

PUBLIC DISCLOSURE

August 29, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Ely Charter Number: 8561

595 Aultman Street Ely, NV 89301

Office of the Comptroller of the Currency

Independence Plaza 1050 17th Street Suite 1500 Denver, CO 80265-1050

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 Satisfactory.

The lending test is rated: Satisfactory

The major factors that support this rating include:

• The First National Bank of Ely (FNBE) originated a substantial majority of its loans inside its delineated assessment area (AA).

- The bank's borrower distribution reflects a reasonable distribution of lending to businesses of different sizes within the bank's AA.
- FNBE's loan-to-deposit ratio is reasonable when compared to similarly sized institutions operating in the state.
- FNBE demonstrated excellent responsiveness to the needs of the bank's AA by originating loans through the Small Business Administration's Paycheck Protection Program (PPP), which was rolled out in response to the COVID-19 pandemic.
- The bank did not receive any CRA related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.

FNBE's average quarterly LTD ratio over the evaluation period was 10.14 percent. The bank's ratio ranged from a high of 14.19 percent to a low of 7.22 percent. Since there were no community banks similarly sized and headquartered within the bank's AA, we compared the bank's LTD ratio with that of similarly sized community banks within the state of Nevada. The average LTD ratio of five comparable institutions operating in the state was 62.31 percent, with a high-average ratio of 80.48 percent and a low-average ratio of 33.71 percent. While FNBE's average is below the range of comparable institutions, there are material differences in the economies, business models, and accessibility to population centers such as Las Vegas, Nevada. The comparable banks benefit from being larger, having multiple branches across the state, and serving multiple assessment areas. Additionally, the LTD analysis does not include any data from the local non-traditional, non-profit lender, which provides considerable competition within FNBEs AA. FNBE does originate smaller dollar loans within the AA, providing important access to credit within the AA.

Lending in Assessment Area

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

The bank originated 94 percent of its total loans inside the bank's AA during the evaluation period, based on a representative sample of business loans. This analysis is performed at the bank, rather than the AA level.

Loan Category	l l	Number of Loans				Dollar 1				
	Insi	de	Outsi	Outside		Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	33	94	2	6	35	3,176	97	113	3	3,289
Total	33	94	2	6	35	3,176	97	113	3	3,289

Description of Institution

FNBE is a community bank headquartered in Ely, Nevada, a non-metropolitan area in the eastern part of the state. FNBE operates under the holding company Fnbely Bancorporation. The bank has no subsidiaries. As of December 31, 2021, FNBE held \$144 million in total assets, \$131 million in investments, \$9 million in loans, and \$2 million in interest bearing bank balances. The loan portfolio primarily consists of business and commercial purpose loans. Tier one capital at year-end 2021 totaled \$14 million.

FNBE offers a traditional mix of loan and deposit products, delivered primarily through the bank's sole physical location in Ely, Nevada. The bank does not own or operate any ATMs. There were no branch openings or closings during the evaluation period. Lending strategies and product offerings are consistent throughout the AA. There were no mergers or acquisitions impacting the bank during the evaluation period.

During the evaluation period, the COVID-19 pandemic impacted both the national and local economies of cities and towns all over the United States. As a result, the SBA PPP provided loans to help businesses keep their workforces employed and businesses operational during the pandemic. FNBE was particularly responsive to the SBA PPP and originated a significant volume of PPP loans, given the bank's size and capacity. FNBE originated 118 PPP loans, during all open application periods in 2020 and 2021, totaling \$7.86 million.

FNBE received a "Satisfactory" rating on its previous CRA examination dated August 13, 2018. There were no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period included an assessment of loan originations from January 1, 2019, through December 31, 2021. Primary loan product was determined based on the number of originations for each

broad loan type made during the evaluation period. Based on the bank's volume of commercial loan originations, this was selected as the bank's primary product.

The bank does originate consumer and agricultural loans; however, the bank's volumes and analysis of those products were not considered as part of this evaluation. The bank does not originate residential mortgage loans.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Also refer to appendix A, Scope of Examination, for AA details.

Ratings

The bank's overall rating is based on its performance in the state of Nevada (NV). The state rating is based on performance within the bank's single NV AA. Refer to the "Scope" section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Nevada

CRA rating for the State of Nevada: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution reflects a reasonable distribution of lending to businesses of different sizes within the bank's AA. The conclusion emphasizes completive factors related to business lending.
- The bank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in Nevada

FNBE has delineated a single non-MSA AA consisting of White Pine County, Nevada. The AA contains a total of three individual census tracts, including no low- or moderate- income tracts, two middle-income tracts, and one upper- income tract. According to 2020 U.S. Census Bureau data, population of the entire county totaled 9,080 covering 8,887 square miles. FNBE offers a traditional mix of both consumer and business accounts, including deposit and lending products. The bank also offers internet and mobile banking platforms. FNBE's primary lending focus is commercial loans. The bank also originates a meaningful number of consumer loans within the AA. Agricultural production and farmland represent a very small portion of the bank's lending activity and the bank does not offer consumer mortgage lending products.

Based on the FDIC deposit market share report as of June 30, 2021, FNBE held 59.27 percent of the total deposits in the AA, ranking first in deposit market share out of three depository institutions in the market. FNBE faces strong competition for loans relative to the limited population base and lending opportunities within the AA. There are financial institutions that have branches within the AA, including three traditional banks, one credit union, and one non-traditional non-profit lender.

Economic Data:

Based on economic data from Moody's Analytics Reports dated July 2022, the state of Nevada is firmly in expansion, however, tourism has yet to return to pre-COVID 19 pandemic levels. The healthy job market has led to steady labor force gains since the start of the year and the jobless rate is within one percentage point of its pre-pandemic low. Demand for housing is strong thanks to second-highest household formation rate in the West. The data states that Nevada's economy will remain a step ahead of the nation through the near term, however, macroeconomic risk make uncertain the outlook beyond 2022 given how sensitive Nevada is to the U.S. business cycle.

The primary economic driver in the AA is the mining industry, with major employers including mining companies, the state prison, and the local hospital district. Per the United States Bureau of Labor Statistics, as of December 31, 2021, the unemployment rate for the entire state of Nevada was 4.3 percent, while the unemployment rate for White Pine County totaled 1.9 percent.

Per 2015 ACS data, displayed in Table A, 5.8 percent of families live below the poverty level in the AA. The median family income for the AA totals \$61,350. Within the AA, low- and moderate- income families compromise 14 and 20 percent of total families, respectively. The remainder is divided between middle- and upper- income families, comprising 21 and 45 percent, respectively.

In order to gain a better understanding of the economic conditions and credit needs within the bank's assessment area, we reviewed one community contact with a county official within White Pine County. The official stated that the local economy is a boom-and-bust community, primarily dependent on the mining industry. According to the community contact, financial institutions within the assessment area are satisfactorily meeting the credit needs of the community.

White Pine County AA

Table A – Demographic Information of the Assessment Area										
Assessment Area: White Pine County										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	3		0.00	66.7	33.33					
Population by Geography	9,974	0.0	0.0	40.7	59.3	0.0				
Housing Units by Geography	4,453	0.0	0.0	48.5	51.5	0.0				
Owner-Occupied Units by Geography	2,386	0.0	0.0	47.7	52.3	0.0				
Occupied Rental Units by Geography	801	0.0	0.0	45.3	54.7	0.0				
Vacant Units by Geography	1,266	0.0	0.0	51.9	48.1	0.0				
Businesses by Geography	471	0.0	0.0	38.6	61.4	0.0				
Farms by Geography	28	0.0	0.0	35.7	64.3	0.0				
Family Distribution by Income Level	1,990	13.5	19.7	21.3	45.5	0.0				
Household Distribution by Income Level	3,187	21.1	14.5	20.4	44.00	0.0				
Median Family Income MSA – Non- MSAs - NV		\$61,350	Median Housi	ng Value		\$125,489				
Median Gross Rent										
Families Below Poverty Level										

Source: 2015 ACS Census 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 Nevada

A full scope review was performed for the bank's single county, non-MSA AA in Nevada. Refer to Appendix A for additional details.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Nevada is reasonable overall. Performance is based solely on the White Pine County AA, since this is the bank's only delineated AA in Nevada.

Distribution of Loans by Income Level of the Geography

A geographic analysis of loan distribution by income level would not provide meaningful results as there are no low- or moderate- income census tracts within the bank's AA.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

Refer to Table R in the state of Nevada 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 businesses.

The distribution of loans to small businesses in the AA is reasonable. The bank's percentage of loans to small businesses is below the percentage of businesses within the AA but exceeds the peer aggregate lending performance for reporting institutions. This conclusion gives additional weight to the bank's performance compared to the peer given the overall strong lending competition within the AA.

Responses to Complaints

During the evaluation period, neither the bank nor the Office of the Comptroller of the Currency received any complaints related to the bank's CRA performance.

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:	01/01/19 to 12/31/21									
Bank Products Reviewed:	Small Business Loans									
Affiliate(s)	Affiliate Relationship	Products Reviewed								
N/A										
List of Assessment Areas and Type o	List of Assessment Areas and Type of Examination									
Rating and Assessment Areas	Type of Exam	Other Information								
State of Nevada										
White Pine County	Full-scope	AA includes the entire county								

Appendix B: Summary of MMSA and State Ratings

RATINGS FNB Ely							
Overall Bank:	Lending Test Rating						
First National Bank of Ely	Satisfactory						
State:							
Nevada	Satisfactory						

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

2019-21

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$ (Thousands)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
White Pine County	33	3,176	100	84	67.7	42	34.5	8.1	15	24.2	42
Total	33	3,176	100	84	67.7	42	34.5	8.1	15	24.2	42

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%