



PUBLIC DISCLOSURE

March 25, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cornerstone Bank
RSSD# 403151

529 North Lincoln Avenue
York, Nebraska 68467

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank'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 bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**

The following table indicates the performance level of Cornerstone Bank (the bank) with respect to the lending, investment, and service tests.

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			
* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.			

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank's loans are originated within its delineated AAs.
- The bank's distribution of loans by income level of geography (geographic distribution) is good.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes (borrower distribution) is good.
- The bank makes an adequate level of community development (CD) loans.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits excellent responsiveness to credit and CD needs.

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank provides an adequate level of CD services and is responsive to the available service opportunities.

INSTITUTION

DESCRIPTION OF INSTITUTION

The bank is an intrastate financial institution headquartered in York, Nebraska. The bank's characteristics include:

- The bank is a wholly owned subsidiary of First York Ban Corporation.
- The bank has total assets of \$2.7 billion as of December 31, 2023.
- The bank operates 38 full-service banking offices and 8 limited-service branches throughout its three delineated AAs in Nebraska, which are designated as the Eastern Nebraska AA, the Grand Island Metropolitan Statistical Area (MSA) AA, and the Omaha-Council Bluffs Metropolitan AA.
- As shown in the table below, the bank's primary business focus is commercial and agricultural lending.
- Since the prior evaluation, the bank expanded its operations through the acquisition of Ashton State Bank of Ashton, Nebraska, on October 25, 2022. The acquisition added Sherman County to the bank's Eastern Nebraska AA; however, this branch was not included in this analysis due to the limited time the branch was operated by the bank during the review period.

Table 1

Composition of Loan Portfolio as of December 31, 2023		
Loan Type	\$(000)	%
Construction and Land Development	326,142	16.3
Farmland	283,122	14.2
1- to 4-Family Residential Real Estate	71,269	3.6
Multifamily Residential Real Estate	37,128	1.9
Nonfarm Nonresidential Real Estate	400,447	20.0
Agricultural	403,761	20.2
Commercial and Industrial	343,241	17.2
Consumer	24,841	1.2
Other	110,880	5.5
Gross Loans	2,000,831	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its May 2, 2022 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's three AAs. The Eastern Nebraska and Grand Island MSA AAs were assessed using a full-scope review. The Omaha-Council Bluffs Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2021 and 2022 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2021 and 2022 CRA loan registers;
- CD loans originated from January 1, 2022 to December 31, 2023;
- Qualified investments that were made from January 1, 2022 to December 31, 2023, qualified investments made prior to but still outstanding during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2022 to December 31, 2023.

The table below illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2023 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

The bank's performance in the Eastern Nebraska AA had a significant influence on the overall analysis, based on a substantial portion of the bank's branch presence, deposit volume, and loan volume that occurred in the AA during the evaluation period. The performance in the Grand Island MSA AA and Omaha-Council Bluffs Metropolitan AA had generally less influence on the overall conclusion. Additionally, based on the volume of originations, small farm lending carried the greatest weight among loan product lines included in the evaluation, followed by small business lending, with home mortgage lending performance being weighted least in the analysis.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ ¹		Percent of Bank's Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Nebraska		46	100.0	100.0	100.0	100.0		
Eastern Nebraska	Full	39	87.3	87.3	90.6	90.6	13.2	1 of 72
Grand Island MSA	Full	4	7.4	7.4	4.9	4.9	2.9	10 of 22
Omaha-Council Bluffs Metropolitan	Limited	3	5.3	5.3	4.5	4.5	6.4	6 of 22
^{1.} Based on the bank's HMDA, small business, and small farm lending used in the analysis. ^{2.} Based on the June 30, 2023 FDIC's Deposit Market Share Report. ^{3.} Based on the bank's ranking among FDIC-insured financial institutions in each AA.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in its specific AAs. Lending data for AAs that received a limited-scope review are located in Appendix E.

While conclusions with respect to the lending test were evaluated for two years, only 2022 lending tables for the full-scope review AAs are reflected in the body of this report. The bank's 2021 lending data can be found in Appendix D of this report.

LENDING TEST

The bank's overall lending test performance is high satisfactory. The conclusion was derived from good lending test performance in the Eastern Nebraska AA and adequate performance in the Grand Island MSA AA.

In addition, it should be noted that an evaluation of the bank's home mortgage lending was only conducted for the Eastern Nebraska AA; the volume of loans in the Grand Island MSA AA was too low to conduct a meaningful analysis.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect good responsiveness to AA credit needs.

Table 3 provides a detailed summary of the loan products and volumes evaluated during the review period. The bank's overall loan distribution for small business and small farm lending increased significantly in 2021 relative to 2022, driven primarily by the bank's participation in the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic).

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2021 and 2022			
	#	#%	\$(000)	\$%
Home Purchase	124	1.7	21,278	2.9
Home Improvement	33	0.4	1,808	0.2
Multifamily Housing	29	0.4	11,188	1.5
Other Purpose Closed-End	13	0.2	502	0.1
Refinancing	120	1.6	38,556	5.3
Total HMDA Loans	319	4.3	73,332	10.1
Small Business Loans	2,367	31.6	199,513	27.5
Small Farms Loans	4,793	64.1	453,186	62.4
Total Loans	7,479	100.0	726,031	100.0

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers an affordable housing grant program (Homeownership Set-aside Program) through the Federal Home Loan Bank of Topeka, Topeka, Kansas.

The Homeownership Set-aside Program provides down payment, closing cost, and repair assistance through a grant to first-time homebuyers earning at or below 80.0 percent of area median incomes. In 2022 and 2023, the bank originated 27 loans totaling \$197 thousand (M) utilizing grants under this program.

In addition to this flexible lending program, the bank maintains a broker relationship for loans through programs backed by the Nebraska Investment Finance Authority (NIFA), the United States Department of Agriculture Rural Development, Veterans Administration, and Small Business Administration. Previously, the NIFA loans were originated by the bank, but are now offered through the broker relationship. All programs are available throughout the bank's three AAs.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. The bank originated a substantial majority of loans, by number and dollar, inside its AAs.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	30	90.9	\$1,168	64.6	3	9.1	\$640	35.4
Home Purchase - Conventional	91	83.5	\$14,357	73.5	18	16.5	\$5,166	26.5
Home Purchase - FHA	15	100.0	\$1,755	100.0	0	0.0	\$0	0.0
Multi-Family Housing	26	89.7	\$4,413	39.4	3	10.3	\$6,775	60.6
Other Purpose Closed-End	12	92.3	\$457	91.0	1	7.7	\$45	9.0
Refinancing	104	86.7	\$32,031	83.1	16	13.3	\$6,525	16.9
Total HMDA related	278	87.1	\$54,181	73.9	41	12.9	\$19,151	26.1
Small Business	2,090	88.3	\$153,354	76.9	277	11.7	\$46,159	23.1
Small Farm	4,516	94.2	\$419,674	92.6	277	5.8	\$33,512	7.4
TOTAL LOANS	6,884	92.0	\$627,209	86.4	595	8.0	\$98,822	13.6
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank's AAs.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AAs. The conclusion is primarily derived from good penetration levels noted in the Eastern Nebraska AA, which carried the greater weight in the analysis. Poor penetration was noted in the Grand Island MSA AA.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank's lending has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. The conclusion is derived from good distributions noted in both the Eastern Nebraska and Grand Island MSA AAs.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank makes an adequate level of CD loans. This overall conclusion is derived from an adequate level in the Eastern Nebraska AA, which carried the greater weight in the analysis. The Grand Island MSA AA had a relatively high level of CD loans.

The table below illustrates the volume of CD loans by number and dollar based on their purpose. The bank has been responsive in providing financing that addresses community development needs, particularly in the affordable housing category. Additional details of specific CD performance results are further discussed in the analysis of each AA evaluation.

Examples of responsive CD lending activities include:

- Two loans totaling \$1.1 million (MM) for improvements to city streets in an underserved area located in a bank AA.
- One loan for \$361M to purchase a building for a local health department which provides services primarily to LMI individuals.

Table 5

Community Development Loans – All		
Community Development Purpose	#	\$(000)
Affordable Housing	6	16,213
Community Services	1	361
Economic Development	0	0
Revitalization and Stabilization	3	1,170
Outside Activities	2	17,100
Total Loans	12	34,844

INVESTMENT TEST

This performance criterion evaluates the bank's level of qualified grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of CD.

The bank's overall performance under the investment test is outstanding. The bank has an excellent level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the CD needs of its AAs. The investment test rating is derived from an excellent rating in the Eastern Nebraska AA, which held considerable weight in the overall conclusion, and an adequate rating in the Grand Island MSA AA.

The table below illustrates the total volume of investment and donation activities by CD purpose, including an itemization of investments that remain on the bank's balance sheet (prior-period) and new investments made during the current evaluation period. Investment vehicles generally consisted of investments in municipal bonds that address various revitalization and stabilization needs throughout many of the bank's distressed and/or underserved communities.

Examples of qualified CD investments include:

- Three school bonds totaling \$1.2MM issued to AA schools, providing education funding in underserved areas.
- Eleven bonds totaling \$3.5MM issued to a municipality for street improvements in an underserved area.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	1	228	1	10	2	238
Community Services	0	0	0	0	13	34	13	34
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	178	25,964	79	6,405	13	37	270	32,406
Outside Activities	0	0	11	2,665	0	0	11	2,665
Total	178	25,964	91	9,298	27	81	296	35,343
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

In addition to its qualified CD investments, the bank also made donations supporting CD activities. As illustrated in Table 6, the bank's donation activity was particularly responsive to organizations that provide community services targeted to LMI individuals and families and to activities that revitalize and stabilize distressed and/or underserved geographies. Examples of the bank's responsive philanthropic activities include:

- One donation for \$10M to an organization that helps LMI homeowners rehabilitate their homes.
- Two donations totaling \$10M to an organization that provides court advocacy services for LMI children.

SERVICE TEST

The bank's overall performance under the service test is low satisfactory. The conclusion was derived from adequate service test conclusions in both the Eastern Nebraska and Grand Island MSA AAs.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification. The table below illustrates the distribution of bank offices and full-service automated teller machines (ATMs) by income level of

geographies, as well as the number of branch openings and closings, and the volume of CD services provided during the evaluation period.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the 46 total branches subject to this evaluation, two were located in moderate-, 36 in middle-, and eight in upper-income census tracts. The bank also maintains ATMs at 31 of its offices in addition to 26 stand-alone locations. Bank office and ATM locations generally align with the total percentage of census tracts by income level throughout its AAs.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank acquired one branch in October 2022; however, this branch was not included in the analysis due to the limited time the branch was operated by the bank during the review period. The bank did not close any branch locations during the review period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's suite of products and services are offered at all full-service branch locations throughout its AAs, while limited-service locations offer deposit-only services and loan services by appointment. Furthermore, a majority of branches operate between 8:00 AM and 4:00 PM, Monday through Friday, as well a majority also offering Saturday operating hours.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	4.4	78.3	17.4	0.0	100.0	1.8	9.8	72.3	16.1	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	3.5	73.7	22.8	0.0	100.0	1.7	9.8	69.0	19.4	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	46		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	8		26		13		24		71		34	
¹. Based on 2022 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank provides an adequate level of CD services. Bank staff performed 71 services to 34 organizations during the evaluation period. As illustrated in Table 7, bank employees performed an evenly distributed mix of services among the varying CD purposes, with a majority of service activities utilizing bank personnel's financial expertise in key leadership positions, such as board of directors (board), committee, and treasurer roles for organizations that support area CD needs. Similar to the distribution of many other activities, a substantial portion of CD services was performed in the Eastern Nebraska AA. Examples of the types of CD service activities performed include:

- Three bank employees served on the boards of three organizations whose missions are to provide affordable housing to LMI individuals.
- One employee serves on the board of a hospital, providing financial expertise and maintaining vital healthcare infrastructure in an underserved area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**EASTERN NEBRASKA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE EASTERN NEBRASKA AA

The bank's Eastern Nebraska AA consists of the following counties in their entirety: Adams, Antelope, Boone, Buffalo, Butler, Clay, Fillmore, Franklin, Greeley, Hamilton, Holt, Kearney, Knox, Madison Nance, Nuckolls, Pierce, Platte, Polk, Thayer, Valley, Webster, Wheeler, and York. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- The AA added Sherman County in its entirety as the result of the acquisition of Ashton State Bank in October 2022. Since the acquisition was late in the second year of the analysis, Sherman County was not included in the AA during this analysis, but will be included in future evaluations.
- The composition of the 2022 AA consisted of 82 total census tracts, including 2 low-, 7 moderate-, 59 middle-, and 14 upper-income census tracts based on 2016-2020 American Community Survey (ACS) data.
- The 2021 AA consisted of 81 census tracts, including 6 moderate-, 62 middle-, and 13 upper-income census tracts based on 2011-2015 ACS data.
- Many of the AA counties contain middle-income census tracts that are distressed or underserved as determined by the FFIEC in 2022. Antelope, Boone, Fillmore, Franklin, Nuckolls, and Thayer Counties contained both distressed and underserved middle-income tracts, while Clay, Greeley, Holt, Knox, Polk, Valley, Webster and Wheeler Counties contained underserved middle-income census tracts.
- The bank operates 39 banking offices in the AA, including its main office. Two banking offices are located in moderate-income tracts, 30 in middle-, and 7 in upper-income tracts. Additionally, the bank operates 49 ATMs in the AA.
- As of June 30, 2023, the bank held a 13.1 percent market share of deposits in the AA, ranking 1st out of 71 FDIC-insured financial institutions with 240 banking offices operating in the AA.
- To further augment the evaluation, three community member interviews recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. These individuals consisted of representatives of economic development organizations and a farm service agency.

Table 8

Population Change Assessment Area: Eastern Nebraska			
Area	2015 Population	2020 Population	Percent Change
Eastern Nebraska	267,821	269,973	0.8
Adams County, NE	31,442	31,205	(0.8)
Antelope County, NE	6,486	6,295	(2.9)
Boone County, NE	5,373	5,379	0.1
Buffalo County, NE	47,958	50,084	4.4
Butler County, NE	8,256	8,369	1.4
Clay County, NE	6,382	6,104	(4.4)
Fillmore County, NE	5,697	5,551	(2.6)
Franklin County, NE	3,105	2,889	(7.0)
Greeley County, NE	2,476	2,188	(11.6)
Hamilton County, NE	9,100	9,429	3.6
Holt County, NE	10,398	10,127	(2.6)
Kearney County, NE	6,549	6,688	2.1
Knox County, NE	8,556	8,391	(1.9)
Madison County, NE	35,111	35,585	1.4
Nance County, NE	3,639	3,380	(7.1)
Nuckolls County, NE	4,391	4,095	(6.7)
Pierce County, NE	7,184	7,317	1.9
Platte County, NE	32,642	34,296	5.1
Polk County, NE	5,271	5,214	(1.1)
Thayer County, NE	5,182	5,034	(2.9)
Valley County, NE	4,254	4,059	(4.6)
Webster County, NE	3,697	3,395	(8.2)
Wheeler County, NE	847	774	(8.6)
York County, NE	13,825	14,125	2.2
NonMSA Nebraska	679,331	672,190	(1.1)
Nebraska	1,869,365	1,961,504	4.9
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- According to 2020 US Census Bureau data, the AA's population of resident's accounts for 40.2 percent of the total nonmetropolitan population in the state of Nebraska and 13.8 percent of the total statewide population.
- The AA's population growth was lower than the Nebraska statewide growth rate, but greater than the nonmetropolitan statewide rate, which was negative.
- Buffalo County, the most populous county in the AA, had the second-highest growth rate and contains 18.6 percent of the total AA population.

Table 9

Median Family Income Change Assessment Area: Eastern Nebraska			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Eastern Nebraska	70,127	75,018	7.0
Adams County, NE	73,196	73,890	0.9
Antelope County, NE	61,516	64,700	5.2
Boone County, NE	69,454	75,179	8.2
Buffalo County, NE	77,985	83,673	7.3
Butler County, NE	69,479	79,865	14.9
Clay County, NE	67,204	76,014	13.1
Fillmore County, NE	68,549	85,924	25.3
Franklin County, NE	64,852	57,589	(11.2)
Greeley County, NE	57,123	62,738	9.8
Hamilton County, NE	74,091	85,144	14.9
Holt County, NE	64,767	71,420	10.3
Kearney County, NE	67,609	76,607	13.3
Knox County, NE	64,366	67,044	4.2
Madison County, NE	67,293	70,228	4.4
Nance County, NE	62,290	64,545	3.6
Nuckolls County, NE	61,373	65,446	6.6
Pierce County, NE	71,720	71,227	(0.7)
Platte County, NE	73,662	76,959	4.5
Polk County, NE	78,387	72,171	(7.9)
Thayer County, NE	64,912	67,045	3.3
Valley County, NE	65,099	77,531	19.1
Webster County, NE	59,693	64,605	8.2
Wheeler County, NE	58,574	69,375	18.4
York County, NE	71,875	78,187	8.8
NonMSA Nebraska	67,146	71,424	6.4
Nebraska	73,448	80,125	9.1
Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The increase in median family income (MFI) in the AA was above the statewide nonmetropolitan rate, but below the state of Nebraska.
- While individual counties appear to have significant fluctuations in MFI values, many counties are sparsely populated (refer to Table 8) and may reflect greater variances due to lower population figures.

- Within the AA, the percentage of AA families living below the poverty level was 6.5 percent, which is below both the statewide nonmetropolitan and state of Nebraska rates of 7.1 and 6.6 percent, respectively.

Table 10

Housing Cost Burden Assessment Area: Eastern Nebraska						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Eastern Nebraska	61.0	15.6	30.3	55.4	17.4	14.6
Adams County, NE	80.2	16.0	42.2	62.9	14.8	13.7
Antelope County, NE	49.7	0.0	23.2	37.7	13.0	10.1
Boone County, NE	60.6	0.0	21.0	49.1	21.7	13.3
Buffalo County, NE	68.1	21.1	37.1	60.0	28.4	17.5
Butler County, NE	47.1	9.5	21.4	56.4	15.8	15.5
Clay County, NE	55.1	0.0	27.5	58.9	16.1	15.0
Fillmore County, NE	26.7	0.0	12.7	48.5	12.6	12.4
Franklin County, NE	72.5	5.7	25.3	52.5	8.6	14.8
Greeley County, NE	64.0	0.0	27.6	54.5	12.8	17.7
Hamilton County, NE	57.3	12.0	21.7	43.8	31.0	13.0
Holt County, NE	49.5	30.9	25.2	60.8	16.8	16.4
Kearney County, NE	62.2	0.0	23.3	62.3	18.5	17.2
Knox County, NE	32.9	10.2	16.1	44.0	4.3	10.6
Madison County, NE	62.6	15.8	30.8	58.5	22.0	16.8
Nance County, NE	70.0	4.7	19.5	50.7	17.8	18.4
Nuckolls County, NE	50.7	5.3	30.1	44.9	4.6	8.9
Pierce County, NE	44.7	32.6	27.4	57.1	24.2	16.1
Platte County, NE	56.1	22.8	28.9	55.4	15.8	12.5
Polk County, NE	39.4	16.7	22.4	48.5	10.3	10.1
Thayer County, NE	50.0	2.8	14.9	34.4	3.1	9.2
Valley County, NE	41.6	3.0	21.2	50.0	10.0	13.2
Webster County, NE	41.9	0.0	22.8	34.9	5.5	8.4
Wheeler County, NE	46.7	0.0	16.5	57.3	30.0	28.7
York County, NE	53.6	14.0	24.9	64.3	19.8	16.1
NonMSA Nebraska	62.8	15.0	30.7	55.5	19.3	15.4
Nebraska	71.4	24.2	36.2	60.6	26.7	15.9
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

- As illustrated in the above table, the percentages of renters and owners considered cost burdened in the AA were slightly below the rates in statewide nonmetropolitan areas as a whole.

- The housing cost burden for renters was highest in Adams, Buffalo, and Madison Counties, three of the four most populous counties in the AA.
- Two community members stated there is a shortage of workforce housing in the AA.

Table 11

Unemployment Rates					
Assessment Area: Eastern Nebraska					
Area	2018	2019	2020	2021	2022
Eastern Nebraska	2.6	2.9	3.6	2.2	2.1
Adams County, NE	3.0	3.3	4.1	2.6	2.2
Antelope County, NE	2.5	2.6	2.3	1.8	1.9
Boone County, NE	2.3	2.8	2.6	1.7	1.8
Buffalo County, NE	2.4	2.7	4.1	2.2	2.0
Butler County, NE	2.4	2.6	3.4	2.3	1.8
Clay County, NE	3.2	3.3	3.3	2.5	2.4
Fillmore County, NE	2.6	2.6	2.8	2.1	1.9
Franklin County, NE	3.2	3.4	3.4	2.3	2.3
Greeley County, NE	2.7	3.1	3.0	1.9	2.1
Hamilton County, NE	2.5	3.1	3.8	2.3	2.1
Holt County, NE	2.6	2.6	2.5	1.9	1.9
Kearney County, NE	2.1	2.3	3.3	1.9	1.9
Knox County, NE	3.2	3.1	3.1	2.2	2.3
Madison County, NE	2.6	2.9	3.9	2.6	2.1
Nance County, NE	2.5	3.1	3.3	2.0	2.1
Nuckolls County, NE	2.8	2.8	2.7	2.0	2.2
Pierce County, NE	2.7	2.7	3.3	2.3	2.0
Platte County, NE	2.7	3.0	3.7	2.3	2.1
Polk County, NE	2.4	2.8	3.0	2.0	2.0
Thayer County, NE	2.3	2.7	2.8	1.8	1.9
Valley County, NE	3.0	3.3	2.9	2.3	2.2
Webster County, NE	2.9	3.5	3.8	2.2	2.5
Wheeler County, NE	2.4	2.8	1.9	1.3	1.6
York County, NE	2.6	2.7	3.4	2.1	2.1
NonMSA Nebraska	2.8	3.0	3.5	2.3	2.2
Nebraska	2.9	3.1	4.3	2.7	2.3

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

- AA unemployment rates held steady from 2018 to 2019, before experiencing an increase in 2020 throughout the AA due to the COVID-19 Pandemic. Unemployment rates returned to levels at or below pre-pandemic levels in 2021 and 2022.
- The AA unemployment rate is slightly below the statewide nonmetropolitan rate and the Nebraska statewide rate.
- Despite a wide geographic area with counties of varying populations, the unemployment rate showed little variance across AA counties.
- A community representative highlighted the reliance on the agriculture industry as the significant source of employment in the AA, with many local businesses relying on the industry.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EASTERN NEBRASKA AA

LENDING TEST

The bank's performance under the lending test in the Eastern Nebraska AA is good. The lending performance of small farm loans was weighted most heavily in the analysis, followed by small business lending, with home mortgage lending receiving the least weight, based on lending volumes.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of loans in the AA included 4,091 small farm, 1,753 small business, and 186 home mortgage loans originated between January 1, 2021 and December 31, 2022. Home improvement and multifamily loans at the product level were not evaluated based on lending levels too low to conduct a meaningful analysis.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of innovative and flexible lending programs is discussed in the overall institution lending activity section of this report.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The distribution of small farm loans reflects excellent penetration, while small business and home mortgage lending reflect poor penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. The bank did not originate any home mortgage loans in low-income tracts in 2022, which was comparable to aggregate lending data as well as the demographic figure. Ultimately these figures reflect an overall limited opportunity and demand for home mortgage loans in these geographies. Lending levels in moderate-income tracts was comparable to the aggregate lending data by number, significantly below by dollar volume, and comparable to the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level.

The geographic distribution of home mortgage lending in 2021 reflected performance below 2022 lending patterns, as the bank originated only one of 97 total home mortgage loans in a moderate-income tract (1.0 percent by number, 0.5 percent by dollar volume). Given the greater volume of loan originations in this year, performance in 2021 supported the overall rating.

An evaluation of the overall dispersion of home mortgage loans identified gaps and lapses in lending including in LMI tracts, which further supports the poor conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is poor. The bank did not originate any home purchase loans in low-income tracts in 2022. Lending levels in moderate-income tracts were comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The geographic distribution of home purchase lending in 2021 reflected penetration levels below 2022 lending patterns, as the bank did not originate any home purchase loans in LMI tracts, which supported the overall rating.

Home Refinance Loans

The geographic distribution of home refinance lending is poor. The bank did not originate any home refinance loans in LMI tracts in either 2021 or 2022, which was below the performance of aggregate lenders as well as the demographic figure, particularly in moderate-income tracts.

Table 12

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	0	0.0	1.4	0	0.0	1.2	1.2
Moderate	2	6.7	6.5	78	2.1	4.8	5.8
Middle	22	73.3	65.5	2,846	78.1	64.5	70.9
Upper	6	20.0	26.6	721	19.8	29.5	22.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	3,645	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.4	0	0.0	1.3	1.2
Moderate	0	0.0	6.2	0	0.0	5.0	5.8
Middle	24	77.4	67.9	13,674	96.3	67.7	70.9
Upper	7	22.6	24.5	528	3.7	26.1	22.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	14,202	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.4	0	0.0	0.4	1.2
Moderate	3	18.8	4.4	86	11.9	3.4	5.8
Middle	11	68.8	71.9	568	78.6	69.9	70.9
Upper	2	12.5	23.4	69	9.5	26.3	22.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	723	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	7.0	0	0.0	1.9	6.3
Moderate	0	0.0	8.8	0	0.0	19.0	13.2
Middle	4	66.7	73.7	1,257	94.1	75.2	50.6
Upper	2	33.3	10.5	79	5.9	4.0	30.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	1,336	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.4	0	0.0	1.2	1.2
Moderate	5	5.6	6.3	164	0.8	5.9	5.8
Middle	66	74.2	66.3	18,576	92.2	66.0	70.9
Upper	18	20.2	25.9	1,414	7.0	26.8	22.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	20,154	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Small Business Lending

The geographic distribution of small business lending is poor. The bank did not originate any small business loans in low-income tracts; however, this was comparable to aggregate lending data by number and dollar volume, as well as to the demographic figure, or percentage of AA businesses in each census tract income level. Lending in moderate-income census tracts was below the aggregate lending data by number, significantly below by dollar volume, and below the demographic figure.

The geographic distribution of small business lending in 2021 reflected penetration levels consistent with 2022 lending. Additionally, an evaluation of the dispersion of small business loans identified gaps and lapses that included LMI tracts, which further supports the poor conclusion.

Table 13

Distribution of 2022 Small Business Lending By Income Level of Geography							
Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	1.2	0	0.0	1.1	1.3
Moderate	21	3.4	6.5	861	1.4	5.8	7.6
Middle	517	83.0	68.8	48,114	80.2	72.1	71.0
Upper	85	13.6	21.3	11,046	18.4	20.5	20.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.3	0	0.0	0.6	
Total	623	100.0	100.0	60,021	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Farm Lending

The geographic distribution of small farm lending is excellent. The bank did not originate any loans in low-income tracts in 2022, which was comparable to the demographic figure or percentage of AA farms in each census tract by income level. As illustrated in the below table, the presence of small farms in AA low-income tracts is very limited, indicating limited opportunity to lend. The bank's performance was also comparable to aggregate lending data by number and dollar volume. Lending in moderate-income census tracts was significantly above the aggregate lending data by number and dollar volume, and significantly above the demographic figure, which represents the percentage of AA farms in each census tract income level.

The geographic distribution of small farm lending in 2021 reflected penetration levels consistent with 2022 lending patterns. Additionally, an evaluation of the dispersion of small farm loans identified gaps and lapses that included LMI tracts. The gaps were located in an area located a considerable distance from the closet bank branch and located in an area with a low volume of farms and thus, did not impact the conclusion.

Table 14

Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	86	6.4	3.1	10,520	6.0	3.5	2.6
Middle	1,101	82.0	84.3	147,487	83.9	85.3	84.5
Upper	156	11.6	12.5	17,856	10.2	11.2	12.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	
Total	1,343	100.0	100.0	175,863	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

The bank's lending has a good distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of small farm lending reflects excellent performance, while the distribution of small business and home mortgage lending reflect good performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The distribution of 2022 home mortgage loans among low-income borrowers was significantly above the aggregate lending data by number, comparable by dollar volume, and above the demographic figure, which represents the percentage of AA families by family income level. Lending among moderate-income borrowers was below the aggregate lending data by number, significantly below by dollar, and comparable to the demographic figure.

The borrower distribution of home mortgage lending in 2021 was above the level noted in 2022, as the bank originated a higher volume of total home mortgage loans to LMI borrowers relative to aggregate lending data and the demographic figure, which supported the overall rating.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. The distribution of 2022 home purchase loans among low-income borrowers was significantly above the aggregate lending data by number and dollar volume, and above the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The borrower distribution of home purchase lending in 2021 was above the level noted in 2022, which supported the overall rating.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of 2022 home refinance loans among low-income borrowers was comparable to the aggregate lending data by number, significantly below by dollar volume, and below the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, significantly below by dollar, and comparable to the demographic figure.

The borrower distribution of home refinance loans in 2021 was above the level noted in 2022, but with the same number of originations, supporting the overall rating.

Table 15

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Eastern Nebraska							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	7	23.3	8.8	517	14.2	5.1	16.9
Moderate	5	16.7	22.4	308	8.4	16.7	17.9
Middle	5	16.7	21.9	689	18.9	22.2	23.4
Upper	9	30.0	24.8	1,122	30.8	36.4	41.8
Unknown	4	13.3	22.0	1,009	27.7	19.5	0.0
Total	30	100.0	100.0	3,645	100.0	100.0	100.0
Refinance Loans							
Low	3	9.7	11.1	57	0.4	5.7	16.9
Moderate	5	16.1	21.8	186	1.3	15.7	17.9
Middle	7	22.6	24.9	547	3.9	22.0	23.4
Upper	10	32.3	31.4	1,737	12.2	40.8	41.8
Unknown	6	19.4	10.8	11,675	82.2	15.8	0.0
Total	31	100.0	100.0	14,202	100.0	100.0	100.0
Home Improvement Loans							
Low	5	31.3	10.6	99	13.7	7.2	16.9
Moderate	1	6.3	16.8	7	1.0	14.1	17.9
Middle	3	18.8	23.0	84	11.6	16.5	23.4
Upper	6	37.5	44.9	483	66.8	57.0	41.8
Unknown	1	6.3	4.7	50	6.9	5.3	0.0
Total	16	100.0	100.0	723	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	18	21.7	9.5	746	4.0	5.3	16.9
Moderate	12	14.5	21.8	531	2.8	16.3	17.9
Middle	17	20.5	22.7	1,465	7.8	22.0	23.4
Upper	25	30.1	28.0	3,342	17.8	38.0	41.8
Unknown	11	13.3	18.0	12,734	67.7	18.4	0.0
Total	83	100.0	100.0	18,818	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table							

Small Business Lending

The borrower distribution of small business lending is good. The distribution of 2022 small business loans to businesses with annual revenues of \$1MM or less (small businesses) reflects performance above the aggregate lending data by number, comparable by dollar

volume, and comparable to the demographic figure, which reflects the percentage of businesses in the AA by revenue size.

In addition, the borrower distribution of small business loans in 2021 was consistent with the level noted in 2022. The bank originated a high number of PPP loans in 2021 in which the collection of revenue information was not required, although 60.9 percent of the small business loans originated by the bank during that year had revenues reported. A review of loans with reported revenues revealed the bank originated a consistent level of loans to small businesses as compared to 2022, supporting the overall conclusion.

Table 16

Distribution of 2022 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Eastern Nebraska							
	Bank And Aggregate Loans						Total
	Bank		Agg	Bank		Agg	Businesses %
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	480	77.0	55.6	31,576	52.6	42.5	88.9
Over \$1 Million	97	15.6		26,395	44.0		8.6
Revenue Unknown	46	7.4		2,050	3.4		2.5
Total	623	100.0		60,021	100.0		100.0
By Loan Size							
\$100,000 or Less	484	77.7	88.8	16,756	27.9	32.4	
\$100,001 - \$250,000	76	12.2	6.3	12,523	20.9	19.6	
\$250,001 - \$1 Million	63	10.1	4.9	30,742	51.2	48.0	
Total	623	100.0	100.0	60,021	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	407	84.8		13,811	43.7		
\$100,001 - \$250,000	54	11.3		8,776	27.8		
\$250,001 - \$1 Million	19	4.0		8,989	28.5		
Total	480	100.0		31,576	100.0		
Source: 2022 FFIEC Census Data							
2022 Dun & Bradstreet Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of 2022 small farm loans to farms with annual revenues of \$1MM or less (small farms) reflects performance above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure, which reflects the percentage of farms in the AA by revenue size.

In addition, the borrower distribution of small farm loans in 2021 was above the level noted in 2022. The bank originated a high number of PPP loans in 2021 in which the collection of revenue information was not required, although 69.8 percent of the small farm loans originated by the bank during that year had revenues reported. A review of loans with reported revenues revealed the bank originated loans to small farms above 2022 levels, supporting the overall conclusion.

Table 17

Distribution of 2022 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Eastern Nebraska							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	1,145	85.3	64.3	136,680	77.7	74.3	98.6
Over \$1 Million	128	9.5		33,398	19.0		1.4
Revenue Unknown	70	5.2		5,785	3.3		0.0
Total	1,343	100.0		175,863	100.0		100.0
By Loan Size							
\$100,000 or Less	791	58.9	70.4	34,187	19.4	22.7	
\$100,001 - \$250,000	332	24.7	16.9	59,163	33.6	29.6	
\$250,001 - \$500,000	220	16.4	12.6	82,513	46.9	47.7	
Total	1,343	100.0	100.0	175,863	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	704	61.5		30,614	22.4		
\$100,001 - \$250,000	290	25.3		51,314	37.5		
\$250,001 - \$500,000	151	13.2		54,752	40.1		
Total	1,145	100.0		136,680	100.0		
Source: 2022 FFIEC Census Data							
2022 Dun & Bradstreet Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated eight CD loans totaling \$11.5MM in the AA. CD loans were most responsive to area affordable housing needs. Examples of CD lending activities include:

- Two loans totaling \$9.1MM for the construction of apartments where the majority of units are income-restricted, providing affordable housing for LMI individuals in the AA.
- One loan totaling \$50M for the purchase of a fire truck, providing public safety services in an underserved area of the AA.

Table 18

Community Development Loans – Eastern Nebraska AA		
Community Development Purpose	#	\$(000)
Affordable Housing	4	9,949
Community Services	1	361
Economic Development	0	0
Revitalization and Stabilization	3	1,170
Total Loans	8	11,480

INVESTMENT TEST

The bank's performance under the investment test in the Eastern Nebraska AA is excellent. The bank has an excellent level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the credit and CD needs of its AA.

As illustrated in the table below, the bank maintains a substantial portfolio strategy of investments in municipal bonds that address various revitalization and stabilization needs throughout many of the AA's distressed and/or underserved communities. All investments supported critical infrastructure needs in rural, underserved areas, such as healthcare and improvements to civil services, including rural fire protection services.

The table below also includes the bank's level of philanthropic activity, which includes a mix of donations to organizations providing community services to LMI individuals, and organizations providing revitalization and stabilization needs throughout many of its distressed and/or underserved communities. Examples of donations include:

- Two donations totaling \$10M to an organization supporting education services in an underserved area.
- Two donations totaling \$19M to provide scholarships for LMI students.

Table 19

Investments, Grants, and Donations – Eastern Nebraska AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	1	10	1	10
Community Services	0	0	0	0	12	33	12	33
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	178	25,964	79	6,405	13	37	270	32,406
Total	178	25,964	79	6,405	26	80	283	32,449
^{1.} Book Value of Investment ^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Eastern Nebraska AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates two branches and two ATMs in the AA's moderate-income tracts. The distribution of branches and ATMs throughout the AA generally aligns with the concentration of LMI tracts within the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in LMI areas or to LMI individuals. The bank did not open or close any branches during the review period. The bank acquired one branch from Ashton State Bank in October 2022, located in Sherman County in a middle-income census tract, but was not included in this analysis due to the limited time the branch was operated by the bank during the review period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Only deposit services are offered at the limited-service locations. Furthermore, a majority of branches offer hours from at least 8:00 AM to 4:00 PM, Monday through Friday, and abbreviated Saturday hours.

Table 20

Retail Banking and Community Development Services – Eastern Nebraska AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	5.1	76.9	18.0	0.0	100.0	2.4	8.5	72.0	17.1	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	4.1	71.4	24.5	0.0	100.0	2.5	7.3	68.7	21.5	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	39		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	6		22		11		24		63		29	
¹. Based on 2022 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank provides an adequate level of CD services. As illustrated in the table above, bank employees supported 29 organizations throughout the AA, providing 63 CD services. Examples of services provided by bank employees include:

- Two bank employees served on the boards of food pantries, providing services to LMI individuals.
- One bank employee served on the board of a community foundation that provides funds for critical infrastructure, including educational services, in an underserved area.

**GRAND ISLAND MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE GRAND ISLAND MSA
AA**

The bank's Grand Island MSA AA consists of the entirety of Hall, Howard, and Merrick counties, the three counties that comprise the Grand Island, Nebraska MSA. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- The AA remains unchanged since the prior evaluation.
- The composition of the 2022 AA consisted of 19 total census tracts, including 3 moderate-, 13 middle-, and 3 upper-income census tracts based on 2016-2020 American Community Survey (ACS) data.
- The 2021 AA consisted of 19 total census tracts, including 4 moderate-, 8 middle-, and 7 upper-income census tracts based on 2011-2015 ACS data.
- The bank operates four banking offices in the AA. Three banking offices are located in middle-, and one in an upper-income tract. Additionally, the bank operates four ATMs in the AA.
- As of June 30, 2023, the bank held a 2.9 percent market share of deposits in the AA, ranking 10th out of 22 FDIC-insured financial institutions with 46 banking offices operating in the AA.
- To further augment the evaluation, one community member interview recently conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The individual is a representative of an economic development organization.

Table 21

Population Change			
Assessment Area: Grand Island MSA			
Area	2015 Population	2020 Population	Percent Change
Grand Island MSA	74,915	77,038	2.8
Hall County, NE	60,792	62,895	3.5
Howard County, NE	6,347	6,475	2.0
Merrick County, NE	7,776	7,668	(1.4)
Nebraska	1,869,365	1,961,504	4.9
Source: 2020 U.S. Census Bureau Decennial Census 2011-2016 U.S. Census Bureau: American Community Survey			

- As illustrated in the above table, 81.6 percent of the AA's population resides in Hall County, the location of the AA's largest city, Grand Island. Howard and Merrick Counties are more rural in nature.
- The AA population experienced a growth rate that was below the Nebraska statewide rate, with most of the population growth by volume experienced in Hall County.

Table 22

Median Family Income Change Assessment Area: Grand Island MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Grand Island MSA	62,880	70,828	12.6
Hall County, NE	61,899	69,722	12.6
Howard County, NE	71,886	73,023	1.6
Merrick County, NE	65,675	72,727	10.7
Nebraska	73,448	80,125	9.1
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The increase in MFI in the AA outpaced the Nebraska statewide growth rate.
- Based on 2016-2020 ACS data, the percentage of AA families living below the poverty level was 8.1 percent, which was above the Nebraska statewide figure of 6.6 percent. Within the AA, 86.0 percent of AA families living below the poverty level reside in Hall County.

Table 23

Housing Cost Burden Assessment Area: Grand Island MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Grand Island MSA	70.3	26.5	35.4	60.5	26.1	15.3
Hall County, NE	71.0	27.8	35.6	58.2	25.9	13.5
Howard County, NE	59.4	23.4	34.3	60.0	27.6	15.9
Merrick County, NE	73.3	17.1	34.0	68.9	26.5	24.8
Nebraska	71.4	24.2	36.2	60.6	26.7	15.9
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						
Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- As illustrated in the above table, housing costs for renters and owners in the AA were slightly below the costs in the state of Nebraska as a whole.
- The housing cost burden for renters was similar across the AA, while the housing cost burden for owners was higher for owners in Merrick County.

- The community member stated that home inventory is limited and many homes that are affordable for LMI individuals are in need of repair.

Table 24

Unemployment Rates					
Assessment Area: Grand Island MSA					
Area	2018	2019	2020	2021	2022
Grand Island MSA	3.2	3.6	5.5	3.0	2.4
Hall County, NE	3.3	3.6	5.9	3.1	2.4
Howard County, NE	3.1	3.6	4.4	2.3	2.1
Merrick County, NE	2.9	3.3	4.0	2.5	2.0
Nebraska	2.9	3.1	4.3	2.7	2.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- AA unemployment rates held steady from 2018 to 2019, before experiencing an increase in 2020 throughout the AA due to the COVID-19 Pandemic. Unemployment rates trended below pre-pandemic levels in 2021 and 2022.
- Unemployment rates show little variability across AA counties.
- The community member stated the AA economy remained stable during and after the Pandemic, but some businesses are facing difficulties finding employees.
- The community member added that businesses face difficulty obtaining small-dollar and start-up loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND ISLAND MSA AA

LENDING TEST

The bank's performance under the lending test in the Grand Island MSA AA is adequate. The lending performance of small farm loans was weighted more heavily in the analysis than small business loans based on lending volumes. Home mortgage lending was not evaluated based on lending levels too low to conduct a meaningful analysis.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of loans in the AA included 241 small farm and 223 small businesses loans originated between January 1, 2021 and December 31, 2022.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of innovative and flexible lending programs is discussed in the overall institution lending activity section of this report.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects poor distribution among the different census tracts and dispersion throughout the AA. While the distribution of small farm loans reflects adequate penetration, the distribution of small business loans reflects poor penetration.

Small Business Lending

The geographic distribution of small business lending is poor. The distribution of loans in 2022 among moderate-income census tracts was significantly below the aggregate lending data, or percentage of AA businesses in each census tract income level, by number and dollar volume, and significantly below the demographic figure.

The geographic distribution of small business lending in 2021 reflected penetration levels above 2022 lending patterns; however, the bank's performance in moderate-income tracts was still below aggregate lending data by number as well as the demographic figure. Additionally, an analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses in lending that impacted the conclusion.

Table 25

Distribution of 2022 Small Business Lending By Income Level of Geography							
Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	2.2	19.4	56	0.7	19.3	18.3
Middle	81	90.0	61.5	6,262	79.1	56.6	63.1
Upper	7	7.8	18.3	1,596	20.2	23.9	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.2	
Total	90	100.0	100.0	7,914	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank did not originate any small farm loans in a moderate-income tract during 2022; however, performance was comparable to the demographic figure or percentage of AA farms in each census tract by

income level. As illustrated in Table 26, the presence of small farms in AA moderate-income tracts is very limited, indicating limited opportunity to lend. These tracts are also located in the city limits of Grand Island, and it would not be reasonable to anticipate a notable volume of small farm operations in such tracts. The bank's performance was also comparable to aggregate lending data.

The geographic distribution of small farm lending in 2021 reflected penetration levels consistent with 2022 lending. Additionally, an analysis of the dispersion of loans was conducted and identified gaps and lapses that included the AA's moderate-income tracts; however, this did not impact the conclusion given the limited opportunity and demand for small farm credit in these areas as indicated above.

Table 26

Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.9	0	0.0	0.9	1.4
Middle	85	98.8	94.7	11,814	99.7	95.3	92.7
Upper	1	1.2	4.4	30	0.3	3.8	5.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	86	100.0	100.0	11,844	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Lending to Businesses and Farms of Different Sizes

The bank's lending has a good distribution among businesses and farms of different sizes. The distribution of small business lending reflects excellent performance, while the distribution of small farm lending reflects good performance.

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of 2022 small business loans to businesses with annual revenues of \$1MM or less reflects performance significantly above the aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The borrower distribution of small business lending in 2021 reflected penetration levels consistent with 2022 lending. The bank originated a high number of PPP loans in 2021 in which the collection of revenue information was not required, although 68.4 percent of the small business loans originated by the bank during that year had revenues reported. A review of loans with reported revenues revealed the bank originated loans to small businesses consistent with 2022 levels.

Table 27

Distribution of 2022 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Grand Island MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	69	76.7	49.0	5,649	71.4	37.5	89.9
Over \$1 Million	12	13.3		2,098	26.5		9.0
Revenue Unknown	9	10.0		167	2.1		1.2
Total	90	100.0		7,914	100.0		100.0
By Loan Size							
\$100,000 or Less	74	82.2	87.5	2,429	30.7	30.5	
\$100,001 - \$250,000	8	8.9	6.7	1,393	17.6	19.1	
\$250,001 - \$1 Million	8	8.9	5.8	4,092	51.7	50.4	
Total	90	100.0	100.0	7,914	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	58	84.1		1,848	32.7		
\$100,001 - \$250,000	5	7.2		824	14.6		
\$250,001 - \$1 Million	6	8.7		2,977	52.7		
Total	69	100.0		5,649	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Small Farm Lending

The borrower distribution of small farm lending is good. The distribution of 2022 small farm loans to farms with annual revenues of \$1MM or less reflects performance above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The borrower distribution of small farm lending in 2021 reflected penetration levels consistent with 2022 lending. The bank originated a high number of PPP loans in 2021 in

which the collection of revenue information was not required, although 77.4 percent of the small farm loans originated by the bank during that year had revenues reported. A review of loans with reported revenues revealed the bank originated loans to small farms consistent with 2022 levels.

Table 28

Distribution of 2022 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Grand Island MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	71	82.6	61.4	9,546	80.6	71.3	97.0
Over \$1 Million	10	11.6		1,857	15.7		3.0
Revenue Unknown	5	5.8		441	3.7		0.0
Total	86	100.0		11,844	100.0		100.0
By Loan Size							
\$100,000 or Less	42	48.8	63.4	1,640	13.8	17.7	
\$100,001 - \$250,000	28	32.6	20.1	4,819	40.7	30.0	
\$250,001 - \$500,000	16	18.6	16.4	5,385	45.5	52.4	
Total	86	100.0	100.0	11,844	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	37	52.1		1,300	13.6		
\$100,001 - \$250,000	20	28.2		3,645	38.2		
\$250,001 - \$500,000	14	19.7		4,601	48.2		
Total	71	100.0		9,546	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Lending

The bank provides a relatively high level of CD loans. The bank originated two CD loans totaling \$6.3MM in this AA, both of which support affordable housing for LMI individuals and families. The proceeds of the CD loans aided in the construction of multifamily housing units which operate under income restrictions set forth as part of a low-income housing tax credit property.

Table 29

Community Development Loans – Grand Island MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	2	6,265
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	2	6,265

INVESTMENT TEST

The bank's performance under the investment test in the Grand Island MSA AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AA.

The bank invested in one security totaling \$228M which helped to finance housing for an LMI individual. Additionally, the bank made one donation totaling \$1M for purchasing school supplies at a school where more than 50.0 percent of students are eligible for free- and reduced-lunch programs.

Table 30

Investments, Grants, and Donations – Grand Island MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	1	228	0	0	1	228
Community Services	0	0	0	0	1	1	1	1
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	0	0	1	228	1	1	2	229
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Grand Island MSA AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates no branches or

ATMs in the AA's moderate-income tracts; however, all banking offices are located within two miles of the moderate-income tracts. Absent banking services in moderate-income tracts, the remaining branches and full-service ATMs are generally proportional to the area demographics.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened or closed any locations since the previous evaluation in this AA.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and services in the AA are consistent institution-wide and do not vary by market.

Table 31

Retail Banking and Community Development Services – Grand Island MSA AA												
Branch Accessibility	Location of Branches by Tract ()						Percent of Tracts ¹					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	75.0	25.0	0.0	100.0	0.0	15.8	68.4	15.8	0.0	100.0
	Location of ATMs by Tract ()						Percent of Households by Tracts ¹ ()					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	75.0	25.0	0.0	100.0	0.0	19.3	63.7	17.0	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	4		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	2	3		0		0		5		3		
^{1.} Based on 2022 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

¹. Based on 2022 FFIEC census tract definitions.

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides an adequate level of CD services. As illustrated in the table above, bank employees supported three organizations in the AA, providing five CD services. The services included:

- One bank employee served on a financial committee for an area organization that provides an array of services to individuals and families in need of affordable housing.
- One bank employee taught financial education courses to students at a school that contains a majority of students that qualify for free or reduced lunches.
- One bank employee served on the board of a food pantry, providing services to LMI individuals.

**OMAHA-COUNCIL BLUFFS METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OMAHA-COUNCIL
BLUFFS METROPOLITAN AA**

The bank delineates a portion of the Omaha-Council Bluffs, Nebraska-Iowa MSA, including the entirety of Saunders and Cass Counties (two of eight counties that comprise the entire MSA), which are located in the southwestern portion of the MSA. Within the AA, the bank operates three full-service branches in the rural communities of Murray and Beaver Lake (Cass County) and one branch in Malmo (Saunders County).

- The AA remains unchanged since the prior evaluation.
- The composition of the 2022 AA consisted of 11 total census tracts, including 1 moderate-, 9 middle-, and 1 upper-income census tract based on 2016-2020 American Community Survey (ACS) data.
- The 2021 AA consisted of 11 total census tracts, all of which were middle-income census tracts based on 2011-2015 ACS data.
- Based on 2020 ACS data, the AA population was 48,876, which reflects a 5.6 percent increase from the 2015 ACS data.
- The bank operates three full-service branches in the AA, all located in middle-income census tracts. The bank did not open or close any branches within the AA during the review period.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank held a 6.4 percent market share of deposits, ranking 6 of 22 financial institutions operating from 37 banking offices in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OMAHA-COUNCIL
BLUFFS METROPOLITAN AA**

The state of Nebraska AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas does not change the rating for the state of Nebraska.

Table 32

Assessment Area	Lending Test	Investment Test	Service Test
Omaha-Council Bluffs Metropolitan AA	Consistent	Below	Consistent

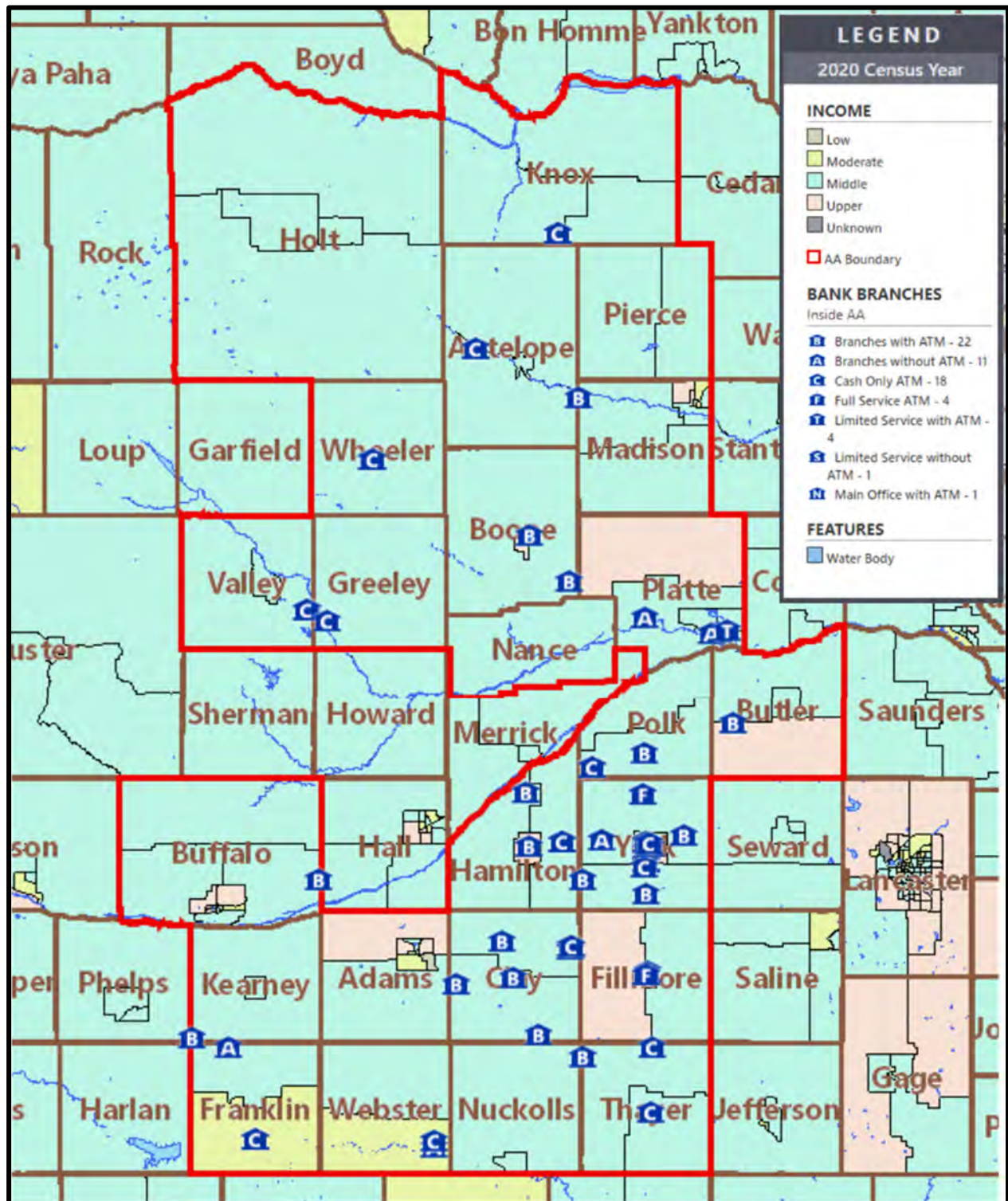
APPENDIX A – SCOPE OF EXAMINATION

Table A-1

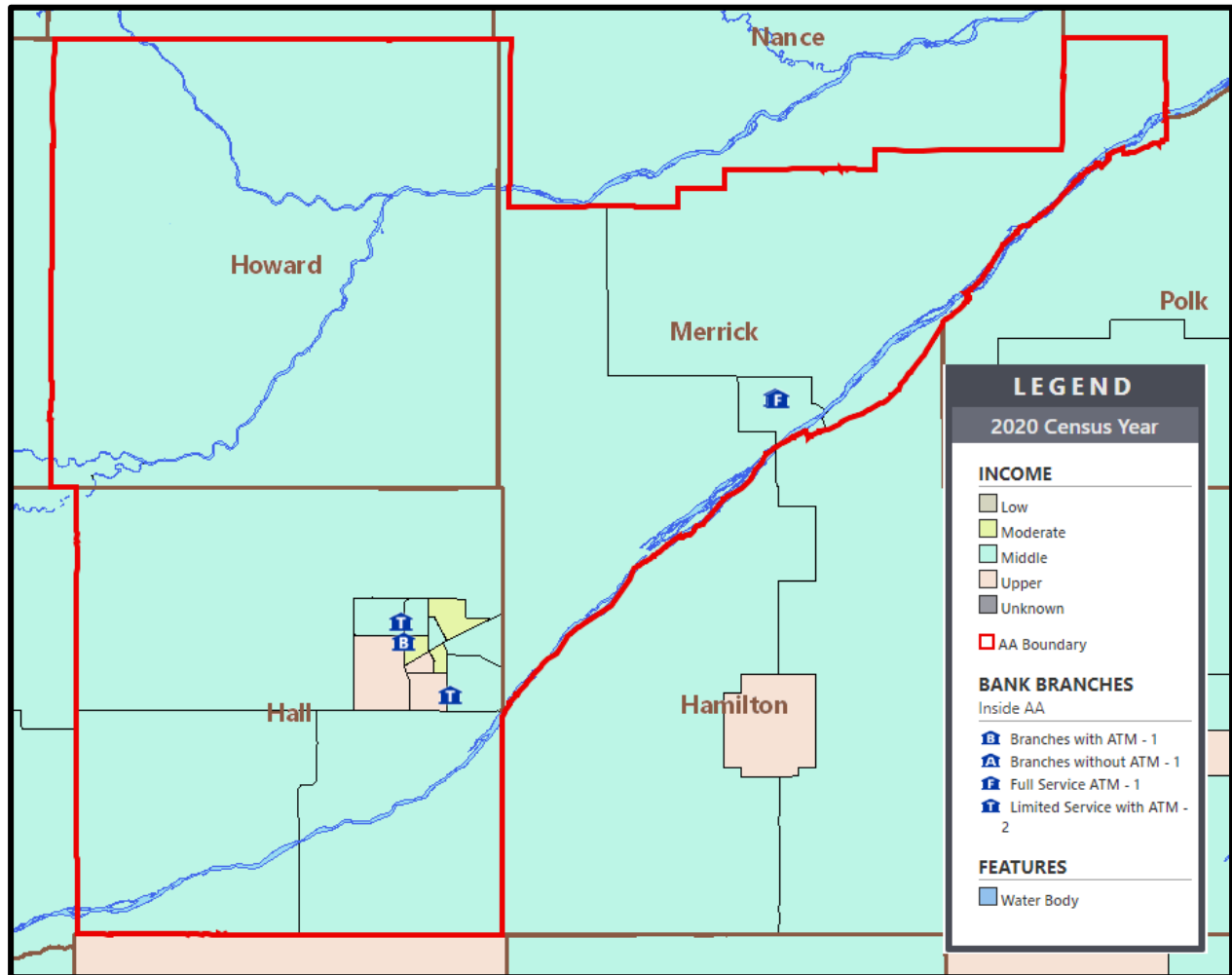
Scope of Examination			
<u>Financial Institution</u> Cornerstone Bank York, Nebraska		<u>Products/Services Reviewed</u> <div><div>• Home Purchase Loans</div><div>• Home Refinance Loans</div><div>• Home Improvement Loans</div><div>• Multifamily Loans</div></div> <div><div>• Small Business (SB) Loans</div><div>• Small Farm (SF) Loans</div><div>• Community Development Loans</div><div>• Qualified Investments and Donations</div><div>• Community Development Services</div></div>	
<u>Time Period</u> <div><u>HMDA LAR and CRA SB and SF Loans:</u>January 1, 2021 to December 31, 2022</div> <div><u>Community Development Activities:</u>January 1, 2022 to December 31, 2023</div>			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
None	None	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Nebraska</u> MSA 99999 Eastern Nebraska AA MSA 24260 Grand Island MSA AA MSA 36540 Omaha-Council Bluffs, NE-IA Metropolitan AA	Full Review Full Review Limited Review	None None None	3 prior 1 prior None

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

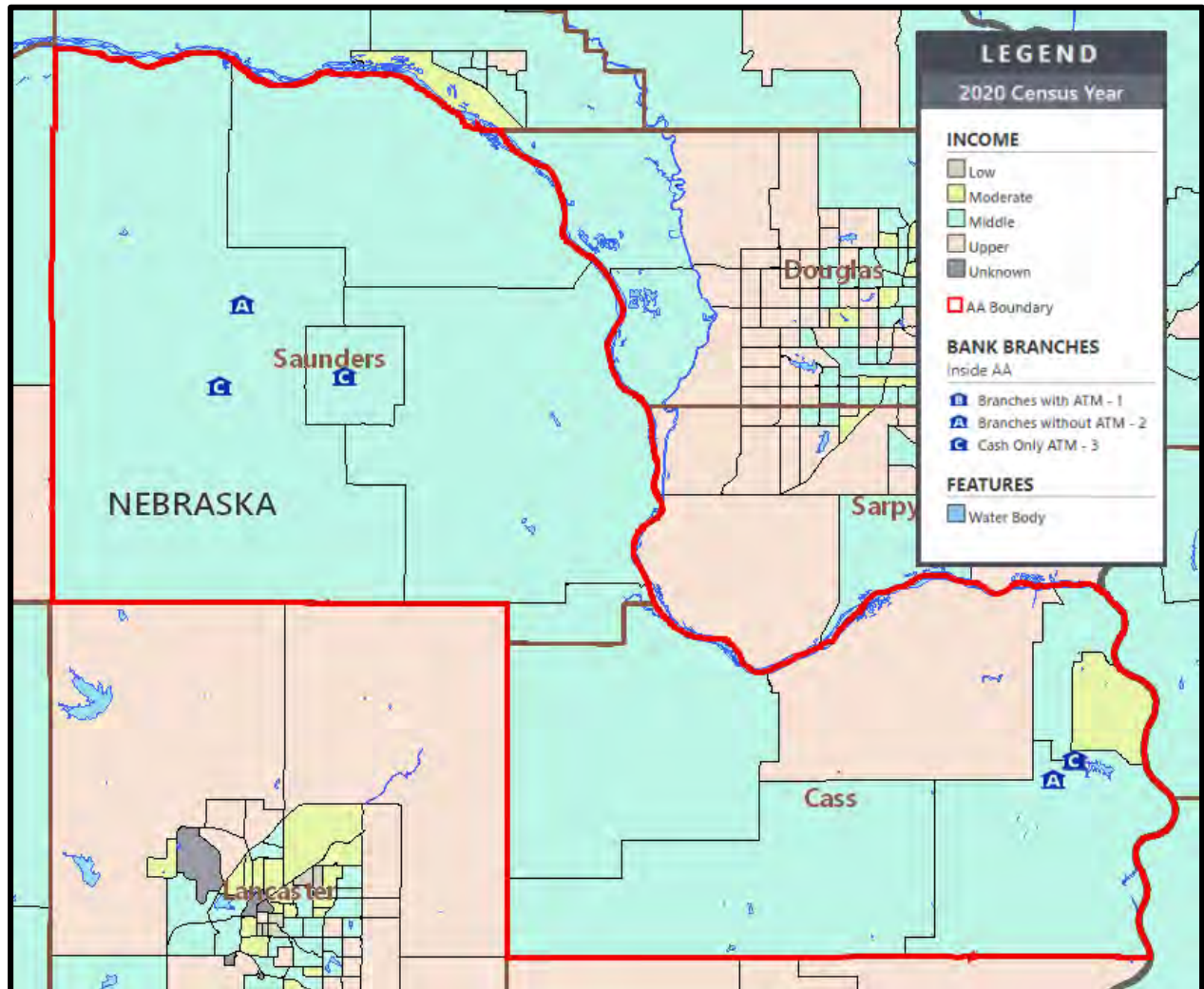
Map B-1
Eastern Nebraska AA



Map B-2
Grand Island MSA AA



Map B-3
Omaha-Council Bluffs Metropolitan AA



APPENDIX C – DEMOGRAPHIC INFORMATION

Table C-1

2022 Eastern Nebraska AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	2.4	1,298	1.9	238	18.3	11,816	16.9
Moderate	7	8.5	4,627	6.6	721	15.6	12,506	17.9
Middle	59	72.0	48,637	69.5	3,112	6.4	16,343	23.4
Upper	14	17.1	15,426	22.0	446	2.9	29,323	41.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	82	100.0	69,988	100.0	4,517	6.5	69,988	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,002	998	1.3	33.2	1,710	57.0	294	9.8
Moderate	9,241	4,634	5.9	50.1	3,354	36.3	1,253	13.6
Middle	86,640	55,680	70.5	64.3	19,419	22.4	11,541	13.3
Upper	25,571	17,688	22.4	69.2	5,869	23.0	2,014	7.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	124,454	79,000	100.0	63.5	30,352	24.4	15,102	12.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	183	1.3	149	1.2	32	2.6	2	0.6
Moderate	1,079	7.6	951	7.5	112	9.1	16	4.6
Middle	10,113	71.0	8,959	70.7	875	71.2	279	79.7
Upper	2,872	20.2	2,609	20.6	210	17.1	53	15.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	14,247	100.0	12,668	100.0	1,229	100.0	350	100.0
Percentage of Total Businesses:				88.9		8.6		2.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	0.1	5	0.1	0	0.0	0	0.0
Moderate	97	2.6	97	2.6	0	0.0	0	0.0
Middle	3,162	84.5	3,120	84.5	41	80.4	1	100.0
Upper	479	12.8	469	12.7	10	19.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,743	100.0	3,691	100.0	51	100.0	1	100.0
Percentage of Total Farms:				98.6		1.4		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table C-2

2022 Grand Island MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,714	18.7
Moderate	3	15.8	3,575	18.0	578	16.2	3,857	19.4
Middle	13	68.4	12,890	64.8	804	6.2	4,618	23.2
Upper	3	15.8	3,440	17.3	220	6.4	7,716	38.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19	100.0	19,905	100.0	1,602	8.0	19,905	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,017	2,824	14.7	46.9	2,869	47.7	324	5.4
Middle	20,685	12,960	67.6	62.7	5,866	28.4	1,859	9.0
Upper	5,263	3,385	17.7	64.3	1,654	31.4	224	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	31,965	19,169	100.0	60.0	10,389	32.5	2,407	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	602	18.3	541	18.3	57	19.3	4	10.3
Middle	2,080	63.1	1,900	64.1	148	50.2	32	82.1
Upper	614	18.6	521	17.6	90	30.5	3	7.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,296	100.0	2,962	100.0	295	100.0	39	100.0
Percentage of Total Businesses:				89.9		9.0		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	1.4	5	1.2	1	7.7	0	0.0
Middle	396	92.7	385	93.0	11	84.6	0	0.0
Upper	25	5.9	24	5.8	1	7.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	427	100.0	414	100.0	13	100.0	0	0.0
Percentage of Total Farms:				97.0		3.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table C-3

2021 Eastern Nebraska AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	12,192	17.1
Moderate	6	7.4	3,650	5.1	679	18.6	12,600	17.7
Middle	62	76.5	52,492	73.6	4,151	7.9	16,739	23.5
Upper	13	16.0	15,151	21.3	624	4.1	29,762	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	81	100.0	71,293	100.0	5,454	7.7	71,293	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,055	3,261	4.2	40.5	3,877	48.1	917	11.4
Middle	89,781	57,464	74.3	64.0	21,960	24.5	10,357	11.5
Upper	23,698	16,612	21.5	70.1	5,842	24.7	1,244	5.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	121,534	77,337	100.0	63.6	31,679	26.1	12,518	10.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	807	5.6	692	5.4	109	8.8	6	1.7
Middle	10,964	76.4	9,706	76.1	943	75.9	315	88.2
Upper	2,579	18.0	2,353	18.5	190	15.3	36	10.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	14,350	100.0	12,751	100.0	1,242	100.0	357	100.0
Percentage of Total Businesses:				88.9		8.7		2.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	43	1.1	43	1.2	0	0.0	0	0.0
Middle	3,213	85.8	3,170	85.9	41	83.7	2	100.0
Upper	487	13.0	479	13.0	8	16.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,743	100.0	3,692	100.0	49	100.0	2	100.0
Percentage of Total Farms:				98.6		1.3		0.1
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table C-4

2021 Grand Island MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,453	18.4
Moderate	4	21.1	5,148	27.4	996	19.3	3,443	18.3
Middle	8	42.1	7,553	40.2	738	9.8	4,476	23.8
Upper	7	36.8	6,106	32.5	234	3.8	7,435	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19	100.0	18,807	100.0	1,968	10.5	18,807	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,980	4,074	22.2	51.1	3,410	42.7	496	6.2
Middle	13,179	7,787	42.4	59.1	4,150	31.5	1,242	9.4
Upper	9,541	6,499	35.4	68.1	2,398	25.1	644	6.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	30,700	18,360	100.0	59.8	9,958	32.4	2,382	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	772	23.3	704	23.7	64	21.3	4	10.0
Middle	1,427	43.1	1,291	43.4	112	37.2	24	60.0
Upper	1,115	33.6	978	32.9	125	41.5	12	30.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,314	100.0	2,973	100.0	301	100.0	40	100.0
Percentage of Total Businesses:				89.7		9.1		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	2.3	9	2.1	1	7.1	0	0.0
Middle	218	49.8	213	50.2	5	35.7	0	0.0
Upper	210	47.9	202	47.6	8	57.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	438	100.0	424	100.0	14	100.0	0	0.0
Percentage of Total Farms:				96.8		3.2		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX D – ADDITIONAL FULL-SCOPE ASSESSMENT AREA TABLES

**Eastern Nebraska AA
Table D-1**

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.3	0	0.0	3.6	4.2
Middle	49	94.2	69.6	5,059	94.4	63.6	74.3
Upper	3	5.8	26.1	301	5.6	32.8	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	52	100.0	100.0	5,360	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.1	0	0.0	2.4	4.2
Middle	28	90.3	65.4	12,858	95.8	61.4	74.3
Upper	3	9.7	31.5	562	4.2	36.3	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	13,420	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	11.1	5.6	100	36.4	4.8	4.2
Middle	7	77.8	68.3	166	60.4	71.4	74.3
Upper	1	11.1	26.1	9	3.3	23.8	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	275	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	8.2	0	0.0	4.9	17.4
Middle	1	100.0	73.5	165	100.0	63.5	53.3
Upper	0	0.0	18.4	0	0.0	31.6	29.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	165	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	1	1.0	3.7	100	0.5	3.0	4.2
Middle	88	90.7	67.5	18,321	94.9	62.7	74.3
Upper	8	8.2	28.8	879	4.6	34.3	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	97	100.0	100.0	19,300	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table D-2

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	1.3	4.2	1,463	2.1	4.3	5.6
Middle	981	86.8	73.5	59,021	83.3	72.2	76.4
Upper	134	11.9	21.0	10,372	14.6	23.3	18.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.2	
Total	1,130	100.0	100.0	70,856	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-3

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Assessment Area: Eastern Nebraska							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	68	2.5	1.5	3,707	1.8	1.2	1.1
Middle	2,277	82.9	85.1	167,564	83.3	85.0	85.8
Upper	403	14.7	13.3	29,798	14.8	13.7	13.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.1	0	0.0	0.0	
Total	2,748	100.0	100.0	201,069	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-4

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Eastern Nebraska							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	10	19.2	5.8	591	11.0	3.1	17.1
Moderate	18	34.6	21.6	1,754	32.7	16.6	17.7
Middle	11	21.2	20.8	1,197	22.3	20.4	23.5
Upper	4	7.7	27.1	787	14.7	37.4	41.7
Unknown	9	17.3	24.6	1,031	19.2	22.5	0.0
Total	52	100.0	100.0	5,360	100.0	100.0	100.0
Refinance Loans							
Low	3	9.7	5.4	74	0.6	2.7	17.1
Moderate	6	19.4	16.6	244	1.8	11.2	17.7
Middle	9	29.0	22.0	852	6.3	19.0	23.5
Upper	5	16.1	40.8	672	5.0	49.8	41.7
Unknown	8	25.8	15.2	11,578	86.3	17.3	0.0
Total	31	100.0	100.0	13,420	100.0	100.0	100.0
Home Improvement Loans							
Low	2	22.2	7.7	29	10.5	5.2	17.1
Moderate	2	22.2	21.1	79	28.7	16.5	17.7
Middle	3	33.3	21.1	140	50.9	19.3	23.5
Upper	2	22.2	45.1	27	9.8	55.6	41.7
Unknown	0	0.0	4.9	0	0.0	3.4	0.0
Total	9	100.0	100.0	275	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	15	15.6	5.5	694	3.6	2.9	17.1
Moderate	27	28.1	18.8	2,100	11.0	13.8	17.7
Middle	26	27.1	21.3	2,246	11.7	19.6	23.5
Upper	11	11.5	34.1	1,486	7.8	43.4	41.7
Unknown	17	17.7	20.3	12,609	65.9	20.2	0.0
Total	96	100.0	100.0	19,135	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table D-5

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Eastern Nebraska							
	Bank And Aggregate Loans						Total
	Bank		Agg	Bank		Agg	Businesses
	#	%	%	\$(000)	%	%	%
By Revenue							
\$1 Million or Less	584	51.7	60.3	38,022	53.7	46.8	88.9
Over \$1 Million	104	9.2		23,253	32.8		8.7
Revenue Unknown	442	39.1		9,581	13.5		2.5
Total	1,130	100.0		70,856	100.0		100.0
By Loan Size							
\$100,000 or Less	985	87.2	90.8	22,763	32.1	36.5	
\$100,001 - \$250,000	65	5.8	5.1	10,659	15.0	18.5	
\$250,001 - \$1 Million	80	7.1	4.2	37,434	52.8	45.0	
Total	1,130	100.0	100.0	70,856	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	505	86.5		14,639	38.5		
\$100,001 - \$250,000	40	6.8		6,587	17.3		
\$250,001 - \$1 Million	39	6.7		16,796	44.2		
Total	584	100.0		38,022	100.0		
Source: 2021 FFIEC Census Data							
2021 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-6

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Eastern Nebraska							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	1,816	66.1	66.8	166,094	82.6	79.4	98.6
Over \$1 Million	103	3.7		17,985	8.9		1.3
Revenue Unknown	829	30.2		16,990	8.4		0.1
Total	2,748	100.0		201,069	100.0		100.0
By Loan Size							
\$100,000 or Less	2,186	79.5	80.3	54,968	27.3	27.8	
\$100,001 - \$250,000	332	12.1	11.6	59,606	29.6	28.7	
\$250,001 - \$500,000	230	8.4	8.2	86,495	43.0	43.5	
Total	2,748	100.0	100.0	201,069	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1,320	72.7		39,304	23.7		
\$100,001 - \$250,000	302	16.6		54,273	32.7		
\$250,001 - \$500,000	194	10.7		72,517	43.7		
Total	1,816	100.0		166,094	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Grand Island MSA AA
Table D-7

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	18.2	29.0	149	4.7	23.3	22.2
Middle	7	63.6	40.0	451	14.3	35.2	42.4
Upper	2	18.2	31.0	2,552	81.0	41.5	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	3,152	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.9	0	0.0	12.4	22.2
Middle	7	100.0	41.4	462	100.0	38.5	42.4
Upper	0	0.0	42.8	0	0.0	49.1	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	462	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.8	0	0.0	21.5	22.2
Middle	0	0.0	45.8	0	0.0	48.8	42.4
Upper	0	0.0	33.3	0	0.0	29.7	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	48.6	0	0.0	39.6	29.1
Middle	5	100.0	37.1	1,233	100.0	54.8	40.3
Upper	0	0.0	14.3	0	0.0	5.6	30.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,233	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	2	8.3	23.3	149	3.0	20.1	22.2
Middle	20	83.3	40.5	2,245	45.4	38.3	42.4
Upper	2	8.3	36.2	2,552	51.6	41.6	35.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	4,946	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table D-8

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	12	9.0	20.5	888	12.9	17.7	23.3
Middle	86	64.7	41.4	4,541	66.0	47.8	43.1
Upper	35	26.3	37.1	1,447	21.0	34.4	33.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.1	
Total	133	100.0	100.0	6,876	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-9

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.6	0	0.0	1.1	2.3
Middle	57	36.8	59.1	4,005	32.6	62.3	49.8
Upper	98	63.2	40.3	8,275	67.4	36.6	47.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	155	100.0	100.0	12,280	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-10

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Grand Island MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	5.6	0	0.0	3.3	18.4
Moderate	1	9.1	22.0	39	1.2	18.7	18.3
Middle	3	27.3	19.6	384	12.2	19.5	23.8
Upper	2	18.2	23.9	80	2.5	32.9	39.5
Unknown	5	45.5	28.8	2,649	84.0	25.6	0.0
Total	11	100.0	100.0	3,152	100.0	100.0	100.0
Refinance Loans							
Low	1	14.3	4.8	17	3.7	2.7	18.4
Moderate	2	28.6	16.0	135	29.2	11.4	18.3
Middle	2	28.6	22.4	195	42.2	20.2	23.8
Upper	0	0.0	40.2	0	0.0	48.0	39.5
Unknown	2	28.6	16.7	115	24.9	17.8	0.0
Total	7	100.0	100.0	462	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.6	0	0.0	3.6	18.4
Moderate	0	0.0	15.3	0	0.0	16.6	18.3
Middle	0	0.0	22.2	0	0.0	16.6	23.8
Upper	0	0.0	38.9	0	0.0	43.5	39.5
Unknown	0	0.0	18.1	0	0.0	19.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	5.3	5.3	17	0.5	3.0	18.4
Moderate	3	15.8	18.5	174	4.7	15.0	18.3
Middle	6	31.6	20.9	678	18.3	19.7	23.8
Upper	2	10.5	32.2	80	2.2	40.1	39.5
Unknown	7	36.8	23.1	2,764	74.4	22.1	0.0
Total	19	100.0	100.0	3,713	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table D-11

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Grand Island MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	83	62.4	56.1	4,488	65.3	38.0	89.7
Over \$1 Million	8	6.0		1,602	23.3		9.1
Revenue Unknown	42	31.6		786	11.4		1.2
Total	133	100.0		6,876	100.0		100.0
By Loan Size							
\$100,000 or Less	120	90.2	90.3	3,365	48.9	31.1	
\$100,001 - \$250,000	8	6.0	5.4	1,250	18.2	19.2	
\$250,001 - \$1 Million	5	3.8	4.3	2,261	32.9	49.6	
Total	133	100.0	100.0	6,876	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	74	89.2		2,531	56.4		
\$100,001 - \$250,000	7	8.4		1,141	25.4		
\$250,001 - \$1 Million	2	2.4		816	18.2		
Total	83	100.0		4,488	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D-12

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Grand Island MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	105	67.7	66.5	9,272	75.5	72.5	96.8
Over \$1 Million	15	9.7		2,546	20.7		3.2
Revenue Unknown	35	22.6		462	3.8		0.0
Total	155	100.0		12,280	100.0		100.0
By Loan Size							
\$100,000 or Less	116	74.8	78.4	3,069	25.0	25.3	
\$100,001 - \$250,000	29	18.7	12.6	5,671	46.2	30.8	
\$250,001 - \$500,000	10	6.5	9.0	3,540	28.8	43.8	
Total	155	100.0	100.0	12,280	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	75	71.4		2,309	24.9		
\$100,001 - \$250,000	22	21.0		4,285	46.2		
\$250,001 - \$500,000	8	7.6		2,678	28.9		
Total	105	100.0		9,272	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-13

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Grand Island MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.2	0	0.0	16.2	14.7
Middle	2	100.0	60.4	274	100.0	59.6	67.6
Upper	0	0.0	19.5	0	0.0	24.1	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	274	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.2	0	0.0	10.1	14.7
Middle	3	100.0	66.7	619	100.0	68.6	67.6
Upper	0	0.0	18.1	0	0.0	21.3	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	619	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.3	0	0.0	2.0	14.7
Middle	1	100.0	73.3	30	100.0	73.0	67.6
Upper	0	0.0	22.4	0	0.0	25.0	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	30	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.1	21.0	26	1.5	4.6	30.0
Middle	13	92.9	69.4	1,653	98.5	81.5	50.6
Upper	0	0.0	9.7	0	0.0	14.0	19.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,679	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.0	18.0	26	1.0	13.0	14.7
Middle	19	95.0	63.0	2,576	99.0	64.7	67.6
Upper	0	0.0	19.0	0	0.0	22.3	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	2,602	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D-14

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Grand Island MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	50.0	4.5	11	4.0	2.4	18.7
Moderate	0	0.0	20.3	0	0.0	16.4	19.4
Middle	0	0.0	19.9	0	0.0	19.2	23.2
Upper	1	50.0	26.1	263	96.0	35.2	38.8
Unknown	0	0.0	29.4	0	0.0	26.8	0.0
Total	2	100.0	100.0	274	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	7.5	0	0.0	3.6	18.7
Moderate	0	0.0	17.2	0	0.0	12.5	19.4
Middle	1	33.3	24.3	170	27.5	22.4	23.2
Upper	2	66.7	37.7	449	72.5	47.4	38.8
Unknown	0	0.0	13.4	0	0.0	14.2	0.0
Total	3	100.0	100.0	619	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.3	0	0.0	2.0	18.7
Moderate	0	0.0	16.4	0	0.0	11.6	19.4
Middle	0	0.0	23.3	0	0.0	20.0	23.2
Upper	1	100.0	48.3	30	100.0	58.2	38.8
Unknown	0	0.0	7.8	0	0.0	8.2	0.0
Total	1	100.0	100.0	30	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	16.7	5.4	11	1.2	2.8	18.7
Moderate	0	0.0	19.1	0	0.0	15.3	19.4
Middle	1	16.7	20.7	170	18.4	19.7	23.2
Upper	4	66.7	31.2	742	80.4	39.0	38.8
Unknown	0	0.0	23.6	0	0.0	23.2	0.0
Total	6	100.0	100.0	923	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Omaha-Council Bluffs Metropolitan AA

Table E-1

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	8.1
Middle	5	100.0	0.0	1,800	100.0	0.0	80.6
Upper	0	0.0	0.0	0	0.0	0.0	11.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	0.0	1,800	100.0	0.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.7	0.0	64	4.9	0.0	8.1
Middle	12	92.3	0.0	1,241	95.1	0.0	80.6
Upper	0	0.0	0.0	0	0.0	0.0	11.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	0.0	1,305	100.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	0.0	20	14.3	0.0	8.1
Middle	3	75.0	0.0	120	85.7	0.0	80.6
Upper	0	0.0	0.0	0	0.0	0.0	11.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	0.0	140	100.0	0.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	15.2
Middle	0	0.0	0.0	0	0.0	0.0	72.6
Upper	0	0.0	0.0	0	0.0	0.0	12.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	2	8.7	0.0	84	2.6	0.0	8.1
Middle	20	87.0	0.0	3,161	96.5	0.0	80.6
Upper	1	4.3	0.0	30	0.9	0.0	11.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	0.0	3,275	100.0	0.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table E-2

Distribution of 2022 Small Business Lending By Income Level of Geography							
Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	15.7	0.0	178	4.4	0.0	6.2
Middle	30	58.8	0.0	1,840	45.9	0.0	84.2
Upper	13	25.5	0.0	1,990	49.7	0.0	9.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	0.0	4,008	100.0	0.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-3

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1.0
Middle	49	86.0	0.0	7,269	80.8	0.0	87.9
Upper	8	14.0	0.0	1,725	19.2	0.0	11.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	0.0	8,994	100.0	0.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-4

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Omaha Council Bluffs Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	16.3
Moderate	1	20.0	0.0	357	19.8	0.0	21.0
Middle	1	20.0	0.0	164	9.1	0.0	24.2
Upper	3	60.0	0.0	1,279	71.1	0.0	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	0.0	1,800	100.0	0.0	100.0
Refinance Loans							
Low	1	7.7	0.0	34	2.6	0.0	16.3
Moderate	3	23.1	0.0	136	10.4	0.0	21.0
Middle	3	23.1	0.0	539	41.3	0.0	24.2
Upper	3	23.1	0.0	314	24.1	0.0	38.4
Unknown	3	23.1	0.0	282	21.6	0.0	0.0
Total	13	100.0	0.0	1,305	100.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	16.3
Moderate	1	25.0	0.0	30	21.4	0.0	21.0
Middle	1	25.0	0.0	35	25.0	0.0	24.2
Upper	2	50.0	0.0	75	53.6	0.0	38.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	0.0	140	100.0	0.0	100.0
Total Home Mortgage Loans							
Low	1	4.3	0.0	34	1.0	0.0	16.3
Moderate	5	21.7	0.0	523	16.0	0.0	21.0
Middle	5	21.7	0.0	738	22.5	0.0	24.2
Upper	9	39.1	0.0	1,698	51.8	0.0	38.4
Unknown	3	13.0	0.0	282	8.6	0.0	0.0
Total	23	100.0	0.0	3,275	100.0	0.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Table E-5

Distribution of 2022 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Omaha Council Bluffs Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	27	52.9	0.0	1,376	34.3	0.0	92.0
Over \$1 Million	21	41.2		2,499	62.4		5.5
Revenue Unknown	3	5.9		133	3.3		2.5
Total	51	100.0		4,008	100.0		100.0
By Loan Size							
\$100,000 or Less	40	78.4	0.0	1,419	35.4	0.0	
\$100,001 - \$250,000	8	15.7	0.0	1,266	31.6	0.0	
\$250,001 - \$1 Million	3	5.9	0.0	1,323	33.0	0.0	
Total	51	100.0	0.0	4,008	100.0	0.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	24	88.9		669	48.6		
\$100,001 - \$250,000	2	7.4		304	22.1		
\$250,001 - \$1 Million	1	3.7		403	29.3		
Total	27	100.0		1,376	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-6

Distribution of 2022 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Omaha Council Bluffs Metropolitan							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	52	91.2	0.0	8,848	98.4	0.0	99.0
Over \$1 Million	1	1.8		100	1.1		0.8
Revenue Unknown	4	7.0		46	0.5		0.3
Total	57	100.0		8,994	100.0		100.0
By Loan Size							
\$100,000 or Less	29	50.9	0.0	911	10.1	0.0	
\$100,001 - \$250,000	15	26.3	0.0	2,880	32.0	0.0	
\$250,001 - \$500,000	13	22.8	0.0	5,203	57.8	0.0	
Total	57	100.0	0.0	8,994	100.0	0.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	24	46.2		765	8.6		
\$100,001 - \$250,000	15	28.8		2,880	32.5		
\$250,001 - \$500,000	13	25.0		5,203	58.8		
Total	52	100.0		8,848	100.0		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-7

2022 Omaha Council Bluffs Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,117	16.3
Moderate	1	9.1	1,098	8.5	93	8.5	2,734	21.0
Middle	9	81.8	10,350	79.7	324	3.1	3,147	24.2
Upper	1	9.1	1,543	11.9	48	3.1	4,993	38.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11	100.0	12,991	100.0	465	3.6	12,991	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,942	1,211	8.1	62.4	589	30.3	142	7.3
Middle	17,155	12,122	80.6	70.7	2,672	15.6	2,361	13.8
Upper	2,322	1,710	11.4	73.6	311	13.4	301	13.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	21,419	15,043	100.0	70.2	3,572	16.7	2,804	13.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	143	6.2	136	6.4	7	5.5	0	0.0
Middle	1,947	84.2	1,777	83.6	115	89.8	55	94.8
Upper	221	9.6	212	10.0	6	4.7	3	5.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,311	100.0	2,125	100.0	128	100.0	58	100.0
Percentage of Total Businesses:				92.0		5.5		2.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	1.0	4	1.0	0	0.0	0	0.0
Middle	341	87.9	337	87.8	3	100.0	1	100.0
Upper	43	11.1	43	11.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	388	100.0	384	100.0	3	100.0	1	100.0
Percentage of Total Farms:				99.0		0.8		0.3
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-8

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	100.0	0.0	1,881	100.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	0.0	1,881	100.0	0.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	19	100.0	0.0	2,023	100.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	0.0	2,023	100.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	25	100.0	0.0	3,904	100.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	0.0	3,904	100.0	0.0	100.0
Source: 2021 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-9

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	63	100.0	0.0	3,679	100.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	63	100.0	0.0	3,679	100.0	0.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-10

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Assessment Area: Omaha Council Bluffs Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	127	100.0	0.0	9,624	100.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	127	100.0	0.0	9,624	100.0	0.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-11

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Omaha Council Bluffs Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	15.1
Moderate	2	33.3	0.0	225	12.0	0.0	18.0
Middle	2	33.3	0.0	251	13.3	0.0	26.2
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	2	33.3	0.0	1,405	74.7	0.0	0.0
Total	6	100.0	0.0	1,881	100.0	0.0	100.0
Refinance Loans							
Low	3	15.8	0.0	262	13.0	0.0	15.1
Moderate	1	5.3	0.0	71	3.5	0.0	18.0
Middle	5	26.3	0.0	647	32.0	0.0	26.2
Upper	5	26.3	0.0	856	42.3	0.0	40.7
Unknown	5	26.3	0.0	187	9.2	0.0	0.0
Total	19	100.0	0.0	2,023	100.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	15.1
Moderate	0	0.0	0.0	0	0.0	0.0	18.0
Middle	0	0.0	0.0	0	0.0	0.0	26.2
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans							
Low	3	12.0	0.0	262	6.7	0.0	15.1
Moderate	3	12.0	0.0	296	7.6	0.0	18.0
Middle	7	28.0	0.0	898	23.0	0.0	26.2
Upper	5	20.0	0.0	856	21.9	0.0	40.7
Unknown	7	28.0	0.0	1,592	40.8	0.0	0.0
Total	25	100.0	0.0	3,904	100.0	0.0	100.0
Source: 2021 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table E-12

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Omaha Council Bluffs Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	31	49.2	0.0	1,607	43.7	0.0	91.9
Over \$1 Million	11	17.5		1,772	48.2		5.5
Revenue Unknown	21	33.3		300	8.2		2.6
Total	63	100.0		3,679	100.0		100.0
By Loan Size							
\$100,000 or Less	51	81.0	0.0	1,007	27.4	0.0	
\$100,001 - \$250,000	8	12.7	0.0	1,312	35.7	0.0	
\$250,001 - \$1 Million	4	6.3	0.0	1,360	37.0	0.0	
Total	63	100.0	0.0	3,679	100.0	0.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	26	83.9		602	37.5		
\$100,001 - \$250,000	4	12.9		605	37.6		
\$250,001 - \$1 Million	1	3.2		400	24.9		
Total	31	100.0		1,607	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-13

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Omaha Council Bluffs Metropolitan							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	81	63.8	0.0	8,468	88.0	0.0	99.0
Over \$1 Million	0	0.0		0	0.0		0.8
Revenue Unknown	46	36.2		1,156	12.0		0.3
Total	127	100.0		9,624	100.0		100.0
By Loan Size							
\$100,000 or Less	100	78.7	0.0	2,086	21.7	0.0	
\$100,001 - \$250,000	14	11.0	0.0	2,678	27.8	0.0	
\$250,001 - \$500,000	13	10.2	0.0	4,860	50.5	0.0	
Total	127	100.0	0.0	9,624	100.0	0.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	55	67.9		1,380	16.3		
\$100,001 - \$250,000	14	17.3		2,678	31.6		
\$250,001 - \$500,000	12	14.8		4,410	52.1		
Total	81	100.0		8,468	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-14

2021 Omaha Council Bluffs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,908	15.1
Moderate	0	0.0	0	0.0	0	0.0	2,267	18.0
Middle	11	100.0	12,629	100.0	671	5.3	3,308	26.2
Upper	0	0.0	0	0.0	0	0.0	5,146	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11	100.0	12,629	100.0	671	5.3	12,629	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	20,556	14,183	100.0	69.0	3,628	17.6	2,745	13.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	20,556	14,183	100.0	69.0	3,628	17.6	2,745	13.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,295	100.0	2,109	100.0	127	100.0	59	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,295	100.0	2,109	100.0	127	100.0	59	100.0
Percentage of Total Businesses:				91.9		5.5		2.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	383	100.0	379	100.0	3	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	383	100.0	379	100.0	3	100.0	1	100.0
Percentage of Total Farms:				99.0		0.8		0.3
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX F – GLOSSARY

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 metropolitan area/assessment area.

Census tract: 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 statistical 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 nonrelatives 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-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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-scope review: Performance is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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). 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage commercial loans.

Small loan(s) to farm(s): A loan included in "loans to small farms" as defined in the instructions for preparation of the 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.