## **PUBLIC DISCLOSURE**

March 5, 2007

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ames Community Bank RSSD# 2939038

> 104 Chestnut Street Ames, Iowa 50010

Federal Reserve Bank of Chicago

230 South LaSalle Street Chicago, IL 60604-1413

NOTE:

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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# **INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING:** This institution's performance is rated **Satisfactory**.

Ames Community Bank is satisfactorily meeting the credit needs of its community based upon an analysis of the bank's lending activities and supported by information from community representatives. The bank's loan-to-deposit (LTD) ratio was above its peer group and local competitors. A majority of the loans are originated within the assessment area as 70.5% of all loans are located in the assessment area. Loans are reasonably disbursed throughout the assessment area, which includes two low-income census tracts. Lending to borrowers of different income levels and to farms and businesses of different revenue sizes reflects a reasonable distribution to low- and moderate-income individuals and small farms and businesses. There were no CRA-related complaints received by the institution or this Reserve Bank since the previous evaluation.

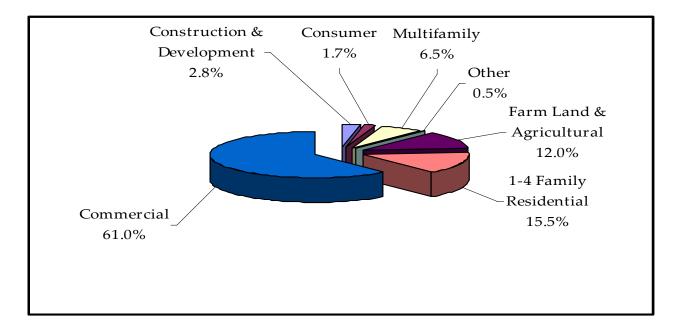
The institution was rated **Satisfactory** under the CRA at its previous evaluation conducted on January 6, 2003.

#### **DESCRIPTION OF INSTITUTION**

Ames Community Bank, Ames, Iowa, is a subsidiary of Ogden Bancshares, Inc., a four-bank holding company located in Ogden, Iowa. The bank's main office is located approximately 30 miles north of Des Moines, Iowa. Since the previous evaluation, the bank has opened two full-service branches located in Ames and Huxley, Iowa. In addition, the bank has established three automated teller machines (ATMs), one in Huxley and two in Ames. The bank offers standard loan and deposit products from its three locations and maintains a total of three full-service ATMs located at its banking offices and one cash dispensing ATM located at a convenience store in Ames.

Based upon the December 31, 2006 Uniform Bank Performance Report, Ames Community Bank has total assets of \$196.9 million. Exhibit 1 illustrates the distribution of the loan portfolio as a percentage of average gross loan and leases as of the same date. As illustrated, the primary loan products are commercial (real estate and operating loans) and 1-4 family residential real estate loans.

Exhibit 1 - Ames Community Bank's Loan Portfolio Mix as of December 31, 2006



The bank's peer group includes all insured commercial banks with assets between \$100 million and \$300 million in a metropolitan area with 3 or more full service offices. The bank's primary local competitors for loans and deposits include: First National Bank, Ames, Iowa and First American Bank, Fort Dodge, Iowa. Competition for credit and deposit opportunities within the bank's assessment area is strong. Based on the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report as of June 30, 2006, there were 20 banking offices located in Story County and Hamilton County. Ames Community Bank holds 8.1% of total deposits in its assessment area and ranks 4th out of the 20 financial institutions.

There are no apparent factors relating to the bank's financial condition, size, products offered, prior performance, legal impediments, or local economic conditions that would prevent the bank from meeting the credit needs of the community.

#### **DESCRIPTION OF ASSESSMENT AREA**

An institution's assessment area(s) will include the towns, counties, or other political subdivisions where its branches are located and a substantial portion of its loans are made. Assessment area(s) must consist of one or more geographies defined by census tracts, which are statistical subdivisions of a county. The 2000 U.S. Bureau of Census data is used in this evaluation, unless stated otherwise.

Ames Community Bank's assessment area, as shown in Appendix A, consists of portions of two contiguous counties: Ames Metropolitan Statistical Area (MSA), which encompasses the western half of Story County, as well as the southeastern census tract located in Hamilton County. Since the previous evaluation, the bank has added census tract 101.00, a middle-income tract in the Ames MSA due to the opening of the branch office in Huxley, Iowa. In addition, there is one unidentified census tract in Ames MSA which is representative of the Iowa State University

campus. According to the 2000 U.S. Census Bureau data, the population of the assessment area is 70,611.

Exhibit 2	Assessment Area By Tract Income Level						
EXIIIDIT 2	Low	Middle	Upper	Unknown			
Ames MSA (Story County)	0005.00 and 0010.00	0002.00, 0003.00, 0004.00, 0006.00, 0007.00, 0009.00, 0013.01, 0101.00 and 0106.00	0001.00, 0011.00, 0012.00 and 0013.02	0008.00			
Hamilton County		9602.00					
Total	2	10	4	1			

#### **Income Characteristics**

Exhibit 3 compares the income levels for the assessment area to Hamilton County, Ames MSA, Non-Metropolitan Iowa and State of Iowa based on 2000 U.S. Census Bureau data. As identified below, the median family income for the assessment area is the highest. In contrast to the 2000 data, the 2006 Housing and Urban Development (HUD) adjusted median family income for Hamilton County, Ames MSA, Non-metropolitan Iowa and State of Iowa are \$55,100, \$67,000, \$53,550 and \$57,800, respectively.

Exhibit 3							
Distribution of Families by Income Level							
Location	Median Family						
	Income(\$)	Low	Moderate	Middle	Upper	Below Poverty Level	
Assessment Area	56,238	18.0	16.7	23.7	41.6	5.9	
Hamilton County	45,771	13.6	18.2	26.8	41.4	4.3	
Ames MSA	54,843	17.9	18.5	24.8	38.8	5.5	
Non-metropolitan Iowa	43,887	16.4	19.5	26.3	37.8	6.4	
State of Iowa	48,005	16.9	19.5	25.7	37.9	6.0	

Low-income is defined as less than 50% of median family income; moderate-income as 50% to less than 80% of median family income; middle-income as 80% to less than 120% of median family income; and upper-income as 120% or more of median family income.

#### Housing Characteristics and Affordability

The assessment area has 26,713 total housing units of which 53.6% are owner-occupied, 42.6% are rental units, and 3.9% are vacant. Of those housing units located in low-income census tract, 25.0% of the housing units are owner-occupied, while owner occupancy in middle- and upper-income

tracts represents 55.0% and 63.2%, respectively. The high rental unit ratio is largely attributed to Iowa State University, which is located in Ames, where accommodations and demand for student housing is high.

In comparison, the Ames MSA and State of Iowa reported 55.9% and 67.5% in owner-occupied units; 40.0% and 25.8% rental units; and 4.1% and 6.7% vacancies. This indicates a slightly lower rate of ownership in the assessment area. The median age of housing stock in the assessment area is 29 years, while the median age of housing stock in the Ames MSA and State of Iowa is 29 years and 41 years, respectively. The median housing value in the assessment area is \$116,537, which is higher than the Ames MSA at \$110,564, and considerably higher than the State of Iowa at \$82,100.

Affordability ratios, developed by dividing the median household income by the median household value for a given area or groups of geographies, are helpful in comparing costs for different areas. An area with a high ratio generally has more affordable housing than an area with a low ratio.

The affordability ratio for the bank's assessment area is .34 which is less than the State of Iowa ratio of .48 and the Ames MSA ratio of .37, concluding that the assessment area has more expensive housing when compared to the State of Iowa and Ames MSA.

#### Labor and Employment

According to the Iowa Workforce Development, Story County's largest private sector is Trade; however, the Government sector is the largest segment of employment due to Iowa State University. Hamilton County's largest private sector is Manufacturing with approximately 75 percent of this sector's employment related to the manufacture of electrical equipment.

Exhibit 4								
Major Employers in the Assessment Area								
Company Location Description # Employee								
*Iowa State University	Story County	Education	13,882					
*Iowa Department of Transportation	Story County	Government	1,200					
*Mary Greeley Medical Center	Story County	Heath Services	1,200					
*McFarland Clinic	Story County	Health Services	825					
*Sauer - Danfoss	Story County	Manufacturing	802					
*Ames Community Schools	Story County	Education	680					
*City of Ames	Story County	Government	500					
**Electrolux	Hamilton County	Manufacturing	2,100					
**Van Diest Supply Company	Hamilton County	Manufacturing	450					
**Swine Graphics Enterprise	Hamilton County	Manufacturing	200					

Source:\*Ames Economic Development Commission
\*\*Webster City Area Development

Exhibit 5 illustrates the unemployment rates for Ames MSA, Hamilton County and the State of Iowa for December 2005 and December 2006. The assessment area unemployment rates compare favorably to the State of Iowa. Ames MSA has the lowest unemployment rates when compared to Hamilton County and the State of Iowa. In addition, unemployment rates for Ames MSA, Hamilton County and the State of Iowa have declined when compared to the prior year-end unemployment rates.

Exhibit 5		
U	nemployment Statistics	
	December 2005	December 2006
Ames MSA (Story County)	2.9%	2.4%
Hamilton County	4.3%	3.5%
State of Iowa	4.5%	3.5%

Source: Iowa Workforce Development

#### **Community Representatives**

Information obtained through discussions with three community representatives was considered for this evaluation. The two community representatives contacted were affordable housing representatives and one contact represented an economic development organization.

Representatives commented that banks in the area do a good job of meeting the credit needs of the community. One community representative stated that there is a need for additional home loan programs that allow home buyers with limited financial resources to obtain a loan with low downpayment and closing costs.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Performance standards for small banks consist of the following, as applicable: the bank's loan-to-deposit (LTD) ratio, the percentage of loans and other lending-related activities located in the bank's assessment area, the record of lending to borrowers of different income levels and farms and businesses of different sizes, the geographic distribution of loans, and the record of taking action in response to written complaints. To determine CRA performance, the preceding standards are analyzed and evaluated within the assessment area context, which includes, but is not limited to, comparative analyses of the assessment area and the state and the non-metropolitan portions of the state demographic data on median income, nature of housing stock, housing costs, and other relevant data pertaining to the bank's assessment area.

#### Loan-to-Deposit (LTD) Ratio

The average LTD ratio, calculated from data contained in the Consolidated Reports of Condition, was evaluated giving consideration to the bank's capacity to lend, competitor and peer loan-to-deposit ratios, as well as demographic factors, economic conditions and lending opportunities present in the assessment area.

When compared to LTD ratios of its national peer group, local competitors, and banks of similar asset size in Iowa, the bank's LTD ratio is excellent and meets the standards for outstanding performance under this criterion. Exhibit 6 shows the comparison for the eight-quarters ending December 31, 2006. The LTD ratio for Ames Community Bank is higher than its national peer group and local competitors. Overall, the bank's average LTD ratios are higher than banks of similar asset size; however, Peoples Trust and Savings Bank, Adel, Iowa, has a slightly higher average LTD ratio.

Exhibit 6									
LTD Ratios									
Bank Name, City, 12/06 Assets \$(Millions)	3/05 (%)	6/05 (%)	9/05 (%)	12/05 (%)	3/06 (%)	6/06 (%)	9/06 (%)	12/06 (%)	Avg.
Ames Community Bank, Ames, IA, \$196.9	114.7	110.3	117.1	114.6	116.7	113.6	105.3	100.7	111.6
Peer Group	86.7	88.1	87.4	87.5	81.8	83.2	83.4	82.4	85.1
	A	mes Com	munity B	ank's Coi	npetitors				
First National Bank, Ames, IA, \$424.4	63.2	63.9	66.4	62.1	61.5	59.1	60.5	56.7	61.7
First American Bank, Fort Dodge, IA, \$1,549.8	98.7	101.9	103.5	102.9	105.1	105.6	105.2	99.4	102.8
		Bank's	with Sim	ilar Asset	Size				
First Bank, West Des Moines, IA, \$169.9	89.4	96.1	94.0	97.4	94.1	94.7	94.1	91.7	93.9
State Bank Lawler, New Hampton, IA, \$188.1	90.2	88.1	90.2	86.4	88.7	84.8	84.1	86.5	87.4
Peoples Trust and Savings Bank, Adel, IA, \$183.9	118.9	122.4	122.0	121.1	123.0	120.9	101.2	102.7	116.5
Farmers and Merchant Savings Bank, Manchester, IA, \$186.7	85.5	87.6	83.6	83.5	86.1	98.7	94.1	97.1	89.5

#### **Lending in the Assessment Area**

To assess the extent of lending within the assessment area, the following data was reviewed: agricultural, commercial, consumer and Home Mortgage Disclosure Act (HMDA)—related loans. The sample period for agricultural, commercial and consumer loan products was December 1, 2005 through November 30, 2006; while the sample period for the HMDA loans was calendar year 2004 and 2005. Information from the performance context, such as economic conditions present within the assessment area, loan demand, bank size, financial condition, branching network, and business strategies, was considered when evaluating the bank's performance.

Ames Community Bank has demonstrated a satisfactory level of lending within its assessment area. As noted below in Exhibit 7, the majority of the bank's loans are originated within its assessment area. Consumer loans represented the lowest percentage of loans originated in the bank's assessment area. This can be attributed to consumers who reside in Boone and Nevada, which border the bank's assessment area, that commute to Ames for work. During the evaluation, it was noted that some larger agricultural and commercial loans were originated outside the bank's assessment area but were participation loans with sister banks in Ogden, Boone, and West Des Moines, Iowa. The numbers below are exclusive of these loan participations purchased.

Exhibit 7					
Distribution of Loans Ir	n/Out of Assessmen	t Area (AA)			
Loan Type Number of Loans					
	# in Sample	# in AA	% in AA		
2004 and 2005 HMDA	238	162	68.1		
Agricultural	172	133	77.3		
Commercial	218	155	71.1		
Consumer	105	67	63.8		
Totals	733	517	70.5		

# <u>Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes</u>

The distribution of loans among borrowers of different income levels was determined by reviewing: 2004 and 2005 HMDA loans as well as small farm and small business loans. Consolidated Report of Condition and Income as of June 30, 2006 was utilized for the analysis of small farm and small business loans. Information from the performance context, such as economic conditions present within the assessment area, demographics, loan demand, bank size, financial condition, branching network, and business strategies, was considered when evaluating the bank's performance.

Given the demographics of the assessment area, the loan penetration and distribution across borrowers of different income levels and businesses and farms of different sizes meets the standard for satisfactory performance under this criterion. The bank's performance overall was

satisfactory given that the percentage of HMDA loans to low-income borrowers increased from 2004 to 2005 and was above the peer group percentage for 2005. In addition, the bank is meeting the small business and small farm needs of the communities with which it services.

#### Home Mortgage Disclosure Act (HMDA) Loans

#### 2004 HMDA-REPORTABLE LENDING

Based on the 2004 lending activity, the bank originated 3.3% of its HMDA-reportable loans to low-income borrowers and 15.6% to moderate-income borrowers. According to the 2004 peer group HMDA data, 7.1% of loans were to low-income borrowers and 21.8% to moderate-income borrowers. Overall, the distribution of the bank's 2004 HMDA-reportable loans to low- and moderate-income borrowers was below the area demographics and peer group.

#### 2005 HMDA-REPORTABLE LENDING

The bank originated 11.1% of its HMDA reportable loans to low-income borrowers and 18.1% to moderate-income borrowers. During 2005, the bank's HMDA lending activity increased to low-and moderate-income borrowers when compared to the prior year's lending activity. According to the 2005 peer group HMDA data, 7.6% of the peer group loans were to low-income borrowers and 23.1% to moderate-income borrowers. The distribution of the bank's 2005 HMDA loans to low-and moderate-income borrowers was in line with its peer group.

Exhibit 8 Distribution of Ames Community Bank's HMDA Loans by Income Level							
Income Level 2004 2005 Percentage of Families in Assessment							
	#	%	#	%	Area		
Low	3	3.3	8	11.1	18.0		
Moderate	14	15.6	13	18.1	16.7		
Middle	20	22.2	20	27.8	23.7		
Upper	23	25.6	24	33.3	41.6		
Unknown	30	33.3	7	9.7	0		
Total	90	100	72	100	100		

Exhibit 9								
Distrib	Distribution of Peer Group HMDA Loans by Income Level							
Income Level 2004 2005 Percentage of Families in Assessme								
	#	%	#	%	Area			
Low	240	7.1	262	7.6	18.0			
Moderate	740	21.8	793	23.1	16.7			
Middle	1,016	30.0	971	28.2	23.7			
Upper	996	29.4	1,029	29.9	41.6			
Unknown	398	11.7	384	11.2	0			
Total	3,390	100	3,439	100	100			

#### **Small Business Loans**

Overall, the distribution of loans to businesses of different sizes reflects a reasonable penetration, given the different product lines offered and the assessment area demographics. Small business loans with annual gross revenue of \$1 million or less represent 47.6% of the bank's commercial loan outstandings. Small business loan originations in the \$100,000 or less category represent 56.1% of the number and 12.5% of the dollar amount of small business loans. Emphasis is placed on this category of loans because the smaller loan amounts encourage small business and economic development within the assessment area.

Exhibit 10						
Distribution of Small Business Loans						
Original	Outstanding	Outstanding Dollar				
Dollar Amount	Number	Amount (000's)				
Loans Secured by Non-	Farm Nonresidential Propertie	s				
Less than or equal to \$100,000	34	\$1,763				
Greater than \$100,000 through \$250,000	31	4,002				
Greater than \$250,000 through \$1 million	50	24,801				
Total	115	\$30,566				
Commercial	and Industrial Loans					
Less than or equal to \$100,000	132	\$3,842				
Greater than \$100,000 through \$250,000	29	2,856				
Greater than \$250,000 through \$1 million	20	7,420				
Total	181	\$14,118				
Loans Secured by Non-Farm Nonresidential Properties and						
Commercial and Industrial Loans						
Grand totals	296	\$44,684				

#### **Small Farm Loans**

The distribution of agricultural loans reflects a reasonable penetration among small farm loans. Small farm loans with annual gross revenue of \$500,000 or less represent 74.5% of the bank's farm loan outstandings. Originations in the amounts of \$100,000 or less represent 48.4% of the number and 14.1% dollar amount of small farm loans. Emphasis is placed on this category of loans because the smaller loan amounts are most beneficial to area small farming operations.

Exhibit 11					
Distribution of Small Farm Loans					
Original	Outstanding	Outstanding			
Dollar Amount	Number	Dollar			
		Amount (000's)			
Loans Secured	d by Farmland				
Less than or equal to \$100,000	17	\$752			
Greater than \$100,000 through \$250,000	17	2,310			
Greater than \$250,000 through \$500,000	13	3,813			
Total	47	\$6,875			
Loans to Finance Agricultural Prod	uction and Other Loans to Farme	ers			
Less than or equal to \$100,000	43	\$1,080			
Greater than \$100,000 through \$250,000	22	2,605			
Greater than \$250,000 through \$500,000	12	2,419			
Total	77	\$6,104			
Loans Secured by Farmland and					
Loans to Finance Agricultural Production and Other Loans to Farmers					
Grand totals	124	\$12,979			

#### **Geographic Distribution of Loans**

The distribution of lending among geographies of different income levels within the assessment area, particularly those defined as low- and moderate-income, was reviewed. To assess the bank's performance, the following were reviewed: agricultural, commercial, and 2004 and 2005 HMDA loans. The sample period for each loan product was December 1, 2005 through November 31, 2006. Demographic characteristics of census tracts, such as housing types and income level, were considered in the evaluation.

The geographic distribution of loans overall meets the standards for satisfactory performance under this criterion. Business and 2004-HMDA lending activity are above area demographics. The 2005-HMDA lending activity declined and was below the area demographics; however, it is slightly above peer group HMDA lending activity in the low-income census tracts. The bank's main office is located in one of the low-income census tracts and the bank offers a full-range of real estate, commercial, agricultural and consumer loan products as well as a variety of deposit products. Competition is strong in the area as there is 19 other banking institutions vying for loan business.

#### **BUSINESS LENDING**

The distribution of the bank's business lending is satisfactory. As noted in Exhibit 12, the bank originated 19.4% of its business loans in low-income census tract which is above the area demographics.

Exhibit 12									
Geographic Distribution of Business Loans									
Census Assessment Area Bank Loans									
Tract	Census T	<b>Tracts</b>	Вι						
	#	%	#	%	#	%			
Low	2	11.8	381	15.4	30	19.4			
Moderate	0	0.0	0	0.0	0	0.0			
Middle	10	58.8	1,322	53.3	85	54.8			
Upper	4	23.5	723	29.2	40	25.8			
Unknown	1	5.9	53	2.1	0	0.0			
Total	17	100.0	2,479	100	155	100.0			

#### 2004 HMDA-REPORTABLE LENDING

The distribution of the bank's 2004 HMDA-related lending is satisfactory. 2000 Census Data indicates owner-occupied dwellings in low-income tracts at 4.9% and the bank originated 8.9% of its HMDA-reportable loans in low-income tracts. According to the 2004 peer group HMDA data, 2.8% of the peer group loans were originated in low-income tracts. The bank was above the area demographics and peer data, illustrating a solid performance for 2004.

#### 2005 HMDA-REPORTABLE LENDING

Overall, the distribution of the bank's 2005 HMDA-related lending is satisfactory. The bank originated 2.8% of its HMDA-reportable loans in low-income tracts which is below the area demographics. The bank does compare more favorably with its peer group, which showed that 2.4% of peer group HMDA-related loans were originated in these low-income tracts.

Exhibit 13								
Geographic Distribution of Ames Community Bank's HMDA Loans								
Census	Assessment Area				Bank Loans			
Tract	Censu	s Tracts	Tracts Owner-Occupied Units		2004		2005	
	#	%	#	%	#	%	#	%
Low	2	11.8	706	4.9	8	8.9	2	2.8
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	10	58.8	9,905	69.2	65	72.2	57	79.2
Upper	4	23.5	3,704	25.9	17	18.9	13	18.0
Unknown	1	5.9	0	0	0	0	0	0.0
Total	17	100.0	14,315	100	90	100	72	100.0

Exhibit 14									
Geographic Distribution of Peer HMDA Loans									
Census	Assessment Area				Peer Bank Loans				
Tract	Censu	Census Tracts		Owner-Occupied Units		2004		2005	
	#	%	#	%	#	%	#	%	
Low	2	11.8	706	4.9	94	2.8	84	2.4	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	10	58.8	9,905	69.2	2,351	69.4	2,344	68.2	
Upper	4	23.5	3,704	25.9	945	27.9	1,009	29.3	
Unknown	1	5.9	0	0	0	0.0	2	0.1	
Total	17	100.0	14,315	100	3,390	100.0	3,439	100.0	

#### **AGRICULTURAL LENDING**

Overall, the distribution of the bank's farm lending is satisfactory. Although the bank did not originate any farm loans in the low-income tracts during the sample period, only 1.3% of the farms in the assessment area are located in these tracts.

Exhibit 15								
Geographic Distribution of Farm Loans								
Census		Assessme	nt Area	Bank Loans				
Tract	Census Tracts		Fa	rm				
	#	%	#	%	#	%		
Low	2	11.8	5	1.3	0	0		
Moderate	0	0.0	0	0.0	0	0		
Middle	10	58.8	296	75.5	95	71.4		
Upper	4	23.5	89	22.7	38	28.6		
Unknown	1	5.9	2	0.5	0	0		
Total	17	100.0	392	100.0	133	100		

#### **Other Lending Related Activities**

Ames Community Bank participates in flexible lending programs, which enhance credit availability in the assessment area. Exhibit 16 highlights flexible loan programs in which the bank has participated since the previous evaluation. In addition to government-subsidized lending programs listed below, the bank originates residential real estate loans sold on the secondary market, which enables the bank to offer longer term fixed-rate loans to its customers. Since the previous evaluation, Ames Community Bank has originated 254 secondary market loans totaling \$30,932,674.

Exhibit 16						
Other Lending Related Activities						
Government Subsidized Programs	Number	Original Dollar Amount				
Farm Service Agency (FSA) - Federal agricultural loan guarantee program.	2	\$468,837				
Small Business Administration - Federal small business loan guarantee program.	1	519,723				
Iowa Department of Economic Development – Loan and credit guarantee fund.	9	406,981				
Total	12	\$1,395,541				

#### **Complaints**

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

#### **Fair Lending**

The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity and Fair Housing Acts. A sample of the bank's lending activity was reviewed to determine whether loan policies and lending standards were in compliance with the fair lending laws and regulations, and that these are being consistently applied to all applicants. No evidence of prohibited discriminatory or other illegal credit practices was detected.

### Ames Community Bank's Assessment Area Census Tracts and Branches

