

# **PUBLIC DISCLOSURE**

January 12, 2026

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Genoa Community Bank  
Certificate Number: 5408

502 Willard Avenue  
Genoa, Nebraska 68640

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Kansas City Regional Office

1100 Walnut Street, Suite 2100  
Kansas City, Missouri 64106

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

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The following points summarize the bank's Community Reinvestment Act (CRA) performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank originated a majority of its loans inside the assessment area.
- The assessment area does not contain any low- or moderate-income census tracts; therefore, this criterion was not evaluated.
- The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes.
- The institution has not received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

## DESCRIPTION OF INSTITUTION

Genoa Community Bank is privately owned and headquartered at its sole branch in Genoa, Nebraska. The bank was rated Satisfactory at its previous FDIC Performance Evaluation dated February 10, 2020, using Interagency Small Institution Examination Procedures.

Genoa Community Bank offers traditional agricultural, commercial, and consumer loan products. Agricultural-related lending remains the primary lending focus, followed by commercial lending. The bank offers a variety of deposit products including savings, checking, individual retirement, money market, and certificate of deposit accounts. Alternative banking services include internet and mobile banking, and four bank-owned ATMs.

As of the September 30, 2025 Reports of Condition and Income (Call Report), Genoa Community Bank reported total assets of \$67.9 million, total loans of \$48.4 million, and total deposits of \$58.4 million. There has been slight growth since the previous evaluation in total assets, loans, and deposits. As illustrated in the following table, the lending concentration is consistent with the loan portfolio distribution at the prior CRA evaluation primarily made up of agricultural and farmland lending.

<b>Loan Portfolio Distribution as of 9/30/2025</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	236	0.5
Secured by Farmland	5,404	11.2
Secured by 1-4 Family Residential Properties	1,673	3.5
Secured by Multifamily (5 or more) Residential Properties	3,131	6.5
Secured by Nonfarm Nonresidential Properties	5,270	10.9
<b>Total Real Estate Loans</b>	<b>15,714</b>	<b>32.5</b>
Commercial and Industrial Loans	7,935	16.4
Agricultural Production and Other Loans to Farmers	22,121	45.8
Consumer Loans	796	1.7
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	1,791	3.7
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>48,357</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income Due to rounding, totals may not equal 100.0%</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet assessment area credit needs.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its performance will be evaluated. Genoa Community Bank has defined one assessment area that includes all of Nance County, census tract 9666 in Merrick County, and census tracts 9651 and 9652.98 in Platte County. According to 2020 U.S. Census data, census tract 9651 in Platte County is an upper-income census tract, while all other census tracts in the assessment area are middle-income census tracts. Nance and Platte counties are located in within the nonmetropolitan portions of central Nebraska; meanwhile, Merrick County is part of the Grand Island, Nebraska Metropolitan Statistical Area. Given that the bank does not operate a branch within the Grand Island, Nebraska MSA, these areas were evaluated as one assessment area. The assessment area remains unchanged since the prior CRA evaluation.

### **Economic and Demographic Data**

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	4	0.0	0.0	75.0	25.0	0.0
Population by Geography	12,145	0.0	0.0	69.9	30.1	0.0
Housing Units by Geography	5,984	0.0	0.0	74.0	26.1	0.0
Owner-Occupied Units by Geography	4,468	0.0	0.0	72.8	27.2	0.0
Occupied Rental Units by Geography	803	0.0	0.0	64.5	35.5	0.0
Vacant Units by Geography	713	0.0	0.0	91.7	8.3	0.0
Businesses by Geography	1,349	0.0	0.0	67.6	32.4	0.0
Farms by Geography	357	0.0	0.0	54.3	45.7	0.0
Family Distribution by Income Level	3,764	15.6	17.0	22.3	45.1	0.0
Household Distribution by Income Level	5,271	19.2	15.3	18.1	47.5	0.0
Median Family Income – Grand Island, Nebraska MSA		\$70,828	Median Housing Value			\$134,382
Median Family Income – Nebraska Nonmetropolitan		\$70,804	Median Gross Rent			\$767
			Families Below Poverty Level			4.9%
<i>Source: 2020 Census and 2024 D&amp;B Data Due to rounding, totals may not equal 100%.</i>						

The assessment area is rural in nature and relies heavily on agriculture. According to the 2022 U.S. Census of Agriculture data, Nance, Merrick, and Platte counties produced \$1.4 billion in commodity sales. According to 2024 D&B data, the primary business segments of the assessment area include agriculture, forestry, fishing, and hunting at 20.9 percent; followed by non-classifiable establishments at 15.1 percent; and other services at 9.2 percent. The farms and businesses in the assessment area are predominantly small, with 76.2 percent employing less than 5 employees and 93.6 percent operating from a single location.

### **Competition**

The assessment area is moderately competitive for financial products and services considering the assessment area demographics and rural nature. According to FDIC Deposit Market Share data as of June 30, 2025, 18 financial institutions operate 35 branches in the assessment area. Of these institutions, Genoa Community Bank ranked 11<sup>th</sup> with 2.9 percent of the deposit market share. Additionally, Genoa Community Bank faces competition for agricultural loans from Farm Credit Services, as well as non-traditional creditors and dealers for agricultural loans.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying area credit needs. This information helps determine whether local financial institutions are responsive to those needs. It also shows what credit opportunities are available.

Examiners interviewed a representative from a local government agency that serves Merrick and Nance counties. The contact stated that the current economic conditions are challenging. Farmers are having a difficult time generating income due to rising costs and low commodity prices, which is causing some farmers to retire earlier than they would like. According to the contact, agricultural loans are the primary credit need of the area. The contact stated that local financial institutions

meet the credit needs of the community and generally there is a lot of competition between financial institutions.

**Credit Needs**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that agricultural, commercial, and home mortgage loans are the primary credit needs of the assessment area.

**SCOPE OF EVALUATION**

**General Information**

This evaluation covers the period from the prior evaluation dated February 10, 2020, to the current evaluation dated January 12, 2026. Examiners used Interagency Small Institution Examination Procedures to evaluate the bank’s CRA performance, which includes the Lending Test. Refer to the Appendices for a description of the criteria evaluated under the Lending Test.

**Activities Reviewed**

As previously stated, the bank’s major product lines are agricultural loans followed by commercial loans. There are no other loan products that are a primary lending focus or comprise a significant portion of the bank’s loan portfolio. Therefore, examiners did not review home mortgage lending. As such, examiners reviewed small farm and small business loans to evaluate the bank’s performance. Examiners selected the products based on the bank’s business strategy, assessment area credit needs, and the number and dollar volume of loans originated during the evaluation period.

The bank’s lending data does not include paid off loans. Therefore, examiners selected December 5, 2024, through December 4, 2025, as the review period, to ensure the lending performance was an accurate representation of the bank’s lending. Bank management also indicated this review period was an accurate representation of the bank’s lending activity throughout the evaluation period. For Assessment Area Concentration, examiners reviewed all small farm and small business loans originated or purchased during the review period. For Borrower Profile, examiners reviewed a random sample of small farm and small business loans located in the assessment area. D&B data from 2024 provided the standard of comparison for both small farm and small business lending, as it is the most recent year available. The following table provides details on the loans reviewed.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Assessment Area Concentration</b>		<b>Borrower Profile</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Small Farm	72	13,125	36	6,629
Small Business	149	8,619	47	3,457
<i>Source: Bank Data</i>				

Examiners placed more weight on small farm performance since agricultural lending is the bank’s primary lending focus, accounts for the largest portion of the loan portfolio, and had higher lending volume by dollar volume during the evaluation period. Although there were more small business loans originated during the evaluation period, a majority of the loans were to one borrower. Examiners reviewed both the number and dollar volume of loans and presented both figures

throughout the evaluation. However, examiners placed greater weight on the number of loans when conducting the Borrower Profile analysis because the number of loans is generally a better indicator of the borrowers served.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

Genoa Community Bank demonstrated satisfactory performance under the Lending Test. The bank’s collective performance under the evaluated criteria supports this conclusion.

#### Loan-to-Deposit Ratio

Genoa Community Bank’s loan-to-deposit ratio is reasonable given the institution’s size, financial condition, and assessment area credit needs. The bank’s net loan-to-deposit ratio, calculated from Call Report data, averaged 81.4 percent over the past 23 quarters from March 31, 2020, to September 30, 2025. This ratio ranged from a high of 96.4 percent as of December 31, 2024, to a low of 67.6 percent as of March 31, 2021. The average net loan-to-deposit ratio represents a decrease since the previous evaluation when it averaged 91.3 percent.

Examiners compared Genoa Community Bank’s net loan-to-deposit ratio to three similarly situated financial institutions to evaluate the bank’s performance. These institutions were selected based on their asset size, geographic location, and lending focus. As shown in the table below, Genoa Community Bank’s loan-to-deposit ratio is comparable to all three institutions.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 9/30/2025 \$(000s)</b>	<b>Average Net Loan-to-Deposit Ratio (%)</b>
<b>Genoa Community Bank, Genoa, Nebraska</b>	<b>67,934</b>	<b>81.4</b>
Bank of Clarks, Clarks, Nebraska	61,422	74.3
Bank of Lindsay, Lindsay, Nebraska	96,596	117.5
First Bank and Trust of Fullerton, Fullerton, Nebraska	110,978	91.1
<i>Source: Reports of Condition and Income 03/31/2020 – 09/30/2025</i>		

#### Assessment Area Concentration

The bank originated a majority of its small farm and small business loans inside the assessment area. The following table provides details.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	
Small Farm	61	84.7	11	15.3	72	10,760	82.0	2,365	18.0	13,125
Small Business	136	91.3	13	8.7	149	4,493	52.1	4,126	47.9	8,619
<b>Total</b>	<b>197</b>	<b>89.1</b>	<b>24</b>	<b>10.9</b>	<b>221</b>	<b>15,253</b>	<b>70.1</b>	<b>6,491</b>	<b>29.9</b>	<b>21,744</b>
<i>Source: Imported Bank Data Due to rounding, totals may not equal 100.0%.</i>										

**Geographic Distribution**

The assessment area does not contain any low- or moderate-income census tracts and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, examiners did not evaluate this criterion.

**Borrower Profile**

The distribution of borrowers reflects reasonable penetration among farms and businesses of different sizes. Reasonable small farm and small business performance supports this conclusion. Examiners focused on the percentage of loans to farms and businesses with gross annual revenues of \$1 million or less.

***Small Farm Loans***

The distribution of borrowers reflects reasonable penetration among farms of different sizes. Although the percentage of small farm loans made to farms with gross annual revenues of \$1 million or less lags demographic data, it is comparable considering the following factors. The 2022 U.S. Census of Agriculture data indicates that 48.5 percent of operations in the counties of the assessment area do not have interest expense and 52.0 percent of operators are considered hobby farmers; therefore, loan demand is likely lower than the percentage of farms reporting revenues of \$1 million or less. Considering this information, the bank’s performance is reasonable. The following table provides details.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000	98.3	26	72.2	4,178	63.0
> \$1,000,000	1.1	6	16.7	2,115	31.9
Revenue Not Available	0.6	4	11.1	336	5.1
<b>Total</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>6,629</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Imported Bank Data Due to rounding, totals may not equal 100.0%.</i>					

***Small Business Loans***

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the percentage of small business loans made to businesses with gross annual revenues of \$1 million or less lags the percentage of businesses reporting revenues in this category. The bank is not required to report small business lending data under CRA; therefore, the table does not include direct comparisons to aggregate lending data. However, examiners considered aggregate performance data as an indicator of the businesses served by other institutions in the assessment area and the demand for small business loans. According to 2024, 2023, and 2022 CRA Aggregate Data, lenders originated 66.3, 72.1, and 54.9 percent of their small business loans to businesses with revenues of \$1 million or less, respectively. In addition, examiners identified one comparable institution who serves a similar assessment area and reviewed their performance to gain a better understanding of loan demand. The comparable institution made 72.0 percent of their small business loans to businesses with gross annual revenues of \$1 million or less. As such, the bank’s performance is comparable to this institution and historical aggregate performance. Considering this information, the bank’s performance is reasonable.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000	88.4	34	72.3	2,227	64.4
> \$1,000,000	3.2	9	19.2	1,006	29.1
Revenue Not Considered	8.5	4	8.5	224	6.5
<b>Total</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>3,457</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Imported Bank Data Due to rounding, totals may not equal 100.0%.</i>					

**Response to Complaints**

Genoa Community Bank has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank’s compliance with laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## APPENDICES

### SMALL BANK PERFORMANCE CRITERIA

#### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

**Rated Area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Loan:** A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-Income:** Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.