



## **PUBLIC DISCLOSURE**

June 29, 2020

### **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 Field Office  
1225 17th Street, Suite 450,  
Denver, CO 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.



## Table of Contents

Overall CRA Rating.....	2
Description of Institution.....	3
Scope of the Evaluation.....	4
Discriminatory or Other Illegal Credit Practices Review.....	4
State Rating.....	6
State of Nebraska.....	6
Community Development .....	9
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## 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:

- The First National Bank of Gordon (FNB Gordon) originated a substantial majority of loans within its assessment area (AA).
- FNB Gordon exhibits an excellent geographic distribution of loans.
- FNB Gordon’s community development (CD) activities demonstrate responsiveness to CD needs in the AA.
- FNB Gordon’s loan-to-deposit (LTD) ratio is reasonable.

### Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s LTD ratio is reasonable. Over the assessment period from 2017 through 2019, FNB Gordon’s average quarterly LTD ratio was 63 percent. This ratio ranged from a quarterly low of 58 percent to a high of 68 percent. This is reasonable compared to the average LTD ratio of similarly situated banks and given local economic conditions. Similarly situated banks’ LTD ratios averaged 74 percent over the same period, ranging from a quarterly low of 66 percent to a high of 81 percent. Similarly situated banks have similar asset sizes or offer similar primary products and operate within similar geographies.

### Lending in Assessment Area

A substantial majority of the bank’s loans are inside its assessment area (AA). The bank originated or purchased 85 percent of its total loans inside the bank’s AA during the evaluation period. Considering the bank originates a substantial volume of small-dollar consumer loans, a greater weight was placed on the number of loans originated rather than the dollar amount of loans. See the table below for lending inside and outside of the AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agriculture	16	80	4	20	20	808	87	119	13	927
Consumer	18	90	2	10	20	61	87	9	13	70
<b>Total</b>	<b>34</b>	<b>85</b>	<b>6</b>	<b>15</b>	<b>40</b>	<b>869</b>	<b>87</b>	<b>128</b>	<b>13</b>	<b>997</b>



## Description of Institution

The First National Bank of Gordon is a national bank headquartered in Gordon, NE with approximately \$200 million of total assets. FNB Gordon operates a single branch and one ATM in Gordon, NE. FNB Gordon is wholly-owned by the Isham Management Company, a one-bank holding company headquartered in Gordon, NE. The bank has no affiliates and has had no merger or acquisition activity during the assessment period.

Since 2011, FNB Gordon has been certified as a minority owned bank and participates in the Minority Owned Deposit Program. 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 but is primarily an agriculture and consumer lender. As of December 31, 2019, the bank's loan portfolio totaled \$109 million. By volume, the bank's loan portfolio is comprised primarily of agriculture real estate and production loans, which total \$80 million. Commercial loans total \$16 million, loans to individuals total \$6 million, and other loans comprise the remaining \$7 million.

The bank's selected assessment area includes all of Sheridan and Cherry counties in Nebraska, and all of Oglala Lakota and Bennett, and part of Jackson counties in South Dakota. However, Jackson County is considered substantially beyond the state boundary. Therefore, the bank's designated AA does not meet the requirements of the regulation. For the purposes of this CRA examination, the bank's assessment area was modified to conform to the regulation. The bank's modified AA for this examination includes all census tracts in Sheridan, Cherry, Oglala Lakota, and Bennett counties.

FNB Gordon received an "Outstanding" rating on its previous CRA examination dated January 21, 2015. 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**

FNB Gordon was evaluated under the small bank CRA examination procedures. The small bank procedures include a lending test, which evaluates the bank's record of meeting the credit needs of its AA through its lending activities. Evaluating community development (CD) activities is optional under the small bank procedures. The OCC completed a limited-scope review of the bank's CD activities.

The lending test included an evaluation of the bank's primary products, agriculture and consumer loans, from January 1, 2017, through December 31, 2019. The OCC determined primary loan products by establishing the concentration of loans originated by number and dollar volume for each loan type.

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

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 an AA 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) or 195.28(c), respectively, in determining a national bank's 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 Bureau of Consumer Financial Protection, as applicable.



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

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

## **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 exhibits an excellent geographic distribution of loans within its AA.
- FNB Gordon exhibits an excellent distribution of loans to borrowers of different incomes and revenues.
- The bank's community development activities help enhance overall CRA performance and meet the needs of the AA.

### **Description of Institution's Operations in Nebraska**

While FNB Gordon offers a traditional line of banking and lending products, operations in the state of Nebraska are focused primarily on agriculture and consumer lending. The bank operates a single location and ATM located in Gordon, NE.

FNB Gordon faces moderate competition for deposits in its market area. There are six FDIC-insured depository institutions in Sheridan county. FNB Gordon ranks second in total deposit market share in Sheridan county with 27 percent of market share totaling \$157 million.

The OCC relied on community contacts completed for other institutions in the assessment area during the assessment period. Community representatives provided examiners with information regarding the community profiles, opportunities for participation in community development by local financial institutions, and perceptions of local financial institutions in the community.

Nebraska-South Dakota Assessment Area

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB Gordon NE-SD</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	9	22.2	33.3	44.4	0.0	0.0
Population by Geography	28,655	32.6	31.1	36.3	0.0	0.0
Housing Units by Geography	10,864	21.8	27.2	51.0	0.0	0.0
Owner-Occupied Units by Geography	5,515	20.5	23.7	55.8	0.0	0.0
Occupied Rental Units by Geography	3,366	23.4	33.5	43.2	0.0	0.0
Vacant Units by Geography	1,983	22.9	26.1	50.9	0.0	0.0
Businesses by Geography	1,257	0.1	24.3	75.6	0.0	0.0
Farms by Geography	350	0.0	21.4	78.6	0.0	0.0
Family Distribution by Income Level	6,378	33.8	20.6	20.6	25.0	0.0
Household Distribution by Income Level	8,881	30.0	18.8	20.0	31.2	0.0
Median Family Income Non-MSAs - NE		\$61,457	Median Housing Value			\$64,900
Median Family Income Non-MSAs - SD		\$60,845	Median Gross Rent			\$507
			Families Below Poverty Level			24.0%

*Source: 2015 ACS and 2019 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

**Scope of Evaluation in Nebraska**

A full-scope review was performed for FNB Gordon’s AA in the state of Nebraska (including two contiguous counties in South Dakota that are not substantially beyond the state line).

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA**

**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 AA is excellent.

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

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





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

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

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

The review of small loans to farms found excellent distribution to farms of different income levels. All of the loan originations in the review were to farms with annual revenues of less than \$1 million.

The review of small loans to farms found excellent distribution throughout the Nebraska-South Dakota AA. The distribution of loans in moderate-and low-income census tracts significantly outperforms area demographics. Refer to Table S and Table T in 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.

### ***Consumer Loans***

The review of consumer loans found an excellent distribution of loans to borrowers of different income levels. In the sample, the distribution of low-or moderate-income borrowers significantly outperforms area demographics.

The review of consumer loans found an excellent geographic distribution of loans throughout the AA. FNB Gordon outperforms area demographics in originating loans in low-or moderate-income geographic areas.

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

## **Responses to Complaints**

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



## COMMUNITY DEVELOPMENT

### Qualified Investments and Community Development Services

FNB Gordon contributed \$67,000 in qualifying community development donations during the CRA exam period that benefited low-to moderate-income (LMI) individuals. Donations were made to many tribal schools that are located in low-income tracts to provide the resources to those students to improve their educations. Additional donations were made by the bank to local communities that did not specifically target LMI individuals but provide programs that benefit economic development and community growth. These efforts positively affect the bank's overall performance. During this evaluation period there were not any investments purchased that qualified for community development.

Bank officers consistently provide community development services. Several employees conduct programs at the local elementary, high school, and college to inform students about banking and personal finance. President Will Isham is on the board of the Western State Director Education Foundation and Executive Vice President, Valerie Mann, serves on the OCC's Minority Financial Institution Advisory Committee.

### Qualified Loans

FNB Gordon provided information on one qualified community development loan originated during the evaluation period. The loan totaled \$850,000, or 3 percent of capital, and was used to provide affordable housing to tribal communities. FNB Gordon also works with the Farmer Mac Program that lends to small farmers in the surrounding area. While this program does not specifically target LMI individuals or pass the purpose and size test, Farmer Mac provides affordable loans to small farmers with 97 percent of their USDA guaranteed loans received by small or family farms. These loans help economic growth and community development.



## Appendix A: Scope of Examination

---

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>	1/1/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Small Farm and Consumer Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
<b>Nebraska</b>		
Nebraska-South Dakota AA	Full-scope	AA includes counties of Sheridan, Cherry, Oglala Lakota, and Bennett.

## Appendix B: Summary of State Ratings

---

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



## Appendix C: Definitions and Common Abbreviations

---

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/assessment area.

**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 investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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.

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

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

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

**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

---

### 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/assessment area. 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - 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 assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (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 S. 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 assessment area.
- Table T. 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 thousand) 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 U. 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 V. 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/assessment area

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2017-19</b>	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
FNB Gordon NE-SD AA	20	1,113	100	210	0.0	30	2.4	21.4	15	11.9	78.6	55	85.7	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>1,113</b>	<b>100</b>	<b>210</b>	<b>0.0</b>	<b>30</b>	<b>2.4</b>	<b>21.4</b>	<b>15</b>	<b>11.9</b>	<b>78.6</b>	<b>55</b>	<b>85.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2017-19</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
FNB Gordon NE-SD AA	20	1,113	100	210	98.0	100	66.2	0.9	0.0	1.1	0.0		
<b>Total</b>	<b>20</b>	<b>1,113</b>	<b>100</b>	<b>210</b>	<b>98.0</b>	<b>100</b>	<b>66.2</b>	<b>0.9</b>	<b>0.0</b>	<b>1.1</b>	<b>0.0</b>		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-19</b>	
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	
FNB Gordon NE-SD AA	20	67	100	21.6	43	27.4	45	51.0	11	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017-19</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
FNB Gordon NE-SD	20	67	100	30.0	25	18.8	45	20.0	15	31.2	15	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>67</b>	<b>100</b>	<b>30.0</b>	<b>25</b>	<b>18.8</b>	<b>45</b>	<b>20.0</b>	<b>15</b>	<b>31.2</b>	<b>15</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														