

PUBLIC DISCLOSURE

August 2, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MidAmerican Bank & Trust Company, N.A.
Charter Number 3033

401 Delaware
Leavenworth, Kansas 66048-0149

Office of the Comptroller of the Currency
Kansas City Field Office
6700 Antioch Road, Suite 450
Merriam, Kansas 66204-1200

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **MidAmerican Bank & Trust Company, N.A., Leavenworth, Kansas, (MidAm)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **August 2, 1999**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.*

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

- ! MidAm has a reasonable record of lending to businesses in the lower revenue categories within its assessment area. MidAm also has a reasonable record of lending to residential real estate and home improvement borrowers of different income levels.
- ! The geographic distribution of loans originated by the bank reflects reasonable dispersion throughout the assessment area.
- ! The bank's loan-to-deposit ratio is reasonable.
- ! A majority of the bank's loan originations are extended to borrowers living within the assessment area.

Bank*MidAmerican Bank & Trust Company, N.A.*

DESCRIPTION OF INSTITUTION

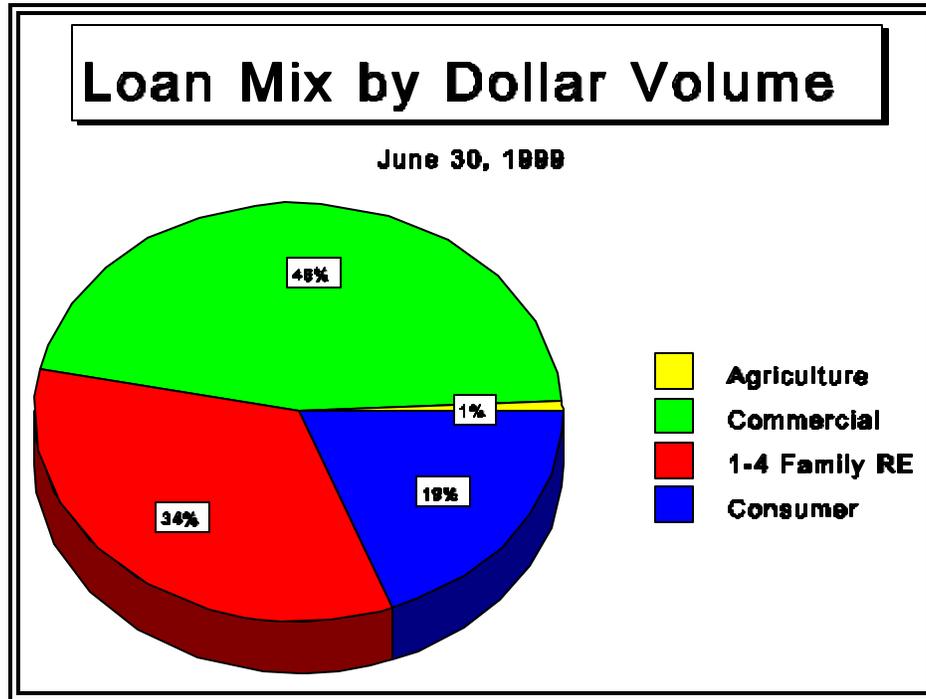
MidAm is a \$82 million institution located in Leavenworth, Kansas, the county seat of Leavenworth County, Kansas. The bank is owned by Acquisition Corporation, Leawood, Ks., a one-bank holding company, with total assets of \$5.6 million. CCB Corporation, Inc., Kansas City, MO; Country Club Bank, N.A., Prairie Village, KS; Platte County Bancshares, Inc., Platte Valley Bank of Missouri, Platte Valley, MO; Peoples Bancshares, Inc., Kansas City, MO; Lindsey Bancshares, Inc., Harrisonville Bancshares, Inc., and Allen Bank and Trust Company, Harrisonville, MO; and Buchanan County Bancshares, Inc., and The Heritage Bank of St Joseph, St. Joseph, MO are affiliates of the bank and the holding company through common ownership.

In addition to its main office, MidAm offers two full service branches and a drive-in facility. The bank has four automated teller machines (ATM). No-fee ATM services are also available at twenty-four affiliate locations. No legal constraints, financial conditions, or other factors inhibit the bank's ability to help meet the credit needs of its assessment area. The institution received an A Outstanding Record of Meeting Community Credit Needs rating at its last CRA examination dated November 22, 1995.

MidAm's net loans total \$41 million as of June 30, 1999, and represent 49 percent of its total assets. The bank's primary credit product by dollar volume is commercial loans. Loans for various consumer purposes represent the bank's primary credit product by number of loans. The following table shows the bank's loan portfolio composition as a percentage of gross loans:

Bank

MidAmerican Bank & Trust Company, N.A..



Bank*MidAmerican Bank & Trust Company, N.A.*

DESCRIPTION OF ASSESSMENT AREA

MidAm has designated all of Leavenworth County as its assessment area (AA). This designation meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income geographies. Competition within Leavenworth County for deposits and loans is strong; it includes the head office of two other national banks, one state bank, two savings and loan associations, and four credit unions, as well as branches of four other banks.

Total population of the AA, based on 1990 U.S. Census information, is 64,371. Leavenworth County is included in Kansas City's Metropolitan Statistical Area (MSA). An MSA is a geographic entity used by Federal statistical agencies to define a core area that contains a large population which is surrounded by adjacent communities that share a high degree of economic and social integration.

Leavenworth County is divided into fourteen census tracts (CT). MidAm's main office is located in CT 701, with one branch each in CTs 704, 705, and 711.98. Each branch has an ATM, and an additional ATM is located in CT 703. None of the CTs within Leavenworth County are designated as low-income. Three CTs, representing 21 percent of the AA, are designated moderate-income. Ten CTs, representing 72 percent of the AA, are designated middle-income, and one CT, representing seven percent, is designated as upper-income. The table on the following page provides additional information on the individual CTs in MidAm's assessment area.

The U.S. Census reports 15,235 families residing in the assessment area. Six percent of these families have income below the poverty level. Approximately 16 percent of the families are designated as low-income, 20 percent are moderate-income, 29 percent are middle-income, and 35 percent are upper-income. Income designations are based on median family income levels as a percentage of the 1999 MSA updated median family income figure of \$54,200. The median family income figure is estimated by the Department of Housing and Urban Development on an annual basis. The median housing value for the AA is \$57,607, as reported by the U. S. Census. The median year houses within the AA were built is 1963.

The economy of the assessment area is strong. County Road 8 divides Leavenworth County into northern and southern sections. The northern section is heavily dependent upon its huge public sector. The cities of Leavenworth and Lansing are home to four prisons and Fort Leavenworth. A majority of the private sector provides goods and services to these governmental entities. Southern Leavenworth County is primarily a bedroom community to Johnson County and Lawrence. Many businesses have sprung up along U.S. Highway 73, the main thoroughfare connecting the County to the southwestern portion of the Kansas City MSA. Major employers include Fort Leavenworth, Eisenhower Veterans Affairs Medical Center, Hallmark Cards, Inc., Leavenworth Public Schools, Lansing Correctional Facility, and the U.S. Federal Penitentiary.

Bank

MidAmerican Bank & Trust Company, N.A..

DESCRIPTION OF ASSESSMENT AREA - CONTINUED

Various local governmental entities, service providers, and the retail sector provide additional opportunities for employment. According to the Kansas Department of Human Resources and Industrial Relations, the June 1999 preliminary unemployment rate for Leavenworth County is 3.6 percent.

We contacted one individual within the community to discuss local credit needs and the performance of financial institutions in the area. This individual represented a private, non-profit corporation which promotes and assists new and expanding business in Leavenworth County. Our contact identified no unmet credit needs in the assessment area.

1990 Demographic Information on the Assessment Area					
Census Tract and City	Income Designation	Median Family Income	Income as % of 1990 MSA Median \$37,652	Total Housing Units	% Owner-Occupied Housing
701.00 (Leavenworth)	Moderate	\$22,031	59%	1,288	25%
702.00 (Leavenworth)	Moderate	\$25,370	67%	1,425	48%
703.00 (Leavenworth)	Middle	\$33,338	89%	2,353	65%
704.00 (Leavenworth)	Middle	\$31,932	85%	1,883	55%
705.00 (Leavenworth)	Moderate	\$27,011	72%	1,275	45%
706.00 (Leavenworth)	Middle	\$44,896	119%	448	59%
707.00 (Leavenworth)	Middle	\$43,150	115%	1,918	67%
708.00 (Leavenworth)	Middle	\$40,107	107%	1,687	*
709.00 (Leavenworth, Easton)	Middle	\$39,205	104%	1,017	81%
710.00 (Leavenworth, Alexandria)	Upper	\$45,897	122%	783	85%
711.98 (Leavenworth, Lansing)	Middle	\$42,126	112%	2,624	74%
712.00 (Basehor, Tonganoxie)	Middle	\$41,767	111%	2,012	85%
713.00 (Tonganoxie)	Middle	\$36,315	96%	1,454	75%

Bank*MidAmerican Bank & Trust Company, N.A.*

1990 Demographic Information on the Assessment Area					
714.00 (Linwood)	Middle	\$37,861	101%	1,097	82%
AA Totals/Averages	C	\$36,500	99%	21,264	60%

*information not available.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels**

Our review determined the bank's primary credit product to be commercial loans. We also reviewed all loans reported on the bank's Home Mortgage Disclosure Act Loan Application Register (HMDA LAR). MidAm is required to maintain a HMDA LAR since it is located in an MSA, it originates home purchase or home improvement loans, and it exceeds the asset threshold of \$29 million. The HMDA LAR records all applications, loans, and loan refinancing for the purpose of purchasing single or multifamily dwellings, or for home improvement.

The analyses and conclusions drawn during this review are based upon data provided by the bank. Our commercial sample was taken from loans originated between January 1, 1996 and August 9, 1999. Due to constraints of the bank's computer software, these originations include all loans that were not paid in full prior to March 31, 1999. We reviewed the loans reported on the HMDA LARs filed by the bank for 1996, 1997, 1998, and through August 3, 1999.

Commercial Lending:

MidAm has a reasonable record of lending to businesses in the lower revenue categories within its assessment area. We reviewed the revenue distribution of 20 commercial borrowers with loan originations between January 1, 1996 and August 9, 1999. For the period under review, these borrowers represented 48 loan originations totalling \$2.7 million. Our sample represented eight percent by number, and four percent by dollar volume, of commercial loans originated in the assessment area during this time period. The table on the following page shows a more detailed analysis of the commercial borrower revenue distribution.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels - Continued

Commercial Loan Customer Revenue Distribution				
Sample of 20 Commercial Loan Customers with Loan Originations Between 1/1/96 and 8/9/99				
Revenue Category	Distribution of MidAm Commercial Loan Customers		Income Distribution of Businesses and Farms in AA	
	Number	Percentage	Number	Percentage
\$0 - \$499,999	15	75%	1,089	85%
\$500,000 - \$949,999	1	5%	78	6%
\$1,000,000 - \$24,999,999	4	20%	110	9%
\$25,000,000 and Over	0	0%	4	0%
Totals	20	100%	1,281	100%

Based on our limited sample of commercial borrowers, we determined that 80 percent of MidAm's commercial loan customers had gross annual revenues of less than \$1 million. We compared the revenue distribution of MidAm's commercial loan customers to area demographic information as compiled by Dun & Bradstreet. Dun & Bradstreet's research indicates 91 percent of the businesses and farms in Leavenworth County had revenues of less than \$1 million. MidAm's proportion of small business borrowers is reasonable in relation to local business demographics.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels - Continued

HMDA Reportable Loans:

MidAm has a reasonable record of lending to residential real estate (RE) and home improvement borrowers of different income levels within its assessment area. We reviewed the income distribution of all residential RE borrowers as reported on the bank's HMDA LARs.

MidAm's record of lending to home purchase customers of all income levels is reasonable. Our review indicates 36 percent of these customers are categorized as low- or moderate-income. The following table provides a more detailed analysis of the income distribution of these customers as compared to area demographics.

Home Purchase Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Income Designation	Loans to Purchase Homes				Families in Leavenworth Co.	
	No. of Loans	% of Loans	\$ Amount of Loans	% of Loans	No. of Families	% of Families
Low	17	17%	\$430,000	9%	2,431	16%
Moderate	19	19%	\$796,000	16%	3,033	20%
Middle	31	31%	\$1,395,000	29%	4,427	29%
Upper	32	32%	\$2,247,000	46%	5,344	35%
Total	99	100%	\$4,868,000	100%	15,235	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels - Continued

MidAm's record of lending to home improvement customers of all income levels exceeds area demographics. Our review indicates 43 percent of these customers are categorized as low- or moderate-income. The following table provides a more detailed analysis of the income distribution of these customers as compared to area demographics.

Home Improvement Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Income Designation	Home Improvement				Families in Leavenworth Co.	
	No. Loans	% of Loans	\$ Amount of Loans	% of Loans	No. of Families	% of Families
Low	19	18%	\$186,000	9%	2,431	16%
Moderate	27	25%	\$458,000	22%	3,033	20%
Middle	30	28%	\$560,000	27%	4,427	29%
Upper	27	25%	\$764,000	36%	5,344	35%
Not Provided	4	4%	\$127,000	6%	0	0%
Total	107	100%	\$2,095,000	100%	15,235	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels - Continued

MidAm's record of lending to customers refinancing home purchase or home improvement matches area demographics. Our review indicates 39 percent of these customers have low- or moderate-income designations. The following table provides a more detailed analysis of the income distribution of these customers as compared to area demographics.

Refinanced Home Purchase and Home Improvement Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Income Designation	Refinanced Loans				Families in Leavenworth Co.	
	No. Loans	% of Loans	\$ Amount of Loans	% of Loans	No. of Families	% of Families
Low	41	17%	\$749,000	7%	2,431	16%
Moderate	54	22%	\$2,076,000	18%	3,033	20%
Middle	52	22%	\$2,543,000	22%	4,427	29%
Upper	92	38%	\$5,902,000	52%	5,344	35%
Not Provided	3	1%	\$84,000	1%	0	0%
Total	242	100%	\$11,354,000	100%	15,235	100%

Based on our review of all HMDA reportable loans, we determined that 40 percent of MidAm's residential real estate and home improvement loan customers have incomes designated as low or moderate. We compared this to area demographic information obtained from 1990 U.S. Census data.

This data indicates 36 percent of the families within the assessment area have incomes designated as low or moderate. MidAm's lending to low- and moderate-income residential RE and home improvement customers slightly exceeds local demographics.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Geographic Distribution of Loans

The geographic distribution of loans originated by the bank reflects reasonable dispersion throughout the assessment area. We reviewed the geographic distribution within the AA of 20 commercial loans with loan originations between January 1, 1996 and August 9, 1999, as well as all HMDA reportable loans with loan originations between January 1, 1996 and August 3, 1999.

MidAm's geographic distribution of commercial loans is reasonable. MidAm originated 45 percent of its commercial loans in low- or moderate-income tracts, based on the address of the commercial loan customers in our sample. We compared the location of MidAm's commercial loan customers to area demographic information as compiled by Dun & Bradstreet. Dun & Bradstreet's research indicates 39 percent of the businesses in Leavenworth County operate in moderate-income census tracts. The following table shows a more detailed analysis of the commercial borrower distribution.

Geographic Distribution of Commercial Loan Customers Sample of 20 Commercial Loan Originations Between 1/1/96 and 8/9/99						
Census Tract Income Designation	Commercial Loan Customers				Distribution of Businesses	
	No. of Loans	Percentage of Loans	\$ Amount of Loans	Percentage of Loans	No. of Businesses	Percentage of Businesses
Low	0	0%	\$0	0%	0	0%
Moderate	9	45%	\$168,638	15%	582	39%
Middle	11	55%	\$961,565	85%	885	60%
Upper	0	0%	\$0	0%	15	1%
Total	20	100%	\$1,130,203	100%	1,482	100%

MidAm's geographic distribution of HMDA loans is also reasonable. The bank originated 24 percent of all its HMDA loans in moderate-income tracts. Twenty-one percent of Leavenworth County's census tracts are designated moderate-income. The first table on the following page shows a more detailed analysis of the all HMDA loans, and compares them with the percentage of census tract income

Bank

MidAmerican Bank & Trust Company, N.A.

designation and owner occupied housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Geographic Distribution of Loans - Continued

Geographic Distribution of all HMDA Reportable Loans						
HMDA Loans Reported 1/1/96 to 8/3/99						
Census Tract Income Designation	All HMDA Loans				Percentage of Tracts in Assessment Area	Percentage of Owner Occupied Housing
	No. of Loans	% of Loans	\$ Amount of Loans	% of Loans		
Low	0	0%	\$0	0%	0%	0%
Moderate	108	24%	\$3,374,000	18%	21%	12%
Middle	317	72%	\$13,768,000	76%	72%	83%
Upper	18	4%	\$1,023,000	6%	7%	5%
Total	443	100%	\$18,165,000	99%	101%	100%

The following three tables break out each type of loan reported on the HMDA LAR.

Geographic Distribution of Home Purchase Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Census Tract Income Designation	Loans to Purchase Homes				Percentage of Tracts in Assessment Area	Percentage of Owner Occupied Housing
	No. of Loans	% of Loans	\$ Amount of Loans	% of Loans		
Low	0	0%	\$0	0%	0%	0%
Moderate	28	28%	\$969,000	20%	21%	12%
Middle	68	69%	\$3,747,000	77%	72%	83%
Upper	3	3%	\$152,000	3%	7%	5%

Community Reinvestment Act Performance Evaluation

Small

Bank

MidAmerican Bank & Trust Company, N.A..

Geographic Distribution of Home Purchase Loan Originations

HMDA Loans Reported 1/1/96 to 8/3/99

Total	99	100%	\$4,868,000	100%	101%	100%
-------	----	------	-------------	------	------	------

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Geographic Distribution of Loans - Continued

Geographic Distribution of Home Improvement Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Census Tract Income Designation	Home Improvement Loans				Percentage of Tracts in Assessment Area	Percentage of Owner Occupied Housing
	No. of Loans	% of Loans	\$ Amount of Loans	% of Loans		
Low	0	0%	\$0	0%	0%	0%
Moderate	20	19%	\$251,000	13%	21%	12%
Middle	79	77%	\$1,673,000	85%	72%	83%
Upper	4	4%	\$44,000	2%	7%	5%
Total	103	100%	\$1,968,000	100%	101%	100%

Geographic Distribution of Refinanced Home Purchase and Home Improvement Loan Originations						
HMDA Loans Reported 1/1/96 to 8/3/99						
Census Tract Income Designation	Refinanced Loans				Percentage of Tracts in Assessment Area	Percentage of Owner Occupied Housing
	No. of Loans	% of Loans	\$ Amount of Loans	% of Loans		
Low	0	0%	\$0	0%	0%	0%
Moderate	60	25%	\$2,154,000	19%	21%	12%
Middle	170	70%	\$8,348,000	74%	72%	83%
Upper	11	5%	\$827,000	7%	7%	5%

Bank

MidAmerican Bank & Trust Company, N.A.

Geographic Distribution of Refinanced Home Purchase and Home Improvement Loan Originations

HMDA Loans Reported 1/1/96 to 8/3/99

Total	241	100%	\$11,329,000	100%	101%	100%
-------	-----	------	--------------	------	------	------

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED

Geographic Distribution of Loans - Continued

Our sample revealed 45 percent of commercial loan originations and 24 percent of all HMDA reportable loan originations were provided to borrowers in the moderate-income geographies of the assessment area.

Loan-to-Deposit Ratio (LTD)

MidAm’s quarterly average loan-to-deposit ratio (LTD) is reasonable in relation to its size, financial condition, and the credit needs of the assessment areas. We compared MidAm’s quarterly average LTD ratio to two other financial institutions with offices in Leavenworth County. Each of the banks in our comparison had total assets of less than \$127 million and at least three branches. MidAm’s quarterly average LTD ratio for the past thirteen quarters was 56 percent. The overall quarterly average LTD ratio for the three banks in our comparison was 71 percent. Quarterly average LTD ratios ranged from 56 percent to 85 percent. MidAm’s quarterly average LTD ratio ranked last among the three banks we reviewed.

MidAm’s LTD ratio for March 31, 1999 is 60 percent. The bank’s national peer group is comprised of banks across the nation with assets between \$50 million and \$100 million, three or more branches, and located in a metropolitan area. The national peer group’s LTD was 69 percent, ranking MidAm in the 22nd percentile.

MidAm’s LTD ratio has gradually increased from 48 percent at the last CRA examination with a high of 65 percent at year end 1997. MidAm’s loans have increased \$12 million representing a 40 percent growth rate since the last CRA examination. Deposits have increased \$9 million, or 14 percent. The bank’s increase in loans ranks second among the three banks in the assessment area. The increased loan production directly benefited Leavenworth County, since MidAm originates more than 80 percent of its loans within its assessment area. MidAm’s LTD dipped below the 60 percent level during the second quarter of 1998 when the bank acquired approximately \$6 million in public deposits. While retaining these public deposits the bank’s LTD ratio has returned to the 60 percent level with a continued increase in loan production.

Bank

MidAmerican Bank & Trust Company, N.A.

Lending in the Assessment Area

A majority of the bank's loan originations are extended to borrowers living within the assessment area. Bank personnel generated reports during the examination which showed agricultural, commercial, residential real estate, and consumer loans originated between January 1, 1996 and August 9, 1999. The residential real estate loan originations includes some of the loans reported on the HMDA LAR.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED**Lending in the Assessment Area - Continued**

Based on the borrower's address, we determined the dollar volume and number of loans originated within the bank's assessment area. MidAm originated 344 commercial loans totaling \$40 million, 368 residential real estate loans totaling \$24 million, 1,166 consumer loans totaling \$13 million, and 21 agricultural loans totaling \$1 million during this period. We determined approximately 82 percent of these loan originations, by number, and 71 percent, by dollar volume, were to borrowers using loan proceeds within the assessment area. The following table details our analysis of the bank's record of commercial lending in the assessment area.

Assessment Area Analysis				
Based on 1,899 Loan Originations Between 1/1/96 and 8/9/99				
Type of Loan	No. of Loans in AA	Percentage of Loans in AA	\$ Volume of Loans in AA	Percentage of Loans in AA
Commercial	260	76%	\$25,243,602	64%
1-4 Residential RE	333	90%	\$19,574,565	82%
Consumer	938	80%	\$9,445,524	75%
Agricultural	19	90%	\$641,488	91%
Total	1,550	82%	\$54,905,179	71%

We also reviewed the data collected on the HMDA LAR. Based on the reported census tract, we determined the dollar volume and number of loans originated within the bank's assessment area.

Bank*MidAmerican Bank & Trust Company, N.A.*

MidAm originated 469 HMDA reportable loans, totaling \$23 million during this period. We determined approximately 96 percent of these loan originations, by number, and 90 percent, by dollar volume, were to borrowers using loan proceeds within the assessment area. The table on the following page details our analysis of the bank's record of HMDA reportable lending in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA - CONTINUED**Lending in the Assessment Area - Continued**

HMDA Loan Assessment Area Analysis				
Based on 469 Loan Originations Between 1/1/96 and 8/3/99				
Type of Loan	No. of Loans in AA	Percentage of Loans in AA	\$ Volume of Loans in AA	Percentage of Loans in AA
Home Purchase	99	94%	\$4,868,000	83%
Home Improvement	103	94%	\$1,968,000	92%
Refinance	241	96%	\$11,329,000	91%
Multifamily Dwellings	5	100%	\$2,509,000	100%
Total	448	96%	\$20,674,000	90%

Other Activities

MidAm participates in various community development projects. Kansas Main Street Incentives Without Walls is a state program designed to create or stimulate private investment in downtown areas. The Neighborhood Revitalization Area Plan is a City of Leavenworth program which encourages reinvestment and improvement of moderate income Census Tract 701. The State of Kansas also offers a first-time home buyers program. MidAm has made six loans to participants of these programs.

Compliance with Antidiscrimination Laws and Regulations

MidAm has a satisfactory record of compliance with antidiscrimination laws and regulations. We

Bank

MidAmerican Bank & Trust Company, N.A.

conducted a consumer compliance examination concurrent with this CRA evaluation. This examination included a review of the bank's compliance with the Equal Credit Opportunity Act. Our review did not disclose substantive violations of fair lending laws or evidence of discriminatory practices.

Response to Complaints

MidAm has not received any written complaints regarding its CRA performance since the previous examination dated November 22, 1995.