

Section 1 - CRA Performance Evaluation



PUBLIC DISCLOSURE

May 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Omaha
Charter Number: 209

1620 Dodge Street
Omaha, NE 68197

Office of the Comptroller of the Currency

425 S. Financial Place, Suite 1700
Chicago, IL 60605

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 following table indicates the performance level of First National Bank of Omaha (FNBO or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	FNBO Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on the Outstanding ratings received in most of the bank's rated areas.
- The Investment Test rating is based on Outstanding ratings in all the bank's rated areas.
- The Service Test rating is based primarily on the High Satisfactory ratings in the Omaha combined statistical area (CSA) and the state of Colorado. These areas contain the majority of the bank's branches, loans, and deposits.

Lending in Assessment Area

An adequate percentage of the bank's loans are in its assessment areas (AAs).

The bank originated and purchased 58.7 percent of its total loans inside the bank's AAs 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.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	30,567	85.6	5,136	14.4	35,703	6,167,006	78.2	1,717,629	21.8	7,884,635
Small Business	23,107	41.2	32,976	58.8	56,083	1,915,632	67.7	914,552	32.3	2,830,184
Small Farm	3,498	63.2	2,033	36.8	5,531	484,486	63.6	277,765	36.4	762,251
Total	57,172	58.7	40,145	41.3	97,317	8,567,124	74.6	2,909,946	25.4	11,477,070

Source: Bank Data
Due to rounding, totals may not equal 100.0%

Innovative and Flexible Loan Programs

The bank offers flexible home loan programs targeted to low- and moderate-income (LMI) borrowers that provided a positive impact under the Lending Test performance, including Federal Housing Association, Veterans Affairs, Federal Home Loan Bank, and United States Department of Agriculture loans. The bank also partners with government and state agencies originating loans through other individual homebuyer programs. The bank originates loans sponsored by the Colorado Housing Finance Authority, Illinois Housing Development Authority, Iowa Finance Authority, Nebraska Investment Finance Authority, and South Dakota Housing Development Authority. The bank also originates loans through Fannie Mae's HomeReady program, which is a low-down payment mortgage product designed for LMI borrowers. Loans originated under these programs are included in the bank's home mortgage lending analysis.

The bank's Secured Credit Card Loan program is another flexible loan product that provided a positive impact to LMI borrowers. This product helps customers with minimal or no credit history establish or build positive credit. The bank originated 7,380 card loans within its AAs during the evaluation period. Approximately 92 percent of the borrowers were LMI and 45 percent were in LMI geographies.

Description of Institution

FNBO is a longstanding family-owned bank headquartered in Omaha, Nebraska. As of December 31, 2021, the bank operated 99 branches and 124 deposit-taking automated teller machines (ATMs) in Colorado, Iowa, Illinois, Kansas, Nebraska, South Dakota, and Texas and a national credit card and mortgage presence. FNBO is a subsidiary of First National of Nebraska, Inc. FNBO offers a full range of credit products including consumer, commercial, agricultural, and real estate loans. Credit card lending is one of FNBO's primary business activities and includes a nationwide customer base.

As of December 31, 2021, FNBO had total assets of \$26.8 billion and tier 1 capital of \$2.7 billion. The bank's loan portfolio consisted of 35 percent consumer credit card, 37 percent real estate, 13 percent commercial and industrial, and 9 percent agricultural loans. Most of the bank's deposits come from the branch footprint.

FNBO's community development corporation (CDC) subsidiary, FNN CDC, owns a small loan portfolio, investments, and real estate. First Capital Partners (FCP), LLC, an affiliate of FNBO, owns FCP Fund II which is a Small Business Investment Company (SBIC). FCP, LLC is not a direct provider

of mezzanine capital and private equity, but the funds they manage are, and support middle market privately owned businesses.

COVID-19 Pandemic

In March 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. The pandemic limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance takes into consideration the impact of the pandemic.

During the evaluation period, the bank strategically targeted certain community development (CD) activities to assist in addressing economic hardships associated with pandemic mitigation practices, advancing the bank's commitment towards alleviating economic disparities among LMI communities. To meet Small Business Administration (SBA) initial guidance on the Paycheck Protection Program (PPP), the bank modified its technology systems to accommodate a large volume of applications from small businesses and nonprofit organizations. A PPP loan is SBA-backed and helped businesses keep their workforce employed during the pandemic.

The pandemic disproportionately affected blue-collar jobs, in which LMI individuals are primarily employed. To assist their borrowers experiencing financial difficulty, the bank offered various services and relief options including loan deferrals, modifications, hardship assistance, forbearance plan options, and fee waivers.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. There were no acquisitions or mergers during the evaluation period that affected the bank's Community Reinvestment Act (CRA) performance or the OCC's analysis. The bank's CRA performance was rated "Outstanding" in the last public evaluation dated April 8, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests was January 1, 2019, through December 31, 2021. We analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms the bank reported under the CRA. We compared home mortgage loans originated or purchased during the evaluation period to the 2015 American Community Service (ACS) survey data.

To perform a meaningful analysis for lending performance, a minimum of 20 loans were needed in a loan product during the evaluation period. Refer to the "Scope of Evaluation" section under each Multistate Metropolitan Statistical Area (MMSA) and State Rating area section for details on loan products that did not have a sufficient volume to perform a quantitative analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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), MMSA, or 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 MMSA and State Rating section 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 a blend of the multistate and state ratings. The rating for the Omaha-Council Bluffs-Fremont, NE-IA CSA AA (Omaha CSA) received the greatest emphasis in our analysis. Emphasis was determined considering the bank’s deposit volume, branch presence, and loan volume in the Omaha CSA and each state relative to the entire bank. The Omaha CSA represented 57.7 percent of deposits, 39.3 percent of loans originated and purchased, and 28.3 percent of FNBO’s branch network.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Other Factors Considered in our Analysis under Performance Tests

Investment Test

Under the Investment Test, we considered grants and investments made by FNBO and considered the responsiveness of those grants and investments to identified CD needs. We also considered investments made during prior evaluation periods that remain outstanding and continue to provide benefit to the AA. We considered prior-period investments at the book value at the end of the current evaluation period and current-period investments at their original investment amount. We compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the tier 1 capital allocated to the AAs to gain a perspective regarding the volume of investment activity. Tier 1 capital was allocated to the rating areas and AAs based on the percentage of bank deposits that were maintained in the rating areas and AAs. Qualitative factors, such as responsiveness, complexity, and innovation were considered in full scope review areas.

FNBO received consideration for any qualified investment activity that benefited a specific AA under the applicable state rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function (P/M/F) that included serving the AA. In addition to qualified investments made in the bank’s AAs and broader statewide areas, we considered investments FNBO made outside of the broader statewide or regional area that include the bank’s AAs. These investments fell into one of two categories: 1) originated to organizations or used for activities with a P/M/F to serve one or more of the bank’s AAs; or 2) originated to organizations or used for activities without a P/M/F to serve one or more of the bank’s AAs. Broader statewide or regional investments are only considered if the bank has been responsive to community development needs and opportunities in its AAs.

Service Test

Primary consideration was given to FNBO's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies. However, the bank also provided internal data showing customers residing in LMI geographies used branches located in middle- and upper-income (MUI) geographies. FNBO tracked customer visits and used customer address as a proxy to determine LMI status. Favorable consideration was given to these MUI branches providing increased access to retail banking services for LMI customers.

Other InformationLending Test – Broader Regional and Nationwide loans

Qualified CD Loans		
Assessment Area	#	\$ (000s)
Regional with P/M/F	2	13,750
Regional with no P/M/F	12	144,359
Nationwide with P/M/F	1	1,636

FNBO made two regional loans totaling \$13.8 million with a P/M/F to serve the bank's AAs. These loans addressed affordable housing by funding project partnerships using Low-Income Housing Tax Credits (LIHTCs) across an eleven-state footprint. FNBO also made 12 regional loans totaling \$144.4 million with no P/M/F to serve the bank's AAs. These loans funded economic development and revitalization/stabilization projects in Kentucky, Minnesota, Missouri, and Wisconsin. One loan totaling \$1.6 million had a nationwide benefit with a P/M/F to serve the bank's AAs. We gave these activities positive consideration given FNBO met the needs of their AAs.

Investment Test – Regional and Nationwide Investments

FNBO participated in Interest on Lawyers Trust Accounts (IOLTA's) in Colorado, Illinois, Iowa, Kansas, Nebraska, South Dakota, and Texas. The IOLTA program allows lawyers holding funds belonging to clients, which are nominal amounts or held short-term to place funds in a pooled, interest-bearing checking account. The interest generated is used to provide civil legal aid to poor/indigent individuals whose income is less than 125 percent of the current poverty threshold established by the U.S. Office of Management and Budget and support improvements to the justice system. The IOLTA program increases access to legal aid/services for LMI individuals and their families. During this evaluation period, FNBO contributed \$398,000 towards IOLTAs in the states FNBO operates. We gave this activity positive consideration given FNBO met the needs of their AAs.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Regional with P/M/F	1	234	0	0	1	25.0	234	0.5	0	0
Regional with no P/M/F	0	0	1	25	1	25.0	25	0.1	0	0
Nationwide with P/M/F	0	0	1	19,968	1	25.0	19,968	40.1	0	0
Nationwide with no P/M/F	1	29,541	0	0	1	25.0	29,541	59.4	0	0

One prior period regional investment with a P/M/F to serve the bank's AAs remains outstanding with a book value of \$234,000. The investment funds a nonprofit tax credit syndicator with offices in Iowa, Kansas, and Oklahoma. The bank made one new regional grant for \$25,000 with no P/M/F to serve the bank's AAs. The funds went to a HUD certified nonprofit that provides housing counseling and financial education to LMI individuals and families.

FNBO made one new investment for \$19.9 million in a specialized SBIC focused on financial services innovation and supporting small businesses throughout the U.S. to enhance and improve banking and financial services. One prior period investment remains outstanding for \$29.5 million made to a SBIC promoting economic development across the U.S. We gave these investments positive consideration given FNBO met the needs of their AAs.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (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.

Multistate Metropolitan Statistical Area Rating

Omaha CSA

CRA rating for the Omaha CSA¹:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA;
- A good geographic distribution based on good dispersion of home mortgage loans and excellent dispersion of small business and farms;
- An excellent borrower distribution based on excellent distribution of home mortgage and small business lending and good distribution of small farms;
- An excellent level of CD lending;
- An excellent level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are accessible to essentially all portions of the AA; and
- A significant level of CD services.

Description of Institution's Operations in Omaha CSA

The Omaha CSA is comprised of four of eight counties in the Omaha-Council Bluffs, NE-IA MSA and Dodge County in the Fremont, NE Micropolitan Statistical Area. The Omaha CSA represents the largest AA for the entire bank with 57.7 percent of deposits, 28.3 percent of branches, and 39.3 percent of all bank loans.

According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO has the largest deposit market share (34.9 percent) of 56 depository financial institutions operating in the Omaha CSA. The Omaha CSA includes some of the nation's largest financial institutions and competition is strong. Banks with deposit market shares greater than 5 percent include Wells Fargo Bank, N.A. (10.6 percent), U.S. Bank, N.A. (9.5 percent), American National Bank (7.1 percent), and Pinnacle Bank (6.1 percent).

Omaha-Council Bluffs, NE-IA MSA (Omaha MSA)

According to the Moody's Analytics February 2022 report, the Omaha MSA has a low-cost skilled workforce, population growth, high-wage management jobs, above-average labor force participation, high housing affordability, and below-average employment volatility. Area weaknesses include a tight labor market and a below average high-tech role. Major employment industries for the area include government, health services, and financial services. The top employers are the Offutt Air Force Base, Nebraska Medicine, CHI Health Center, Methodist Health System, Mutual of Omaha, FNBO, and Fiserv.

¹This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Omaha MSA was 2.2 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise from 3.2 percent in March 2020 to 9.4 percent in April 2020.

According to data from the Zillow Home Value Index (ZHVI), which combines a variety of housing market and sales information into a single indicative measure of housing values, the median sale prices of homes in the Omaha MSA increased each year of the evaluation period. Overall, the ZHVI indicates prices increased 28.9 percent during the evaluation period. The 2015 ACS survey data shows the AA had 352,152 housing units, with 60.2 percent owner-occupied, 32.9 percent rental, and 6.9 percent vacant units.

Fremont, NE Micropolitan Statistical Area, (Fremont non-MSA)

U.S. Census QuickFacts on Dodge County, Nebraska shows the estimated population as of July 1, 2021, was 37,103. There are 16,825 housing units in the AA with an owner-occupied housing unit rate of 62.2 percent. According to the Greater Fremont Development Council, major employment industries include manufacturing, agricultural, food processing, and healthcare. The major employers are Valmont Industries, Wholestone Farms, Methodist Fremont Health, Fremont Public Schools, and Nye Health Services.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fremont non-MSA was 1.7 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise from 2.9 percent in February 2020 to 6.3 percent in April 2020.

Community Contacts

We reviewed seven community contacts conducted in the Omaha CSA as part of this performance evaluation. Community contacts included an affordable housing organization, an organization that provides small business financing, the City of Omaha planning department, an agriculture organization, and three economic development organizations that help attract and retain businesses in the area.

Community contacts identified the following credit and CD needs:

- Affordable rental housing
- Affordable for-sale housing/first-time homebuyer housing
- Small business lending/micro business loans for start-up companies
- Agricultural financing/equipment loans/operating lines of credit

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting community development services such as financial literacy
- Supporting non-profit community-based organizations

The following table provides information on the demographic composition of the Omaha CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Omaha CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	243	12.3	22.2	40.3	25.1	0.0
Population by Geography	851,647	9.3	21.4	41.0	28.3	0.0
Housing Units by Geography	352,152	9.6	22.0	42.9	25.5	0.0
Owner-Occupied Units by Geography	211,841	4.9	18.8	42.9	33.5	0.0
Occupied Rental Units by Geography	115,875	15.8	27.2	43.9	13.0	0.0
Vacant Units by Geography	24,436	20.9	25.9	38.0	15.2	0.0
Businesses by Geography	71,105	6.5	15.8	45.0	32.7	0.0
Farms by Geography	3,285	2.6	8.8	55.6	33.0	0.0
Family Distribution by Income Level	213,482	20.7	18.0	21.4	39.9	0.0
Household Distribution by Income Level	327,716	23.5	16.8	18.4	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$150,024
Median Family Income non-MSAs - NE		\$61,457	Median Gross Rent			\$823
			Families Below Poverty Level			8.8%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Omaha CSA

The Omaha CSA received a full-scope review. Home mortgage loans received the most weight as it reflected the bank's business focus and accounted for significantly more loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OMAHA CSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Omaha CSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Home mortgage and small business lending are excellent and small farm lending is adequate considering the bank's capacity based on deposits, competition, and market presence in the AA.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Omaha CSA	14,300	8,006	134	97	22,537

Dollar Volume of Loans (\$000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Omaha CSA	\$2,588,211	\$609,724	\$18,605	\$527,104	\$3,743,644

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$12.6 billion in deposits with a deposit market share of 34.9 percent. The bank ranked first in total deposits out of 56 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 1 percent of lenders, first out of 423 lenders, originating home mortgage loans in the AA. Although the bank's rank in loans is the same as the bank's rank in deposits, the bank's market share of 8.3 percent in loans is weaker than the bank's market share in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders, including FNBO, have captured 31.1 percent of the market.

According to the 2020 peer small business data, the bank ranked first out of 138 lenders originating small business loans in the AA. Although the bank's rank in loans is the same as the bank's rank in deposits, the bank's market share of 19.3 percent is weaker. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders, including FNBO, have captured 54.0 percent of the market.

According to the 2020 peer small farm data, the bank ranked fourth out of 20 lenders originating small farm loans in the AA. The bank's market share of 11.7 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small farm lenders, including FNBO, have captured 76.0 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Omaha CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is good.

The proportion of loans in LMI geographies was below the percentage of owner-occupied housing units in those geographies. However, the bank's performance exceeded aggregate lending in LMI geographies.

Small Loans to Businesses

Refer to Table Q in the Omaha CSA 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 businesses.

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in low-income geographies exceeded both the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was near to the percentage of businesses but exceeded aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the Omaha CSA 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 proportion of loans in low-income geographies was below the percentage of farms but exceeded aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies exceeded the percentage of farms and significantly exceeded aggregate lending in moderate-income geographies.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the Omaha CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. With median family income of \$73,632, low-income borrowers earn less than \$36,816 a year. Median housing values of \$150,024 would require a down payment of around \$30,000, making it challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the Omaha CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was somewhat near to the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the Omaha CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The borrower distribution of small loans to farms by revenue is good.

The proportion of loans was below the percentage of small farms but significantly exceeded aggregate lending.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Omaha CSA. The bank originated 97 CD loans totaling \$527.1 million representing 33.8 percent of allocated tier 1 capital. CD loans exhibited excellent responsiveness to the credit and community needs in the AA. CD loans primarily supported revitalization and stabilization and economic development.

Examples of CD loans originated during the evaluation period include:

- A \$200 million loan to an acute care hospital providing liquidity to support operations and protect public health during the pandemic.
- \$22.6 million in loans to purchase and renovate two multi-family buildings located in a low-income census-tract (CT) as part of a city redevelopment plan.
- \$10 million in loans to assist with infrastructure repair following a disaster declaration caused by spring 2019 storms and flooding.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank partnered with the Nebraska Investment Finance Authority, Nebraska Housing Developers Association, and Iowa Finance Authority programs to provide down payment and closing cost assistance. Loans originated under these programs are included in the bank's home mortgage lending analysis.

INVESTMENT TEST

The institution's performance under the Investment Test in the Omaha CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Omaha CSA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes occasional use of complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Omaha CSA	63	61,048	181	91,224	244	98.4	152,272	98.7	0	0
IA Statewide with P/M/F	0	0	3	5	3	1.2	5	0.0	0	0
IA Statewide with no P/M/F	1	2,000	0	0	1	0.4	2,000	1.3	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Qualified investments totaled \$152.3 million, representing 9.8 percent of allocated tier 1 capital. FNBO made 24 current period investments totaling \$86.1 million. Sixty-three prior period investments remain outstanding at \$61 million and provide continuing benefit to the AA. Many current and prior period investments consist of funds utilized to finance affordable housing projects through federal LIHTCs and mortgage-backed securities (MBS) for LMI borrowers residing in the AA. Affordable housing is a primary credit need in the Omaha CSA. The institution invested \$9.2 million in the current period in the bank's CDC. FNBO also made 157 grants totaling almost \$5.1 million to primarily support community services targeted to LMI individuals.

Examples of CD qualified investments and grants in the AA include:

- \$1.5 million in equity equivalent investments (EQ2) to a certified CD financial institution (CDFI) providing pre-development loans, infrastructure development loans, and construction financing to affordable housing developers working with LIHTC projects. All projects are housing units set aside for households earning at or below 60 percent of area median income. FNBO's funds target projects in Douglas and Dodge Counties in the Omaha CSA.
- \$550,000 in grants to fund a building expansion at an Omaha high school that primarily serves LMI students.
- \$250,000 EQ2 to a CDFI providing loans to Native American owned businesses with funds targeted towards Douglas County in the Omaha CSA.
- \$250,000 grant to a community service organization addressing poverty across the Omaha CSA.

Iowa – Statewide

FNBO contributed interest of \$5,000 to Iowa’s IOLTA program for legal services to support poor and indigent individuals in Iowa, including Pottawattamie County in the Omaha CSA. Additionally, one prior period investment with a book value of \$2 million remains outstanding to a LIHTC syndicator operating in Iowa with no P/M/F to serve the AA. These investments had a neutral impact on the overall performance.

SERVICE TEST

The institution’s performance under the Service Test in the Omaha CSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Omaha CSA is good.

Retail Banking Services

Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels, based on the good performance in the Omaha CSA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Omaha CSA	100.0	28	100.0	3.6	32.1	35.7	28.6	9.3	21.4	41.0	28.3

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Omaha CSA	0	3			-2	-1

The distribution of FNBO’s branches in the Omaha CSA is adequate. The bank’s branches are accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank operates 28 branches in the AA including one branch in a low-income geography and nine branches in moderate-income geographies. The percentage of branches in low-income geographies is well below the percentage of population in those geographies. The percentage of branches in moderate-income geographies significantly exceeds the percentage of population in those geographies.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. FNBO operates 40 deposit-taking ATMs within the AA. Additionally, customers can continue

to access their accounts from outside of the bank's AAs through the Allpoint ATM network, consisting of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, so no significant weight was placed on these services.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. The bank closed two branches in middle-income geographies and one branch in an upper-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides a significant level of CD services. During the evaluation period, 202 bank employees provided their expertise to 116 organizations for a total of 6,776 hours within the AA. Of these total hours, bank employees provided 5,173 hours of service to 79 organizations in a leadership capacity as board members. The employees used their financial expertise to provide technical assistance and strategic guidance for those 79 organizations. The employees were involved with organizations working to create affordable housing, provide education to children of LMI parents, and provide economic development support to the local community.

The following are examples of CD services provided by employees:

- Fourteen employees spent 607 hours working with an affordable housing organization. Thirteen of the employees provided various aspects of financial expertise as board members and also fundraising. One employee assisted with mortgage loan servicing for the organization.
- An employee served 365 hours as a board member of an organization that addresses affordable housing needs for homeless veterans within the Omaha CSA. The employee assisted with fundraising, bookkeeping, and provided other technical assistance.
- Thirty-four employees provided financial education to majority LMI elementary, middle, and high schools across the Omaha CSA. Curriculum included savings programs, credit fundamentals, career education, and workforce skills. Employees provided financial education to over 2,000 LMI students.

State Rating

State of Colorado

CRA rating for the State of Colorado:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AAs;
- A good geographic distribution based on good dispersion of home mortgage and small business loans;
- A good borrower distribution based on good distribution of home mortgage, small business, and small farm lending;
- An excellent level of CD lending;
- An excellent level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels in the institution's AA; and
- The level of CD services is good.

Description of Institution's Operations in Colorado

The bank has two AAs in the state of Colorado: Fort Collins MSA and the Denver-Aurora Colorado CSA AA (Denver CSA). The bank's operations in Colorado comprise 17.2 percent of total bank deposits, 23.2 percent of total bank branches, and 20.7 percent of bank loans.

Fort Collins MSA

The Fort Collins MSA consists of Larimer County, Colorado. The Fort Collins MSA is the bank's largest AA in the state of Colorado and the second largest AA for the entire bank based on its total deposits. According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO maintained approximately \$2.5 billion or 11.3 percent of its total deposits in financial centers in the Fort Collins MSA. FNBO's deposit market share of 22.2 percent is the largest of the 25 depository financial institutions operating in the Fort Collins MSA. Other depository financial institutions with market shares greater than 5 percent include Wells Fargo Bank, N.A. (14.2 percent), JPMorgan Chase Bank, N.A. (12.3 percent), Independent Bank (10 percent), FirstBank (9 percent), and Bank of Colorado (7 percent).

According to the Moody's Analytics November 2021 report, the Fort Collins MSA area has a high quality of life, well-educated workforce, lower living and business costs, and strong population growth with positive net migration. Colorado State University also fosters growth of private businesses. Weaknesses include a heavy reliance on cyclical high tech and significantly overvalued housing. Job growth has especially slowed in professional/business services and the metro area's outsized public sector. The jobless rate is falling and is on par with the national average, though some of the recent decline can be attributed to a shrinking labor force. However, the housing market is holding its own, with price appreciation accelerating and solid gains in new-home construction. Key sectors of the

economy include professional and business services, government, education and health services. Major employers include University of Colorado Health, Colorado State University, Woodward Governor Co., and Broadcom Ltd.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Fort Collins MSA was 3 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise from 2.6 percent in January 2020 to 10.7 percent in April 2020.

The 2015 ACS survey data shows the AA had 136,851 housing units, with 58.7 percent owner-occupied, 32.8 percent rental, and 8.5 percent vacant units. The ZHVI indicates home prices significantly increased 30.4 percent during the evaluation period.

Community Contacts

We reviewed two community contacts conducted in the Fort Collins MSA during the evaluation period as part of this performance evaluation. The organizations included an affordable housing organization and a small business development organization.

Community contacts identified the following credit and CD needs:

- Affordable rental housing
- Affordable for-sale housing
- Limited availability of commercial buildings
- Start-up financing for small business

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending for start-up companies

The following table provides information on the demographic composition of the Fort Collins MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fort Collins MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	4.1	27.4	49.3	17.8	1.4
Population by Geography	318,227	3.5	25.8	48.8	21.9	0.0
Housing Units by Geography	136,851	1.9	29.9	48.9	19.2	0.1
Owner-Occupied Units by Geography	80,264	1.5	20.5	52.7	25.2	0.0
Occupied Rental Units by Geography	44,874	2.8	42.7	43.0	11.4	0.1
Vacant Units by Geography	11,713	1.2	44.9	45.4	7.4	1.2
Businesses by Geography	58,199	3.1	26.8	42.2	27.9	0.0
Farms by Geography	1,947	4.1	18.8	46.0	31.1	0.1
Family Distribution by Income Level	78,216	20.5	17.2	22.6	39.6	0.0
Household Distribution by Income Level	125,138	24.6	16.2	17.7	41.5	0.0

Median Family Income MSA - 22660 Fort Collins, CO MSA	\$76,886	Median Housing Value	\$270,378
		Median Gross Rent	\$1,048
		Families Below Poverty Level	6.4%
<i>Source: 2015 ACS and 2021 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.</i>			

Denver CSA

FNBO delineated three AAs within the Denver CSA: the Greeley MSA, the Boulder MSA, and an AA (Denver MSA) containing two of ten counties in the Denver-Aurora-Lakewood MSA. Examiners combined, analyzed, and presented the AAs at the CSA level. The Denver CSA is FNBO's fifth largest AA based on its total deposits. As of June 30, 2021, the bank maintained approximately \$1.3 billion or 5.9 percent of its total domestic deposits in financial centers within the Denver CSA. Of the 45 depository financial institutions operating in the Denver CSA, FNBO is the fifth largest with a deposit market share of 4.6 percent. Other depository financial institutions with market shares greater than 5 percent include Wells Fargo Bank, N.A. (19.7 percent), JPMorgan Chase Bank, N.A. (17.1 percent), FirstBank (12.7 percent), and U.S. Bank, N.A. (5.7 percent).

Denver-Aurora-Lakewood, CO MSA

According to the Moody's Analytics February 2022 report, the Denver-Aurora-Lakewood, CO MSA area is an attractive tourist destination with proximity to the nearby Rocky Mountains. The area has a high concentration of dynamic, knowledge-based industries; strong population growth with net migration and a skilled workforce; and high employment diversity. The area's weaknesses include elevated cost of living relative to other Mountain West metro areas and a significantly overvalued housing market with low and decreasing affordability. The ZHVI indicates prices significantly increased 25.7 during the evaluation period. Major employment industries for the area include professional and business services, government, and education and health services. Major employers in the area include HealthONE, UCHHealth: University of Colorado Hospital, Lockheed Martin Corp., United Airlines, and Children's Hospital Colorado.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Denver MSA was 3.7 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise significantly from 2.9 percent in February 2020 to 12.4 percent in May 2020.

Boulder MSA

According to the Moody's Analytics November 2021 report, the Boulder MSA has deep ties to technology across a broad range of industries, an extremely high educational attainment, and above-average per capita income and superior consumer credit quality. The weaknesses include high living costs relative to nearby areas, high employment volatility due to exposure to cyclical industries, and overvalued single-family housing. The ZHVI indicates prices significantly increased 23.9 percent during the evaluation period. Key sectors of the economy include professional and business services, government, education and health services, and manufacturing. Major employers in the MSA include University of Colorado, Medtronic, Boulder Community Health, Ball Corp., and IBM Corp.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Boulder MSA was 2.8 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise from 2.5 percent in February 2020 to 9.9 percent in May 2020.

Greeley MSA

According to the Moody's Analytics July 2021 report, the Greeley MSA area has a strong factory base with exposure to noncyclical food manufacturing, exceptionally strong population growth with robust net migration, and a large base of working-age residents. The area's weaknesses include reliance on cyclical energy that creates high employment volatility and low educational attainment, especially relative to the rest of Colorado. Major employment industries for the area include energy, agriculture, and manufacturing. Major employers in the area include JBS, Banner Health System, Vestas, UC Health, State Farm Mutual Automobile Insurance CO., and Colorado Premium Foods. The ZHVI indicates prices significantly increased 23.4 percent during the evaluation period.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Greeley MSA was 3.8 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise from 2.9 percent in January 2020 to 10.6 percent in June 2020.

Community Contacts

We reviewed four community contacts conducted in the Denver CSA during the evaluation period as part of this performance evaluation. The organizations included a chamber of commerce, two small business development organizations, and an economic development corporation.

Community contacts identified the following credit and CD needs:

- Affordable rental housing
- Affordable for-sale housing
- Small business lending to access capital needs
- Financial literacy/education
- Credit counseling
- Technical assistance to small businesses
- Checking accounts for small businesses

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Supporting CD services such as financial literacy
- Working with the area's CDC network
- Various state and local government partnership opportunities

The following table provides information on the demographic composition of the Denver CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	9.2	27.7	35.0	26.2	1.9
Population by Geography	1,112,885	9.2	30.2	36.7	23.7	0.2
Housing Units by Geography	418,721	9.0	29.0	38.4	23.6	0.0
Owner-Occupied Units by Geography	258,728	4.3	25.4	39.9	30.4	0.0
Occupied Rental Units by Geography	138,241	17.3	35.9	35.2	11.6	0.0
Vacant Units by Geography	21,752	12.2	28.7	40.9	18.3	0.0
Businesses by Geography	180,096	7.3	27.3	36.3	29.1	0.0
Farms by Geography	5,237	5.7	21.8	43.6	28.9	0.0
Family Distribution by Income Level	267,797	23.1	19.1	21.6	36.2	0.0
Household Distribution by Income Level	396,969	24.3	17.1	18.7	39.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$264,825
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,098
Median Family Income MSA - 24540 Greeley, CO MSA		\$70,457	Families Below Poverty Level			8.5%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Colorado

We performed full scope reviews of both the Fort Collins MSA and Denver CSA. The Fort Collins MSA is the most significant AA in the state of Colorado with the most deposit and lending volumes. The Fort Collins MSA represents 65.5 percent of deposits, 39.1 percent of branches, and 54 percent of bank loans in the state of Colorado. The Denver CSA represents 34.5 percent of deposits, 60.9 percent of branches, and 46 percent of bank loans in the state of Colorado. Based on loan volumes, small business lending received the most weight in the Denver CSA and home mortgage lending received the most weight in the Fort Collins MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Based on full-scope reviews, the bank's performance in the Fort Collins MSA and Denver CSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Home mortgage and small business lending are excellent and small farm lending is adequate considering the bank's capacity based on deposits, competition, and market presence in the AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Fort Collins MSA	3,486	2,863	37	24	6,410	54.0	65.5
Denver CSA	2,436	2,919	95	13	5,463	46.0	34.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (\$000)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Fort Collins MSA	\$971,488	\$248,228	\$4,341	\$94,171	\$1,318,228	58.7	65.5
Denver CSA	\$620,799	\$238,678	\$13,008	\$54,822	\$927,307	41.3	34.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Fort Collins MSA

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$2.5 billion in deposits with a deposit market share of 22.2 percent. The bank ranked first in total deposits out of 25 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 1 percent of lenders, fourth out of 580 lenders, originating home mortgage loans in the AA. The bank's market share of 3.7 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders, including FNBO, have captured 23.2 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 2 percent of lenders, second out of 136 lenders originating small business loans in the AA. The bank's market share of 11.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders, including FNBO, have captured 49.2 percent of the market.

According to the 2020 peer small farm data, the bank ranked fifth out of 18 lenders originating small farm loans in the AA. The bank's market share of 9.3 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small farm lenders, including FNBO, have captured 66.9 percent of the market.

Denver CSA

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$1.3 billion in deposits with a deposit market share of 4.6 percent. The bank ranked fifth in total deposits out of 45 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 5 percent of lenders, 33rd out of 723 lenders, originating home mortgage loans in the AA. The bank's market share of 0.8 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The five largest mortgage lenders have captured 21.0 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 4 percent of lenders, eighth out of 214 lenders originating small business loans in the AA. The bank's market share of 3.4 percent and rank in loans is weaker than the bank's deposit market share and rank. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders have captured 49.4 percent of the market.

According to the 2020 peer small farm data, the bank ranked sixth out of 29 lenders originating small farm loans in the AA. Although the bank's market share in loans of 6.5 percent is stronger than the bank's market share in deposits, the rank is weaker. The five largest small farm lenders have captured 71.5 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is good.

Fort Collins MSA

The geographic distribution of home mortgage loans is good.

The proportion of loans in LMI geographies was near to the percentage of owner-occupied housing units and aggregate lending in those geographies. Lending opportunities were greater in moderate-income geographies.

Denver CSA

The geographic distribution of home mortgage loans is adequate.

The proportion of loans in low-income geographies was well below the percentage of owner-occupied housing units but near to aggregate lending. The proportion of loans in moderate-income geographies was well below the percentage of owner-occupied housing units and below aggregate lending. Lending

opportunities were greater in moderate-income geographies, therefore carried more weight in the assessment of performance.

Small Loans to Businesses

Refer to Table Q in the state of Colorado 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 businesses.

The overall geographic distribution of small loans to businesses is good.

Fort Collins MSA

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in low-income geographies significantly exceeded the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies exceeded the percentage of businesses and approximates aggregate lending in moderate-income geographies.

Denver CSA

The geographic distribution of small loans to businesses is good.

The proportion of loans in low-income geographies was below the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was near to the percentage of businesses and aggregate lending in moderate-income geographies. Lending opportunities were greater in moderate-income geographies, therefore carried more weight in the assessment of performance.

Small Loans to Farms

Refer to Table S in the state of Colorado 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 overall geographic distribution of small loans to farms is poor.

Fort Collins MSA

The geographic distribution of small loans to farms is adequate.

FNBO did not originate or purchase any small loans to farms in low-income geographies. Demographic data indicates that only 79 farms, or 4.1 percent of all farms in the AA, are located in low-income CTs. There is significant competition for these limited lending opportunities in low-income CTs. The proportion of loans in moderate-income geographies was well below the percentage of farms but exceeded aggregate lending in moderate-income geographies. Lending opportunities were greater in moderate-income geographies, therefore carried more weight in the assessment of performance.

Denver CSA

The geographic distribution of small loans to farms is poor.

The proportion of loans in low-income geographies was below the percentage of farms but exceeded aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies were significantly below the percentage of farms and well below aggregate lending in moderate-income geographies. Lending opportunities were greater in moderate-income geographies, therefore carried more weight in the assessment of performance.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans is good.

Fort Collins MSA

The borrower distribution of home mortgage loans is good.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but near aggregate lending. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to aggregate lending.

Denver CSA

The borrower distribution of home mortgage loans is good.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but met aggregate lending. The proportion of loans to moderate-income borrowers was somewhat near to the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is good.

Fort Collins MSA

The borrower distribution of small loans to businesses by revenue is good.

The proportion of loans was below the percentage of small businesses but significantly exceeded aggregate lending.

Denver CSA

The borrower distribution of small loans to businesses by revenue is good.

The proportion of loans was below the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the state of Colorado 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 overall borrower distribution of small loans to farms is good.

Fort Collins MSA

The borrower distribution of small loans to farms by revenue is good.

The proportion of loans was below the percentage of small farms but significantly exceeded aggregate lending.

Denver CSA

The borrower distribution of small loans to farms by revenue is good.

The proportion of loans was below the percentage of small farms but significantly exceeded aggregate lending.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Fort Collins MSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Fort Collins MSA. The bank originated 24 CD loans totaling \$94.2 million representing 30.9 percent of

allocated tier 1 capital. CD loans exhibited excellent responsiveness to the credit and community needs in the AA. CD loans supported revitalization and stabilization, economic development, and community service.

Examples of CD loans originated during the evaluation period include:

- \$38.1 million loan to construct a 288-unit apartment complex located in a moderate-income CT in Loveland, CO. The city's plan encourages development of diverse housing types in communities.
- \$6.8 million loan to build mixed used property in a middle-income CT located adjacent to a moderate-income CT. The mixed-use property will include retail and urgent care spaces on the first floor, with workforce housing units on two other floors. The project aligns with the local economic development strategy to increase the workforce and housing.
- \$1.9 million SBA PPP loan to support staff payroll during the pandemic at an organization providing support and services for disabled LMI individuals.

Denver CSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Denver CSA. The bank originated 13 CD loans totaling \$54.8 million representing 34.2 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans supported revitalization and stabilization, economic development, and community service.

Examples of CD loans originated during the evaluation period include:

- \$28 million loan to construct two industrial buildings in a middle-income CT adjacent to moderate-income CTs as part of a city plan to attract and grow employment in primary industries.
- \$1 million loan to support job retention at a small business located in a moderate-income CT under the SBA PPP.
- \$600,000 loan to refinance property for a non-profit organization providing affordable and accessible housing, home health services, and other supportive programs to LMI individuals with disabilities.

CO-Statewide

The bank made a CD loan totaling \$1.6 million in the broader statewide area that had a P/M/F to serve one or more of the bank's AAs in the state. Additionally, the bank made six CD loans totaling \$13.2 million in the broader statewide area that did not have a P/M/F to serve the bank's AA. These investments received positive consideration since the bank met the needs of their AAs.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank partnered with the Colorado Finance Authority to provide home buyer education programs.

INVESTMENT TEST

The bank’s performance under the Investment Test in Colorado is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in both the Fort Collins MSA and Denver CSA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes occasional use of complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Fort Collins MSA	34	13,181	49	14,672	83	42.6%	27,853	39.2%	0	0
Denver CSA	46	14,290	60	22,547	106	54.4%	36,837	51.9%	0	0
CO Statewide with P/M/F	1	2,645	5	3,662	6	3.1%	6,306	8.9%	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Fort Collins MSA

Qualified investments totaled \$27.9 million, representing 9.2 percent of allocated tier 1 capital. FNBO made 12 current period investments totaling \$14.1 million and 34 prior period investments totaling \$13.2 million remain outstanding. A substantial majority of these investment activities consist of EQ2s and MBS for LMI borrowers residing in the AA. Both activities focus on affordable housing which is a primary credit need in the AA. FNBO also made 37 grants totaling \$607,000 to primarily support community services targeted to LMI individuals and families.

Examples of CD qualified investments and grants in the AA include:

- \$6 million investment in a non-profit LIHTC syndicator. Funds supported an affordable housing project classified as section 8 housing located in a moderate-income CT.
- \$500,000 investment in a CDFI fund providing microloans, small business loans, and technical assistance to low-income communities. Funds were part of a pandemic small business relief loan fund to support small business operating needs amid the pandemic.
- \$30,000 grant to fund Cameron Peak wildfire recovery efforts in Larimer County, declared a designated disaster area in September 2020.

Denver CSA

Qualified investments totaled \$36.8 million, representing 23 percent of allocated tier 1 capital. FNBO made 23 current period investments totaling \$22.1 million and 46 prior period investments totaling \$14.3 million remain outstanding. A substantial majority of these investments are MBS for LMI borrowers residing in the AA. Affordable housing is a primary credit need in the Denver CSA. FNBO also made 37 grants totaling \$440,000 to primarily support affordable housing and community services targeted to LMI individuals and families.

Examples of CD qualified investments and grants in the AA include:

- \$4.8 million of EQ2 investments in a CDFI participating in the development, preservation, and financing of affordable housing for LMI.
- \$2.1 million of EQ2 investments in a CDFI that invests in affordable housing and provides economic development financing and technical assistance.
- \$125,000 in multiple grants to various non-profits across the Denver CSA supporting affordable housing construction for LMI.
- \$95,000 to organizations providing education, job training and employment support, and other support services targeted to LMI.

Colorado – Statewide

The bank made one EQ2 totaling \$1.4 million to a CDFI involved with affordable housing projects in the broader statewide area that has a P/M/F to serve the bank's AA. The CDFI has over 30 years of affordable housing lending experience and generates an average of 1,000 new affordable housing units annually. FNBO invested \$2.1 million in its CDC, with another \$2.6 million still outstanding from the prior period. FNBO contributed interest of \$189,000 to Colorado's IOLTA program for legal services to support poor and indigent individuals across Colorado. These statewide investments received positive consideration since FNBO has been responsive to the needs and opportunities of its AAs.

SERVICE TEST

The bank's performance under the Service Test in Colorado is rated High Satisfactory.

Based on full-scope reviews, the bank's performance in the Fort Collins MSA is excellent and its performance in the Denver CSA is adequate.

Retail Banking Services

Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Fort Collins MSA	65.5	9	39.1	11.1	33.3	33.3	22.2	3.5	25.8	48.8	21.9
Denver CSA	34.5	14	60.9	0.0	28.6	35.7	35.7	9.2	30.2	36.7	23.7

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
			Denver CSA	1	2	0

Fort Collins MSA

The bank's branches are readily accessible to all portions of the AA including geographies and individuals of different income levels. The bank operates nine branches in the AA, including one branch in a low-income geography, and three branches in moderate-income geographies. The percentage of the bank's branches in LMI geographies exceeds the percentage of the population in those geographies. Internal data and analysis demonstrated that two branches located in middle-income geographies, and one branch located in an upper-income geography also provide increased access to retail banking services for customers in LMI geographies. Customers from LMI geographies conducted 21.7 and 24.1 percent of transactions at the middle-income branches and 17.2 percent of transactions at the upper-income branch. Examiners considered the additional accessibility provided by these branches, which had a positive impact on overall retail services delivery.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates 12 deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank's AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, so no significant weight was placed on these services.

FNBO did not open or close any branches in the Fort Collins MSA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Denver CSA

The bank's branches are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank operates 14 branches in the AA, with no branches in low-income geographies but four branches in moderate-income geographies. The percentage of branches in moderate-income geographies is near to the percentage of the population in those geographies. Internal data and analysis demonstrated that one branch located in a middle-income geography, and one branch located in an upper-income geography provide increased access to retail banking services for customers in LMI geographies. Customers from LMI geographies conducted 20.2 percent of transactions at the upper-income branch, and 27.8 percent of transactions at the middle-income branch. Examiners considered the additional accessibility provided by these branches in the evaluation, which provided a slightly positive impact on the overall retail services delivery systems.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates 15 deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank's AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. FNBO opened one branch in an upper-income geography and closed two branches within middle-income geographies during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered, and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides a good level of CD services.

Fort Collins MSA

FNBO's performance in providing CD services in the Fort Collins MSA is good. During the evaluation period, 24 bank employees provided their expertise to 20 organizations for a total of 1,048 hours within the AA. Of these total hours, bank employees provided 43 hours of service as board members to 17 organizations addressing economic development, affordable housing, and community service needs in the community.

The following are examples of CD services provided by employees:

- An employee serves on the board of directors of an organization that provides social services including legal assistance, free safe-housing, transitional housing, and education to area LMI families.

- An employee serves on the board of directors of an organization that facilitates economic development needs in Larimer County, CO. The organization supports job creation and facilitates a loan pool for small businesses of which the vast majority have annual revenues less than \$1 million.
- An employee served on the board of directors and Finance Committee for an organization that serves Medicaid eligible LMI individuals who are intellectually and developmentally disabled. The organization serves its clients by assisting them in conquering challenges to achieve their maximum potential.

Denver CSA

FNBO's performance in providing CD services in the Denver CSA is good. During the evaluation period, 22 bank employees provided their expertise to 24 organizations for a total of 1,072 hours within the AA. Of these total hours, bank employees provided 929 hours of service to 18 organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- An employee served on the board of directors of an organization that provides financial support and assistance in securing suitable and stable housing through funding a security deposit and first month's rent for LMI individuals experiencing homelessness.
- An employee served on the board of directors and multiple committees of an organization that provides community services targeted to LMI families and individuals. The organization provides programs to students eligible for free and reduced lunch focusing on academic success, health and wellness, fine arts, character, and leadership.
- A loan operations employee provided loan servicing assistance to an affordable housing organization that provides affordable housing for LMI families.

State of Illinois

CRA rating for the State of Illinois:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA;
- An excellent geographic distribution based on excellent dispersion of home mortgage, small business, small farm loans;
- An excellent borrower distribution based on excellent distribution of home mortgage and good distribution of small business and farm lending;
- An excellent level of CD lending;
- An excellent level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels; and
- The level of CD services is good.

Description of Institution's Operations in Illinois

The bank has two assessment areas in the state of Illinois: the Chicago-Naperville-Elgin, IL-IN-WI MSA AA (Chicago MSA) and the Rockford, IL MSA AA (Rockford MSA). The Chicago MSA consists of all three counties in the Elgin, IL MD and one of five counties in the Chicago-Naperville-Evanston, IL MD. The Rockford MSA consists of one of two counties comprising the Rockford, IL MSA. The bank's operations in Illinois comprise 8.1 percent of total bank deposits, 13.1 percent of total bank branches, and 10 percent of bank loans. The Chicago MSA received a full scope review.

The Chicago MSA is FNBO's third largest AA based on its total deposits. According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO maintained approximately \$1.7 billion or 7.7 percent of total domestic deposits in financial centers in the Chicago MSA. Of the 51 depository financial institutions operating in the AA, FNBO is the fifth largest with a deposit market share of 6 percent. Banks in the Chicago MSA with market shares greater than 5 percent include JPMorgan Chase Bank, NA (18.1 percent), BMO Harris Bank, NA (10 percent), Old Second National Bank (7.3 percent), Fifth Third Bank, N.A. (6.3 percent), and St. Charles Bank & Trust Company, N.A. (5.7 percent).

The 2015 ACS survey data shows the AA had 382,095 housing units, with 70.3 percent owner-occupied, 23.3 percent rental, and 6.4 percent vacant units. The ZHVI indicates prices increased 17.7 percent during the evaluation period.

Chicago-Naperville-Evanston, IL MD (Chicago MD)

According to the Moody's Analytics February 2022 report, the Chicago area is a major center for business, distribution, transportation, and finance. The area also has a huge talent pool, several well-

regarded educational institutions, and a budding high-tech center in the River North neighborhood. The weaknesses include state and local budget pressures, weak population trends, and a high crime rate. Major employment industries for the area include education and health services, government, professional and business services, and retail trade. Major employers in the area include Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, University of Chicago, and JPMorgan Chase & Co.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Chicago MD was 4.2 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to rise significantly from 4 percent in February 2020 to 18.3 percent in April 2020.

Elgin, IL MD

According to the Moody's Analytics February 2022 report, the Elgin area has a proximity to Chicago's businesses and large consumer base, a large commuter workforce, and a low cost of doing business. The area's challenges include very few highly skilled workers, weak population growth, with negative net migration, high employment volatility, and a low per capita income. Major employment industries for the area include education and health services, government, professional and business services, and manufacturing. Major employers in the area include Northern Illinois University, J.P. Morgan Chase, Caterpillar Inc., Rush Copley Medical Center, and Advocate Sherman Hospital.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Elgin MD was 4.6 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise significantly from 4.1 percent in February 2020 to 16.1 percent in April 2020.

Community Contacts

We performed two new community contacts and reviewed three community contacts conducted in the Chicago MSA during the evaluation period as part of this performance evaluation. Community contacts included an economic development corporation, a CDFI, a county community reinvestment office, an affordable housing organization, and an organization offering credit counseling services.

Community contacts identified the following credit and CD needs:

- Small business capital funds
- African American and Hispanic business expertise guidance
- Majority minority neighborhood business guidance

Opportunities for participation by financial institutions include the following:

- Lending and investment in economic development and workforce development
- Supporting CD services such as financial literacy
- Working with the area's CDC network
- Various state and local government partnership opportunities

The following table provides information on the demographic composition of the Chicago MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	165	3.6	22.4	42.4	30.9	0.6
Population by Geography	1,056,624	2.5	20.2	39.5	37.3	0.5
Housing Units by Geography	382,095	2.7	18.9	41.7	36.6	0.1
Owner-Occupied Units by Geography	268,740	0.9	14.1	42.3	42.7	0.0
Occupied Rental Units by Geography	89,015	7.4	31.5	40.2	20.6	0.3
Vacant Units by Geography	24,340	5.7	26.1	39.7	28.2	0.2
Businesses by Geography	72,977	1.9	13.4	40.4	44.1	0.2
Farms by Geography	2,884	0.7	11.6	57.8	29.9	0.0
Family Distribution by Income Level	264,314	18.4	16.4	20.8	44.5	0.0
Household Distribution by Income Level	357,755	20.1	14.7	18.4	46.8	0.0
Median Family Income MD - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$206,866
Median Family Income MD - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,048
			Families Below Poverty Level			7.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

We performed a full scope review of the Chicago MSA and a limited scope review of the Rockford MSA. The Chicago MSA represents 94.5 percent of deposits, 92.3 percent of branches, and 96.1 percent of bank loans in the state of Illinois. Home mortgage lending received the most weight in both AAs as it accounted for more loan volume. The bank did not originate or purchase a sufficient volume of small farm loans in the Rockford MSA during the evaluation period to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago MSA	2,894	2,341	263	12	5,510	96.1	94.5
Rockford MSA	165	46	14	0	225	3.9	5.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (\$000)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago MSA	\$532,680	\$243,014	\$40,388	\$32,261	\$848,343	97.0	94.5
Rockford MSA	\$21,072	\$3,096	\$1,950	\$0	\$26,118	3.0	5.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$1.7 billion in deposits with a deposit market share of 6 percent. The bank ranked fifth in total deposits out of 51 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 3 percent of lenders, 16th out of 596 lenders, originating home mortgage loans in the AA. The bank's market share of 1.5 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders have captured 24.9 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 3 percent of lenders, sixth out of 177 lenders originating small business loans in the AA. The bank's market share of 4.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders have captured 41.2 percent of the market.

According to the 2020 peer small farm data, the bank ranked second out of 25 lenders originating small farm loans in the AA. The bank's market share of 18.3 percent and rank in loans is stronger than the bank's market share and rank in deposits. The five largest small farm lenders, including FNBO, have captured 76.2 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent.

The proportion of loans in LMI geographies exceeded both the owner-occupied housing units and aggregate lending percentages in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Illinois 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 businesses.

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in low-income geographies exceeded both the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies exceeded both the percentage of businesses and aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Illinois 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 proportion of loans in low-income geographies exceeded the percentage of farms and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies exceeded the percentage of farms and aggregate lending in moderate-income geographies.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was below the percentage of low-income families but significantly exceeded aggregate lending. The proportion of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is good.

The proportion of loans was below the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the state of Illinois 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 borrower distribution of small loans to farms by revenue is good.

The proportion of loans was below the percentage of small farms but significantly exceeded aggregate lending.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Chicago MSA. The bank originated 12 CD loans totaling \$32.3 million representing 15.5 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans supported economic development and revitalization and stabilization. As an example, FNBO provided funds to support renovation of a theatre in a moderate-income CT operated by a non-profit charitable organization. The city's downtown revitalization plan capitalizes on activity generated by the theatre to promote downtown business opportunities and revitalization achievements.

IL-Statewide

The bank made one CD loan totaling \$1.5 million in the broader statewide area that had a P/M/F to serve one or more of the bank's AAs in the state. The loan funded a working capital line of credit for a medical company providing anesthesia and payment management services for hospitals. Counties served were included in the Federal Emergency Management Agency's pandemic designated disaster areas. The bank also made one CD loan totaling \$40 million in the broader statewide area that did not have a P/M/F to serve the bank's AAs. Funds supported development of a senior living facility under a regional plan to stabilize local communities. These loans received positive consideration since the bank has been responsive to the needs and opportunities of the AA.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank partnered with the Illinois Development Authority which provides down payment assistance and grants for home repairs and improvements.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Rockford MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Chicago MSA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs, although rarely uses innovative or complex investments.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MSA	54	6,853	42	9,079	96	88.9	15,932	77.3	0	0
Rockford MSA	4	132	3	30	7	6.5	162	0.8	0	0
IL Statewide with P/M/F	0	0	3	61	3	2.8	61	0.3	0	0
IL Statewide with no P/M/F	2	4,462	0	0	2	1.9	4,462	21.6	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Qualified investments totaled \$15.9 million, representing 7.7 percent of allocated tier 1 capital. FNBO made 13 current period investments totaling \$8.7 million and 54 prior period investments remain outstanding at \$6.9 million that provide continuing benefit to the AA. Most investments consist of MBS for LMI borrowers residing in the AA. FNBO also made 29 grants totaling \$380,000 to primarily support community services targeted to LMI individuals and families.

FNBO also invested \$1.0 million in a Minority Depository Financial Institution (MDFI) during the current period. The MDFI is a women-owned commercial bank, headquartered in, and focused on the Chicago market, particularly Kane and McHenry counties. Their strategic focus is on the women’s economy and addressing the significant gender gap to access capital.

IL – Statewide

FNBO contributed interest of \$5,000 to the Illinois IOLTA program for legal services to support poor and indigent individuals in Illinois. Two prior period investments in the broader statewide area with no P/M/F to serve one or more of the bank’s AA in the state remain outstanding with a book value totaling \$4.5 million. These investments received positive consideration since FNBO has been responsive to the needs and opportunities of its AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Rockford MSA is weaker than the bank’s overall performance under the Investment Test in the full-scope area because the bank has a poor level of qualified investments and grants in this AA. The performance in the limited-scope AA has minimal impact on the Investment Test rating because of the bank’s small presence in the AA.

SERVICE TEST

The bank’s performance under the Service Test in Illinois is rated Low Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Chicago MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Chicago MSA	94.5	12	92.3	0.0	16.7	41.7	41.7	2.5	20.2	39.5	37.3
Limited Review:											
Rockford MSA	5.5	1	7.7	0.0	0.0	100.0	0.0	0.0	15.4	53.2	31.4

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago MSA	0	1			-1	

The distribution of FNBO’s branches in the Chicago MSA is adequate. The bank’s branches are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank operates 12 branches in the AA with no branches in low-income geographies but two branches in moderate-income geographies. The percentage of branches in moderate-income geographies is below the percentage of population in those geographies.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates eight deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank’s AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. FNBO closed one branch in a middle-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides a good level of CD services.

FNBO’s performance in providing CD services in the Chicago MSA is good. During the evaluation period, 17 bank employees provided their expertise to 24 organizations for a total of 962 hours within the AA. Of these total hours, bank employees provided 902 hours of service to 15 organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- A mortgage loan originator serves on the board of directors for an organization that provides services related to health, education, and financial stability targeted to LMI families and individuals.
- An employee serves on the board of directors for an organization that provides affordable housing to low-income individuals by offering 280 units of affordable housing and 611 units with housing choice vouchers.

- A mortgage loan originator serves on the board of directors for an organization that provides community services to Medicaid eligible, developmentally and intellectually disabled, LMI adults by providing services that assist in developing growth and independence.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Rockford MSA is weaker than the bank's overall performance under the Service Test in the full-scope area(s). The weaker performance is a result of the lack of branches in LMI geographies. The weaker performance in the Rockford MSA has minimal impact on the Service Test rating since the bank's presence is limited to one branch. The Rockford MSA is the smallest AA for the entire bank based on percent of deposits, offices, and loan volume.

State of Kansas

CRA rating for the State of Kansas:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in the AA;
- A good geographic distribution based on good dispersion of home mortgage loans and adequate dispersion of small business lending;
- An excellent borrower distribution, as evidenced by excellent distribution of home mortgage and small business loans;
- A relatively high level of CD lending has a positive impact on the bank's overall Lending Test performance;
- An excellent level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels; and
- The level of CD services is adequate.

Description of Institution's Operations in Kansas

FNBO has one AA within the fourteen county Kansas City, MO-KSMSA. The AA (Kansas City MSA) consists solely of Johnson County, Kansas. The bank's operations in Kansas comprise 4.3 percent of total bank deposits, 10.1 percent of total bank branches, and 4.9 percent of bank loans.

According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO holds 3.5 percent deposit market share, ranking 11th of 65 depository financial institutions operating in the Kansas City MSA. The Kansas City MSA includes some of the nation's largest financial institutions and competition is strong among depository financial institutions. Banks in the Kansas City MSA with deposit market shares greater than 5 percent include Capitol Federal Savings Bank (11.3 percent), Bank of America, N.A. (8.9 percent), U.S. Bank, N.A. (8.6 percent), Commerce Bank (8 percent), Crossfirst Bank (5.4 percent), and BOKF, N.A. (5.3 percent).

According to the Moody's Analytics February 2022 report, the Kansas City, MO-KS MSA has an educated workforce with above average per capita income, well-developed transportation and distribution network, and a below-average cost of doing business. Area weaknesses include high dependence on a declining telecommunications industry and suburban sprawl that limits growth in the downtown central business district. Housing is at the same double-digit price growth occurring nationally while tight supply is rapidly pushing new-home construction higher. The ZHVI indicates home prices increased 24.3 percent during the evaluation period. The top employers are Children's Mercy Hospital, Cerner Corporation, Honeywell, Saint Luke's Health System, and Truman Medical Centers.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Kansas City, MO-KS MSA was 2.9 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise from 3.8 percent in March 2020 to 11.9 percent in April 2020.

Community Contacts

We reviewed two community contacts conducted in the Kansas City MSA as part of this performance evaluation. Community contacts included an affordable housing organization and an economic development organization. We also considered comments from a listening session held with multiple community organizations serving the Kansas City MSA.

Community contacts identified the following credit and CD needs:

- Affordable rental housing
- Affordable for-sale housing
- Homebuyer and financial literacy/education (in person preferred)
- Credit counseling
- Checking accounts
- Activities that create or retain jobs and attract, expand, and retain businesses.

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting CD services such as financial literacy
- Supporting non-profit community-based organizations

The following table provides information on the demographic composition of the Kansas City MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	1.5	9.2	32.3	54.6	2.3
Population by Geography	566,814	0.9	7.7	32.8	58.5	0.0
Housing Units by Geography	231,029	1.2	8.3	35.4	55.2	0.0
Owner-Occupied Units by Geography	152,762	0.3	4.5	31.3	63.9	0.0
Occupied Rental Units by Geography	66,973	3.2	16.0	43.4	37.5	0.0
Vacant Units by Geography	11,294	2.0	14.6	42.1	41.2	0.0
Businesses by Geography	62,366	1.1	6.8	26.4	62.8	2.9
Farms by Geography	1,433	1.2	6.0	30.6	61.5	0.6
Family Distribution by Income Level	149,562	12.0	13.6	19.0	55.3	0.0
Household Distribution by Income Level	219,735	14.7	13.5	16.7	55.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$229,855
			Median Gross Rent			\$975

	Families Below Poverty Level	4.0%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>		

Scope of Evaluation in Kansas

The Kansas City MSA received a full-scope review. Home mortgage lending received a greater weighting than small business lending as it accounted for significantly more loan volume. The bank did not originate or purchase a sufficient volume of small farm loans in the Kansas City MSA during the analysis period to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Kansas City MSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Kansas City MSA	1,753	1,015	6	3	2,777	100.0	100.0

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Kansas City MSA	\$390,944	\$70,733	\$1,476	\$6,943	\$470,096	100.0	100.0

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$930.3 million in deposits with a deposit market share of 3.5 percent. The bank ranked 11th in total deposits out of 65 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 4 percent of lenders, 18th out of 492 lenders, originating home mortgage loans in the AA. The bank's market share of 1.5 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders have captured 25.8 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 7 percent of lenders, 12th out of 174 lenders originating small business loans in the AA. The bank's market share of 2.5 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders have captured 41.3 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is good.

The proportion of loans in low-income geographies was significantly below the percentage of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was below the percentage of owner-occupied housing units but near to aggregate lending. Lending opportunities were greater in moderate-income geographies, therefore received more weight in the assessment of performance.

Small Loans to Businesses

Refer to Table Q in the state of Kansas 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 businesses.

The geographic distribution of small loans to businesses is adequate.

The proportion of loans in low-income geographies was below the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was somewhat near to the percentage of businesses and was below aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Kansas 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 bank did not originate or purchase a sufficient volume of small loans to farms for a meaningful analysis.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. With median family income of \$72,623, low-income borrowers earn less than \$36,312 a year. Median housing values of \$229,855 would require a down payment of around \$46,000, making it challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was somewhat near to the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the state of Kansas 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 bank did not originate or purchase a sufficient volume of small loans to farms for a meaningful analysis.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

CD lending had a positive impact on the bank's overall lending performance in the Kansas City MSA. The bank originated three CD loans totaling \$6.9 million representing 6 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans

supported economic development which is an identified credit need. Two loans totaling \$5.9 million were to construct a new headquarters for an entity providing support to disabled individuals. The expansion provides permanent job creation and improvement for LMI individuals based on average wages.

KS-Statewide

The bank made one CD loan totaling \$116 million in the broader statewide area that had a P/M/F to serve the bank’s AA. Funds were for the development of an industrial warehouse and distribution center creating permanent job creation for LMI individuals based on average wages. FNBO also made two CD loans totaling \$2.5 million in the broader statewide area that does not have a P/M/F to serve the bank’s AA. The loans were for the purchase of apartment buildings in low-income CTs targeted toward LMI individuals. These investments received positive consideration since the bank has been responsive to the needs and opportunities of the AA.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank’s performance under the Investment Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Kansas City MSA is excellent.

The institution has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, often in a leadership role.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Kansas City MSA	21	8,383	19	5,960	40	90.9	14,343	77.5	0	0
KS Statewide with P/M/F	1	4,146	3	10	4	9.1	4,156	22.5	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Qualified investments totaled \$14.3 million, representing 12.5 percent of allocated tier 1 capital. FNBO made five current period investments totaling \$5.8 million and 21 prior period investments remain outstanding at \$8.4 million that provide continuing benefit to the AA. Investments consist of LIHTC and MBS, both of which focus on affordable housing which is a primary credit need in the MSA. FNBO also

made 14 grants totaling \$195,000 to support economic development, affordable housing, and community services targeted to LMI individuals and families.

Examples of CD grant activities include:

- \$48,000 in grants for personal and professional development to LMI transitioning from poverty, incarceration, domestic violence, and other situations. Funds assisted with virtual support and training that kept individuals engaged in programs during challenges associated with the pandemic.
- \$40,000 supporting construction renovation costs of affordable and accessible housing for LMI adults with disabilities.
- \$10,000 to a small business development center providing education, consulting, and network services to entrepreneurs and small businesses.

KS – Statewide

FNBO contributed interest of \$10,000 to the Kansas IOLTA program for legal services to support poor and indigent individuals in Kansas. One prior period investment in the broader statewide area with a P/M/F to serve the bank’s AA in the state remains outstanding with a book value totaling \$4.2 million. These investments received positive consideration since FNBO has been responsive to the needs and opportunities of its AA.

SERVICE TEST

The bank’s performance under the Service Test in Kansas is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Kansas City MSA is good.

Retail Banking Services

Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Kansas City MSA	100.0	10	100.0	0.0	10.0	30.0	60.0	0.9	7.7	32.8	58.5

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Kansas City MSA	3	0		+1	+1	+1

The distribution of FNBO's branches in the Kansas City MSA is good. The bank's branches are accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank operates 10 branches in the AA with no branches in low-income geographies but one branch in a moderate-income geography. Only 0.9 percent of the total population is in low-income geographies and only 1.5 percent of all geographies within the bank's AA are low-income. The percentages of branches in moderate-income geographies exceeds the percentage of population in those geographies.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates 10 deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank's AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, so no significant weight was placed on these services.

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. FNBO opened one branch in a moderate-income geography during the evaluation period. FNBO also opened one branch in a middle-income and one in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides an adequate level of CD services.

FNBO's performance in providing CD services in the Kansas City MSA is adequate. During the evaluation period, five bank employees provided their expertise to seven organizations for a total of 139

hours within the AA. Of these total hours, FNBO's employees provided 134 hours of service to six organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- An employee served on the board of directors of a health care center that provides services to primarily LMI patients. Healthcare services provided include medical, dental, and behavioral services.
- An employee served on the board of directors for an organization that provides social services to Medicaid eligible, developmentally disabled, LMI adults by providing individualized support to enable safe and independent living.
- A branch manager taught two financial education classes at a local elementary school. The classes focused on zoning, life skills, and banking.

State of Nebraska

CRA rating for the State of Nebraska:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA;
- An excellent geographic distribution based on excellent dispersion of home mortgage and small business loans and good dispersion of small farm loans;
- An excellent borrower distribution based on excellent distribution of small business and farm lending and good distribution of home mortgage lending;
- An excellent level of CD lending;
- An excellent level of qualified investments and grants that provides excellent responsiveness to community needs;
- Service delivery systems are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels; and
- The level of CD services is good.

Description of Institution's Operations in Nebraska

The bank has three assessment areas in the state of Nebraska: the Nebraska non-MSA AA (NE non-MSA), the Lincoln-Beatrice, NE CSA AA (Lincoln CSA), and the Grand Island MSA AA (Grand Island MSA). The bank's operations in Nebraska comprise 9.5 percent of total bank deposits, 17.1 percent of total bank branches, and 20.1 percent of bank loans. The NE non-MSA and Lincoln CSA received full-scope reviews.

NE non-MSA

FNBO delineated four non-MSA AAs within the state of Nebraska. Examiners combined these four AAs for analysis and presentation purposes given similar demographic information. Refer to appendix A for a complete description of the AA.

The NE non-MSA AA is FNBO's fourth largest AA based on its total deposits. According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO has the largest deposit market share (11.6 percent) of 67 depository financial institutions operating in the AA. Other depository financial institutions with market shares greater than 5 percent include Pinnacle Bank (6.6 percent), Elkhorn Valley Bank & Trust (5.8 percent), and Platte Valley Bank (5.2 percent).

According to the Moody's Analytics February 2022 report, the state of Nebraska has low living and business costs, significant military presence, strong population growth, a transportation hub, and below-average exposure to trade. Area weaknesses include exposure to the volatile farm economy, declining migration trends, and below-average productivity and incomes. Major employment industries for the area include government, health services, retail, and agriculture. Major employers in the area include Offutt Air Force Base, CHI Health, Walmart, Inc., Hy-Vee Inc., The Methodist Health System and JBS.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the NE non-MSA was 1.4 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise from 2.9 percent in February 2020 to 5.6 percent in April 2020.

Community Contacts

We reviewed 11 community contacts conducted in the NE non-MSA as part of this performance evaluation. Community contacts included three economic development organizations, two farm service agencies, an affordable housing organization, a chamber of commerce, a community action agency, a state university extension office, a farm cooperative, and a small business development organization.

Community contacts identified the following credit and CD needs:

- Agriculture
- Affordable housing units
- Workforce housing
- Small business startup lending
- Down payment assistance

Opportunities for participation by financial institutions include the following:

- Agricultural operating capital loans
- Lending and investment in affordable housing
- Supporting CD services such as financial literacy

The following table provides information on the demographic composition of the NE non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NE non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	1.1	11.5	74.7	12.6	0.0
Population by Geography	318,714	1.3	11.9	71.7	15.1	0.0
Housing Units by Geography	141,581	1.3	11.3	72.9	14.5	0.0
Owner-Occupied Units by Geography	87,792	0.9	8.8	74.2	16.1	0.0
Occupied Rental Units by Geography	39,391	2.0	16.9	67.4	13.7	0.0
Vacant Units by Geography	14,398	1.7	11.3	79.7	7.3	0.0
Businesses by Geography	26,329	1.1	11.5	70.6	16.9	0.0
Farms by Geography	4,785	0.1	2.9	82.0	15.0	0.0
Family Distribution by Income Level	84,037	18.4	18.2	23.4	40.0	0.0
Household Distribution by Income Level	127,183	22.5	16.2	19.1	42.2	0.0
Median Family Income non-MSAs - NE		\$61,457	Median Housing Value			\$112,524
			Median Gross Rent			\$644
			Families Below Poverty Level			8.6%

Source: 2015 ACS and 2021 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.*

Lincoln CSA

The Lincoln CSA is comprised of one of two counties in the Lincoln, NE MSA and the sole county comprising the Beatrice Micropolitan Statistical Area. The Lincoln CSA is the seventh largest AA for the bank based on its total deposits in the Lincoln CSA.

According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO ranks ninth of 31 depository financial institutions operating in the bank's Lincoln CSA, with 3.3 percent deposit market share. The Lincoln CSA includes some of the nation's largest financial institutions and competition is strong among depository financial institutions. Banks in the Lincoln CSA with deposit market shares greater than 5 percent include Union Bank and Trust Company (31.9 percent), Wells Fargo Bank, N.A. (12.6 percent), Pinnacle Bank (9 percent), U.S. Bank, N.A. (8.6 percent), West Gate Bank (6.1 percent), and Cornhusker Bank (5.7 percent).

According to the Moody's Analytics October 2021 report, the Lincoln CSA has the University of Nebraska that provides talent and helps foster growth of private firms, good transportation infrastructure, below-average employment volatility, comparatively equal distribution of income, wealth, and high economic vitality. Area weaknesses include dependency on state government and outflow of skilled labor. Major employment industries for the area include government, healthcare, and manufacturing industries. The top employers are University of Nebraska, Lincoln, Bryan LGH Medical Center, B & R Stores, Horizon Holding Inc., Saint Elizabeth Regional Medical Center, and Hy-Vee Inc.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Lincoln CSA was 1.6 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise from 2.8 percent in February 2020 to 8.8 percent in April 2020.

Community Contacts

We reviewed three community contacts conducted in the Lincoln CSA as part of this performance evaluation. Community contacts included two local government offices and an affordable housing organization.

Community contacts identified the following credit and CD needs:

- Affordable rental housing
- Affordable single family and multifamily housing
- Home improvement lending
- Small business lending
- Agricultural financing/equipment loans/operating lines of credit

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting CD services such as financial literacy

The following table provides information on the demographic composition of the Lincoln CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lincoln CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	6.2	25.9	32.1	29.6	6.2
Population by Geography	319,898	5.2	24.5	36.6	30.7	3.0
Housing Units by Geography	134,192	6.8	26.0	37.2	29.3	0.7
Owner-Occupied Units by Geography	76,422	1.5	17.8	41.0	39.5	0.1
Occupied Rental Units by Geography	50,485	14.2	37.5	31.9	14.9	1.5
Vacant Units by Geography	7,285	10.9	32.2	33.2	22.8	0.9
Businesses by Geography	25,348	3.4	24.8	32.4	37.6	1.7
Farms by Geography	1,279	1.1	9.6	26.0	63.3	0.1
Family Distribution by Income Level	76,513	21.0	17.1	21.3	40.6	0.0
Household Distribution by Income Level	126,907	23.7	16.8	17.4	42.1	0.0
Median Family Income MSA - 30700 Lincoln, NE MSA		\$70,200	Median Housing Value			\$149,279
Median Family Income non-MSAs - NE		\$61,457	Median Gross Rent			\$720
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Nebraska

FNBO has three AAs in the state of Nebraska. We performed a full-scope review of the NE non-MSA and Lincoln CSA AAs and a limited-scope review of the Grand Island MSA. The NE non-MSA received the most weight since it contains 74.5 percent of deposits, 64.7 percent of branches, and 67 percent of bank loans in the state of Nebraska. The Lincoln CSA is the second largest AA in the state by deposits, branches, and loan volume. Based on loan volume, small business lending received the most weight in the NE non-MSA and home mortgage lending received the most weight in the Lincoln CSA and Grand Island MSA.

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 Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NE non-MSA and Lincoln CSA is excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
NE non-MSA	2,643	3,001	2,052	16	7,712	66.9	74.5
Lincoln CSA	1,622	787	88	10	2,507	21.8	19.9
Grand Island MSA	600	523	175	0	1,298	11.3	5.6

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (\$000)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
NE non-MSA	\$386,969	\$271,161	\$272,478	\$27,325	\$957,933	63.9	74.5
Lincoln CSA	\$325,030	\$81,019	\$11,951	\$33,058	\$370,039	24.7	19.9
Grand Island MSA	\$85,076	\$57,655	\$28,792	\$0	\$171,523	11.4	5.6

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

NE non-MSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$1.5 billion in deposits with a deposit market share of 11.6 percent. The bank ranked first in total deposits out of 67 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 2 percent of lenders, third out of 239 lenders, originating home mortgage loans in the AA. The bank's market share of 9.4 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders, including FNBO, have captured 43.8 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 2 percent of small business lenders, second out of 85 lenders originating small business loans in the AA. Although the bank's market share in loans of 19.4 percent is stronger than the bank's market share in deposits, the rank is weaker. Positive consideration is given to the bank's performance given there is a significantly higher number of small business lenders in the AA. The five largest small business lenders, including FNBO, have captured 60.7 percent of the market.

According to the 2020 peer small farm data, the bank ranked second out of 23 lenders originating small farm loans in the AA. Although the bank's market share in loans of 21.4 percent is stronger than the

bank's deposit market share, the rank is weaker. The five largest small farm lenders, including the bank's market share, have captured 88.6 percent of the market.

Lincoln CSA

Lending levels reflect excellent responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$411.2 million in deposits with a deposit market share of 3.3 percent. The bank ranked ninth in total deposits out of 31 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 5 percent of lenders, 11th out of 265 lenders, originating home mortgage loans in the AA. The bank's market share of 2.8 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders have captured 34.6 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 8 percent of lenders, seventh out of 86 lenders originating small business loans in the AA. The bank's market share of 4.8 percent and rank in loans is stronger than the bank's market share and rank in deposits. Positive consideration is also given to the bank's performance because of the significantly higher number of small business lenders in the AA. The five largest small business lenders have captured 64.4 percent of the market.

According to the 2020 peer small farm data, the bank ranked fourth out of 14 lenders originating small farm loans in the AA. The bank's market share of 7 percent and rank in loans is stronger than the bank's market share and rank in deposits. The five largest small farm lenders, including FNBO, have captured 94.1 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is excellent.

NE non-MSA

The geographic distribution of home mortgage loans is excellent.

The proportion of loans in low-income geographies was below the percentage of owner-occupied housing units but exceeded aggregate lending. The proportion of loans in moderate-income geographies was near to the percentage of owner-occupied housing units but exceeded aggregate lending. The moderate-income geographies contained significantly greater opportunities for owner-occupied lending, therefore carried more weight in the assessment of performance.

Lincoln CSA

The geographic distribution of home mortgage loans is good.

The proportion of loans in low-income geographies was well below the percentage of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was below the percentage of owner-occupied housing units but exceeded aggregate lending. The moderate-income geographies contained significantly greater opportunities for owner-occupied lending, therefore carried more weight in the assessment of performance.

Small Loans to Businesses

Refer to Table Q 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 businesses.

The overall geographic distribution of small loans to businesses is excellent.

NE non-MSA

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in low-income geographies was below the percentage of businesses and met aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was near to the percentage of businesses but exceeded aggregate lending in moderate-income geographies. The moderate-income geographies contained significantly greater opportunities for business lending, therefore carried more weight in the assessment of performance.

Lincoln CSA

The geographic distribution of small loans to businesses is excellent.

The proportion of loans in low-income geographies exceeded the percentage of businesses and exceeded aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was somewhat near to the percentage of businesses and aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S 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 overall geographic distribution of small loans to farms is good.

NE non-MSA

The geographic distribution of small loans to farms is good.

FNBO did not originate or purchase small loans to farms in low-income geographies. Demographic data indicates that only five farms, or 0.1 percent of all farms in the AA, are in low-income CTs. This limits lending opportunities in the low-income geographies and the bank's performance is consistent with aggregate performance. The proportion of loans in moderate-income geographies was below the percentage of farms but exceeded aggregate lending in moderate-income geographies.

Lincoln CSA

The geographic distribution of small loans to farms is good.

FNBO did not originate or purchase small loans to farms in low-income geographies. Demographic data indicates that only 14 farms, or 1.1 percent of all farms in the AA, are in low-income CTs. This limits lending opportunities in the low-income geographies and the bank's performance is consistent with aggregate performance. The proportion of loans in moderate-income geographies was well below the percentage of farms but exceeded aggregate lending in moderate-income geographies.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is good.

NE non-MSA

The borrower distribution of home mortgage loans is good.

The proportion of loans to low-income borrowers was well below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. With median family income of \$61,457, low-income borrowers earn less than \$30,729 a year. Median housing values of \$112,524 would require a down payment of around \$23,000, making it challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Lincoln CSA

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. With median family income of \$70,200, low-income borrowers earn less than \$35,100 a year. Median housing values of \$149,279 would require a down payment of around \$30,000, making it challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is excellent.

NE non-MSA

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was near to the percentage of small businesses but significantly exceeded aggregate lending.

Lincoln CSA

The borrower distribution of small loans to businesses by revenue is good.

The proportion of loans was below the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T 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 overall borrower distribution of small loans to farms is excellent.

NE non-MSA

The borrower distribution of small loans to farms by revenue is excellent.

The proportion of loans was somewhat near to the percentage of small farms but significantly exceeded aggregate lending.

Lincoln CSA

The borrower distribution of small loans to farms by revenue is excellent.

The proportion of loans was somewhat near to the percentage of small farms but exceeded aggregate lending.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

NE non-MSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the NE non-MSA. The bank originated 16 CD loans totaling \$27.3 million representing 14.4 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans supported revitalization and stabilization, affordable housing, economic development, and community service.

Examples of CD loans originated during the evaluation period include:

- \$3.2 million loan to finance improvements and maintenance of facilities for public safety and public services in a middle-income underserved area.
- \$2 million lines of credit to a CDC to purchase and rehabilitate homes for LMI buyers and other additional housing expenses.
- \$942,000 loan to finance a LIHTC project adding 54 units of affordable housing.

Lincoln CSA

CD lending is excellent and had a positive impact on the bank's overall lending performance in the Lincoln CSA. The bank originated 10 CD loans totaling \$33.1 million representing 64.9 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans supported economic development and revitalization and stabilization. For example, FNBO made five loans to a metal fabrication company located in a moderate-income CT for additional equipment. Also, SBA PPP loans funded payroll for primarily LMI individuals.

NE-Statewide

The bank made three CD loans totaling \$3.6 million in the broader statewide area that had a P/M/F to serve one or more of the bank's AAs in the state. The bank made four CD loans totaling \$8.8 million in the broader statewide area that does not have a P/M/F to serve the bank's AA. These investments received positive consideration since the bank met the needs of the AAs.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank partnered with the Nebraska Investment Finance Authority and Nebraska Housing Developers Association programs that provide down payment and closing cost assistance. Loans originated under these programs are included in the bank's home mortgage lending analysis.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Grand Island MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Nebraska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the NE non-MSA and the Lincoln CSA is excellent.

The institution has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, often in a leadership role.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NE non-MSA	40	18,526	31	6,703	71	48.6	25,229	65.2	0	0
Lincoln CSA	24	5,435	18	2,274	42	28.8	7,708	19.9	0	0
Grand Island MSA	4	2,281	14	325	18	12.3	2,607	6.7	0	0
NE Statewide with P/M/F	5	2,488	10	646	15	10.3	3,134	8.1	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

NE non-MSA

Qualified investments totaled \$25 million, representing 13.3 percent of allocated tier 1 capital. FNBO made six current period investments totaling \$6.4 million and 40 prior period investments remain outstanding at \$18.5 million that provide continuing benefit to the AA. Most investments consist of EQ2 and LIHTC investments focusing on an affordable housing project, a primary credit need in the AA.

FNBO also made 25 grants totaling \$328,000 to support affordable housing and community services targeted to LMI individuals and families.

Examples of CD grant activities include:

- \$135,000 in multiple grants to various non-profits across the AA supporting affordable housing construction or rehabilitation of multifamily rental housing for LMI.
- \$98,000 in grants to provide down payment assistance and homebuyer education to LMI households.
- \$28,000 in grants to provide support service and educational opportunities for women facing homelessness.

Lincoln CSA

Qualified investments totaled \$7.7 million, representing 15.1 percent of allocated tier 1 capital. FNBO made six current period investments totaling \$2.1 million and 24 prior period investments remain outstanding at \$5.4 million that provide continuing benefit to the AA. Investments consist of EQ2, LIHTC, and MBS, all of which focus on affordable housing, which is a primary credit need in the CSA. FNBO also made 12 grants totaling \$135,000 to support affordable housing and community services targeted to LMI individuals and families.

Examples of CD grant activities include:

- \$45,000 in grants to a non-profit community housing development organization working to increase the supply of affordable housing and strengthen neighborhoods. The organization provides down payment assistance and homebuyer education to LMI households. FNBO's funding will support the purchase of land for revitalization and assist in providing homeownership education to at least 300 LMI individuals and support 50 LMI households with down payment assistance.
- \$30,000 in grants to a non-profit organization focused on early childhood education, homelessness prevention, financial stability and wealth building, and healthy food access for LMI.
- \$10,000 toward a non-profit providing LMI families with rental and utility assistance during the pandemic.

NE- Statewide

FNBO made one EQ2 investment totaling \$107,000 to a CDFI involved with affordable housing projects in the broader statewide area that has a P/M/F to serve the bank's AAs. Five prior period EQ2 and LIHTC investments remain outstanding at \$2.5 million. Grants included \$112,000 in tuition scholarships for LMI families' education needs. FNBO partnered with the Nebraska Community Foundation to create the Rebuild the Heartland Community Fund in response to devastating floods that impacted Nebraska, western Iowa, and southeastern South Dakota in the spring and summer of 2019. FNBO provided grants totaling \$300,000 to the disaster relief program that included individual assistance grants, flood mitigation assistance, and funds toward the establishment of a statewide disaster resiliency network to assist communities with identifying and addressing disaster-related housing needs and helping developers effectively utilize funding sources. The Rebuild the Heartland Community Fund ultimately raised more than \$800,000 from resources across the country. Also, FNBO contributed interest of \$127,000 to the Nebraska IOLTA program for legal services to support poor and indigent

individuals in Nebraska. These statewide investments and grants received positive consideration since FNBO has been responsive to the needs and opportunities of its AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test, in the Grand Island MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Nebraska is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full scope reviews, the bank’s performance in the NE non-MSA and the Lincoln CSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
NE non-MSA	74.5	11	64.7	0.0	18.2	81.8	0.0	1.3	11.9	71.7	15.1
Lincoln CSA	19.9	4	23.5	0.0	25.0	50.0	25.0	5.2	24.5	36.6	30.7
Limited Review:											
Grand Island MSA	5.6	2	11.8	0.0	0.0	100.0	0.0	0.0	28.5	40.3	31.2

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
NE non-MSA	0	2		-1		-1
Lincoln CSA	1	3		-1		-1

NE non-MSA

The bank's branches are accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank operates 11 branches in the AA with no branches in low-income geographies but two branches in moderate-income geographies. Although the bank has no branches in low-income geographies, only 1.3 percent of the AAs population lives in low-income geographies. The percentage of branches in moderate-income geographies exceeds the percentage of population in those geographies.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates 16 deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank's AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. FNBO closed one branch in a moderate-income geography and one branch in an upper-income geography during the evaluation period since they did not meet growth expectations.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Lincoln CSA

The bank's branches are reasonably accessible to essentially all portions of the AA including geographies and individuals of different income levels. The bank has a limited presence in the AA, with a total of four branches. The bank operates no branches in low-income geographies but one branch in a moderate-income geography. The percentage of branches in moderate-income geographies exceeds the percentage of population in those geographies.

FNBO complements its traditional service delivery systems with alternative delivery systems, which include deposit-taking ATMs, electronic bill-pay, telephone banking, mobile banking, and online banking. The bank operates four deposit-taking ATMs in the AA. Additionally, customers can access their accounts from outside of the bank's AAs through the Allpoint ATM network, which consists of over 55,000 ATMs. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals. The bank consolidated two moderate-income branches into one new moderate-income branch that serves the same market. The change allowed for both lobby access and drive-thru services in one location. The bank also closed an upper-income branch during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides a good level of CD services.

NE non-MSA

FNBO's performance in providing CD services in the NE non-MSA is excellent. During the evaluation period, 26 bank employees provided their expertise to 23 organizations for a total of 700 hours within the AA. Of these total hours, bank employees provided 607 hours of service to 15 organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- An employee served on the Finance Committee and assists with fundraising for an organization that provides healthcare services to LMI patients.
- A personal banker provided financial education at an elementary school where the majority of students are eligible for free-and reduced lunch.
- An employee served on a board committee for an organization that provides affordable housing to LMI individuals.

Lincoln CSA

FNBO's performance in providing CD services in the Lincoln CSA is adequate. During the evaluation period, 16 bank employees provided their expertise to 15 organizations for a total of 569 hours within the AA. Of these total hours, bank employees provided 553 hours of service to 10 organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- Three employees served on the board and Executive Committee of an organization that aids LMI individuals to achieve affordable home ownership.
- An employee served on the board of directors and sub-committee and assisted with fundraising for an educational foundation. The foundation provides grants that allow educators to provide extra learning opportunities beyond the regular school budget of a LMI public school.
- A branch manager served on the board of directors for an organization's restoration program for LMI women healing from addiction, crisis living, and homelessness. The program provides a residential program offering support and educational services.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Grand Island MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. Although the bank does not operate any branches in LMI geographies, two branches in adjacent middle-income geographies serve a significant number of LMI customers.

State of South Dakota

CRA rating for the State of South Dakota:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in the AA;
- An excellent borrower distribution, as evidenced by excellent distribution of small business, small farm, and home mortgage loans;
- An adequate geographic distribution based on adequate dispersion of small business and farm lending and good dispersion of home mortgage loans;
- A relatively high level of CD lending;
- A good level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels; and
- The level of CD services is excellent.

Description of Institution's Operations in South Dakota

FNBO delineated two non-MSA AAs within the state of South Dakota. One AA consisted of Beadle, Davison, and Sanborn Counties in east central South Dakota and the other AA included Yankton County in southeast South Dakota. Examiners combined these two AAs for analysis and presentation purposes given similar demographic information (SD non-MSA). The bank's operations in South Dakota comprise 1.9 percent of total bank deposits, 4 percent of total bank branches, and 3.1 percent of bank loans.

According to the FDIC's June 30, 2021, Deposit Market Share Report, FNBO has the second largest deposit market share (16.4 percent) of 14 depository financial institutions operating in the South Dakota non-MSA (SD non-MSA) AA. Other depository financial institutions with market shares greater than 5 percent include First Dakota National Bank (31.9 percent), Cortrust Bank N.A. (14 percent), Wells Fargo Bank, N.A. (11.3 percent), and American Bank & Trust (7.7 percent).

According to the Moody's Analytics February 2022 report, the state of South Dakota has a favorable business climate with low cost, no state tax on personal income, strong labor force growth, and high housing affordability despite prices that are well above their prior peak. The area's weaknesses include a high dependence on agriculture, exposure to volatile commodity prices, and a heavy reliance on cyclical tourism. Major employment industries for the state include agriculture, government, and health services. Major employers in the state include Sanford Health, Avera Health, Rapid City Regional Hospital, Ellsworth Air Force Base, and Smithfield Foods.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the SD non-MSA was 2.4 percent compared to the national unemployment rate of 3.7 percent. The unemployment rate was stable until the pandemic caused it to raise from 2.8 percent in February 2020 to 7.3 percent in April 2020.

Community Contacts

We reviewed two community contacts conducted in the SD non-MSA during the evaluation period as part of this performance evaluation. Community contacts included two farm service agencies serving the AA.

Community contacts identified the following credit and CD needs:

- Affordable housing units
- Agricultural lending
- Lending to assist with labor shortages

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Agricultural credit

The following table provides information on the demographic composition of the SD non-MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: SD non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	6.3	87.5	6.3	0.0
Population by Geography	62,930	0.0	5.5	91.6	2.9	0.0
Housing Units by Geography	28,392	0.0	5.4	91.7	2.9	0.0
Owner-Occupied Units by Geography	17,129	0.0	3.8	92.8	3.3	0.0
Occupied Rental Units by Geography	8,987	0.0	7.5	91.4	1.1	0.0
Vacant Units by Geography	2,276	0.0	8.7	84.4	6.9	0.0
Businesses by Geography	5,923	0.0	5.5	91.9	2.7	0.0
Farms by Geography	697	0.0	1.1	87.8	11.0	0.0
Family Distribution by Income Level	16,418	21.3	15.9	23.2	39.6	0.0
Household Distribution by Income Level	26,116	23.9	16.3	17.5	42.4	0.0
Median Family Income non-MSAs - SD		\$60,845	Median Housing Value			\$118,589
			Median Gross Rent			\$600
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in South Dakota

The SD non-MSA AA received a full-scope review. Small business lending received the most weight in assessing loan performance since it had the most loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the SD non-MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Small business and farm lending are excellent and home mortgage lending is good considering the bank's capacity based on deposits, competition, and market presence in the AA.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
SD non-MSA	274	864	633	4	1,775	100.0	100.0

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
SD non-MSA	\$41,656	\$60,817	\$91,491	\$5,875	\$199,839	100.0	100.0

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$404.7 million in deposits with a deposit market share of 16.4 percent. The bank ranked second in total deposits out of 14 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 6 percent of lenders, seventh out of 122 lenders, originating home mortgage loans in the AA. The bank's market share of 4.7 percent and rank in loans is weaker than the bank's market share and rank in deposits. Positive consideration is given to the bank's performance given there is a significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders have captured 50.2 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 4 percent of small business lenders, second out of 47 lenders originating small business loans in the AA. The bank's market share of 20.4 percent is stronger than the bank's market share and the rank in deposits is the same. Positive consideration is given to the bank's performance relative to the larger number of small business lenders in the AA. The five largest small business lenders, including FNBO, have captured 75.8 percent of the market.

According to the 2020 peer small farm data, the bank ranked first out of 18 lenders originating small farm loans in the AA. The bank's market share of 39.8 percent and rank in loans is stronger than the bank's market share and rank in deposits. The five largest small farm lenders, including FNBO, have captured 89.7 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is good.

The proportion of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units but exceeded aggregate lending. There are only 659 owner-occupied one-to four-family housing units located in moderate-income CTs. Demographic data also shows that 30 percent of families living in moderate-income CTs are below poverty level. These factors create limited opportunities for lending in these CTs. There were no low-income CTs in the AA.

Small Loans to Businesses

Refer to Table Q in the state of South Dakota 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 businesses.

The geographic distribution of small loans to businesses is adequate given performance context factors.

The proportion of loans in moderate-income geographies is significantly below the percentage of businesses and below aggregate lending in moderate-income geographies. Demographic data indicates that 324, or 5.5 percent of all businesses in the AA, are located in moderate-income CTs. This presents limited lending opportunities for small loans to businesses in this geography, which is consistent with the low level of aggregate lending in these CTs. There were no low-income CTs in the AA.

Small Loans to Farms

Refer to Table S in the state of South Dakota 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 adequate given performance context factors.

FNBO did not make any loans to farms in the moderate-income CT. Aggregate lending in moderate-income CTs was similarly low. Demographic data indicates there are only eight farms located in moderate-income CTs which makes lending opportunities very limited. There were no low-income CTs in the AA.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. With median family income of \$60,845, low-income borrowers earn less than \$30,423 a year. Median housing values of \$118,589 would require a down payment of around \$23,800, making it challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was near to the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the state of South Dakota 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 borrower distribution of small loans to farms by revenue is excellent.

The proportion of loans was somewhat below the percentage of small farms but significantly exceeded aggregate lending.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity Table, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

CD lending had a positive impact on the bank’s overall lending performance in the SD non-MSA. The bank originated four CD loans totaling \$5.9 million representing 11.7 percent of allocated tier 1 capital. CD loans exhibited adequate responsiveness to the credit and community needs in the AA. CD loans supported economic development.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank partnered with the South Dakota Housing Development Authority which provides down payment and closing cost assistance programs.

INVESTMENT TEST

The bank’s performance under the Investment Test in South Dakota is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the South Dakota non-MSA is Good.

The institution has a significant level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
SD non-MSA	5	3,026	13	140	18	81.8	3,166	94.5	0	0
SD Statewide with P/M/F	1	184	3	0	4	18.2	184	5.5	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments totaled \$3.2 million, representing 6.3 percent of allocated tier one capital. Five prior period investments remain outstanding at \$3 million that provide continuing benefit to the AA. Investments consist of EQ2 and MBS investments, all of which focus on affordable housing which is a primary credit need in the AA. FNBO also made 13 grants totaling \$140,000 to support affordable housing and community services targeted to LMI individuals and families.

Examples of CD grant activities include:

- \$65,000 in multiple grants to various non-profits across the AA supporting affordable housing construction or rehabilitation for LMI.
- \$25,000 in grants to provide financial education, workshops, and counseling to LMI.
- \$20,000 in grants to assist creating a new housing authority position in the housing rehab specialist program designed to stabilize and address urban blight in LMI neighborhoods.

SD – Statewide

FNBO participated in South Dakota’s IOLTA program for legal services to support poor and indigent individuals but provided minimal interest to the state during the evaluation period. One prior period LIHTC investment remains outstanding at \$184,000.

SERVICE TEST

The bank’s performance under the Service Test in South Dakota is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the SD non-MSA is good.

Retail Banking Services

Service delivery systems are accessible to essentially all portions of the AA including geographies and individuals of different income levels.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
SD non-MSA	100.0	4	100.0	0.0	25.0	75.0	0.0	0.0	5.5	91.6	2.9

The bank has a limited presence in the AA, with a total of four branches. The bank operates one branch in a moderate-income geography. The percentage of branches in moderate-income geographies significantly exceeds the percentage of the population in those geographies. There are no low-income geographies within the AA.

FNBO compliments its traditional delivery service systems with alternative delivery systems which includes deposit-taking ATMs, telephone banking, mobile banking, electronic bill pay, and online banking. FNBO operates six deposit-taking ATMs within the AA. In addition, customers can continue to access cash from their accounts outside of the bank’s AAs through FNBO’s partnership with the Allpoint ATM network, which includes over 55,000 ATM locations. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

FNBO did not open or close any branches within the SD non-MSA AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered, and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides an excellent level of CD services.

During the evaluation period, nine bank employees provided their expertise to 10 organizations for a total of 769 hours within the AA. Of these total hours, bank employees provided 698 hours of service to nine organizations in a leadership capacity, either as a board member or committee member.

The following are examples of CD services provided by employees:

- An employee performed mortgage loan financing activities for an organization addressing affordable housing needs for LMI families. Another employee served on the board and other committees and assisted with fundraising.
- A bank employee served on the board of directors for an organization that provides emergency and/or transitional housing for adult survivors of domestic violence and their children escaping domestic violence and/or sexual assault.
- A branch manager serves on the board of directors for an organization that provides healthcare, education, and social services targeted to LMI individuals and families.

State of Texas

CRA rating for the State of Texas:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Substantial Noncompliance

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in the AA;
- An excellent borrower distribution, as evidenced by excellent distribution of small business and home mortgage loans;
- A good geographic distribution based on good dispersion of small business and home mortgage loans;
- The lack of any CD lending, without performance context for that lack of lending, will generally result in a negative impact on the overall Lending Test performance conclusion.
- An excellent level of qualified investments and grants that provides good responsiveness to community needs;
- Service delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or individuals; and
- The level of CD services is poor.

Description of Institution's Operations in Texas

The bank has one AA (Dallas MSA) in Texas consisting of Collin and Denton Counties within the Dallas-Fort Worth-Arlington, Texas MSA. The bank's operations in Texas comprise 1.3 percent of total bank deposits, 4 percent of total bank branches, and 2 percent of bank loans.

As of June 30, 2021, the bank maintained approximately \$288.1 million or 1.3 percent of its total domestic deposits in financial centers in the bank's Dallas MSA. Of the 78 depository financial institutions operating in the Dallas MSA, FNBO, ranks 26th with a deposit market share of 0.1 percent. The Dallas MSA includes some of the nation's largest financial institutions and competition is strong among depository financial institutions. Banks in the Dallas MSA with deposit market shares greater than 5 percent include Charles Schwab Bank, SSB (79.5 percent) and Charles Schwab Premier Bank, SSB (7.5 percent).

According to the Moody's Analytics February 2022 report, the Dallas-Fort Worth-Arlington, Texas MSA has stable demand for professional services because of many corporate headquarters, a well-positioned distribution center for the Southwest as international trade grows, and favorable migration trends. Area weaknesses include exposure to volatile high tech and diminished housing affordability. The ZHVI indicates prices significantly increased 27 percent during the evaluation period. Major employment industries for the area include retail, health services, communication, and aviation. The top employers are Walmart Inc., American Airlines, Baylor Scott & White Health, Lockheed Martin, UT Southwestern Medical Center, and AT&T.

According to the Bureau of Labor Statistics, the December 2021 non-seasonally adjusted unemployment rate for the Dallas MSA was 3.6 percent compared to the national unemployment rate of 3.7 percent.

The unemployment rate was stable until the pandemic caused it to rise from 3.1 percent in February 2020 to 11.9 percent in April 2020.

Community Contacts

We reviewed one community contact conducted in the Dallas MSA as part of this performance evaluation. The organization advises small businesses and connects businesses to resources such as financing and coaching.

The community contact identified the following credit and CD needs:

- Affordable rental housing
- Affordable for-sale housing
- Small business lending/micro business loans for start-up companies/micro lines of credit
- Flexible credit analysis

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting CD services such as financial literacy

The following table provides information on the demographic composition of the Dallas MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	289	2.8	10.7	27.3	58.8	0.3
Population by Geography	1,594,066	2.3	9.5	28.6	59.3	0.3
Housing Units by Geography	594,194	2.8	10.1	29.7	57.0	0.4
Owner-Occupied Units by Geography	368,982	0.3	5.5	26.2	67.9	0.1
Occupied Rental Units by Geography	194,120	7.2	18.0	35.2	38.6	1.0
Vacant Units by Geography	31,092	4.7	14.5	36.9	43.1	0.9
Businesses by Geography	220,334	2.8	6.9	23.4	66.8	0.2
Farms by Geography	4,324	1.7	6.4	31.0	60.8	0.1
Family Distribution by Income Level	409,207	13.5	12.8	17.1	56.5	0.0
Household Distribution by Income Level	563,102	15.5	13.3	16.6	54.6	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$223,665
			Median Gross Rent			\$1,103
			Families Below Poverty Level			5.7%

Source: 2015 ACS and 2021 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 Texas

The Dallas MSA received a full-scope review. Small business lending received a greater weighting than home mortgage lending as it accounted for significantly more loan volume. The bank did not originate or purchase a sufficient volume of small farm loans in the Dallas MSA during the analysis period to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Dallas MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. Lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence was taken into consideration.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Dallas MSA	394	742	1	0	1,137	100.0	100.0

Dollar Volume of Loans (\$000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Dallas MSA	\$203,081	\$31,507	\$6	\$0	\$234,594	100.0	100.0

According to the FDIC Deposit Market Share data as of June 30, 2021, the bank had \$288.1 million in deposits with a deposit market share of 0.1 percent. The bank ranked 26th in total deposits out of 78 banks in the AA.

According to the 2020 peer mortgage data, the bank ranked in the top 18 percent of lenders, 152nd out of 864 lenders, originating home mortgage loans in the AA. Although the bank's market share of 0.1 percent is the same as the bank's deposit market share, the rank is weaker. Positive consideration is given to the bank's performance given the significantly higher number of home mortgage lenders in the AA. The top five largest mortgage lenders have captured 21.0 percent of the market.

According to the 2020 peer small business data, the bank ranked in the top 14 percent of small business lenders, 38th out of 277 lenders originating small business loans in the AA. Although the bank's market share of 0.4 percent in loans is slightly stronger than the bank's market share in deposits, the rank in loans is weaker than the rank in deposits. Positive consideration is given to the bank's performance given the significantly higher number of small business lenders in the AA. The five largest small business lenders have captured 54.3 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is good.

The proportion of loans in low-income geographies was equal to the percentage of owner-occupied housing units and exceeded aggregate lending. The proportion of loans in moderate-income geographies was below the percentage of owner-occupied housing units but exceeded aggregate lending.

Small Loans to Businesses

Refer to Table Q in the state of Texas 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 businesses.

The geographic distribution of small loans to businesses is good.

The proportion of loans in low-income geographies exceeded both the percentage of businesses and aggregate lending in low-income geographies. The proportion of loans in moderate-income geographies was well below the percentage of businesses and aggregate lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Texas 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 bank did not originate or purchase a sufficient volume of small loans to farms for a meaningful analysis.

Lending Gap Analysis

Summary reports, maps, and lending activity were reviewed over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent.

The proportion of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending. Aggregate lenders were similarly well below the percentage of families in low-income geographies. Demographic data indicates that 60 percent of low-income families live in low-income CTs, with 28.1 percent of families in these low-income CTs living below poverty level. Only 1,276 or 0.3 percent of all owner-occupied housing units are located in low-income CTs, which limits lending opportunities. With median family income of \$71,149, low-income borrowers earn less than \$35,575 a year. Median housing values of \$223,665 would require a down payment of around \$45,000, making it significantly challenging for low-income borrowers in the AA. The proportion of loans to moderate-income borrowers exceeded the percentage of moderate-income families and significantly exceeded aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses by revenue is excellent.

The proportion of loans was somewhat near to the percentage of small businesses but significantly exceeded aggregate lending.

Small Loans to Farms

Refer to Table T in the state of Texas 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 bank did not originate or purchase a sufficient volume of small loans to farms for a meaningful analysis.

Community Development Lending

FNBO did not originate any CD loans during the evaluation period, which had a negative impact on the lending performance considering credit and community needs in the AA.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in Texas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Dallas MSA is excellent.

The institution has an excellent level of qualified CD investment and grants, particularly those that are not routinely provided by private investors, often in a leadership role.

The institution exhibits good responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas MSA	9	8,213	14	13,343	23	88.5	21,556	100.0	0	0
TX Statewide with P/M/F	0	0	3	6	3	11.5	6	0.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Qualified investments totaled \$21.6 million, representing 60.4 percent of allocated tier 1 capital. FNBO made five current period investments, consisting of MBS, totaling \$13.2 million. Nine prior period investments remain outstanding at \$8.2 million that provide continuing benefit to the AA. Outstanding investments consist primarily of MBS, which focus on affordable housing, which is a primary credit need in the MSA, and one small business investment company fund for economic development. FNBO also made nine grants totaling \$105,000 to support affordable housing, economic development, and community services targeted to LMI individuals and families.

Examples of CD grant activities include:

- \$64,000 in grants to a CDFI providing access to business credit and training for entrepreneurs and other small businesses.
- \$19,000 in grants to a non-profit organization operating one of the largest food pantries in North TX. One grant was in direct response to a February 2021 winter storm that destroyed crops and caused damage to homes and businesses with power outages coupled with freezing temperatures. Funds provided over 37,000 meals for those in Collin and Denton Counties.
- \$15,000 to a non-profit organization providing housing and transitional services to women and their children experiencing poverty and situational homelessness, often associated with abuse or domestic violence.

TX - Statewide

FNBO contributed interest of \$6,000 to the Texas IOLTA program for legal services to support poor and indigent individuals in Texas.

SERVICE TEST

The bank’s performance under the Service Test in Texas is rated Substantial Noncompliance.

Based on a full-scope review, the bank’s performance in the Dallas MSA is very poor.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Dallas MSA	100.0	4	100.0	0.0	0.0	0.0	100.0	2.3	9.5	28.6	59.3

The bank has a limited presence in the AA, with a total of four branches. The bank does not operate any of its four branches in LMI geographies. The percentage of branches in LMI geographies is significantly below the percentage of the population in those geographies. Internal data and analysis revealed that two of the bank's branches are located within two miles of moderate-income geographies; however, these branches demonstrate low levels of transaction usage among the AA's LMI population. Frisco branch usage data indicated that just 3 percent of transactions were conducted by LMI customers while West Plano branch usage data indicated that just 13.8 percent of transactions were conducted by LMI customers. Additional accessibility provided by these two branches had a neutral impact on the overall retail services delivery.

FNBO complements its traditional delivery service systems with alternative delivery systems, which includes deposit-taking ATMs, telephone banking, mobile banking, electronic bill pay, and online banking. FNBO operates four deposit-taking ATMs within the AA. In addition, customers can continue to access cash from their accounts from outside of the bank's AA through FNBO's partnership with the Allpoint ATM network, which includes over 55,000 ATM locations. No data and analysis were available to determine the impact of alternative delivery systems on LMI individuals, therefore no significant weight was placed on these services.

FNBO did not open or close any branches in the Dallas MSA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. Services offered, and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provides a poor level of CD services.

During the evaluation period, one bank employee provided expertise to two organizations for a total of 89 hours within the AA. This employee served on the boards for both organizations providing support to dependent, neglected, and abused children.

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”.

Time Period Reviewed:	Lending Test (includes CD loans): 01/01/2019 to 12/31/2021 Investment and Service Tests 01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, small farm CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
FNN CDC	Operating Subsidiary	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Omaha CSA	Full-Scope	NE: Dodge, Sarpy, and Douglas Counties IA: Mills and Pottawattamie Counties
Colorado		
Denver CSA	Full-Scope	Adams, Boulder, Broomfield, and Weld Counties
Fort Collins MSA	Full-Scope	Larimer County
Illinois		
Chicago MSA	Full-Scope	DeKalb, Kane, Kendall, and McHenry Counties
Rockford MSA	Limited-Scope	Boone County
Kansas		
Kansas City MSA	Full-Scope	Johnson County
Nebraska		
NE non-MSA	Full-Scope	Antelope, Boone, Box Butte, Buffalo, Butler, Colfax, Custer, Dawes, Dawson, Kearney, Lincoln, Madison, Morrill, Phelps, Pierce, Platte, Polk, Scotts Bluff, Sheridan, and Stanton Counties.
Lincoln CSA	Full-Scope	Gage and Lancaster Counties
Grand Island MSA	Limited-Scope	Hall, Howard, and Merrick Counties
South Dakota		
SD non-MSA	Full-Scope	Beadle, Davison, Sanborn, and Yankton
Texas		
Dallas MSA	Full-Scope	Collin, Denton

Appendix B: Summary of MMSA and State Ratings

RATINGS: FNBO				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
FNBO	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Omaha CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Colorado	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Illinois	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Kansas	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Nebraska	Outstanding	Outstanding	High Satisfactory	Outstanding
State of South Dakota	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Texas	Low Satisfactory	Outstanding	Substantial Noncompliance	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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 CT 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 CT 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.

MMSA (state): 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.

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 loans are treated the same 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 30th 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. 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.

Omaha CSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% Of Total	Overall Market	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Omaha CSA	14,300	2,588,211	100.0	59,890	4.9	2.7	2.5	18.8	13.3	12.3	42.9	39.0	37.0	33.5	45.0	48.2	0.0	0.0	0.0		
Total	14,300	2,588,211	100.0	59,890	4.9	2.7	2.5	18.8	13.3	12.3	42.9	39.0	37.0	33.5	45.0	48.2	0.0	0.0	0.0		

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% Of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Omaha CSA	14,300	2,588,211	100.0	59,890	20.7	8.3	6.5	18.0	20.9	16.9	21.4	23.8	20.1	39.9	37.0	34.4	0.0	9.9	22.2		
Total	14,300	2,588,211	100.0	59,890	20.7	8.3	6.5	18.0	20.9	16.9	21.4	23.8	20.1	39.9	37.0	34.4	0.0	9.9	22.2		

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Omaha CSA	8,006	609,724	100.0	17,799	6.4	7.0	5.9	15.9	13.8	13.6	45.8	47.3	45.8	31.9	31.9	34.7	0.0	0.0	0.0		
Total	8,006	609,724	100.0	17,799	6.4	7.0	5.9	15.9	13.8	13.6	45.8	47.3	45.8	31.9	31.9	34.7	0.0	0.0	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Omaha CSA	8,006	609,724	100.0	17,799	84.5	72.1	44.7	5.2	24.6	10.3	3.2		
Total	8,006	609,724	100.0	17,799	84.5	72.1	44.7	5.2	24.6	10.3	3.2		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-2021		
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		
Omaha CSA	134	18,605	100.0	563	2.6	1.5	0.2	8.8	9.0	2.7	55.6	67.9	65.0	33.0	21.6	32.1	0.0	0.0	0.0		
Total	134	18,605	100.0	563	2.6	1.5	0.2	8.8	9.0	2.7	55.6	67.9	65.0	33.0	21.6	32.1	0.0	0.0	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-2021	
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		
Omaha CSA	134	18,605	100.0	563	97.5	76.1	57.5	1.3	19.4	1.2	4.5		
Total	134	18,605	100.0	563	97.5	76.1	57.5	1.3	19.4	1.2	4.5		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Colorado

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Denver CSA	2,436	620,799	41.1	113,107	4.3	2.5	2.8	25.4	13.8	20.9	39.9	38.7	38.2	30.4	45.0	38.1	0.0	0.0	0.0		
Fort Collins MSA	3,486	971,488	58.9	34,801	1.5	1.2	1.4	20.5	16.4	18.4	52.7	50.5	47.4	25.2	31.8	32.8	0.0	0.0	0.0		
Total	5,922	1,592,287	100.0	147,908	3.6	1.7	2.4	24.3	15.4	20.3	42.9	45.7	40.4	29.2	37.3	36.8	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Denver CSA	2,436	620,799	41.1	113,107	23.1	6.0	6.0	19.1	18.0	20.1	21.6	27.6	24.3	36.2	42.9	32.1	0.0	5.5	17.5		
Fort Collins MSA	3,486	971,488	58.9	34,801	20.5	6.0	7.0	17.2	18.7	20.0	22.6	26.6	24.5	39.6	43.7	34.6	0.0	5.0	13.9		
Total	5,922	1,592,287	100.0	147,908	22.5	6.0	6.3	18.7	18.4	20.1	21.8	27.0	24.3	37.0	43.4	32.7	0.0	5.2	16.6		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Denver CSA	2,919	238,678	50.5	36,177	7.4	5.8	8.1	27.3	24.6	26.9	36.5	39.6	35.6	28.8	30.0	29.4	0.0	0.0	0.0
Fort Collins MSA	2,863	248,228	49.5	11,762	3.0	6.4	5.1	27.2	28.0	28.6	42.4	38.9	37.7	27.4	26.8	28.5	0.0	0.0	0.0
Total	5,782	486,906	100.0	47,939	6.3	6.1	7.4	27.3	26.3	27.3	37.9	39.3	36.1	28.4	28.4	29.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Denver CSA	2,919	238,678	50.5	36,177	92.3	70.4	39.4	2.4	27.7	5.3	1.9
Fort Collins MSA	2,863	248,228	49.5	11,762	92.6	74.6	41.1	2.0	24.0	5.4	1.4
Total	5,782	486,906	100.0	47,939	92.4	72.5	39.8	2.3	25.9	5.3	1.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

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
Denver CSA	95	13,008	72.0	576	5.7	3.2	2.8	21.8	4.2	8.0	43.6	60.0	63.9	28.9	32.6	25.3	0.0	0.0	0.0
Fort Collins MSA	37	4,341	28.0	149	4.1	0.0	2.7	18.8	10.8	7.4	46.0	40.5	47.7	31.1	48.6	42.3	0.1	0.0	0.0
Total	132	17,349	100.0	725	5.2	2.3	2.8	21.0	6.1	7.9	44.2	54.5	60.6	29.5	37.1	28.8	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

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
Denver CSA	95	13,008	72.0	576	96.4	76.8	58.5	1.9	17.9	1.7	5.3
Fort Collins MSA	37	4,341	28.0	149	97.5	73.0	55.7	1.3	24.3	1.2	2.7
Total	132	17,349	100.0	725	96.7	75.8	57.9	1.7	19.7	1.6	4.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Illinois

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago MSA	2,894	532,680	94.6	69,709	0.9	1.9	0.4	14.1	15.7	8.4	42.3	57.4	40.9	42.7	24.9	50.3	0.0	0.1	0.0
Rockford MSA	165	21,072	5.4	2,686	0.0	0.0	0.0	11.7	8.5	8.9	52.3	61.2	49.1	36.0	30.3	42.0	0.0	0.0	0.0
Total	3,059	553,752	100.0	72,395	0.8	1.8	0.4	14.0	15.3	8.4	42.8	57.6	41.2	42.3	25.2	50.0	0.0	0.1	0.0

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	2,894	532,680	94.6	69,709	18.4	12.3	6.2	16.4	24.6	18.5	20.8	27.2	23.3	44.5	30.5	35.0	0.0	5.4	17.0
Rockford MSA	165	21,072	5.4	2,686	15.7	13.3	4.3	17.1	26.1	14.4	22.3	30.9	20.9	45.0	27.3	42.2	0.0	3.4	18.2
Total	3,059	553,752	100.0	72,395	18.2	12.4	6.2	16.4	24.6	18.4	20.9	27.4	23.2	44.5	30.3	35.3	0.0	5.2	17.0

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago MSA	2,341	243,014	98.1	24,651	1.7	2.1	1.7	13.2	14.1	11.3	40.7	47.8	40.6	44.3	35.2	46.3	0.2	0.9	0.1
Rockford MSA	46	3,096	1.9	757	0.0	0.0	0.0	15.6	8.7	15.9	45.0	65.2	44.0	39.4	26.1	40.2	0.0	0.0	0.0
Total	2,387	246,110	100.0	25,408	1.6	2.1	1.6	13.3	14.0	11.5	40.8	48.1	40.7	44.1	35.1	46.1	0.2	0.8	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago MSA	2,341	243,014	98.1	24,651	85.9	68.3	39.2	5.1	29.3	9.0	2.3
Rockford MSA	46	3,096	1.9	757	84.0	69.6	38.3	4.7	28.3	11.3	2.2
Total	2,387	246,110	100.0	25,408	85.8	68.4	39.2	5.1	29.3	9.1	2.3

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

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
Chicago MSA	263	40,388	96.1	539	0.7	1.5	0.9	11.6	14.4	7.1	57.8	79.1	79.4	29.9	4.9	12.6	0.0	0.0	0.0
Rockford MSA	14	1,950	5.1	95	0.0	0.0	0.0	6.5	0.0	2.1	54.9	100.0	48.4	38.6	0.0	49.5	0.0	0.0	0.0
Total	277	42,338	100.0	634	0.7	1.4	0.8	11.3	13.7	6.3	57.7	80.1	74.8	30.4	4.7	18.1	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

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
Chicago MSA	263	40,388	94.9	539	95.7	76.0	55.5	2.6	20.9	1.7	3.0
Rockford MSA	14	1,950	5.1	95	96.7	100.0	56.8	2.2	0.0	1.1	0.0
Total	277	42,338	100.0	634	95.8	77.3	55.7	2.5	19.9	1.7	2.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Kansas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Kansas City MSA	1,753	390,944	100.0	46,662	0.3	0.1	0.2	4.5	3.1	3.3	31.3	24.8	26.2	63.9	72.0	70.3	0.0	0.0	0.0		
Total	1,753	390,944	100.0	46,662	0.3	0.1	0.2	4.5	3.1	3.3	31.3	24.8	26.2	63.9	72.0	70.3	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Kansas City MSA	1,753	390,944	100.0	46,662	12.0	3.3	3.0	13.6	14.0	13.2	19.0	21.7	21.2	55.3	57.0	49.5	0.0	4.0	13.2		
Total	1,753	390,944	100.0	46,662	12.0	3.3	3.0	13.6	14.0	13.2	19.0	21.7	21.2	55.3	57.0	49.5	0.0	4.0	13.2		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City MSA	1,015	70,733	100.0	18,840	1.2	0.8	1.1	7.1	6.2	8.2	26.9	21.0	25.0	61.6	67.6	62.2	3.3	4.4	3.5
Total	1,015	70,733	100.0	18,840	1.2	0.8	1.1	7.1	6.2	8.2	26.9	21.0	25.0	61.6	67.6	62.2	3.3	4.4	3.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City MSA	1,015	70,733	100.0	18,840	85.7	74.6	38.5	5.1	23.4	9.2	2.0
Total	1,015	70,733	100.0	18,840	85.7	74.6	38.5	5.1	23.4	9.2	2.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-2021**

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
Kansas City MSA	6	1,476	100.0	104	1.2	0.0	0.0	6.0	0.0	1.9	30.6	16.7	38.5	61.5	83.3	59.6	0.6	0.0	0.0
Total	6	1,476	100.0	104	1.2	0.0	0.0	6.0	0.0	1.9	30.6	16.7	38.5	61.5	83.3	59.6	0.6	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019-2021**

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
Kansas City MSA	6	1,476	100.0	104	94.3	100.0	51.9	3.1	0.0	2.6	0.0
Total	6	1,476	100.0	104	94.3	100.0	51.9	3.1	0.0	2.6	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Nebraska

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Grand Island MSA	600	85,076	12.3	3,334	0.0	0.0	0.0	22.2	29.8	20.9	42.4	32.7	37.9	35.4	37.5	41.3	0.0	0.0	0.0
Lincoln CSA	1,622	325,030	33.3	23,108	1.5	0.9	1.6	17.8	14.1	12.7	41.0	40.1	34.6	39.5	44.8	50.9	0.1	0.2	0.2
NE non-MSA	2,643	386,969	54.3	10,346	0.9	0.5	0.4	8.8	8.2	7.7	74.2	64.2	68.5	16.1	27.2	23.4	0.0	0.0	0.0
Total	4,865	797,075	100.0	36,788	1.0	0.5	1.1	13.9	12.8	12.1	57.1	52.3	44.5	27.8	34.3	42.3	0.1	0.1	0.1

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Grand Island MSA	600	85,076	12.3	3,334	19.0	4.8	4.4	18.8	23.8	17.8	24.1	21.8	18.9	38.2	33.8	36.0	0.0	15.7	22.9
Lincoln CSA	1,622	325,030	33.3	23,108	21.0	8.1	6.7	17.1	23.0	18.5	21.3	25.5	21.0	40.6	37.5	33.6	0.0	5.8	20.2
NE non-MSA	2,643	386,969	54.3	10,346	18.4	5.7	4.7	18.2	20.1	17.8	23.4	25.5	20.4	40.0	38.4	34.8	0.0	10.4	22.3
Total	4,865	797,075	100.0	36,788	19.5	6.4	5.9	17.8	21.5	18.2	22.6	25.1	20.7	40.1	37.6	34.2	0.0	9.5	21.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Grand Island MSA	523	57,655	12.1	1,339	0.0	0.0	0.0	21.4	23.1	19.7	43.9	29.4	42.3	34.7	47.4	37.9	0.0	0.0	0.0
Lincoln-Beatrice CSA	787	81,019	18.3	6,957	3.4	4.2	2.7	25.5	20.5	22.6	32.9	34.8	33.0	36.4	37.7	40.5	1.8	2.8	1.2
NE non-MSA	3,001	271,161	69.6	5,528	1.1	0.8	0.8	11.8	10.9	9.5	70.7	66.7	72.3	16.4	21.7	17.3	0.0	0.0	0.0
Total	4,311	409,835	100.0	13,824	2.0	1.3	1.7	18.8	14.1	17.1	51.5	56.3	49.6	27.0	27.7	31.0	0.8	0.5	0.6

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Grand Island MSA	523	57,655	12.1	1,339	79.8	65.0	45.5	5.7	30.6	14.5	4.4
Lincoln CSA	787	81,019	18.3	6,957	83.1	66.8	44.8	5.2	30.0	11.7	3.2
NE non-MSA	3,001	271,161	69.6	5,528	79.8	73.6	51.2	5.1	22.2	15.1	4.2
Total	4,311	409,835	100.0	13,824	81.2	71.4	47.5	5.2	24.6	13.5	4.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019-2021**

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
Grand Island MSA	175	28,792	7.6	462	0.0	0.0	0.0	6.6	1.1	1.1	43.9	40.0	57.6	49.4	58.9	41.3	0.0	0.0	0.0
Lincoln CSA	88	11,951	5.0	475	1.1	0.0	0.0	9.6	2.3	1.3	26.0	40.9	23.8	63.3	56.8	74.9	0.1	0.0	0.0
Nebraska Non-MSA	2,052	272,478	88.6	3,618	0.1	0.0	0.0	2.9	1.3	1.2	82.0	79.5	86.1	15.0	19.2	12.8	0.0	0.0	0.0
Total	2,315	313,221	100.0	4,555	0.3	0.0	0.0	4.6	1.3	1.2	67.4	75.1	76.7	27.8	23.6	22.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

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
Grand Island MSA	175	28,792	7.6	462	96.8	85.1	62.3	2.4	8.0	0.8	6.9
Lincoln CSA	88	11,951	3.8	475	98.3	85.2	71.4	1.2	5.7	0.5	9.1
NE non-MSA	2,052	272,478	88.6	3,618	97.1	83.4	64.0	1.8	12.4	1.1	4.1
Total	2,315	313,221	100.0	4,555	97.3	83.6	64.6	1.7	11.8	1.0	4.5

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of South Dakota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
SD non-MSA	274	41,656	100.0	2,259	0.0	0.0	0.0	3.8	1.5	1.3	92.8	98.5	97.2	3.3	0.0	1.5	0.0	0.0	0.0		
Total	274	41,656	100.0	2,259	0.0	0.0	0.0	3.8	1.5	1.3	92.8	98.5	97.2	3.3	0.0	1.5	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
SD non-MSA	274	41,656	100.0	2,259	21.3	5.1	4.9	15.9	17.9	16.7	23.2	23.4	21.8	39.6	36.1	39.0	0.0	17.5	17.6		
Total	274	41,656	100.0	2,259	21.3	5.1	4.9	15.9	17.9	16.7	23.2	23.4	21.8	39.6	36.1	39.0	0.0	17.5	17.6		

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
SD non-MSA	864	60,817	100.0	1,524	0.0	0.0	0.0	5.9	1.2	1.8	91.5	97.2	97.0	2.6	1.6	1.2	0.0	0.0	0.0
Total	864	60,817	100.0	1,524	0.0	0.0	0.0	5.9	1.2	1.8	91.5	97.2	97.0	2.6	1.6	1.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
SD non-MSA	864	60,817	100.0	1,524	81.9	76.2	57.6	4.9	19.4	13.2	4.4
Total	864	60,817	100.0	1,524	81.9	76.2	57.6	4.9	19.4	13.2	4.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

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
SD non-MSA	633	91,491	100.0	600	0.0	0.0	0.0	1.1	0.0	0.7	87.8	95.6	91.0	11.0	4.4	8.3	0.0	0.0	0.0
Total	633	91,491	100.0	600	0.0	0.0	0.0	1.1	0.0	0.7	87.8	95.6	91.0	11.0	4.4	8.3	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

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
SD non-MSA	633	91,491	100.0	600	98.0	85.2	70.2	0.9	11.1	1.1	3.8
Total	633	91,491	100.0	600	98.0	85.2	70.2	0.9	11.1	1.1	3.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Texas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Dallas MSA	394	203,081	100.0	152,821	0.3	0.3	0.2	5.5	3.6	3.4	26.2	15.5	25.6	67.9	80.7	70.7	0.1	0.0	0.0
Total	394	203,081	100.0	152,821	0.3	0.3	0.2	5.5	3.6	3.4	26.2	15.5	25.6	67.9	80.7	70.7	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019-2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas MSA	394	203,081	100.0	152,821	13.5	1.8	1.6	12.8	14.0	9.4	17.1	20.6	18.8	56.5	60.2	54.4	0.0	3.6	15.8
Total	394	203,081	100.0	152,821	13.5	1.8	1.6	12.8	14.0	9.4	17.1	20.6	18.8	56.5	60.2	54.4	0.0	3.6	15.8

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas MSA	742	31,507	100.0	58,276	2.8	4.9	3.3	6.9	4.4	7.3	24.0	20.1	21.0	66.1	70.6	68.3	0.2	0.0	0.1
Total	742	31,507	100.0	58,276	2.8	4.9	3.3	6.9	4.4	7.3	24.0	20.1	21.0	66.1	70.6	68.3	0.2	0.0	0.1

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas MSA	742	31,507	100.0	58,276	90.9	82.1	41.2	2.4	15.8	6.6	2.2
Total	742	31,507	100.0	58,276	90.9	82.1	41.2	2.4	15.8	6.6	2.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2019-2021

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
Dallas MSA	1	6	100.0	292	1.7	0.0	0.3	6.4	0.0	4.5	31.0	0.0	38.4	60.8	100.0	56.8	0.1	0.0	0.0
Total	1	6	100.0	292	1.7	0.0	0.3	6.4	0.0	4.5	31.0	0.0	38.4	60.8	100.0	56.8	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-2021

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
Dallas MSA	1	6	100.0	292	96.2	100.0	59.9	2.1	0.0	1.7	0.0
Total	1	6	100.0	292	96.2	100.0	59.9	2.1	0.0	1.7	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%