



**SMALL BANK**

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Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

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## **PUBLIC DISCLOSURE**

**March 1, 2004**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**The Genoa National Bank  
Charter Number 6805**

**502 Willard Avenue  
Genoa, Nebraska 68640**

**Comptroller of the Currency  
Omaha South Field Office  
13710 FNB Parkway, Suite 110  
Omaha, Nebraska 68154**

**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, nor should it 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.**

## INSTITUTION'S CRA RATING

### This institution is rated Satisfactory.

- The bank had a satisfactory record of lending to farms of different sizes.

The distribution of agricultural borrowers reflected satisfactory penetration amongst farms of different sizes. As displayed in the following table, the U.S. Census Bureau's 1997 Census of Agriculture reveals that the vast majority of farms in the bank's Assessment Area (AA) have revenues of less than \$500 thousand. Based on 20 borrowers sampled, the bank's agricultural lending was split almost evenly among farms with revenues less than \$100 thousand, \$100 thousand to \$250 thousand, and \$250 thousand to \$500 thousand. This demonstrates that the bank is lending to the smallest as well as the largest farms in the AA.

<b>Borrower Distribution of Loans to Farms in AA</b>				
Farm Revenues	<\$100,000	\$100,000 - \$249,000	\$250,000 - \$500,000	>\$500,000
% of AA Farms*	58%	23%	14%	5%
% of Bank Loans in AA by #	30%	30%	35%	5%
% of Bank Loans in AA by \$	10%	72%	9%	9%

\*Source: Loan sample; 1997 U.S. Census of Agriculture.

- The bank's average loan-to-deposit ratio since the last examination was more than reasonable. It averaged 90% over the past 21 quarters, and compared favorably with the ratios of similarly situated banks in the AA. Competing banks' ratios ranged from 53% to 99% and averaged 78%.
- The bank originated a majority of its loans in the AA. For agricultural loans sampled, the bank originated 65% by number and 77% by dollar amount within its AA.
- A geographic analysis of the bank's lending was not meaningful, as the AA consists of only middle- and upper-income geographies.
- The bank did not receive any complaints about its performance in helping to meet AA credit needs during the evaluation period.
- We found no evidence of illegal discrimination or other illegal credit practices.

## DESCRIPTION OF INSTITUTION

The Genoa National Bank (GNB) is a \$45MM institution located in east central Nebraska. The bank's primary loan product by number and dollar amount was agricultural loans. GNB received

a “Satisfactory” rating at the last CRA examination, dated November 24, 1998. There are no legal or financial factors that impede the bank’s ability to help meet the credit needs of the AA. Examiners contacted a member of the community that is involved with city government. The contact indicated that community credit needs include agricultural, small business, and housing loans. GNB makes all of these types of loans, but focuses on agricultural lending. Refer to the bank’s CRA Public File for more information.

## **DESCRIPTION OF ASSESSMENT AREA**

The bank’s AA encompassed Platte, Merrick, and Nance counties, three whole contiguous counties in Nebraska. The bank’s AA meets the requirements of the regulation and does not arbitrarily exclude any low- and moderate-income areas. It is composed of nine middle-income census tracts and two upper-income census tracts. Refer to the bank’s CRA Public File for more information.