	60%	100%	N/A	N/A	6%	0%	78%	58%	16%	42%	N/A	N/A	N/A	N/A	N/A	

\* Based on NA Peer Mortgage Data: NA Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

# Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: Nebraska					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
MA/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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
FNB North Platte AA	1,145	100%	N/A	N/A	7%	3%	74%	78%	19%	19%	11%	N/A	7%	11%	10%									

\* Based on 2007 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet 2008.

# Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: NEBRASKA		Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008								
MA/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										
<b>Full Review:</b>																									
FNB North Platte AA	1,319	100%	N/A	N/A	8%	6%	75%	81%	17%	13%	38%	N/A	21%	40%	45%										

\* Based on 2007 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet 2008.

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

Borrower Distribution: HOME PURCHASE		Geography: Nebraska				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share <sup>*</sup>				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
FNB North Platte AA	60	100%	20%	3%	18%	24%	23%	30%	39%	43%	N/A	N/A	N/A	N/A	N/A

<sup>\*</sup> Based on NA Peer Mortgage Data: NA Region.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0% 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, 2006 TO DECEMBER 31, 2008								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	% Families <sup>***</sup>	% BANK <sup>****</sup> Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
FNB North Platte AA	60	100%	20%	3%	18%	12%	23%	27%	39%	58%	N/A	N/A	N/A	N/A	N/A

<sup>\*</sup> Based on NA Peer Mortgage Data: NA Region.

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

<sup>\*\*\*</sup> Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0% 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, 2006 TO DECEMBER 31, 2008				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
FNB North Platte AA	1,145	100%	50%	82%	81%	11%	8%	11%	18%

\* Based on 2007 Peer Small Business Data: US.

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008r).

\*\*\*\* 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 4.37% 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, 2006 TO DECEMBER 31, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
FNB North Platte AA	1,319	100%	97%	94%	76%	18%	6%	38%	41%

\* Based on 2007 Peer Small Business Data: US.

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

\*\*\*\* 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 2.27% of small loans to farms originated and purchased by Bank.

## Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Nebraska				Evaluation Period: March 1, 2006 to July 6, 2009			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
FNB North Platte AA	0	0	27	540	27	540	35%	0	0
Statewide/Regional Area	2	1,020	0	0	2	1,020	65%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nebraska Evaluation Period: March 1, 2006 to July 6, 2009																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
FNB North Platte AA	100%	6	100%	NA	0%	83%	17%	0	0	0	0	0	0	NA	7%	78%	15%