



## PUBLIC DISCLOSURE

December 3, 2018

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Security National Bank of Omaha  
Charter Number 15379

1120 S. 101st Street  
Omaha, NE 68124

Office of the Comptroller of the Currency

13710 FNB Parkway, Suite 110  
Omaha, NE 68154

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

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## **Overall CRA Rating: Satisfactory**

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Outstanding.**

Security National Bank of Omaha's (SNB) CRA performance reflects a satisfactory response to the needs of its assessment area (AA). This conclusion is based on the following:

- SNB's loan-to-deposit (LTD) ratio is reasonable compared to similarly situated banks in the AA;
- A substantial majority of SNB's loans are originated inside its AA;
- SNB's distribution of loans to businesses of different sizes reflects reasonable penetration;
- SNB's distribution of loans to census tracts (CTs) of different income levels reflects reasonable dispersion;
- There were no complaints regarding the bank's performance in meeting the credit needs of its AA; and,
- SNB's responsiveness to the community development (CD) needs in the AA is excellent.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## **Description of Institution**

SNB is a full-service financial institution headquartered in Omaha, Nebraska. SNB operates 13 branch locations and 47 automated teller machines (ATMs) in the AA. SNB is a multistate institution, with 12 of their branches located in Nebraska, and one located in Iowa.

SNB is owned by Security National Corporation (SNC). SNC is a one-bank holding company headquartered in Omaha, Nebraska. As of December 31, 2017, the holding company had total assets of \$93 million. There have not been any significant changes to SNB's corporate structure, including merger or acquisition activities, since the previous CRA examination.

SNB operates with one AA. The AA is a multistate AA in the Omaha-Council Bluffs NE-IA metropolitan statistical area (MSA) encompassing two whole counties in Nebraska and one whole county in Iowa. The AA is referred to as the Douglas, Sarpy, and Pottawattamie Counties AA.

SNB offers a full range of credit products within its AA including commercial, residential real estate, consumer, and agricultural loan products. SNB offers a full range of deposit products to businesses and individuals, including alternative retail services, such as direct deposit and access to electronic banking services (bill payment, mobile banking, and electronic statements). SNB's business strategy is community banking, specializing in business lending. As of December 31, 2017, SNB reported total assets of \$858 million and total loans of \$523 million, resulting in a total loan to total assets ratio of 61 percent. The December 31, 2017 call report identifies \$409 million in business loans, \$54 million in residential real estate loans, \$41 million in consumer loans, \$1 million in agricultural loans, and \$18 million in other loans. Tier 1 capital was \$91 million as of December 31, 2017.

Competition is significant and based on the June 30, 2017 FDIC Deposit Market Share Report, there were 42 financial institutions operating in the Douglas, Sarpy, and Pottawattamie Counties AA. SNB holds 2.49 percent of deposits in the AA.

There were no legal or financial impediments to SNB's ability to meet the credit needs of its AA over the evaluation period. SNB received a satisfactory rating at its last CRA examination dated January 1, 2016.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated SNB using intermediate small bank examination procedures, which include a lending test and a CD test. We conducted a full scope review of SNB's AA; Douglas, Sarpy, and Pottawattamie Counties. This review considers performance context, quantitative, and qualitative factors.

The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The CD test evaluates the bank's record of responding to the CD needs of its AA through CD lending and providing qualified investments, donations, and services.



SNB’s primary product is business loans. The following table summarizes the percentage of loan originations by loan type from January 1, 2016 to December 31, 2017.

<b>Loan Originations</b>		
<b>Loan Type</b>	<b>% by Dollar</b>	<b>% by Number</b>
Business	81	52
Residential RE	14	30
Consumer	5	18
Agriculture	0	0

*Source: Bank-provided loan origination reports (2016-2017).*

The lending test covers the bank’s performance from January 1, 2016, to December 31, 2017. To evaluate lending performance, we selected a random sample of 20 business loans originated over the evaluation period to assess lending in the AA. We expanded the sample to include 20 loans inside the AA for each year evaluated in order to complete the borrower income distribution and geographic distribution analysis.

The CD test covers the bank’s performance from January 1, 2016 to December 31, 2017. We reviewed all CD loans, investments, donations, and services submitted by SNB management to ensure they met the regulatory definition of CD. We included only items that meet the definition or purpose of CD.

### **Data Integrity**

The bank’s internal loan origination reports capture CT data, and we relied upon these reports when completing the geographic distribution analysis. We verified the accuracy of the bank’s internal reports by selecting a sample of loans and testing the recorded CT information within the internal reports. We found that the bank’s internal reports were accurate and reliable to be used in assessing their CRA performance.

### **Selection of Areas for Full-Scope Review**

We completed a full scope review of the bank’s sole AA comprised of Douglas, Sarpy, and Pottawattamie Counties. The AA consists of all CTs located in the three counties. The AA is located within the Omaha-Council Bluffs NE-IA multistate MSA. Refer to Appendix A of this evaluation for additional information.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

SNB's CRA performance is satisfactory.

The lending test is rated satisfactory and the CD test meets the standard for outstanding performance.

### LENDING TEST

SNB's performance in regards to the lending test is satisfactory. The bank's LTD ratio is reasonable given the bank's size, financial condition, and credit needs of the AA. In addition, SNB originates a substantial majority of its loans inside the AA. The borrower distribution of business loans reflects reasonable penetration, while the geographic distribution of business loans reflects reasonable dispersion. SNB has not received any complaints regarding its CRA performance since the previous examination.

### Loan-to-Deposit Ratio

SNB's lending level is reasonable and meets the criteria for satisfactory performance. SNB's LTD ratio as of December 31, 2017, was 72 percent. Over the past eight quarters ending December 31, 2017, SNB's quarterly average LTD ratio was 70 percent. To complete this analysis, we attempted to identify similarly situated banks for comparison purposes. We identified four institutions that operate in the AA, are of relatively similar asset size, and have similar primary loan products. These four institutions had a quarterly average LTD ratio of 99 percent. While SNB's LTD ratio is lower than these four comparable banks, it should be noted that most of these banks also have branches located outside of the AA and benefit from loan demand outside of the AA. Additionally, the competition within the AA is significant and served by 42 FDIC-insured institutions.

### Lending in Assessment Area

A substantial majority of SNB's loans are originated inside its AA, which meets the standard for outstanding performance. Management originated 90 percent of its loans by number and 95 percent of its loans by dollar within the AA.

The following table details SNB's lending within the AA by number and dollar amount of loans:

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Business Loans	18	90	2	10	20	7,044	95	335	5	7,379
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2017 Bank Data            Due to rounding, totals may not equal 100.0</i>										

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The distribution of loans to businesses of different sizes reflects reasonable penetration. Our sample of 20 business loans indicated SNB originated 50 percent of its loans by number in 2016 and 75 percent in 2017 to small businesses. Small businesses are those with annual gross revenues equal to or less than \$1 million.

The demographic data for the AA for both 2016 and 2017 shows approximately 80 percent of businesses within the AA reporting revenue data have gross annual revenues of \$1 million dollars or less. However, only 41 percent of aggregate market loans reported by other financial institutions in the area were originated to small businesses in 2016, and 48 percent in 2017. SNB's performance in comparison to demographic and aggregate market data reflects satisfactory performance for both 2016 and 2017.

Refer to Table R in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

## **Geographic Distribution of Loans**

SNB has demonstrated reasonable dispersion of lending throughout the Douglas, Sarpy, and Pottawattamie Counties AA.

The distribution of business loans originated or purchased in the AA in 2016 reflects reasonable dispersion of business lending activity throughout the AA. Five percent of business loans were made to businesses in low-income CTs and 5 percent were made to businesses in moderate-income CTs. The bank's level of lending to low-income CTs within the AA is comparative to demographic data that states 7 percent of businesses within the AA are located in low-income tracts. The bank's performance is also comparative to aggregate market data that reflects approximately 6 percent of market loans originated within the AA were to low-income tracts. However, the percentage of bank loans originated to moderate-income CTs is lower than both demographic data and aggregate market data. Demographic data indicates 18 percent of businesses are operating in moderate-income CTs, while aggregate market data reflects approximately 15 percent of market loans originated were to moderate-income tracts. The bank's low level of lending to moderate-income tracts is a result of our small sample size of only 20 business loans. A review of bank origination reports indicate that the bank originated approximately 19 percent of their business loans to moderate-income CTs in 2016 and aligns with both demographic and aggregate market data.

The distribution of business loans originated or purchased in the AA in 2017 reflects reasonable dispersion of business lending activity throughout the AA. Ten percent of business loans were made to businesses in low-income CTs and 10 percent were made to businesses in moderate-income CTs.

The bank's level of lending to low-income CTs within the AA is comparative to demographic data that states 7 percent of businesses within the AA are located in low-income tracts. The bank's performance is also comparative to aggregate market data that reflects approximately 6 percent of market loans originated within the AA were to low-income tracts. However, the percentage of bank loans originated to moderate-income CTs is lower than both demographic

data and aggregate market data. Demographic data indicates 17 percent of businesses are operating in moderate-income CTs, while aggregate market data reflects approximately 15 percent of market loans originated were to moderate-income tracts. The bank's low level of lending to moderate-income tracts is a result of our small sample size of only 20 business loans. A review of bank origination reports indicate that the bank originated nearly 16 percent of their business loans to moderate-income CTs in 2017 and aligns with both demographic and aggregate market data.

SNB's performance in comparison to demographic and aggregate market data reflects satisfactory performance for both 2016 and 2017.

Refer to Table Q in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during this evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

SNB's performance under the CD test is outstanding. Aggregate CD activities demonstrated excellent responsiveness to CD needs and opportunities in the AA. CD investments, donations, and CD loans total \$32.7 million and represent 36 percent of tier 1 capital as of December 31, 2017. Ten bank employees provided 284 service hours to six qualified CD organizations during the evaluation period.

### **Number and Amount of Community Development Loans**

CD loans demonstrated excellent responsiveness to CD needs and opportunities in the AA, during the evaluation period. The bank originated 20 CD loans, totaling more than \$32 million in the AA. Ten loans, totaling more than \$21 million, provided support for revitalization and stabilization in low- and moderate-income CTs. Ten loans, totaling more than \$10 million, provided support for community services targeted to low- and moderate-income individuals and families.

CD loans totaled \$32.2 million, which is 35 percent of the bank's tier one capital, as of December 31, 2017.

### **Number and Amount of Qualified Investments**

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the AA during the evaluation period. The bank presented no prior period investments in the AA for consideration. Management made 230 qualified donations, totaling more than \$450 thousand to 57 organizations in the AA during the evaluation period. Donations supported organizations who provide community services primarily to low- and moderate-income individuals or those that support small businesses.

CD qualified investments, totaled \$450 thousand, which is 0.5 percent of the bank's tier one capital, as of December 31, 2017.

### **Extent to Which the Bank Provides Community Development Services**

SNB's record of providing CD services in the AA is adequate. Ten employees provided 284 hours to six qualified CD organizations, during the evaluation period. Examples of CD services provided by bank staff include:

- Board member for an organization that provides temporary housing and empowers individuals experiencing homelessness to find safe and affordable housing;
- Board member of faith-based organization that provides meals and housing to low- and moderate-income individuals in need; and,
- Bank provides financial education through a youth program primarily serving low- to moderate-income individuals.

### **Responsiveness to Community Development Needs**

SNB's CD activities in aggregate in the AA represent excellent responsiveness to the CD needs in the AA. CD activities are consistent with the needs identified by community contacts in the AA.

# Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/16 to 12/31/17 Investment and Service Tests and CD Loans: 01/01/16 to 12/31/17	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Security National Bank of Omaha(SNB) Omaha, NE	Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Douglas, Sarpy, & Pottawattamie Counties AA	Full-Scope	

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

### DOUGLAS, SARPY, AND POTTAWATTAMIE COUNTIES AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Douglas, Sarpy, and Pottawattamie Counties AA (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	229	12.7	22.3	38.0	26.6	0.4
Population by Geography	769,108	9.5	21.8	38.3	30.1	0.3
Housing Units by Geography	314,489	10.2	23.5	39.9	26.3	0.1
Owner-Occupied Units by Geography	194,504	5.9	18.2	42.0	33.8	0.0
Occupied Rental Units by Geography	96,743	16.1	31.8	37.8	14.2	0.2
Vacant Units by Geography	23,242	21.9	32.7	30.7	14.2	0.5
Businesses by Geography	46,351	7.3	18.4	42.1	31.7	0.5
Farms by Geography	1,955	2.2	8.8	59.4	29.5	0.1
Family Distribution by Income Level	190,585	21.0	17.3	22.4	39.3	0.0
Household Distribution by Income Level	291,247	23.5	17.0	18.2	41.3	0.0
Median Family Income MSA – \$36,540 Omaha-Council Bluffs, NE-IA MSA		\$69,538	Median Housing Value			\$147,442
			Median Gross Rent			\$738
			Families Below Poverty Level			8.2%
<p>Source: 2010 U.S. Census and 2016 Dun &amp; Bradstreet (D&amp;B) Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Douglas, Sarpy, and Pottawattamie Counties AA (2017)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	229	13.1	23.1	38.0	25.8	0.0
Population by Geography	800,060	9.8	22.4	38.6	29.1	0.0
Housing Units by Geography	329,464	10.3	23.1	40.4	26.2	0.0
Owner-Occupied Units by Geography	197,463	5.2	19.7	40.5	34.5	0.0
Occupied Rental Units by Geography	109,744	16.7	28.4	41.4	13.4	0.0
Vacant Units by Geography	22,257	23.0	26.8	34.3	16.0	0.0
Businesses by Geography	46,819	7.1	17.1	45.4	30.4	0.0
Farms by Geography	1,977	2.1	9.4	53.4	35.2	0.0
Family Distribution by Income Level	199,434	21.0	17.8	21.1	40.1	0.0
Household Distribution by Income Level	307,207	23.7	16.8	18.2	41.3	0.0
Median Family Income MSA- \$36,540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$151,805
			Median Gross Rent			\$831
			Families Below Poverty Level			9.0%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Douglas, Sarpy, and Pottawattamie Counties AA is located within the Omaha-Council Bluffs NE-IA MSA. The AA includes all of Douglas County (NE), Sarpy County (NE), and Pottawattamie County (IA). This is a multistate MSA because it includes counties and CTs in both Nebraska and Iowa. SNB operates entirely in this AA, with 13 branch locations and 47 ATMs. The AA consists of 229 CTs, which includes 30 low-income, 53 moderate-income, 87 middle-income, and 59 upper-income CTs. The AA consists of whole CTs and does not reflect illegal discrimination or arbitrarily exclude any low- and moderate-income areas.

Competition within the AA is significant. According to the June 30, 2017, FDIC Deposit Market Share Report, 42 deposit-taking financial institutions serve the AA. SNB ranks ninth for deposit market share with \$731 million in deposits, which represented 2.49 percent of the market. Demographic data for 2017 shows a population of 800 thousand, with a median family income of \$73,632.

We relied on a community representative to gain additional insight of the AA in order to conduct the examination. The community contact indicated that local economic conditions were strong with a need for small business start-up financing. The contact felt that there are ample opportunities in low- and moderate-income area for bank to finance small business ventures, but acknowledged that some may be lacking the necessary equity and/or collateral to obtain traditional financing. Overall, the representative was unaware of any lending discrimination and felt that the local banks in the area are willing to lend to all types of businesses and borrowers.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided in this appendix. Only one set of tables is provided as SNB operates in a single multistate metropolitan area. For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables are identified by letters, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in each set:

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2016**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Douglas, Sary, and Pottawattamie AA	20	6,774	100	7.3	5.0	5.9	18.4	5.0	14.8	42.1	55.0	40.7	31.7	35.0	38.6	0.5	0.00	0.1

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data  
Due to rounding, totals may not equal 100.0*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Douglas, Sary, and Pottawattamie AA	20	5,674	100	7.1	10.0	6.2	17.1	10.0	14.6	45.4	65.0	44.1	30.4	15.0	35.0	0.0	0.0	0.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data  
Due to rounding, totals may not equal 100.0*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2016**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Douglas, Sarpy, and Pottawattamie AA	20	6,774	100	79.8	50.0	41.3	7.5	50.0	12.7	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data  
Due to rounding, totals may not equal 100.0*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Douglas, Sarpy, and Pottawattamie AA	20	5,674	100	79.7	75.0	48.0	7.6	25.0	12.7	0.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data  
Due to rounding, totals may not equal 100.0*