



**LARGE BANK**

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## **Public Disclosure**

October 6, 2004

# **Community Reinvestment Act Performance Evaluation**

**The Security National Bank of Sioux City, Iowa  
Charter Number: 3124**

**605 Pierce Street  
Sioux City, Iowa 51102**

**Office of the Comptroller of the Currency**

**Omaha North Field Office  
13710 FNB Parkway, Suite 110  
Omaha, Nebraska 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.**

## Description of Institution

Security National Bank of Sioux City, Iowa (SNB) is a full-service financial institution headquartered in Sioux City, Iowa. For purposes of this Community Reinvestment Act (CRA) evaluation, SNB is an intrastate bank with offices located only in Iowa. As of our examination, the bank had four branch locations and ten automated teller machines (ATMs), all located in the Sioux City, IA-NE Metropolitan Statistical Area (MSA). The assessment area (AA) meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income (LMI) areas. For additional information on SNB's AA see Market Profile – Demographic Information Tables in appendix B.

As of June 30, 2004, SNB had \$538 million in total assets and tier 1 capital of \$50 million. The bank's primary loan products include residential real estate and commercial lending; however, the bank offers a full range of credit products within its AA including agricultural and consumer loan products.

SNB sells a significant amount of home purchase and refinance mortgage loans it originates to the secondary market. During 2001, 2002, and 2003, there were 249 such loans totaling \$22 million. These loans were not reported on SNB's Loan Application Register for the Home Mortgage Disclosure Act (HMDA) and were not included in the lending test analysis because the bank does not make the credit decision for them.

For additional information on the bank, its affiliates, or products and services offered, please refer to the bank's CRA Public File.

SNB's performance was rated "Satisfactory" at its last CRA examination dated November 6, 2000.

## Evaluation Period

For home mortgage loans, small loans to businesses, and small loans to farms, the evaluation period was from January 1, 2001 through December 31, 2003. We evaluated 2001-2002 loan data separately from 2003 loan data. The 2001-2002 loan data was compared to the 1990 U.S. Census Data and the 2003 loan data was compared to the 2000 U.S. Census Data. We did not weight one evaluation period over the other in our analysis. The evaluation period for community development (CD) loans, the investment test, and the service test was from November 7, 2000 through August 31, 2004.

## Overall CRA Rating

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

The following table indicates the performance level of SNB with respect to the lending, investment, and service Tests:

Performance Levels	The Security National Bank of Sioux City, Iowa Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	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 following are the major factors that support this overall rating and conclusions with respect to performance tests.

### Lending

Refer to Tables 1 through 12 in appendix C for the facts and data used to evaluate the bank’s lending activity.

Performance under the lending test is rated low satisfactory.

- SNB’s lending activity in the AA was adequate. The bank’s volume of home mortgage lending and small loans to businesses were the primary factors supporting this conclusion. The bank’s deposit share was 19%, which exceeded its HMDA and small business loan market share. The bank’s volume of home purchase loans was adequate. There were over 117 lenders reporting one or more home purchase loans in 2003. SNB ranked fifth among these lenders with a 5% market share. The bank’s volume of home mortgage refinance loans was adequate. There were over 184 lenders reporting one or more home mortgage refinance loans in 2003. SNB ranked fifth among these lenders with a 6% market share. SNB also originated and sold home purchase and home refinance loans, that in accordance with HMDA reporting requirements, the bank did not include on its HMDA Loan Application Register. Factoring in these loans did not make a significant difference in the ranking among lenders. The bank’s volume of home improvement loans was adequate. There were 42 lenders reporting one or more home improvement loans in 2003. SNB ranked third among these lenders with an 11% market share, which is considerably below the bank’s deposit market share. The bank’s volume of small business loans was adequate. There were 39 lenders reporting

one or more small business loans in 2003. SNB ranked sixth among these lenders with a 6% market share. The bank's volume of small farm loans was excellent. There were 12 lenders reporting one or more small farm loans in 2003. SNB ranked first among these lenders with a 32% market share.

- SNB's geographic distribution was adequate overall. Performance for home mortgage lending was adequate, good for small loans to farms, and excellent for small loans to businesses. In 2003, there were no owner-occupied units located in low-income tracts. The distribution for home purchase lending was good with lending in moderate-income geographies as good. SNB's percentage of home purchase loans in moderate-income tracts was generally near to the percentage of owner-occupied units. The distribution for home improvement lending was adequate with lending in moderate-income geographies as adequate. The distribution for home refinance loans was adequate. The bank's percentage of small business loans in LMI tracts consistently exceeded the percentage of businesses in those areas. SNB's percentage of small farm loans in low-income tracts was generally below demographics because those tracts are in the city. In 2003, the percentage of farms in moderate-income tracts exceeded the demographics.
- Sixty-five percent of SNB's reportable loans were made inside the AA, which represented an adequate percentage.
- SNB's distribution of home mortgage loans was good. Performance was strongest for home improvement, home purchase, and home refinance loans. It was considered adequate for small business and farm loans. The bank's percentage of home improvement loans to moderate-income borrowers exceeded the percentage of families in the AA that were moderate-income. The bank's portion of home improvement loans to low-income borrowers was near to in 2001-2002 and exceeded in 2003 the portion of families in the AA that were low-income. SNB's percentage of home purchase loans to moderate-income borrowers was near to the percentage of families in the AA that were moderate-income. The bank's portion of reported loans to low-income borrowers was below the percentage of families in the AA that were low-income. Performance was still considered good given the shortage of housing affordable to LMI persons. SNB's percentage of home refinance loans to moderate-income borrowers was near to the percentage of families in the AA that were moderate-income. The bank's percentage of refinance loans to low-income borrowers was lower than the percentage of families in the AA that were low-income. The bank's market share percentage of refinance loans to LMI borrowers met its overall market share percentage of home mortgage refinance loans in the AA. The bank's percentage of reported loans to businesses with gross annual revenues of \$1 million or less did not compare favorably to the percentage of businesses in the AA with revenues of \$1 million or less. However, this was a considerable improvement over the last examination, and the bank's market share percentage exceeded the overall market share percentage of small business loans in the AA.
- In evaluating the bank's distribution of small loans to farms, we considered the following contextual issues. During the evaluation period, SNB typically originated one master note or line of credit per year to its small business and farm customers. The customer drew on the note repeatedly as needed throughout the year; however, each line of

credit was reported only once per year for CRA reporting purposes. For larger business and farm customers, the bank originated a separate note for each credit request. Each of these notes was reported separately for CRA reporting purposes. The result of this practice was the bank reported a disproportionate number of loans to larger businesses and farms than to smaller businesses and farms. SNB's distribution of loans to farms of different sizes was adequate. The bank's percentage of reported loans to farms with gross annual revenues of \$1 million or less was below the percentage of farms in the AA with revenues of \$1 million or less. The bank's percentage was calculated based on the number of reported loans and did not accurately represent the bank's lending to small farms. SNB's performance was considerably stronger when analyzing the bank's reported small loans to farms by borrower instead of by individual loan. During the evaluation period, SNB reported 39 agricultural borrowers in the AA. Of these borrowers, 87% were farms with revenues of \$1 million or less.

- CD lending positively affected the bank's rating. SNB originated 23 qualified loans totaling \$15 million. This activity was favorable because a significant number of the projects were for affordable housing for LMI persons.
- During the evaluation period, SNB offered flexible lending programs to help meet the credit needs of LMI borrowers in the Sioux City AA. This included three programs sponsored by federal and state government agencies. The bank's participation in these programs received positive consideration in the analysis of the lending test performance.

## Investments

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

Performance under the investment test is rated low satisfactory.

- SNB provided an adequate level of qualified investments in the AA. During the evaluation period, SNB provided \$236 thousand in grants and contributions to nearly 35 organizations whose primary purposes were to provide qualified CD services in the AA. This volume was considered adequate given the limited CD investment opportunities in the AA. Discussions with community contacts and a review of CRA performance evaluations of competing banks did not identify any qualified CD investment securities available for purchase during the evaluation period. Refer to the market profile for further information on the investment opportunities in the AA.
- SNB demonstrated an adequate responsiveness to identified needs in the AA. Qualified CD organizations receiving contributions from the bank provided a variety of services to the community. These included nonprofit developers of affordable housing for LMI persons and entities providing various services to LMI individuals, including emergency shelter, food, education, job training, day care, and medical assistance.

## Services

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.

The bank's performance under the service test is rated high satisfactory.

- SNB's service delivery systems were accessible to geographies and individuals of different income levels throughout the AA. The bank did not have any branches located in low-income geographies. Concern was mitigated because two of the bank's four locations were located in moderate-income tracts. These two branches were in the central business district. In addition, one branch located in an upper-income census tract was across the street from a moderate-income tract. The vast majority of LMI areas in the AA were within two miles of an SNB bank branch. SNB's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals in the AA. SNB did not open or close any branches during the evaluation period. The bank experienced some changes in this area due to redesignated census tracts (CTs) following the 2000 census.
- 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 LMI geographies or LMI individuals. SNB supplemented its banking hours and services offered Monday through Friday with Saturday hours at all branches except the main bank, which was located in the moderate-income central business district. The motor bank, located three blocks away, was open on Saturday with extended hours. Office hours and services, including the availability of loan officers for all loan products, were comparable among locations regardless of the income level of the geography.
- The bank's ATM network offered a reasonably effective alternative system for delivering retail banking services in LMI geographies and to LMI individuals. SNB operated 10 ATMs throughout the AA, including one at each branch location. Twenty percent of the bank's ATMs were located in moderate-income geographies. This was near to the percentage of the population located in these tracts. ATMs in middle- and upper-income geographies provided reasonable access for persons in low- and moderate-income areas.
- SNB also offered other alternative delivery systems. These included banking by telephone, Internet, and mail services. Telephone allowed customers to access checking and savings balances, transfer funds, obtain loan information, and access customer service representatives. Internet banking allowed customers to access account balances, transfer funds, pay bills, and complete loan applications. No information was available on the effectiveness of these services in reaching LMI geographies or individuals. We did not place significant weight on these systems when drawing conclusions under the service test.

## **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal practices.

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

Demographic Information for 2001–2002 Sioux City, IA-NE MSA # 7720						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	7%	20%	47%	23%	3%
Population by Geography	115,018	4%	18%	49%	29%	0%
Owner-Occupied Housing by Geography	29,400	2%	16%	51%	31%	0%
Businesses by Geography	7,135	20%	14%	36%	26%	4%
Farms by Geography	717	2%	3%	81%	14%	< 1%
Family Distribution by Income Level	30,609	19%	19%	24%	38%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,569	5%	27%	51%	17%	0%
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level		\$30,450 \$52,300 12%	Median Housing Value Unemployment Rate			\$41,028 4%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

Demographic Information for 2003 Sioux City, IA-NE MSA # 7720						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	3%	23%	52%	19%	3%
Population by Geography	124,130	< 1%	21%	56%	23%	0%
Owner-Occupied Housing by Geography	31,645	0%	14%	58%	28%	0%
Businesses by Geography	7,235	3%	33%	43%	21%	0%
Farms by Geography	727	< 1%	5%	83%	12%	0%
Family Distribution by Income Level	31,882	18%	19%	24%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,747	< 1%	30%	56%	14%	0%
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below the Poverty Level		\$46,048 \$52,300 9%	Median Housing Value Unemployment Rate			\$75,332 5.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2003 HUD updated MFI.

## 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: 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. 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. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**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.

Note: The following tables are excluded from this PE because the related data was not applicable:

- Table 1. Other Products
- Table 5. Geographical Distribution of Multifamily Loans
- Table 13. Geographical and Borrower Distribution of Consumer Loans (Optional)

## Table 1. Lending Volume

LENDING VOLUME		Geography: IOWA						Evaluation Period: January 1, 2001 to December 31, 2003				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2001-2002 Sioux City, IA-NE MSA #7720	65%	826	63,303	407	50,847	147	17,749	19	12,317	1,399	144,216	100%
2003 Sioux City, IA-NE MSA #7720	35%	499	38,431	179	22,348	76	10,754	4	2,487	758	74,020	100%

\* Loan Data as of December 31, 2003. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is November 7, 2000 to August 31, 2004.

\*\*\* Deposit Data as of June 30, 2003. 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: IOWA				Evaluation Period: January 1, 2001 to December 31, 2003								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	198	66%	2%	3%	16%	13%	51%	41%	31%	43%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	104	34%	0%	0%	14%	11%	58%	41%	28%	48%	5%	0%	5%	4%	7%

\* Based on 2003 Peer Mortgage Data: Western Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area. Based on 1990 Census information for loan data from 2001 and 2002; and 2000 Census information for loan data from 2003.

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

Geographic Distribution: HOME IMPROVEMENT			Geography: IOWA								Evaluation Period: January 1, 2001 to December 31, 2003				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	172	69%	2%	3%	16%	10%	51%	47%	31%	40%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	78	31%	0%	0%	14%	9%	58%	58%	28%	33%	11%	0%	8%	12%	11%

\* Based on 2003 Peer Mortgage Data: Western Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area. Based on 1990 Census information for loan data from 2001 and 2002; and 2000 Census information for loan data from 2003.

## Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: IOWA				Evaluation Period: January 1, 2001 to December 31, 2003							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	452	59%	2%	< 1%	16%	6%	51%	40%	31%	54%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	316	41%	0%	0%	14%	5%	58%	41%	28%	54%	6%	0%	3%	4%	8%

\* Based on 2003 Peer Mortgage Data: Western Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area. Based on 1990 Census information for loan data from 2001 and 2002; and 2000 Census information for loan data from 2003.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: IOWA						Evaluation Period: January 1, 2001 to December 31, 2003						
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	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	407	69%	20%	32%	14%	19%	36%	17%	26%	27%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	179	31%	3%	7%	33%	51%	43%	22%	21%	20%	6%	10%	11%	4%	5%

\* Based on 2003 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 (2002 for loan data from 2001 and 2002; 2003 for loan data from 2003).

## Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: IOWA					Evaluation Period: January 1, 2001 to December 31, 2003							
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	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	147	66%	2%	0%	3%	0%	81%	85%	14%	12%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	76	34%	< 1%	0%	5%	7%	83%	88%	12%	5%	32%	0%	50%	34%	13%

\* Based on 2003 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 (2002 for loan data from 2001 and 2002; 2003 for loan data from 2003).

## Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: IOWA						Evaluation Period: January 1, 2001 to December 31, 2003						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	198	66%	19%	7%	19%	16%	24%	26%	38%	51%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	104	34%	18%	8%	19%	16%	24%	30%	39%	46%	5%	2%	4%	6%	9%

\* Based on 2003 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 11% of loans originated and purchased by Bank in 2001 and 2002; and 5% of loans originated by Bank in 2003.

\*\*\* Percentage of Families is based on the 1990 Census information for loan data from 2001 and 2002; and the 2000 Census information for loan data from 2003.

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

## Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: IOWA						Evaluation Period: January 1, 2001 to December 31, 2003							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
2001-2002 Sioux City, IA-NE MSA #7720	172	69%	19%	17%	19%	28%	24%	26%	38%	29%	NA	NA	NA	NA	NA
2003 Sioux City, IA-NE MSA #7720	78	31%	18%	20%	19%	20%	24%	22%	39%	38%	11%	15%	11%	8%	11%

\* Based on 2003 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by Bank in 2001 and 2002; and 3% of loans originated and purchased by Bank in 2003.

\*\*\* Percentage of Families is based on the 1990 Census information for loan data from 2001 and 2002; and 2000 Census information for the loan data from 2003.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IOWA				Evaluation Period: January 1, 2001 to December 31, 2003									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
2001-2002 Sioux City, IA-NE MSA #7720	452	59%	19%	8%	19%	14%	24%	24%	38%	54%	NA	NA	NA	NA	NA	
2003 Sioux City, IA-NE MSA #7720	316	41%	18%	9%	19%	17%	24%	23%	39%	51%	6%	6%	6%	5%	9%	

\* Based on 2003 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 6% of loans originated and purchased by Bank in 2001 and 2002; and 5% of loans originated and purchased by Bank in 2003.

\*\*\* Percentage of Families is based on the 1990 Census information for loan data from 2001 and 2002; and the 2000 Census information for loan data from 2003.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: IOWA		Evaluation Period: January 1, 2001 to December 31, 2003			
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	Revenues \$1 Million or Less
<b>Full Review:</b>									
2001-2002 Sioux City, IA-NE MSA #7720	407	69%	71%	42%	70%	16%	14%	NA	NA
2003 Sioux City, IA-NE MSA #7720	179	31%	61%	54%	73%	10%	17%	6%	10%

\* Based on 2003 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 – 2002 for loan data from 2001 and 2002; 2003 for loan data from 2003).

\*\*\*\* 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 12% of small loans to businesses originated and purchased by the Bank in 2001 and 2002; and 0% of small loans to businesses originated and purchased by the bank in 2003.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: IOWA			Evaluation Period: January 1, 2001 to December 31, 2003				
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	Revenues \$1 Million or Less
<b>Full Review:</b>									
2001-2002 Sioux City, IA-NE MSA #7720	147	66%	96%	53%	49%	40%	11%	NA	NA
2003 Sioux City, IA-NE MSA #7720	76	34%	95%	58%	43%	46%	11%	32%	24%

\* Based on 2003 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 – 2002 for loan data from 2001 and 2002; 2003 for loan data from 2003).

\*\*\*\* 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 1% of small loans to farms originated and purchased by the Bank in 2001 and 2002; and 0% of small loans to farms originated and purchased by the Bank in 2003.

## Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: IOWA				Evaluation Period: November 7, 2000 to August 31, 2004			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
<b>Full Review:</b>									
Sioux City, IA-NE MSA #7720	0	0	33	236	33	236	100%	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: IOWA																		
Evaluation Period: November 7, 2000 to August 31, 2004																		
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>																		
2001-2002 Sioux City, IA-NE MSA #7720	100%	4	100%	50%	0%	50%	0%	0	0	NA	NA	NA	NA	4%	18%	49%	29%	
2003 Sioux City, IA-NE MSA #7720	100%	4	100%	0%	50%	0%	50%	0	0	NA	NA	NA	NA	< 1%	21%	56%	23%	