



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

October 8, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank North Platte
Charter Number: 3496

201 North Dewey Street
North Platte, NE 69101-4036

Office of the Comptroller of the Currency

Midsized Bank Supervision
Office of the Comptroller of the Currency
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- The volume of lending reflects excellent responsiveness to the credit needs of the communities it serves.
- The bank originated a majority of its loans within its defined assessment area (AA).
- The distribution of home mortgage, small business, and small farm loans by income level of the borrower all reflect good penetration.
- The distribution of small business loans and small farm loans by the income of the geography each represented adequate penetration.
- The bank's use of flexible loan products has a positive impact on the bank's performance under the lending test.
- The volume of community development lending was relatively high and had a positive impact on the bank's performance under the lending test.
- The bank provided a relatively high level of qualified community development services in the AA. FNB's service delivery systems are readily accessible to all geographies and individuals of different income levels.
- The bank's dollar volume of qualifying investments, grants, and donations demonstrates a significant level of qualified investments.

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 geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency (OCC), 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 geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies 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 refinancing, 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

FNB is a full-service financial institution headquartered in North Platte, Nebraska. FNB offers a full range of credit products within its AA including agricultural, commercial, home mortgage, and consumer loans.

FNB is an intrastate bank with all offices located in Nebraska. It is considered an intermediate small bank, but has opted to be examined as a large bank for CRA purposes. As of December 31, 2011, the bank's main office and one branch were located in North Platte. Three additional branches were located in the Western Nebraska communities of Alliance, Chadron, and Scottsbluff. None of the offices were located in a Metropolitan Statistical Area (MSA). A fifth branch was located in Gering, Nebraska during part of the evaluation period, but was closed April 21, 2010. The bank has seven deposit taking automated teller machines (ATMs) and two cash dispensing machines dispersed throughout the AA. There were no mergers or acquisitions during the evaluation period. FNB has no operating subsidiaries, and the activities of other affiliated organizations did not materially impact FNB's CRA evaluation.

First National of Nebraska, Inc. (FNNI) owns 99.33 percent of the bank stock. FNNI is a \$16 billion multibank holding company headquartered in Omaha, Nebraska. In addition to FNB, FNNI owns four national banks and a state chartered bank with locations in Nebraska, Colorado, Illinois, Iowa, Kansas, Texas, and South Dakota.

As of December 31, 2011, FNB had \$433 million in total assets and Tier One Capital of \$33 million. The bank's loan-to-deposit ratio was 80 percent and net loans and leases represented 71 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 41 percent agricultural (including agricultural real estate); 21 percent commercial (including commercial real estate); 15 percent residential real estate; 6 percent consumer; and 3 percent other. The remaining 14 percent is a term secured note made to its affiliate, First National Bank of Omaha. 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 attained a "Satisfactory" rating at its previous CRA examination dated July 7, 2009.

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, 2009 to December 31, 2011. Lending analysis conducted to evaluate geographic distribution and borrower distribution were compared against 2000 Census demographic data. We based all market comparisons on 2010 peer data as 2011 peer data on small business and small farm loans reported under CRA was not yet available. We did not include multifamily lending in our analysis as FNB did not report any multifamily loans. Due to the very low volumes, we do not include any analysis of home improvement loans in our assessment of the bank's performance. For community development loans, the Investment Test, and the Service Test, the evaluation period was from July 7, 2009 to October 8, 2012.

Data Integrity

Prior to this CRA performance evaluation, we verified the accuracy of data available to the public in accordance with the CRA regulation. This public data included small loans to businesses and farms. We also verified the accuracy of bank maintained home mortgage data and sampled the data to make certain conclusions about the bank's home mortgage lending practices. This was required because the bank is not a HMDA reporting institution. Finally, we verified the bank's reporting of community development loans, investments, and services. Based on the results of our review, we considered all lending data to be materially accurate.

Selection of Areas for Full-Scope Review

The bank's AA consists of 12 contiguous counties in Western Nebraska. All counties are non-MSA and share similar demographic and economic characteristics. We performed a full-scope review of this AA. Refer to Appendixes A and B for more information.

Ratings

When determining conclusions for the lending test, we weighted loan products to reflect FNB's loan volume by product type over the evaluation period. Accordingly, we weighted small loans to farms most heavily in our analysis of the Western Nebraska Non-MSA AA because they represented 52 percent of the total number of loans originated by FNB during the evaluation period. The next largest loan product was small loans to businesses accounting for 42 percent of the total number of reported loans. Home mortgage loans, including home purchase and home mortgage refinance accounted for 6 percent of reported loans. We also gave more weight to the distribution of loans by the income of the borrower over income level of the geography. This is because there are no low-income census tracts and only a few moderate-income census tracts which contained only 6 percent of owner occupied housing units or 3,633 units. This compares to the demographic of 5,542 low-income families and 5,240 moderate-income families which represents 37.8 percent of all families in the AA. There are many more opportunities to lend to low- and moderate-income families as opposed to lending in low-and moderate-income census tracts.

Other

We performed a community contact with a local non-profit organization that provides housing options for individuals and families that qualify as low-income. The organization recently received federal funds related to two projects for the purchase and rehabilitation of rental units in the bank's AA. Affordable housing that meets health and safety standards was noted as a need in the area.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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

Further, section 1025 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111- 203) assigns to the Consumer Financial Protection Bureau (CFPB) exclusive examination authority, and primary enforcement authority, to ensure compliance by banks and FSAs with Federal consumer financial laws, if the bank or FSA has more than \$10 billion in assets. The CFPB has not provided the OCC with any information about, or other evidence of, discriminatory or other illegal credit practices relative to this institution with respect to the Federal consumer financial laws.

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." Based on a full-scope review, the bank's performance in the Western Nebraska Non-MSA assessment area is good.

Lending Activity

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

FNB's lending activity in the Western Nebraska Non-MSA assessment area reflects excellent responsiveness to assessment area credit needs. Over the evaluation period, FNB originated 1,257 small loans to farms totaling \$110 million; 1,005 small loans to businesses totaling \$71 million; 141 home mortgage loans totaling \$19 million; and 13 community development loans totaling \$6 million.

To analyze the lending activity of FNB, we compared the bank's deposit market share with its lending market share for small business and small farm loans. In comparing market share percentages, we considered the fact that the deposit market share analysis only included deposit-taking financial institutions with one or more offices in the AA. However, the lending market share calculations included lenders who did not have a deposit-taking facility in the assessment area, as well as some non-bank lenders. We did not expect FNB's deposit share to equal their lending market share percentages for performance to be considered excellent. We also considered the fact that many small banks are not required to report small farm and small business loans.

Based on FDIC deposit market share data as of June 30, 2011, there were 24 deposit-taking institutions with 65 offices in the Western Nebraska Non-MSA assessment area. FNB ranked first with 19 percent of the deposit market share.

Small loans to farms represent the majority of the bank's CRA lending activity at 52 percent of loan originations during the evaluation period by number and 54 percent by dollar volume. During 2010, the bank achieved a 48 percent market share by number of small loans to farms, ranking first out of 20 reporting lenders. By dollar volume of small loans to farms, the bank also ranked first, with a 45 percent market share.

Small loans to businesses represent 42 percent of bank loan originations by number and 35 percent by dollar volume. FNB achieved a 25 percent market share by number of small business loans, ranking first out of 29 reporting lenders. By dollar volume of small business loans, the bank ranked first, with a 48 percent market share.

Home mortgage loans represent 6 percent of bank loan originations by number and 9 percent by dollar volume. The breakdown by number of home mortgage loans was home purchase 47 percent, home refinance 50 percent, and home improvement 3 percent. Market share information for home mortgage

lending is not available since the bank is not required to report mortgage information under the Home Mortgage Disclosure Act.

The bank also originated an additional 559 secondary market qualified home mortgage loans that were sold to affiliated financial institutions during the evaluation period. These loans are not reflected in the bank's numbers and we do not have information on the total dollar volume or distribution of these loans.

The unemployment rates in the AA are also considered in evaluating lending activity, as they are generally reflective of the overall economic stability of the area. Unemployment rates remain relatively low in the counties that makeup the assessment area, although they have collectively almost doubled from the date of the last performance evaluation. Based on December 2011 data, the unemployment rate averaged 4.2 percent in the 12 counties of the assessment area.

Distribution of Loans by Income Level of the Geography

The bank's distribution of all loans by geography income level in the Western Nebraska Non-MSA AA reflects adequate penetration.

Home Mortgage Loans

Refer to Tables 2, 3 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.

A geographic analysis of home mortgage loans was not meaningful as the Western Nebraska Non-MSA assessment area did not consist of any low-income census tracts and only 4 out of thirty-two tracts were moderate-income. The bank did not make any home mortgage loans in the moderate-income tracts; however, the demographic based on owner occupied units was so small that the bank could have equaled the demographic in each category with only four loans. This volume is not significant enough to conduct a meaningful analysis.

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.

Based on 2010 data, there are 614 businesses located in moderate-income census tracts in the assessment area. This represents 6.6 percent of all businesses in the assessment area.

FNB's geographic distribution of small loans to businesses reflects adequate penetration throughout the Western Nebraska Non-MSA assessment area. The percentage of small loans to businesses in moderate-income tracts is somewhat lower than the percentage of businesses in these tracts. The bank's market share for small loans to businesses in moderate-income tracts is somewhat lower than its overall market share for small loans to businesses.

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.

Based on 2010 data, there are 121 farms located in moderate-income census tracts in the assessment area. This represents 8.2 percent of all farms in the AA.

FNB's geographic distribution of small loans to farms reflects adequate penetration throughout the Western Nebraska Non-MSA assessment area. The percentage of small loans to farms in moderate-income tracts is somewhat lower than the percentage of farms in these tracts. The bank's market share for small loans to farms in moderate-income tracts is somewhat lower than its overall market share for small loans to farms.

Lending Gap Analysis

We reviewed FNB's publicly reported and other data for home mortgage loans, small loans to businesses, and small loans to farms to identify gaps in the geographic distribution of these loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

An adequate percentage of FNB's loans were originated or purchased within its AA. In total, 69 percent of the bank's home mortgage, small business, and small farm loans were originated or purchased within the bank's assessment area. FNB originated 88 percent of its home mortgage loans within the assessment area. Small business and small farm loans originated within the bank's AA were 88 percent and 58 percent, respectively.

Distribution of Loans by Income Level of the Borrower

The distribution of all loans by income level of the borrower in the Western Nebraska Non-MSA AA reflects good penetration.

Home Mortgage Loans

Refer to Tables 8, 9 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.

The distribution of home mortgage loans by income level of the borrower reflects good penetration throughout the Western Nebraska Non-MSA AA. In evaluating the borrower distribution of home mortgage loans, we considered the number of low- and moderate-income families in the AA. We also considered the number of households living below the poverty level and the barriers this may impose on home ownership. Based on the 2000 census data, there are 28,519 families in the assessment area, with 19 percent considered low-income and 18 percent considered moderate-income. In 2010, the percentage of total persons living below the poverty level exceeded 14 percent. More weight was given to the bank's performance related to moderate-income borrowers due to the difficulties many low-income borrowers have in qualifying for mortgage loans, especially those below the poverty level. This is especially true with the tightening of credit standards that resulted during the economic downturn within the evaluation period.

Home Purchase

The borrower income distribution of home purchase loans is adequate for the Western Nebraska Non-MSA AA. The percentage of home purchase loans to low-income borrowers is lower than the

percentage of low-income families in the assessment area. The percentage of home purchase loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the assessment area.

Home Refinance

The borrower income distribution of home refinance loans is good for the Western Nebraska Non-MSA AA. The percentage of home refinance loans to low-income borrowers is somewhat lower than the percentage of low-income families in the assessment area. The percentage of home refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the assessment area.

Small Loans to Businesses

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.

The bank's borrower distribution of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) reflects good penetration throughout the Western Nebraska Non-MSA AA.

FNB's distribution of small loans to businesses with revenues of \$1 million or less is good, especially when considering mitigating factors. The percentage of small loans to businesses is near to the percentage of businesses with revenues of \$1 million or less in the assessment area. The bank's market share of small loans to businesses with revenues of \$1 million or less exceeds the bank's overall market share for small loans to businesses, regardless of revenue size.

In evaluating the bank's performance, we considered the competitive market in which the bank operates regarding small business lending. We considered the effect of the deteriorating economic conditions in much of the evaluation period, which adversely affected both demand for credit and availability of credit on a national scale, especially for smaller businesses.

Small Loans to Farms

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.

The bank's borrower distribution of small loans to farms (farms with gross annual revenues of \$1 million or less) reflects good penetration throughout the Western Nebraska Non-MSA AA.

FNB's distribution of small loans to small farms is good, especially when considering mitigating factors. The percentage of small loans to small farms is somewhat lower than the percentage of small farms in the assessment area. The bank's market share of small loans to small farms exceeds the bank's overall market share for small loans to small farms, regardless of revenue size.

In evaluating the bank's performance, we considered the competitive market in which the bank operates regarding small farm lending. We considered the effect of the deteriorating economic conditions in much of the evaluation period, which adversely affected both demand for credit and availability of credit on a national scale, including for smaller farms.

Community Development Lending

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

FNB provided a high level of community development loans in the Western Nebraska Non-MSA assessment area and had a positive impact on Lending Test conclusions. FNB originated 13 qualifying community development loans totaling \$5.5 million which represents approximately 17 percent of Tier One Capital.

The following summarizes some of the bank's qualified community development loans:

- The bank participated in a \$2 million unsecured loan to refinance the funding of improvements to a non-profit hospital authority located in the assessment area. The hospital serves a large rural area that includes moderate-income, underserved and distressed census tracts. It also serves low- and moderate-income residents and is a major job provider in the region.
- The bank participated in three unsecured loans totaling \$1.8 million to refinance the funding of improvements to the facilities of a regional community college (political subdivision) located in the assessment area. The college serves a large rural area that includes moderate-income, underserved and distressed census tracts. It also serves low- and moderate-income residents and is a major job provider in the region.

Product Innovation and Flexibility

FNB made use of flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals and geographies, which had a positive impact on the lending test performance.

FNB participated in several loan programs sponsored by federal and state governments that primarily served low- and moderate-income home mortgage applicants during the evaluation period. The loan programs generally included reduced down payment requirements, lower interest rates, and more liberal underwriting criteria than conventional loans. FNB originated the following loans during the evaluation period:

- 43 United States Department of Agriculture (USDA) Rural Development loans totaling \$3.3 million.
- 8 USDA and Nebraska Investment Finance Authority (NIFA) loans totaling \$600 thousand.
- 60 Federal Housing Authority (FHA) loans totaling \$6.4 million.
- 10 FHA and NIFA loans totaling \$802 thousand.
- 6 Veterans Administration (VA) loans totaling \$664 thousand.

FNB also participated in several loan programs sponsored by the federal government that primarily served small businesses and small farm applicants during the evaluation period. The loan programs included government guarantees, lower interest rates, and interest subsidy programs. FNB originated the following loans during the evaluation period:

- 55 USDA Farm Service Agency (FSA) guaranteed loans totaling \$19.9 million.
- 84 U.S. Small Business Administration (SBA) guaranteed loans totaling \$10.8 million.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory." Based on the full-scope review of the Western Nebraska Non-MSA assessment area, the bank's performance is good.

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

The bank's dollar volume of qualifying investments, grants, and donations demonstrates a significant level of qualified investments. This conclusion considers the limited investment opportunities within the Western Nebraska Non-MSA assessment area and the bank's ability to address these needs. Qualified investments, grants, and donations total \$1.1 million during the evaluation period. Of this total, \$110 thousand is current period versus \$1.0 million prior period. Qualified investments, grants, and donations represent approximately 3.3 percent of Tier One Capital.

Current period investments consisted of \$110 thousand in donations to 15 qualified organizations that provide community services to low- and moderate-income individuals and families, and promote affordable housing.

Prior period investments also continue to have a positive impact on the bank's assessment area. FNB carried forward a \$770 thousand investment in the First National Nebraska Community Development Corporation (FNNCDC) from the prior evaluation period. FNNCDC lends to a number of community development related entities and is responsive to the qualified investment needs in the assessment area. FNB also carried forward a \$250 thousand investment in an equity fund that promotes affordable housing and economic development on a regional basis that includes the bank's assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Western Nebraska Non-MSA assessment area is excellent.

Retail Banking 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.

FNB's service delivery systems are readily accessible to all geographies and individuals of different income levels in the Western Nebraska Non-MSA assessment area. Four of the bank's offices in the assessment area are located in middle-income census tracts with one office in an upper-income census tract. However, two of these five offices are located in designated distressed and/or underserved census tracts. This represents 40 percent of all offices compared to 24 percent of total persons in these census tracts within the bank's assessment area.

The bank operates seven deposit-taking ATMs in the Western Nebraska Non-MSA assessment area. Six of the ATMs are located in middle-income census tracts and two are located in an upper-income census

tract. However, two of these ATMs are located in designated distressed and/or underserved census tracts. The bank also operates two ATMs that only dispense cash and do not accept deposits. These ATMs are both located in upper-income census tracts.

FNB's record of opening and closing branches and ATMs did not adversely affect the accessibility of its delivery systems to low- or moderate-income individuals. The bank closed one branch in the Western Nebraska Non-MSA assessment area during the evaluation period. It was located in a middle-income census tract that was not designated as distressed and/or underserved.

The bank's hours and services offered throughout the Western Nebraska Non-MSA assessment area were good. Hours and services did not vary in a way that inconvenienced low- or moderate-income individuals in the assessment area. Office hours varied only slightly between the bank's five locations based on customer needs. All branch locations offered drive-up services with extended hours, including Saturday hours.

FNB offered good alternative systems for delivering retail banking services to low- and moderate-income individuals and geographies. These alternative systems included the bank's ATM network, 24-hour telephone banking, Internet banking services, and banking by mail. No information was available regarding the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these alternatives when drawing conclusions under the Service Test.

Community Development Services

FNB provided a relatively high level of qualified community development services in the assessment area. In total, 14 bank officers and employees provided qualified services to 17 organizations serving the Western Nebraska Non-MSA assessment area. These organizations addressed assessment area needs for affordable housing, revitalization/stabilization, economic development, and social services to low- or moderate-income individuals. Bank employees served in leadership positions in many of these organizations, including executive officers, board members, treasurer and finance committee members. In these roles, they provided key leadership regarding the provision of financial services, such as planning, budgeting, fund raising, and loan review. The following examples illustrate some of the services provided:

- A senior executive serves as director and treasurer of a private economic development organization focused on attracting small business, manufacturing, and industry to Alliance, Nebraska. He uses his financial experience to help guide the funding decisions of the organization.
- A senior vice-president serves on a substandard housing committee and consults on loan programs designed to promote homeownership by low- and moderate-income families in partnership with the Lincoln County Community Development Corporation (LCCDC).
- A senior executive serves as board member on a local housing authority. He uses his knowledge of banking and finance to help make decisions regarding strategic planning, policy, budget, and application of federal and state affordable housing programs that are available to the community.

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 nonmetropolitan area that received comprehensive examination review (designated by the term “full-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2009 to 12/31/2011) Investment and Service Tests and CD Loans: (07/07/2009 to 10/08/2012)	
Financial Institution	Products Reviewed	
First National Bank (FNB) North Platte, NE	<ul style="list-style-type: none"> -- Home mortgage loans, including home purchase, home improvement, and home refinance -- Small loans to businesses -- Small loans to farms -- Community development loans. -- Qualified investments. -- Community development services. -- Retail banking services. 	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Western Nebraska Non-MSA	Full-Scope	Consists of 12 counties in Western Nebraska: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas Counties.

Appendix B: Market Profiles for Full-Scope Areas

Western Nebraska Non-MSA

Demographic Information for Full-Scope Area: Western Nebraska Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.00	12.50	75.00	12.50	0.00
Population by Geography	104,543	0.00	7.29	77.50	15.21	0.00
Owner-Occupied Housing by Geography	28,565	0.00	6.21	78.35	15.44	0.00
Businesses by Geography	9,319	0.00	6.59	74.48	18.93	0.00
Farms by Geography	1,473	0.00	8.21	75.22	16.56	0.00
Family Distribution by Income Level	28,519	19.43	18.37	22.94	39.25	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,782	0.00	10.69	79.64	9.66	0.00
Median Family Income	= \$41,596			Median Housing Value	= \$68,864	
HUD Adjusted Median Family Income for 2010	= \$54,200			Unemployment Rate	= 4.2%	
Household's Below the Poverty (2010 USDA)	= 14.35%			(2011 Bureau of Labor)		

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

Source: 2000 U.S. Census, 2010 USDA Economic Research, 2010 HUD updated MFI, and 2011 Bureau of Labor stats.

The Western Nebraska Non-MSA assessment area consists of 12 counties in Western Nebraska: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas. The assessment area complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income areas. The bank's main office is located in North Platte, Nebraska with the other four Nebraska offices located in Alliance, Chadron, North Platte and Scottsbluff. The bank has seven deposit-taking automated teller machines and two cash-dispensing ATMs dispersed throughout the assessment area.

The assessment area consists of four moderate-, 24 middle- and four upper-income census tracts. There are no low-income census tracts. During the evaluation period, Logan County was designated as a distressed middle-income geography, while Dawes County and Morrill County were designated as underserved middle-income geographies. The counties of Grant, Hooker, Thomas and part of Box Butte (including part of the town of Alliance) were designated as both distressed and underserved middle-income geographies.

The bank's deposits in the Western Nebraska Non-MSA assessment area totaled approximately \$427 million as of June 30, 2011. Based on FDIC deposit market share as of that date, this equated to a 19 percent deposit market share and ranked FNB as the largest deposit-taking financial institution in the assessment area.

Competition in the assessment area was strong. Approximately 24 deposit-taking institutions operated 65 offices in the Western Nebraska Non-MSA assessment area as of June 30, 2011. Major competitors

included Platte Valley Bank, NebraskaLand National Bank, First State 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 relatively good, especially when compared to national unemployment rates. December 2011 unemployment rates for the 12 counties in the Western Nebraska Non-MSA assessment area ranged from a low of 2.2 percent to a high of 7.2 percent. The average unemployment rate was 4.2 percent, only slightly higher than the state average of 4.1 percent. These rates were well below the national unemployment rate of 8.5 percent. Major employers in the assessment area are related to agriculture, hospitals, local schools, transportation and manufacturing.

According to the 2000 Census, the population living in the Western Nebraska Non-MSA assessment area was approximately 104 thousand, the number of households was 42 thousand, and the number of families was 28 thousand. The percentage of families by income level was 19 percent for low-income, 18 percent moderate-income, 23 percent middle-income, and 39 percent upper-income. In aggregate, 14.4 percent of the households had income below the poverty level as reported in the 2010 USDA Economic Research Service.

A local community contact indicated that affordable housing which meets health and safety standards is a primary need in the assessment area.

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 geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products (OMITTED)** - 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 (OMITTED)** - 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Table 1. Lending Volume

LENDING VOLUME												Geography: Western Nebraska		Evaluation Period: January 01, 2009 TO December 31, 2011	
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)				
Full Review:															
Western NE Non-MSA	100.0	141	18,686	1,005	71,480	1,257	110,279	13	5,510	2,416	205,955	100.00			

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 7, 2009 to October 8, 2012.

*** Deposit Data as of June 30, 2011. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: Western Nebraska					Evaluation Period: January 01, 2009 TO December 31, 2011				
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	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Western NE Non-MSA	66	100.00	0.00	0.00	6.21	0.00	78.35	54.55	15.44	45.45	NA	NA	NA	NA	NA									

* Based on 2010 Peer Mortgage Data: (USPR)

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Western Nebraska					Evaluation Period: January 01, 2009 TO December 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Lns		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Western NE Non-MSA	4	100.00	0.00	0.00	6.21	0.00	78.35	75.00	15.44	25.00	NA	NA	NA	NA	NA	

* Based on 2010 Peer Mortgage Data: (USPR)

** 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 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: Western Nebraska					Evaluation Period: January 01, 2009 TO December 31, 2011				
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	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Western NE Non-MSA	71	100.0	0.00	0.00	6.21	0.00	78.35	67.61	15.44	32.39	NA	NA	NA	NA	NA									

* Based on 2010 Peer Mortgage Data (USPR)

** 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: Western Nebraska						Evaluation Period: January 01, 2009 TO December 31, 2011							
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Western NE Non-MSA	1,005	100.0	0.00	0.00	6.59	3.08	74.48	79.30	18.93	17.61	24.85	0.00	13.24	29.69	22.43

* Based on 2010 Peer Small Business Data: US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Western Nebraska								Evaluation Period: January 01, 2009 TO December 31, 2011					
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
Full Review:															
Western NE Non-MSA	1,257	100.0	0.00	0.00	8.21	6.44	75.22	82.50	16.56	11.06	48.26	0.00	35.71	51.18	47.96

* Based on 2010 Peer Small Business Data: US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Western Nebraska					Evaluation Period: January 01, 2009 TO December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Western NE Non-MSA	66	100.0	19.43	4.55	18.37	13.64	22.94	16.67	39.25	63.64	NA	NA	NA	NA	NA	

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.52% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Western Nebraska					Evaluation Period: January 01, 2009 TO December 31, 2011					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}						
Full Review:																
Western NE Non-MSA	4	100.0	19.43	0.00	18.37	0.00	22.94	75.00	39.25	25.00	NA	NA	NA	NA	NA	

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. Income information was available for all loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Western Nebraska			Evaluation Period: January 01, 2009 TO December 31, 2011				
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****	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Western NE Non-MSA	71	100.0	19.43	9.86	18.37	16.90	22.94	18.31	39.25	52.11	NA	NA	NA	NA	NA				

* Based on 2010 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.82% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Western Nebraska		Evaluation Period: January 01, 2009 TO December 31, 2011		
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
Full Review:									
Western NE Non-MSA	1,005	100.0	75.50	66.57	84.38	9.85	5.77	24.85	32.14

* Based on 2010 Peer Small Business Data: US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2010).

**** 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 2.85% 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: Western Nebraska			Evaluation Period: January 01, 2009 TO December 31, 2011				
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
Full Review:									
Western NE Non-MSA	1,257	100.0	97.22	75.26	73.35	18.54	8.11	48.26	49.39

* Based on 2010 Peer Small Business Data: US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

**** 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 4.43% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Western Nebraska				Evaluation Period: July 7, 2009 TO October 8, 2012			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Western NE Non-MSA	2	1,020	15	110	17	1,130	100.00	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: Western Nebraska										Evaluation Period: January 01, 2009 TO December 31, 2011							
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
Full Review:																	
Western NE Non-MSA	100.00	5	100.00	0.0	0.0	80.0*	20.0	0	1	0	0	-1	0	0.00	7.29	77.50	15.21

* Two offices (40%) were located in census tracts designated as Distressed and/or Underserved. This compares to Population in these census tracts representing 23.60 percent.

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: Western Nebraska																	
Evaluation Period: January 01, 2009 TO December 31, 2011																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Western NE Non-MSA	100.00	5	100.00	0.0	0.0	80.0*	20.0	9	100.00	0	0	66.67**	33.33	0.00	7.29	77.50	15.21

* Two offices (40%) were located in census tracts designated as Distressed and/or Underserved. This compares to Population in these census tracts representing 23.60 percent.

** Two ATMs (22.2%) were located in census tracts designated as Distressed and/or Underserved. This compares to Population in these census tracts representing 23.60 percent.