

## **PUBLIC DISCLOSURE**

July 26, 2021

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First American State Bank RSSD# 2317672

8390 East Crescent Parkway, Suite 100 Greenwood Village, Colorado 80111

Federal Reserve Bank of Kansas City 1 Memorial Drive Kansas City, Missouri 64198

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, 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'S COMMUNITY REINVESTMENT ACT RATING

First American State Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- An excellent geographic distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

#### SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's Denver Metropolitan AA. The following data was reviewed:

- The bank's 19-quarter average NLTD ratio,
- The universe of 91 home mortgage loans reported on the bank's 2019 and 2020 Home Mortgage Disclosure Act Loan/Application Registers and a statistical sample of 45 small business loans from a universe of 55 loans originated between January 1, 2020 and December 31, 2020.

Small business lending was weighted more heavily in the analysis due to the higher number of annual originations and because commercial lending is a strategic focus of the bank.

### **DESCRIPTION OF INSTITUTION**

The bank is a community bank headquartered in Greenwood Village, Colorado. The bank's characteristics include:

- The bank is a wholly owned subsidiary of First American Bancorp.
- The bank has total assets of \$264.4 million as of March 31, 2021.
- The bank has one location with an on-site cash-only automated teller machine.
- The bank's primary business focus is commercial lending. Notably, while residential real estate lending makes up a significant portion of the loan portfolio, approximately 40.0 percent of loans are to borrowers for nonowner-occupied investment properties.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF MARCH 31, 2021											
Loan Type \$(000) %											
Commercial	98,386	50.1									
Residential Real Estate	95,438	48.6									
Agricultural	2,630	1.3									
Consumer	116	0.1									
Other	4	0.0									
Gross Loans 196,574 100.0											
Note: Percentages may not total 100.0 percent due to rounding.											

The bank was rated Satisfactory under the CRA at its December 5, 2016 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

### **DESCRIPTION OF ASSESSMENT AREA**

The bank's AA is comprised of six of ten counties within the Denver-Aurora-Lakewood, Colorado Metropolitan Statistical Area (MSA) - Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson Counties, in their entireties (see Appendix A for an AA map).

- The AA consists of 605 census tracts, which includes 51 low-, 147 moderate-, 196 middle-, 203 upper-, and 8 unknown-income census tracts. This has changed since the prior evaluation when the AA consisted of 69 low-, 137 moderate-, 197 middle-, 195 upper-, and 7 unknown-income census tracts.
- According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranks 28<sup>th</sup> of 66 FDIC-insured institutions operating in the AA, with a deposit market share of 0.2 percent.
- Three contacts with community members were used to augment the evaluation. One community contact interview with a representative of a local economic development organization was conducted to gain insight into area demographic and business conditions. Two previous community contact interviews conducted in conjunction with the CRA evaluations of other institutions operating in the AA were also referenced for additional context.. One contact was conducted with a representative of a housing authority and the other contact was with a representative of an organization that provides support to small businesses and entrepreneurs.

TABLE 2 POPULATION CHANGE											
Area 2010 Population 2015 Population Percent Change											
Denver Metropolitan AA	2,489,661	2,649,187	6.4								
Adams County, CO	441,603	471,206	6.7								
Arapahoe County, CO	572,003	608,310	6.3								
Broomfield County, CO	55,889	60,699	8.6								
Denver County, CO	600,158	649,654	8.2								
Douglas County, CO	285,465	306,974	7.5								
Jefferson County, CO	534,543	552,344	3.3								
Denver-Aurora-Lakewood MSA	2,543,482	2,703,972	6.3								
State of Colorado 5,029,196 5,278,906 5.0											
Source: 2010 U.S. Census Bureau Decennial 2011-2015 U.S. Census Bureau: Ame											

 According to the U.S. Census Bureau, the AA and the state experienced a population growth from 2015 to 2019 of 9.7 percent and 9.1 percent, respectively. This indicates substantially higher population growth than the period between 2010 and 2015.

TABLE 3 MEDIAN FAMILY INCOME CHANGE											
Area 2010 Median Family 2015 Median Family Percent Char											
Denver Metropolitan AA	81,678	80,163	(1.9)								
Adams County, CO	68,456	66,619	(2.7)								
Arapahoe County, CO	78,904	76,437	(3.1)								
Broomfield County, CO	102,508	97,886	(4.5)								
Denver County, CO	62,268	69,783	12.1								
Douglas County, CO	118,274	115,309	(2.5)								
Jefferson County, CO	88,353	86,565	(2.0)								
Denver-Aurora-Lakewood MSA	81,781	80,820	(1.2)								
State of Colorado 76,277 74,826 (1.9)											
Source: 2006-2010 U.S. Census Bureau: Am 2011-2015 U.S. Census Bureau: Am Note: Median family incomes have been in	erican Community Survey	2015 dollars	· · ·								

Similar to the range of median family income seen in Table 3, the 2015 U.S. Census Bureau
estimates show the AA's percentage of families below poverty at 8.1 percent is comparable
to the state at 8.5 percent; however, the poverty rate varies widely between counties, ranging
from a low of 3.1 percent in Douglas County to a high of 12.8 percent in Denver County.

TABLE 4 HOUSING COST BURDEN													
Cost Burden – Renters Cost Burden – Owners													
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners							
Denver Metropolitan AA	80.2	46.0	45.7	68.4	48.3	23.3							
Adams County, CO	80.1	45.3	47.9	69.0	48.6	27.2							
Arapahoe County, CO	83.9	47.4	48.6	71.1	50.2	23.4							
Broomfield County, CO	81.1	68.7	40.8	68.9	43.2	20.5							
Denver County, CO	76.4	40.4	44.7	65.7	43.7	24.1							
Douglas County, CO	82.2	69.1	37.1	74.5	62.3	21.0							
Jefferson County, CO	83.7	46.4	45.7	66.2	46.4	21.6							
Denver-Aurora-Lakewood MSA	80.1	45.8	45.7	68.3	48.5	23.5							
State of Colorado	79.5	46.1	46.5	65.2	45.7	23.9							

Note: Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development, 2011-2015 Comprehensive Housing Affordability Strategy

- According to the U.S. Department of Housing and Urban Development Fair Market Rent (FMR) documentation system, the FMR for a two-bedroom unit in the Denver-Aurora-Lakewood, Colorado Metropolitan Statistical Area increased 35.5 percent between 2015 and 2020.
- A member of the community noted there are very few affordable housing units in the area.
- Another member of the community noted that while Colorado continues to experience an
  increase in the number of households, the production of new housing units often does not
  keep pace. This gap has led to increased home prices and rents, which both may negatively
  influence the ability of LMI individuals to purchase homes.
- The contact further stated that the affordable housing market needs credit to remain available at low interest rates to facilitate the construction of affordable units.

TABLE 5 UNEMPLOYMENT RATES											
Region 2016 2017 2018 2019 2020											
Denver Metropolitan AA	3.0	2.5	2.9	2.6	7.5						
Adams County, CO	3.4	2.8	3.2	2.8	8.0						
Arapahoe County, CO 3.0 2.6 3.0 2.6											
Broomfield County, CO	2.8	2.4	2.7	2.4	6.6						
Denver County, CO	3.0	2.6	2.9	2.6	8.2						
Douglas County, CO	2.5	2.2	2.6	2.3	5.8						
Jefferson County, CO	2.8	2.4	2.8	2.4	7.1						
Denver-Aurora-Lakewood MSA											
State of Colorado	3.1	2.6	3.0	2.7	7.3						
Source: Bureau of Labor Statistics: Local Area Un		2.0	3.0	2.1	7.0						

- As noted in Table 5, the AA, like many areas of the United States, experienced a sharp increase in the unemployment rate in 2020 due to the economic impacts of the Coronavirus Disease 2019 pandemic. At its peak in April of 2020, the state had an unemployment rate of nearly 12.1 percent.
- A member of the community noted unemployment has since decreased, especially in Arapahoe and Douglas Counties.
- The primary industries in the area include financial services; healthcare and life sciences; and information technology-software and electronics.
- The largest public sector employers in the AA include Federal and State Governments, the University of Colorado System, Denver and Jefferson County Public Schools, and the City of Denver. Major private sector employers in the AA include HealthONE Corporation, SCL Health System, Centura Health, and UCHealth.
- A member of the community indicated there are various entities that provide small business loans within the AA. This individual also stated that if a business cannot qualify under traditional bank underwriting requirements, credit unions, community development corporations, and community development financial institutions are available to provide funding. Additionally, there are numerous micro-lenders that offer revolving loan funds to small businesses. However, the community member also stated that in addition to funding challenges, the significant amount of paperwork involved in starting and managing a business remains a barrier to credit.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### **Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on geographic proximity to the bank, comparable asset size, and similar portfolio composition. The bank's NLTD ratio is reasonable. The NLTD is above three and below one of the similarly situated institutions' ratios.

TABLE 6 COMPARATIVE NLTD RATIOS												
Institution	NLTD Ratio (%)											
institution	Location	Asset Size (\$000s)	19 Quarter Average									
First American State Bank	Greenwood Village, CO	264,377	91.9									
North Valley Bank	Thornton, CO	216,813	96.0									
Evergreen National Bank	· · · · · · · · · · · · · · · · · · ·											
The Bank of Denver												
Redstone Bank	Centennial, CO	208,754	76.7									

### **Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank's loans, by number and dollar, are originated inside the AA.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA												
T	, _ Inside Outside											
Loan Type	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%				
Home Purchase	24	16,822	82.8	87.6	5	2,378	17.2	12.4				
Home Refinance	45	22,763	91.8	89.7	4	2,621	8.2	10.3				
Multifamily	11	11,254	84.6	79.8	2	2,845	15.4	20.2				
Total Home Mortgage Loans	80	50,839	87.9	86.6	11	7,844	12.1	13.4				
Small Business Loans	42	17,417	93.3	91.5	3	1,620	6.7	8.5				
Total Loans 122 68,256 89.7 87.8 14 9,464 10.3 12.2												
Note: Percentages may not add to 100.0	percent due	to rounding.										

### **Geographic Distribution of Loans**

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts. The bank's geographic distribution of loans reflects excellent dispersion among the different census tracts within the AA.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. In 2019, the bank's lending in low-income census tracts was comparable to aggregate lending data by number but below by dollar, and comparable to the percentage of owner-occupied housing units (the demographic figure). Lending in moderate-income census tracts was above aggregate lending data by number and by dollar and comparable to the demographic figure. In 2020, the bank's lending in low-income census tracts was above the demographic figure, while lending in moderate-income census tracts was below the demographic figure. Loan dispersion was also evaluated and no significant gaps or lapses in lending were noted.

# TABLE 8 DISTRIBUTION OF 2019 AND 2020 TOTAL HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY

	Bank and Aggregate Loans by Year										0
Geographic			2	019				202		Owner-	
Income Level	Ва	nk	Agg	Bar	ık	Agg		Ва	nk		Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	Office 70
Low	2	4.7	4.5	300	1.1	4.1	6	16.2	4,772	20.2	4.7
Moderate	7	16.3	18.4	4,144	15.2	15.1	4	10.8	994	4.2	18.9
Middle	9	20.9	33.6	4,359	16.0	30.7	8	21.6	3,849	16.3	33.9
Upper	25	58.1	43.5	18,406	67.6	50.1	19	51.4	14,015	59.3	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Not Reported	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	
Total	43	100.0	100.0	27,209	100.0	100.0	37	100.0	23,630	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

\*Aggregate data was not publicly available at the time of data analysis.

### **Small Business Lending**

The geographic distribution of small business lending is excellent. Bank lending in low-income census tracts was above the percentage of businesses (the demographic figure). Bank lending in moderate-income census tracts was comparable to the demographic figure. Loan dispersion was also evaluated and no significant gaps or lapses in lending were noted.

TABLE 9 DISTRIBUTION OF 2020 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY												
Census Tract		Bank	Loans		% of							
Income Level	#	\$(000)	#%	\$%	Businesses							
Low	11	6,129	26.2	35.2	7.1							
Moderate	8	3,705	19.0	21.3	18.8							
Middle	10	4,163	23.8	23.9	32.4							
Upper	11	2,872	26.2	16.5	41.5							
Unknown	2 548 4.8 3.1 0.3											
Not Reported	0	0	0.0	0.0								
	42	17,417	100.0	100.0	100.0							

Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

### Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has a reasonable penetration among individuals of different income levels and businesses of different sizes.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. In 2019, the bank originated no loans to low-income borrowers. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar and the percentage of families (the demographic figure). Furthermore, lending to middle-income borrowers was below aggregate lending data by number and by dollar and below the demographic figure, while lending to upper-income borrowers was above aggregate lending data by number and by dollar and above the demographic figure. In 2020, the bank again originated no loans to low-income borrowers. Lending to moderate-income borrowers was below the demographic figure. Finally, lending to middle-income borrowers was below the demographic figure, while lending to upper-income borrowers was comparable to the demographic figure.

The evaluation considered the high average home price and lack of affordable housing in the AA, and consequently lower demand from LMI individuals for home purchase loans. Additionally, considered was the high number of loans originated to borrowers of unknown incomes. However, when loans to borrowers of unknown incomes were removed from the data, the bank's performance was still below aggregate lender performance. Therefore, reduced bank lending to LMI individuals cannot be fully explained by lack of demand nor the numbers of loans to individuals of unknown incomes.

	TABLE 10 DISTRIBUTION OF 2019 AND 2020 TOTAL HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL													
Borrower	Borrower Bank and Aggregate Loans by Year Families													
Income Level	Ва	nk	Agg	Bar	ık	Agg		Ba			Family Income %			
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	ilicollie /			
Low	0	0.0	5.5	0	0.0	3.0	0	0.0	0	0.0	21.4			
Moderate	4	10.3	18.1	820	3.6	13.3	2	6.7	643	3.9	17.5			
Middle	2	5.1	23.0	705	3.1	20.8	1	3.3	450	2.7	20.4			
Upper	Jpper         27         69.2         37.5         18,896         81.9         45.3         15         50.0         9,334         56.6										40.7			
Unknown	6	15.4	15.9	2,663	11.5	17.6	12	40.0	6,074	36.8	0.0			
Total	39	100.0	100.0	23,084	100.0	100.0	30	100.0	16,501	100.0	100.0			

Source: 2020 FFIEC Census Data

Note:

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

\*Aggregate data was not publicly available at the time of data analysis. Multifamily loans are not included in the borrower distribution analysis.

### Small Business Lending

The borrower distribution of small business lending is reasonable. Bank lending to businesses with \$1 million or less in annual revenue is comparable to the percentage of businesses (the demographic figure). Additional performance context considered was the numerous organizations that specialize in supporting and funding small businesses and entrepreneurs within the AA.

TABLE 11 DISTRIBUTION OF 2020 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES												
Bank Loans Total Businesse												
	#	\$(000)	#%	\$%	%							
		By Reve	nue									
\$1 Million or Less 28 12,769 66.7 73.3 92.6												
Over \$1 Million	10	4,515	23.8	25.9	6.5							
Not Known	4	132	9.5	0.8	0.9							
Total	42	17,417	100.0	100.0	100.0							
		By Loan	Size									
\$100,000 or less	8	482	19.0	2.8								
\$100,001 - \$250,000	12	2,573	28.6	14.8								
\$250,001 – \$1 Million	22	14,361	52.4	82.5								
Total	42	17,417	100.0	100.0								
	By Loan	Size and Revenu	ue \$1 Million or Lo	ess								
\$100,000 or less	3	250	10.7	2.0								
\$100,001 - \$250,000	9	1,973	32.1	15.5								
\$250,001 – \$1 Million	16	10,546	57.1	82.6								
Total	28	12,769	100.0	100.0								

Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data

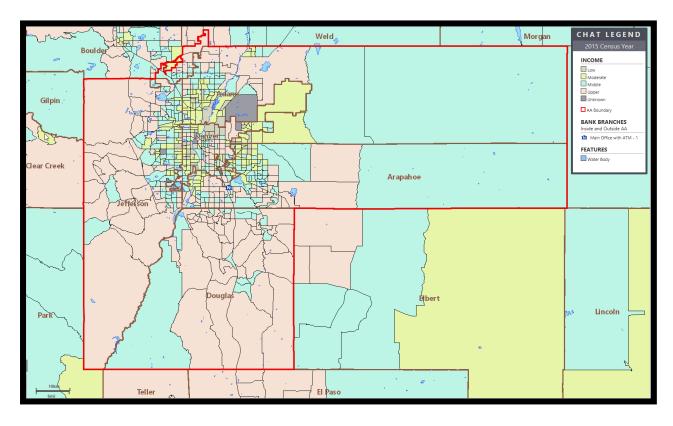
Note:

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

### APPENDIX A - MAP OF THE ASSESSMENT AREA



### **APPENDIX B - DEMOGRAPHIC INFORMATION**

	DE	NVER ME		LE B-1 AN AA DE	MOGRAF	PHICS		
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.4	47,570	7.4	13,712	28.8	137,795	21.4
Moderate	147	24.3	143,321	22.3	20,270	14.1	112,440	17.5
Middle	196	32.4	209,289	32.5	11,448	5.5	131,053	20.4
Upper	203	33.6	243,278	37.8	6,760	2.8	262,187	40.7
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	605	100.0	643,475	100.0	52,190	8.1	643,475	100.0
	Housing	Housing Type by Tract						
	Units by	Owner-occupied		Rental		Vacant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.7	33.0	54,410	60.0	6,354	7.0
Moderate	255,389	120,985	18.9	47.4	120,634	47.2	13,770	5.4
Middle	366,723	217,005	33.9	59.2	131,825	35.9	17,893	4.9
Upper	359,995	272,093	42.5	75.6	72,564	20.2	15,338	4.3
Unknown	67	16	0.0	23.9	43	64.2	. 8	11.9
Total AA	1,072,923	640,084	100.0	59.7	379,476	35.4	53,363	5.0
			Businesses by Tract & Revenue Size					
	T-4-1 D			Busine	sses by Tra	ct & Revenu	e Size	
	Total Bus			nan or =	sses by Tra Over \$1		Reven	
	by T	ract	\$1 M	nan or = illion	Over \$1	Million	Reven Repo	orted
Low	by T	ract %	\$1 M #	nan or = illion %	Over \$1 #	Million %	Reven Repo	orted %
Low Moderate	<b>by T</b> # 12,372	<b>%</b> 7.1	\$1 M # 10,901	nan or = illion % 6.7	Over \$1 # 1,378	Million % 12.0	Reven Repo #	<b>%</b> 6.0
Moderate	# 12,372 32,939	7.1 18.8	\$1 M # 10,901 30,372	nan or = illion % 6.7 18.7	Over \$1 # 1,378 2,377	Million % 12.0 20.8	# 93 190	6.0 12.2
Moderate Middle	# 12,372 32,939 56,758	7.1 18.8 32.4	\$1 M # 10,901 30,372 52,709	nan or = illion % 6.7 18.7 32.5	Over \$1  #  1,378 2,377 3,578	Million % 12.0 20.8 31.3	Reven Repo # 93 190 471	6.0 12.2 30.2
Moderate Middle Upper	# 12,372 32,939 56,758 72,705	7.1 18.8 32.4 41.5	\$1 M # 10,901 30,372	nan or = illion % 6.7 18.7 32.5 41.9	Over \$1  #  1,378 2,377 3,578 3,942	Million  12.0 20.8 31.3 34.4	# 93 190	6.0 12.2 30.2 51.1
Moderate Middle Upper Unknown	# 12,372 32,939 56,758 72,705 579	7.1 18.8 32.4 41.5 0.3	\$1 M # 10,901 30,372 52,709 67,965 401	nan or = illion % 6.7 18.7 32.5 41.9 0.2	Over \$1  #  1,378 2,377 3,578 3,942 168	Million  12.0 20.8 31.3 34.4 1.5	Reven Repo # 93 190 471 798 10	6.0 12.2 30.2 51.1 0.6
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353	7.1 18.8 32.4 41.5 0.3 100.0	\$1 M # 10,901 30,372 52,709 67,965	nan or = illion % 6.7 18.7 32.5 41.9	Over \$1  #  1,378 2,377 3,578 3,942	Million  12.0 20.8 31.3 34.4	Reven Repo # 93 190 471 798	6.0 12.2 30.2 51.1
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B	7.1 18.8 32.4 41.5 0.3 100.0 Businesses:	\$1 M # 10,901 30,372 52,709 67,965 401	nan or = iillion % 6.7 18.7 32.5 41.9 0.2 100.0 92.6	7	Million  12.0 20.8 31.3 34.4 1.5 100.0 6.5	Reven Repo # 93 190 471 798 10 1,562	6.0 12.2 30.2 51.1 0.6 100.0
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B	7.1 18.8 32.4 41.5 0.3 100.0 Businesses:	\$1 M # 10,901 30,372 52,709 67,965 401	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443  s by Tract &	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si	Reven Repo # 93 190 471 798 10 1,562	6.0 12.2 30.2 51.1 0.6 100.0
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B	7.1 18.8 32.4 41.5 0.3 100.0 Businesses:	\$1 M # 10,901 30,372 52,709 67,965 401 162,348	nan or = illion	7	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si	Reven Repo #  93 190 471 798 10 1,562	6.0 12.2 30.2 51.1 0.6 100.0 0.9
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B	7.1 18.8 32.4 41.5 0.3 100.0 Businesses:	\$1 M # 10,901 30,372 52,709 67,965 401 162,348	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443  s by Tract &	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si	Reven Repo # 93 190 471 798 10 <b>1,562</b> ze	6.0 12.2 30.2 51.1 0.6 100.0 0.9
Moderate Middle Upper Unknown Total AA	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B by Tr	7.1 18.8 32.4 41.5 0.3 100.0 Businesses: arms	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443  s by Tract &	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si	Reven Repo # 93 190 471 798 10 <b>1,562</b> ze Revenu	6.0 12.2 30.2 51.1 0.6 100.0 0.9
Moderate Middle Upper Unknown Total AA Percenta	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B by Tr	7.1 18.8 32.4 41.5 0.3 100.0 Businesses: arms act	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443 s by Tract &  Over \$1	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si Million %	Reven Repo # 93 190 471 798 10 1,562 ze Revenu Repo	6.0 12.2 30.2 51.1 0.6 100.0 0.9
Moderate Middle Upper Unknown Total AA Percenta	# 12,372 32,939 56,758 72,705 579 175,353 age of Total F by Tr	7.1 18.8 32.4 41.5 0.3 100.0 Businesses: arms act %	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil #	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443 s by Tract &  Over \$1  #	Million  12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si Million  %	Reven Repo # 93 190 471 798 10 1,562 ze Revenu Repo #	6.0 12.2 30.2 51.1 0.6 100.0 0.9
Moderate Middle Upper Unknown Total AA Percenta  Low Moderate	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B  Total Fa by Tr  # 99 208	7.1 18.8 32.4 41.5 0.3 100.0 Susinesses: arms act % 6.1 12.8	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil #	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443 s by Tract & Over \$1  #	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si Million  % 26.5 11.8	Reven Repo # 93 190 471 798 10 1,562 ze Revenu Repo # 0 0	6.0 12.2 30.2 51.1 0.6 100.0 0.9  e Not rted % 0.0 0.0
Moderate Middle Upper Unknown Total AA Percenta  Low Moderate Middle	# 12,372 32,939 56,758 72,705 579 175,353 age of Total B  Total F by Tr  # 99 208 537	7.1 18.8 32.4 41.5 0.3 100.0 Susinesses: arms act % 6.1 12.8 32.9	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil # 90 204 527	nan or = illion	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443 s by Tract & Over \$1  #  9 4 8	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si Million  % 26.5 11.8 23.5	Reven Repo # 93 190 471 798 10 1,562  ze Revenu Repo # 0 0 2	6.0 12.2 30.2 51.1 0.6 100.0 0.9  1e Not rted % 0.0 0.0 100.0
Moderate Middle Upper Unknown Total AA Percenta  Low Moderate Middle Upper	# 12,372 32,939 56,758 72,705 579 175,353 age of Total E by Tr # 99 208 537 771	7.1 18.8 32.4 41.5 0.3 100.0 Businesses: arms act % 6.1 12.8 32.9 47.3	\$1 M # 10,901 30,372 52,709 67,965 401 162,348 Less Tha \$1 Mil # 90 204 527 759	nan or = illion  % 6.7 18.7 32.5 41.9 0.2 100.0 92.6  Farm an or = llion % 5.6 12.8 33.0 47.6	Over \$1  #  1,378 2,377 3,578 3,942 168 11,443  s by Tract &  Over \$1  #  9 4 8 12	Million  % 12.0 20.8 31.3 34.4 1.5 100.0 6.5 Revenue Si Million  % 26.5 11.8 23.5 35.3	Reven Repo  #  93 190 471 798 10 1,562  ze  Revenu Repo #  0 0 2 0	6.0 12.2 30.2 51.1 0.6 100.0 0.9  1e Not rted % 0.0 0.0 100.0 0.0

Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

### APPENDIX C - 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.

**Census tract**: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development**: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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.

**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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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**Home mortgage loans**: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, 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.

**Metropolitan area (MA)**: A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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.

**Other products**: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**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.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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