



Community Reinvestment Act  
The First National Bank of Gordon  
134 N. Main Street Gordon, NE 69343

## **LOCATION OF SERVICES:**

### **Bank Building**

134 North Main Street  
Gordon, NE 69343

### **Night Deposit Service**

Located at front and back of Bank

### **ATM Machine**

Located at the front of Bank

## **HOURS OF OPERATION:**

### **Lobby**

Monday-Friday 9:00am to 3:00pm

### **Drive Up Window**

Monday-Friday 7:30am to 4:00pm

### **ATM Machine**

24-hour availability



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## COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Office of the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The OCC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC; and comments received from the public relating assessment area needs and opportunities, as well as our responses to those comments. You may review this information today by reviewing the public file which is available at [www.fnbgordon.com](http://www.fnbgordon.com) or 134 N. Main St. Gordon, NE 69343.

You may also have access to the following additional information, which we will make available to you after you make a request to us: (1) a map showing the assessment area containing a select branch which is the area in which the OCC evaluates our CRA performance for the particular community; (2) branch addresses and associated branch facilities and hours in any assessment area; (3) a list of the services that we provide at those locations; (4) most recent rating in the assessment area; and (5) copies of all written comments received by us that specifically relate to the needs and opportunities of a given assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks and savings associations that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller Attn: Karen Boehler, West/Midwest Region, 1050 17th Street, Suite 1500, Denver, Colorado 80265. You may send written comments regarding the needs and opportunities of any of bank's assessment areas to Brooke Gates, CRA Officer, The First National Bank of Gordon, P.O. Box 290, Gordon, Nebraska 69343 or by email, [brooke@fnbgordon.com](mailto:brooke@fnbgordon.com) and Karen Boehler, Deputy Comptroller West/Midwest, Office of the Comptroller of Currency, 1050 17th Street, Suite 1500, Denver, Colorado 80265 or by email, [CRAComments@OCC.TREAS.GOV](mailto:CRAComments@OCC.TREAS.GOV). Your comments, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. You may also request from the Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller.

We are an affiliate of Isham Management Company, a bank holding company. You may request from the Assistant Vice President, Federal Reserve Bank of Kansas City, 1 Memorial Dr., Kansas City, MO 64198 an announcement of applications covered by the CRA filed by bank holding companies.



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134 N. Main Street Gordon, NE 69343

## **SERVICES PROVIDED**

- ❖ Lending
- ❖ Deposit
- ❖ Night Depository
- ❖ Drive-Up Window
- ❖ ATM- 24-Hr.
- ❖ Account Reconciliation
- ❖ Safe Deposit Box Rental
- ❖ Money Orders
- ❖ Cashier's Checks
- ❖ Wire Transfers
- ❖ Internet Banking
- ❖ Bill Pay
- ❖ Intra Fi Network (CDARS)
- ❖ Instant Issue Visa Debit Card
- ❖ Fraud Watch Plus
- ❖ Mobile Banking
- ❖ Remote Deposit Capture/Merchant Source Capture
- ❖ Westgate Bank Broker Program
- ❖ Texas Independent Bank Broker Program
- ❖ Rocket Mortgage Broker Program
- ❖ Direct Payroll
- ❖ Money IQ Financial Literacy Center
- ❖ Retail and Business Online Banking
- ❖ Digital Wallet
- ❖ E-Statements
- ❖ Card Hub
- ❖ Positive Pay
- ❖ Savings Bond Redemption
- ❖ Escrow Services

## **SPECIAL SERVICES**

- ❖ Photocopying
- ❖ Fax Service



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134 N. Main Street Gordon, NE 69343

## **TYPES OF CREDIT OFFERED**

- ❖ Real Estate Loans
  - Construction and land development
  - Farmland and farmland residential
  - 1-4 Family residential through third party programs
  - Multi-family
  - Nonfarm, nonresidential (commercial)
- ❖ Agricultural/Commercial Loans
  - Current year operating expense
  - Livestock or commodities
  - Intermediate term loans
  - Capital improvement loans
  - General Purpose
  - Capital Assets
  - Operating
- ❖ Consumer Loans
  - Automobiles – installment
  - Home Improvement – installment
  - Dealer – consumer
  - Personal- installment
  - Personal – single pay
- ❖ Guaranteed Loans
  - FSA
  - SBA
  - USDA
  - HUD
- ❖ Letters of Credit
- ❖ Farmer Mac, Conterra
- ❖ Assist borrower in obtaining financing under various GAP financing programs such as: REAP, PADD, NNDC, West River Development, Lakota Funds, Nebraska Department of Energy Loans, and Mazaska Owecasco OTIPI Financial (Native Financing Group in Pine Ridge, South Dakota).

*The First National Bank of Gordon has increased efforts to make loans to help meet identified credit needs within the communities we serve. First National does not make VA or FMHA Insured Mortgage Loans, but personnel can assist you in applying for these loans with other legal institutions.*



## **PUBLIC DISCLOSURE**

September 8, 2025

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

The First National Bank of Gordon  
Charter Number 8521

134 N Main St,  
Gordon, NE 69343

Office of the Comptroller of the Currency

Denver Office  
1050 17th Street, Suite 1500  
Denver, Colorado 80202

**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

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

**The lending test is rated: Outstanding.**

The major factors that support this rating include:

- FNB Gordon's loan-to-deposit (LTD) ratio is reasonable.
- The First National Bank of Gordon (FNB Gordon) originated a substantial majority of loans within its assessment area (AA).
- FNB Gordon exhibited an excellent geographic distribution of loans in the AA.
- FNB Gordon exhibited an excellent distribution of loans to borrowers of different incomes and farms of different revenues in the AA.
- FNB Gordon's Community Development (CD) activities demonstrate an excellent responsiveness to the CD needs within the AA.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was reasonable.

FNB Gordon's LTD ratio as of December 31, 2024, was 39.9 percent. The bank's average quarterly LTD ratio from March 31, 2020, through December 31, 2024 was 43.5 percent. FNB Gordon's LTD over this period ranged from a high of 55.8 percent to a low of 36.9 percent. During the same period, similarly situated bank's (comparator banks) LTD ratio averaged 63.2 percent with quarterly averages ranging from a high of 81.3 percent to a low of 28.3 percent. Comparator banks have comparable asset sizes, operate in the same geographies, and have a comparable number of branches. The LTD ratio is calculated on a bank wide basis.

Though the bank's LTD ratio is less than comparator banks, it is considered reasonable given the bank's primary lending focus of agricultural loans. The bank faces heavy competition for these products with the top 5 institutions in the area making up 74.5 percent of originations in 2024. Competitors include institutions such as John Deere Financial, F.S.B., Pinnacle Bank, and Union Bank and Trust Company. FNB Gordon also carries a large concentration of public deposits which require collateralization in investment securities and cannot be loaned out. The bank meets key credit needs of the AA by providing smaller dollar loans to its consumer and agricultural clients.

### Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA.

The bank originated and purchased 87.5 percent of the loans sampled inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	15	75.0	5	25.0	20	480	41.9	666	58.1	1,146
Consumer	20	100.0	0	0.0	20	69	100.0	0	0.0	69
Total	35	87.5	5	12.5	40	549	45.2	666	54.8	1,215
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

## Description of Institution

FNB Gordon is a nationally chartered community bank headquartered in Gordon, NE with \$333.6 million in total assets as of December 31, 2024. FNB Gordon is wholly-owned by Isham Management Company, a one-bank holding company headquartered in Gordon, NE. The bank has no affiliates, and there was no merger or acquisition activity during the assessment period.

FNB Gordon's assessment area includes all of Sheridan and Cherry counties in Nebraska and all of Oglala Lakota and Bennett counties in South Dakota. FNB Gordon operates a single branch and one ATM in Gordon, NE.

Since 2011, FNB Gordon has been a certified Minority Depository Institution. Although the ownership of the bank no longer qualifies from minority ownership, FNB Gordon meets the criteria by supporting the economic viability of communities comprised of predominately minority individuals, women, or socially and economically disadvantaged individuals. FNB Gordon serves as the primary financial institution for the Oglala Sioux Tribe located on the Pine Ridge Indian Reservation in South Dakota.

FNB Gordon offers traditional banking products with a focus on providing agriculture and consumer loans to its AA. As of December 31, 2024, the bank's net loans totaled \$114.7 million. The loan portfolio primarily consists of agricultural real estate and production loans totaling \$91.6 million (77.5 percent of gross loans). The remainder of the portfolio is comprised of commercial, non-real estate loans totaling \$8.9 million (7.6 percent), real estate loans totaling \$8.6 million (7.4 percent), individual loans totaling \$6.7 million (5.7 percent) and other loans totaling 2.2 million (1.9 percent). Their 1 capital as of December 31, 2024, was \$43.2 million with a tier one leverage ratio of 12.3 percent.

FNB Gordon received an "Outstanding" rating on its previous CRA examination dated June 29, 2020. There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test covered loan originations from January 1, 2022, through December 31, 2024. Examiners reviewed loan activity during this period to determine the bank's primary loan product as the focus for this evaluation. A summary of the bank's lending activity during the evaluation period is detailed in the table below. The table reflects consumer loans as a primary product with the highest percentage of loans by number and agricultural loans as a second primary product with the highest percentage of loans by dollar volume during the evaluation period.



The First National Bank of Gordon Loan Originations from January 1, 2022, to December 31, 2024		
Loan Type	% of Total #	% of Total \$
Consumer	84.5	16.7
Mortgage	0.0	0.0
Commercial	2.3	12.7
Agricultural	13.2	70.6
Total	100.0	100.0

## Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## Ratings

The bank’s overall rating is based on the performance in the bank’s single AA. The AA is primarily in Nebraska but includes two adjacent counties in South Dakota. While the bank’s AA crosses state lines, it does not extend substantially beyond the state boundary. The AA as defined is connected economically and demographically and functions essentially as one economy.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) 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 AA 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 (or any affiliate whose loans have been considered as part of the institution’s lending performance) 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.

## State Rating

### State of Nebraska

**CRA rating for the State of Nebraska:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- FNB Gordon originated a substantial majority of loans within its AA.
- FNB Gordon exhibited an excellent geographic distribution of loans in the AA.
- FNB Gordon exhibited an excellent distribution of loans to borrowers of different incomes and farms of different revenues in the AA.
- FNB Gordon's Community Development (CD) activities demonstrated an excellent responsiveness to the CD needs within the AA.

### Description of Institution's Operations in Nebraska

FNB Gordon's operations in the state of Nebraska include traditional banking and lending products. Lending activity is focused primarily on agriculture and consumer lending. The bank operates a single location and ATM located in Gordon, NE.

FNB Gordon ranks second in its assessment area for total deposit market share with 32.5 percent of deposits totaling \$279.8 million as of June 30, 2024. The bank faces moderate competition for deposits in the area with six institutions in the market, including Security First Bank, Union Bank and Trust Company, Sandhills State Bank, BMO Bank National Association, and Wells Fargo Bank, National Association.

#### *Economic Data*

According to the Moody's Analytics report dated February 2025, Nebraska's economy is stabilizing. Year-over-year total employment growth is underperforming the nation and region. Manufacturing has lost jobs, partially offsetting large job gains from healthcare and local government. The unemployment rate has been increasing; however, this is partly due to a positive development as more people have entered the labor force. Housing prices are still appreciating slower than the nation. Nebraska benefits from its transportation hub, low living and business costs, significant military presence, strong population growth for the Midwest and below-average exposure to trade. Weaknesses in Nebraska's economy include high exposure to the volatile agricultural sector, worsening migration trends, and below-average productivity and incomes. Nebraska ranks among the top three states most reliant on farm income and is a leading producer of corn, soybeans and livestock. In 2023, feed crop prices had increased but have since fallen amid elevated production levels, weighing on crop farmers' revenue.

According to the Moody's Analytics report dated June 2025, South Dakota's economy is making progress. Job growth is above average in construction and leisure/hospitality. Housing price appreciation is near the national average, and homebuilding is stable. South Dakota benefits from a favorable business climate with low costs, no state tax on personal income, and strong labor force growth. Weaknesses in South Dakota's economy include high dependence on agriculture, exposure to volatile

commodity prices, and a heavy reliance on cyclical tourism. In South Dakota farm earnings contribute more to total income than in any other state. Agriculture is sensitive to fluctuations in international demand for the state's most cultivated crops: corn and soybeans. Low demand has contributed to falling prices in these crops since 2022, which has pushed down earnings.

### *Income and Employment Data*

In 2024, median family income in Nebraska was \$85,800. Nebraska's top employers include the University of Nebraska System, Offutt Air Force Base, Nebraska Medicine, CHI, and Methodist Health System. As of December 31, 2024, the unemployment rate was 2.3 percent in Sheridan County and 1.8 percent in Cherry County. This is compared to the state of Nebraska at 2.6 percent, and the national unemployment rate of 4.1 percent.

In 2024, median family income in South Dakota was \$87,700. South Dakota's top employers include Standford Health, Avera Health, Monument Health, and Ellsworth Air Force Base. As of December 31, 2024, the unemployment rate was 2.9 percent in Bennett County and 5.4 percent in Oglala Lakota County. This is compared to the state of South Dakota at 2 percent, and the national unemployment rate of 4.1 percent.

## **Gordon Non-MSA AA**

Gordon Non-MSA AA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	11.11	55.56	33.33	0.00	0.00
Population by Geography	27,635	20.74	48.50	30.76	0.00	0.00
Housing Units by Geography	11,083	14.22	39.99	45.79	0.00	0.00
Owner-Occupied Housing by Geography	5,020	12.03	40.98	46.99	0.00	0.00
Occupied Rental Units by Geography	3,600	17.86	40.86	41.28	0.00	0.00
Vacant Units by Geography	2,463	13.36	36.70	49.94	0.00	0.00
Businesses by Geography	832	8.05	31.25	60.70	0.00	0.00
Farms by Geography	214	1.40	23.36	75.23	0.00	0.00
Family Distribution by Income Level	6,052	35.86	20.95	19.73	23.46	0.00
Household Distribution by Income Level	8,620	31.53	19.50	18.94	30.02	0.00
Unemployment rate (%)	7.62	25.79	8.40	0.38	0.00	0.00
Households Below Poverty Level (%)	24.58	58.06	25.94	12.48	0.00	0.00
Median Family Income (Non-MSAs - NE)		\$70,804			Median Housing Value	\$79,700
Median Family Income (Non-MSAs - SD)		\$72,374			Median Gross Rent	\$619
Median Family Income (Non-MSAs - NE) for 2024		\$85,800			Families Below Poverty Level	24.65
Median Family Income (Non-MSAs - SD) for 2024		\$87,700				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## **Community Contact**

To assess community needs in the Nebraska region of the AA, examiners utilized a community contact from the evaluation period. The contact represents an economic development organization in the AA. The contact indicated the local economy, primarily driven by agriculture, has been negatively affected by unfavorable commodity pricing, high input costs, and high interest rates. The contact also indicated

affordable housing inventory is low due to high construction costs and high interest rates, which have negatively affected new home construction. Additionally, the community is dealing with population loss. The contact indicated lending for agriculture, small businesses, and housing are the primary credit needs of the community. Affordable housing and workforce development are additional needs in the area. The contact indicated local financial institutions are meeting the needs of the area.

To assess the community needs in the South Dakota region of the AA, examiners utilized group consensus from a community listening session with seven participants from the evaluation period. The participants represented economic development, municipal governance, and housing organizations in the AA. The group indicated the local economy is facing challenges and is primarily dependent on casinos but is growing in economic diversity. The group indicated the primary needs of the community are affordable housing and commercial real estate (CRE) for new businesses. High interest rates, lack of financing options, and high construction costs were all indicated as root causes for affordable housing and CRE shortfalls. The group indicated that banks in the AA need to expand access to financial education and mortgage lending products to support the community's growth.

## **Scope of Evaluation in Nebraska**

Examiners performed a full scope examination of FNB Gordon's single AA in the state of Nebraska (including two contiguous counties in South Dakota that are not substantially beyond the state line). See Appendix A for details.

## **LENDING TEST**

The bank's performance under the Lending Test in Nebraska is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Gordon Non-MSA AA was excellent.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited excellent geographic distribution of loans in the State.

### ***Small Loans to Farms***

Refer to Table 11 in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent. The percentage of loans reviewed made in low- and moderate-income census tracts significantly exceeded both the peer bank aggregate and demographic figures for the review period.

### ***Consumer Loans***

Refer to Table 13 in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of small loans to farms is excellent. The percentage of loans reviewed made in low- and moderate-income census tracts exceeded the demographic figures for the review period.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited an excellent distribution of loans to individuals of different income levels and farms of different sizes, given the product lines offered by the bank.

#### ***Small Loans to Farms***

Refer to Table 12 in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is excellent. The percentage of loans reviewed made to small farms exceeded both the aggregate and demographic figures for the review period.

#### ***Consumer Loans***

Refer to Table 14 in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of loans to borrowers of different income levels is excellent. The percentage of loans reviewed made to low- and moderate-income borrowers significantly exceeded the demographic figures for the review period.

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

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				2022-2024
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Gordon Non-MSA AA	20	100.0	3,823	100.0

FNB Gordon exhibited excellent responsiveness to the needs of its AA through community development lending. The bank originated 20 qualified community development loans during the evaluation period benefiting organizations serving communities and employing low or moderate income (LMI) individuals in the AA during the evaluation period. CD lending totaled \$3.8 million, or 8.2 percent of tier 1 capital.

The following are examples of CD loans the bank originated or purchased in its AA:

- 12 loans totaling \$3.1 million to fund businesses creating or retaining jobs in LMI geographies.
- 5 loans totaling \$556,000 to organizations providing community services to LMI individuals.

### **Responses to Complaints**

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

## **ADDITIONAL CONSIDERATION**

Based on a full-scope review, the bank exhibited excellent responsiveness to needs in the state through qualified donations and providing services in its AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA. Performance related to these activities had a positive effect on the bank's rating in the state.

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

During the evaluation the bank made a total of 20 qualified donations to community development institutions in the AA with a total dollar value of \$59,000. These donations were primarily directed at youth programs and school districts benefiting LMI students. The bank also made additional financial donations to organizations in the AA reflecting their ongoing support for the community, but they did not meet the criteria for community development credit.

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

FNB Gordon staff provided qualified community development services during the evaluation period to include financial education to LMI youth and financial expertise to community development qualified institutions. Bank staff also provided volunteer services to other organizations in the AA reflecting their ongoing support for the community, but they did not meet the criteria for community development credit.

## 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 MSAs and non-MSAs 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>	01/01/2022 to 01/01/2024	
<b>Bank Products Reviewed:</b>	Small farm and consumer loans. Community development loans, qualified investments, and community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Nebraska</b>		
Gordon Non-MSA AA	Full-scope	The Assessment Area includes Bennett and Oglala Lakota counties in South Dakota. A separate state rating was not assigned as the bank does not have any branches in South Dakota.

## Appendix B: Summary of State Ratings

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RATINGS	
Overall Bank:	Lending Test Rating
The First National Bank of Gordon	Outstanding
State:	
Nebraska	Outstanding



## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 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 CD loans and qualified investments, branch distribution, and CD services).

**Low-Income:** Individual income that is at 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 state/AA.

**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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

**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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

**Rating Area:** A rated area is a state or multistate metropolitan statistical 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 statistical area, the institution will receive a rating for the multistate metropolitan statistical 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 1 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.

**Unfunded Commitments:** Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**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.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 that were 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) in those geographies. Because aggregate 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 AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2024		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
Gordon Non-MSA	20	654	100.00	465	1.40	20.00	0.86	23.36	70.00	14.62	75.23	10.00	84.52	--	--	--	--	--	--		
Total	20	654	100.00	465	1.40	20.00	0.86	23.36	70.00	14.62	75.23	10.00	84.52	--	--	--	--	--	--		
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.																					
Due to rounding, totals may not equal 100.0%																					

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue <span style="float: right;">2022-2024</span>												
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Gordon Non-MSA	20	654	0.00	465	89.25	100.00	59.78	10.28	--	0.47	--	--
<b>Total</b>	<b>20</b>	<b>654</b>	<b>0.00</b>	<b>465</b>	<b>89.25</b>	<b>100.00</b>	<b>59.78</b>	<b>10.28</b>	<b>--</b>	<b>0.47</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography <span style="float: right;">2022-2024</span>													
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gordon Non-MSA	20	69	0.00	14.47	30.00	40.93	65.00	44.61	5.00	--	--	--	--
<b>Total</b>	<b>20</b>	<b>69</b>	<b>0.00</b>	<b>14.47</b>	<b>30.00</b>	<b>40.93</b>	<b>65.00</b>	<b>44.61</b>	<b>5.00</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower <span style="float: right;">2022-2024</span>													
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Gordon Non-MSA	20	69	0.00	31.53	65.00	19.50	25.00	18.94	10.00	30.02	--	--	--
<b>Total</b>	<b>20</b>	<b>69</b>	<b>0.00</b>	<b>31.53</b>	<b>65.00</b>	<b>19.50</b>	<b>25.00</b>	<b>18.94</b>	<b>10.00</b>	<b>30.02</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%