



PUBLIC DISCLOSURE

October 16, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FIRSTBANK
RSSD# 288853

12345 West Colfax Avenue
Lakewood, Colorado 80215

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

NOTE: This document is an evaluation of this bank'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 bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating 3

Institution

- Description of Institution..... 4
- Scope of Examination 5
- Conclusions With Respect to Performance Tests 7

Fair Lending or Other Illegal Credit Practices Review 16

State of Colorado

- Summary
 - State Rating 17
 - Scope of Examination 17
 - Description of Institution’s Operations 18
 - Conclusions With Respect to Performance Tests 18
- Denver-Boulder-Greeley CSA Metropolitan AA (Full-Scope Review)
 - Description of Institution’s Operations 23
 - Conclusions With Respect to Performance Tests 284
- Fort Collins MSA Metropolitan AA (Limited-Scope Review)
 - Description of Institution’s Operations 42
 - Conclusions With Respect to Performance Tests 43
- Colorado Springs MSA Metropolitan AA (Limited-Scope Review)
 - Description of Institution’s Operations 42
 - Conclusions With Respect to Performance Tests 43
- Mountain Nonmetropolitan AA (Limited-Scope Review)
 - Description of Institution’s Operations 44
 - Conclusions With Respect to Performance Tests 44

State of Arizona / Phoenix MSA AA (Full-Scope Review)

- Summary
 - State Rating 45
 - Scope of Examination 46
 - Description of Institution’s Operations 46
 - Conclusions With Respect to Performance Tests 49

State of California / Coachella Valley Metropolitan AA (Full-Scope Review)

Summary

State Rating	62
Scope of Examination	63
Description of Institution's Operations	63
Conclusions With Respect to Performance Tests	66

Appendix

Appendix A: Scope of Examination.....	79
Appendix B: Summary of State Ratings.....	80
Appendix C: Maps of the Assessment Areas.....	81
Appendix D: Demographic Information	88
Appendix E: 2022 Full-Scope Review Lending Tables	100
Appendix F: Limited-Scope Review Assessment Area Lending Tables.....	115
Appendix G: Glossary	148

INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Outstanding**

The following table indicates the performance level of FirstBank (the bank) with respect to the lending, investment, and service tests.

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

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank’s loans are originated within its delineated AAs.
- The bank’s distribution of loans by income level of geography (geographic distribution) is adequate.
- The bank’s distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes (borrower distribution) is good.
- The bank is a leader in making community development (CD) loans, which bolstered the overall lending test performance rating.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent responsiveness to credit and CD needs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

INSTITUTION

DESCRIPTION OF INSTITUTION

The bank is an interstate financial institution headquartered in Lakewood, Colorado. The bank's characteristics include:

- The bank is a wholly owned subsidiary of FirstBank Holding Company, a one-bank holding company also headquartered in Lakewood.
- The bank has total assets of \$28.1 billion (B) as of June 30, 2023.
- The bank operates 103 full-service banking offices, with 85 locations in the state of Colorado, 14 in Arizona, and 4 in California.
- The bank operates a total of 113 Automated Teller Machines (ATMs) throughout its AAs, 103 of which are located at branch offices and ten that are stand-alone.
- As shown in the table below, the bank's primary business focus is residential real estate and commercial lending.

Table 1

Composition of Loan Portfolio as of June 30, 2023		
Loan Type	\$(000)	%
Construction and Land Development	1,613,119	9.7
Farmland	1,786	0.0
1- to 4- Family Residential Real Estate	8,605,981	52.0
Multifamily Residential Real Estate	1,367,090	8.3
Nonfarm Nonresidential Real Estate	3,849,188	23.3
Agricultural	0	0.0
Commercial and Industrial	323,988	2.0
Consumer	76,539	0.5
Other	715,687	4.3
Gross Loans	16,553,378	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its November 1, 2021 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.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* 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. Performance was assessed within the bank's six AAs, with full-scope reviews performed on the Denver-Boulder-Greeley, Colorado Combined Statistical Area (CSA), the Phoenix, Arizona Metropolitan Statistical Area (MSA), and the Coachella Valley, California Metropolitan AA. The Colorado Springs, Colorado MSA AA, Fort Collins, Colorado MSA AA, and Mountain AA received limited-scope reviews. The following data was reviewed as part of the evaluation:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2021 and 2022 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business loans reported on the bank's 2021 and 2022 Community Reinvestment Act (CRA) LARs;
- CD loans originated from July 1, 2021 through December 31, 2022;
- Qualified investments that were made from July 1, 2021 through December 31, 2022, qualified investments made prior to but still outstanding during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from July 1, 2021 through December 31, 2022.

For this evaluation, significantly more weight was placed on the bank's performance in Colorado when determining the overall institution rating conclusion, based on the bank's relative branch, deposit, and loan presence within this state. Home mortgage lending generally carried more weight in the analysis based on the higher volume of loans compared to the bank's small business lending. In addition, more emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is considered a representative indicator of credit demand within the AAs, while demographic data was incorporated into the analysis to a lesser extent to understand available opportunities present throughout the bank's various markets. Home mortgage loans with a purpose of "other" reported on the bank's HMDA LAR were evaluated individually as part of the geographic or borrower distribution analyses for the Denver-Boulder-Greeley, Colorado CSA AA only, although this lending data is included in the lending tables and totals throughout this evaluation.

Table 2 illustrates the bank's presence in each AA, including the type of performance review analysis in this evaluation for each AA (full-scope or limited-scope), the numbers of retail branch offices, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2022 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by # ¹		Percent of Bank's Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Colorado		85	90.3	100.0	92.2	100.0	12.1	3 of 126
Denver-Boulder-Greeley CSA	Full	64	67.3	74.5	75.7	82.1	13.8	3 of 78
Fort Collins MSA	Limited	4	6.3	7.0	4.0	4.4	9.6	5 of 24
Colorado Springs MSA	Limited	6	5.4	5.9	3.5	3.8	7.9	4 of 40
Mountain	Limited	11	11.3	12.6	9.0	9.7	24.2	2 of 17
State of Arizona		14	7.3	100.0	5.1	100.0	0.6	17 of 67
Phoenix MSA	Full	14	7.3	100.0	5.1	100.0	0.8	14 of 61
State of California		4	2.5	100.0	2.7	100.0	0.0	101 of 183
Coachella Valley Metropolitan	Full	4	2.5	100.0	2.7	100.0	6.2	4 of 20

¹ Based on the bank's HMDA and small business lending used in the analysis.
² Based on the June 20, 2022 FDIC's Deposit Market Share Report.
³ Based on the bank's ranking among FDIC-insured financial institutions in each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

While conclusions with respect to lending performance were evaluated for two years, only 2021 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank's 2022 lending data for AAs that received full-scope reviews can be found in Appendix E of this report. Lending data for AAs that received a limited-scope review are located in Appendix F. This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the states of Colorado, Arizona, and California and specific AAs within each state.

LENDING TEST

The bank's overall lending test performance is high satisfactory. The lending test ratings for the states of Colorado, Arizona, and California are all high satisfactory. The ratings for Colorado and California were bolstered by the significant level of CD lending in each respective state.

Lending Activity

This performance criterion evaluates the bank’s lending volume considering the bank’s resources and business strategy and other information from the performance context. The bank’s overall lending activities reflect good responsiveness to AA credit needs. Lending volume was significant in the state of Colorado, while activity in the states of Arizona and California was lower based on a smaller geographic footprint and a significantly lower number of branch offices in each respective state.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2021 and 2022			
	#	\$(000)	#%	\$%
Home Purchase	6,648	3,503,812	23.8	39.9
Home Improvement	3,251	411,707	11.7	4.7
Multi-Family Housing	566	1,759,715	2.0	20.0
Other Purpose LOC	733	124,142	2.8	1.4
Other Purpose Closed-End	659	123,122	2.4	1.4
Refinancing	4,478	1,730,579	16.1	19.7
Total HMDA Loans	16,375	7,653,077	58.7	87.1
Small Business Loans	11,516	1,129,288	41.3	12.9
Total Loans	27,891	8,782,365	100.0	100.0

The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers a number of flexible programs throughout its AAs, including government guaranteed loans and affordable housing program loans. Loans originated through these programs aid a significant number of borrowers who might not otherwise qualify for credit. The numerous program initiatives are largely driven by the Community Reinvestment & Involvement Oversight Committee (CRIOC) that manages the bank’s CRA strategic focus. The CRIOC is comprised of individuals from various business lines within the bank and includes members of the bank’s directorate and senior leadership. Flexible lending programs include the following:

- The bank provides Federal Housing Administration (FHA) purchase and refinance loans across all markets. During the evaluation period, the bank originated 13 FHA loans for \$4.1 million (MM).
- The bank originated over 6,500 loans through the Small Business Administration’s (SBA’s) Paycheck Protection Program (PPP) in 2021, totaling \$470.7MM in its six AAs with over 1,300 loans totaling \$109.3MM in LMI geographies.
- The bank also participates in the SBA 7(a) and 504 loan programs to provide support for small business borrowers. From 2021 through 2022, the bank originated 59 SBA 504 loans for \$50.9MM and four SBA 7(a) loans for \$3.4MM.

- The bank offers two affordable mortgage programs that offer reduced fees and lower costs for LMI borrowers seeking permanent financing on a primary residence. During the examination period, the bank originated approximately \$383.0MM in affordable housing loans for a total of 1,543 affordable housing units.
- In addition to its affordable housing programs, the bank offers a "Mortgage Modification Program" that allows LMI borrowers to modify an existing mortgage at a reduced rate or shorter amortization term, along with reduced fees from a typical refinancing. Overall, 317 LMI borrower loans were modified in 2021 and 2022.
- The bank also offers a HMDA Second Look Program to all HMDA-covered applications submitted by LMI borrowers. The program assigns an experienced lender to review applications that were initially denied to consider all possible approval alternatives under the bank's array of available loan programs, combined with competitive interest rates. The process may include counteroffers to ensure that credit might be extended under modified terms.
- The bank works closely with several affordable housing agencies, certified development financial institutions (CDFIs), and land trusts by participating in various loan and down payment assistance programs that support LMI borrowers. The programs and accomplishments noted below represent a partial listing of the bank's numerous innovative and flexible lending programs.
 - Boulder's Permanently Affordable Homeworks Program – Homes under this program are sold at below market-rate prices to eligible LMI borrowers through a managed deed restricted program. The bank originated 17 mortgage loans under this program in 2021 and 2022 for \$3.2MM.
 - Colorado Community Land Trust (CCLT) – CCLT provides affordable homes for moderate-income borrowers located in the Denver metropolitan area whereby the borrower owns the home while CCLT owns the land. Between 2021 and 2022, the bank originated 12 loans under this program for \$2.9MM.
 - Providing Access to Homeownership (PATH) – This internally developed program in partnership with a local CDFI provides down payment and closing cost assistance to first-time LMI borrowers. PATH's two grant programs offer up to \$15,000 and up to \$20,000, respectively, in subsidies. The \$20,000 program resulted in 29 loan originations by the bank in 2021 totaling \$9.3MM. In 2022, the \$20,000 program resulted in 19 loans for \$5.3MM, while the \$15,000 program resulted in 94 loans for \$27.4MM. The PATH program was recently approved by the bank for implementation in its Arizona market.
 - Newtown Community Development Corporation – This organization provides homebuyer education, homeownership counseling, financial literacy education, and down-payment assistance. The bank originated eight loans in 2021 for \$1.4MM and seven loans in 2022 for \$1.5MM under this program.

- Elevation Community Land Trust (ECLT) – Using a similar model as CCLT, ECLT created its program in 2020. In 2021 and 2022, the bank originated 64 ECLT loans for \$11.1MM.
- Rocky Mountain Community Land Trust (RMCLT) – Serving the Colorado Springs metropolitan area, RMCLT provides down payment assistance to eligible LMI borrowers who in turn agree to resell the home to another eligible buyer. RMCLT retains the ground lease. From 2021 to 2022, the bank originated 14 loans under the program for \$2.3MM.
- Impact Development Fund Down Payment Assistance Program – This program is sponsored by a local CDFI serving the Denver and Fort Collins, Colorado Metropolitan areas. From 2021 to 2022, the bank originated 32 loans through the program for \$5.7MM.
- Landed Down Payment Assistance Program – This is a down payment assistance program through an equity share program available to Denver and Jefferson County school district employees. The partner organization is able to offer assistance for up to 15.0 percent of the purchase prices for a 25.0 percent equity share that is repaid when the home sells. Between 2021 and 2022, the bank originated 14 loans through the program for \$6.4MM.
- Trellis Down Payment Assistance Program – The bank has been a partner with the Trellis affordable housing agency since 2015. In 2021 and 2022, the bank originated 42 down payment assistance loans to LMI borrowers for \$320,000.
- In 2021 and 2022, the bank purchased 27 loans from Habitat for Humanity’s Colorado affiliates totaling \$5.1MM. These purchases provide the organization additional liquidity to build more homes for LMI families as well as funding for down payment assistance programs and interest free loans.

In addition to the various activities noted above, the bank operates a Multicultural Banking Center that serves as a hub for all of its branch locations to ensure that customers have access to banking services in their preferred language. The bank currently employs 57 Spanish-speaking loan officers, as well as 36 loan officers that are proficient in at least one of 19 different languages spoken in various parts of Europe, Africa, and Asia.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. The bank originated a substantial majority of loans, by number and dollar, inside its AAs.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Purchase - Conventional	6,519	98.3	3,431,001	98.0	116	1.7	68,704	2.0
Home Purchase – FHA	13	100.0	4,107	100.0	0	0.0	0	0.0
Home Improvement	3,242	99.7	410,231	99.6	9	0.3	1,476	0.4
Multi-Family Housing	546	96.5	1,729,761	98.3	20	3.5	29,954	1.7
Other Purpose Closed End	653	99.1	121,876	99.0	6	0.9	1,246	1.0
Other Purpose LOC	772	99.9	124,042	99.9	1	0.1	100	0.1
Refinancing	4,449	99.4	1,716,423	99.2	29	0.6	14,156	0.8
Total HMDA related	16,194	98.9	7,537,441	98.5	181	1.1	115,636	1.5
Small Business	11,133	96.7	1,094,346	96.9	383	3.3	34,942	3.1
Total Loans	27,327	98.0	8,631,787	98.3	564	2.0	150,578	1.7

Note: Percentages may not total 100.0 percent due to rounding.

The remaining loan distribution analyses discussed in this performance evaluation will consider only those loans originated within the bank’s AAs.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AAs. As previously stated, the bank’s performance in the state of Colorado carries the greatest weight. The state rating for Colorado is adequate and for Arizona is good, while the bank’s state rating for California is poor.

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 an overall good penetration among individuals of different income levels and businesses of different sizes. The conclusion is derived from a good distribution in the state of Colorado, which carries the greatest weight, and is further supported by good performance in California, while performance in the state of Arizona was adequate.

Community Development Lending

This performance criterion evaluates the bank’s level of CD lending. The bank is a leader in making CD loans when considering the bank’s capacity, AA needs, and the availability of such opportunities. This conclusion is consistent with the individual ratings for CD lending in each state. In addition, the significant level of lending that met CD qualifications resulted in a positive impact on the bank’s overall lending test rating.

The bank has been responsive in providing financing that addresses needs across all CD categories and was particularly responsive in originating loans that supported affordable housing initiatives. The state of Colorado AAs had the highest volume of CD loan activity during the review period, with approximately 89.6 percent of bank-wide CD loans by number. CD lending in Colorado also included 18 loans in a broader statewide area outside the boundaries of the bank’s four delineated AAs. Furthermore, 72.4 percent of the Colorado CD loans supported affordable housing needs and community services targeted to LMI individuals or families. Affordable housing loans have a positive impact in high-cost housing areas that are especially prevalent throughout the state of Colorado and also provide tangible benefits to a significant number of LMI individuals and families.

Table 5 illustrates the volume of CD loans by number and dollar volume based on their CD purpose. Additional details of specific CD performance results are further discussed in the analysis of each state and AA evaluation. Examples of responsive CD lending activities among all AAs include:

- A \$63.1MM loan was originated in Larimar County for the construction of a senior care living facility. The construction of the facility helps to revitalize and stabilize an LMI geography by creating 90 to 100 new jobs, the majority of which will employ LMI individuals.
- A \$12.8MM loan was originated for renovations of multifamily, affordable housing units where rents are restricted to individuals making 60 percent or less of the Fort Collins MSA Median Family Income (MFI).
- A \$14.1MM loan was originated for the construction of an industrial building in Colorado Springs which will primarily create jobs for LMI individuals.

Table 5

Community Development Loans – All		
Community Development Purpose	#	\$(000)
Affordable Housing	158	416,933
Community Services	45	19,826
Economic Development	89	237,852
Revitalization and Stabilization	18	221,314
Outside Activities	18	63,600
Total Loans	328	959,526

INVESTMENT TEST

This performance criterion evaluates the bank’s level of qualified grants, donations, or in-kind contributions of property that have a primary purpose of community development. The bank’s overall performance under the investment test is outstanding, with outstanding performance across all three states. The bank has an excellent level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs.

Table 6 illustrates the total volume of investment and donation activities by CD purpose, including an itemization of investments that remain on the bank’s balance sheet (prior-period) and new investments made during the current evaluation period. Investment vehicles generally consisted of a variety of private bonds, school bonds to districts where greater than 50 percent of students qualified for the free and reduced lunch program, tax credits for low-income housing, investments in affordable housing equity funds, and investment funding for small business investment companies (SBICs). Examples of responsive CD investments include:

- The bank purchased a \$46.5MM investment for the construction of multifamily, attainable, workforce housing in the Mountain AA with rents lower than comparable properties in the area and targeted to individuals and families earning less than 80.0 percent of the area MFI.
- The bank invested in eight equity equivalent (EQ2s) investments for \$6.3MM supporting microlending and emergency programs for small businesses, as well as affordable housing and down payment assistance programs.
- The bank purchased 14 low-income housing tax credits (LIHTCs) totaling \$36.7MM supporting the creation and improvement of affordable housing through investments in several non-profit organizations and local housing authorities.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	37	94,736	15	155,418	68	1,854	120	252,008
Community Services	30	106,659	1	2,090	388	8,230	419	116,979
Economic Development	6	9,954	1	2,674	14	47	21	12,674
Revitalization and Stabilization	6	22,195	0	0	1	2	7	22,196
Total	79	233,543	17	160,182	471	10,133	567	403,858

¹ Book Value of Investment

² Original Market Value of Investment

In addition to its qualified investments, the bank also makes a significant volume of CD donations throughout its geographic footprint. The bank's donation activity was particularly responsive to organizations that provide community services targeted to LMI individuals and families, including various non-profit entities and local grassroots agencies. Examples of the bank's responsive philanthropic activities include:

- Nineteen donations totaling \$110.4M to various local chapters of a national organization that provides affordable housing construction for LMI individuals.
- Twenty-six donations totaling \$91M to various organizations that provide support and services for children and victims of domestic abuse, the majority of which are LMI.
- Seven donations totaling \$91M to various local chapters of a national organization that provides community services targeted to children from LMI homes.

SERVICE TEST

The bank's overall performance under the service test is outstanding, with outstanding performance across all three states.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic census tract classification. The table below illustrates the distribution of bank offices and full-service automated teller machines (ATMs) by income level of geographies, as well as the number of branch openings/closing, and the volume of CD services provided during the evaluation period.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Bank offices and full-service ATM locations generally align with the total percentage of census tracts by income level throughout the bank's AAs. Additionally, several of the bank's branches located in middle- and upper-income geographies are in close proximity to LMI tracts, further supporting the accessibility of the bank's branch and ATM network to all tract income levels.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. During the evaluation period, the bank opened two branch offices and closed eight branch offices in Colorado. As shown in the table below, the closures were in middle-, upper-, and unknown-income census tracts.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby business hours and drive-through services are relatively consistent across all six bank AAs, with lobbies generally open eight hours a day Monday through Friday along with Saturday morning lobby and drive-through hours.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.9	15.5	43.7	35.9	1.0	100.0	5.3	25.2	35.9	31.4	2.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
4.4	14.2	42.5	38.1	0.9	100.0	4.6	25.8	37.6	31.2	0.7	100.0	
Changes in Branch Location	Number of Branches (#)				Net Change in Branch Locations (#)							
	Total Branches	Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total		
	103	2	8		0	0	(1)	(4)	(1)	(6)		
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	99	321	27	9	456	232						

¹ Based on 2022 FFIEC census tract definitions.
Note: Total percentages may vary by 0.1 percent due to automated rounding differences. Branch and ATM data is as of December 31, 2022.

Community Development Services

This performance criterion evaluates the bank’s level of CD services. The bank is a leader in providing CD services, which is derived from an excellent level of CD services provided in all the AAs in each state. As noted in Table 7, bank representatives provided 456 services to 232 area organizations. The overwhelming majority of services were provided to organizations that provide community services to LMI individuals and families. Examples of CD services include:

- Six bank employees served on the boards of directors (boards) for organizations that provide support and services for children and victims of domestic abuse, the majority of which are LMI.
- Thirteen bank employees served on the boards for various chapters of a national organization that provides affordable housing construction for LMI individuals and families.
- Three bank employees served on the board for an organization whose efforts are aimed at revitalizing and stabilizing economically marginalized neighborhoods in the Denver area by to developing community leaders, cultivating food systems and creating an economy owned by the community.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB primary supervisory authority over insured depository institutions and their affiliates with total assets of more than \$10B when assessing compliance with the requirements of federal consumer compliance laws. The Reserve Bank, however, retains authority to enforce compliance with the bank's CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Reserve Bank did not cite violations involving discriminatory or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this report, the Reserve Bank is unaware of any violations of Regulation B, Equal Credit Opportunity Act, or any Unfair or Deceptive Acts and Practices identified by the CFPB.

STATE OF COLORADO

CRA rating for **Colorado**: **Outstanding**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is adequate.
- The bank's distribution of loans including LMI is good.
- The bank is a leader in making CD loans within its AAs, which bolstered the lending test rating for the state of Colorado.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent responsiveness to the credit and CD needs throughout its Colorado AAs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Colorado AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution. A full-scope review was conducted for the Denver-Boulder-Greeley

CSA AA, and the overall state rating was based on the bank's performance in this AA. Limited-scope reviews were conducted for the Colorado Springs MSA, Fort Collins MSA, and Mountain AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. A total of 24,671 loans were reviewed in the state of Colorado, including 14,373 home mortgage and 10,298 small business loans. More weight was placed on the bank's home mortgage lending in the state of Colorado, followed by small business lending, based on the lending volume for each respective product.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates four of its six AAs and operates 85 of its 103 branches in the state of Colorado. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on home mortgage and small business lending. Detailed descriptions of the bank's operations in the Denver-Boulder-Greeley CSA AA are provided in analysis that follows.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is high satisfactory. The ratings for all limited-scope AAs were consistent with the overall state rating.

Lending Activity

The bank's overall lending activities in the state of Colorado reflect good responsiveness to AA credit needs. The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the overall lending activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Colorado reflects adequate distribution among the different census tracts and dispersion throughout the AAs based on an adequate distribution in the Denver-Boulder-Greeley CSA AA.

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

The bank’s lending within Colorado has an overall good penetration among individuals of different income levels and businesses of different sizes based on the distribution in the Denver-Boulder-Greeley CSA AA.

Community Development Lending

The bank is a leader in providing CD loans within the state of Colorado. The bank originated 294 CD loans totaling \$868.9MM in AAs within the state. The Denver-Boulder-Greeley CSA AA is the bank’s primary market and lending included 192 CD loans totaling \$535.5MM, or 58.5 percent by number and 55.8 percent by dollar volume of all CD loans originated bank-wide. The bank’s performance was also supported by CD loans originated in a broader statewide area of Colorado beyond the bank’s delineated AAs that supported various CD initiatives in the state. The following are specific examples of CD loans that were responsive to AA needs in the state of Colorado:

- The bank originated a loan for \$28.0MM for the construction of multifamily, attainable, workforce housing in the Mountain AA. Seventy-five percent of units are restricted to individuals making at or below 100 percent of the area median income in this high-cost housing area.
- The bank originated a loan for \$27.0MM for the construction of a biosciences center in an enterprise zone. The center is part of an urban renewal project that will revitalize and stabilize the local area and will allow for the addition of residences, hotels, and retail spaces.
- The bank originated a \$3.3MM loan to a non-profit organization that provides community services for LMI individuals. Services provided by the organization include counseling, emergency services, rent and utility assistance, shelter, meals, early childhood education, and affordable housing.

Table 8

Community Development Loans – State of Colorado		
Community Development Purpose	#	\$(000)
Affordable Housing	154	384,163
Community Services	43	16,187
Economic Development	61	183,662
Revitalization and Stabilization	18	221,314
Outside Activities	18	63,600
Total Loans	294	868,926

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of Colorado is outstanding. The bank has an excellent level of qualified CD investments and grants within Colorado and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs. The bank’s performance in Colorado was further bolstered by a substantial portion of investment dollars in statewide areas outside of its delineated AAs in the state. These activities were predominately comprised of investments in affordable housing bonds.

Bank performance under the investment test is good in the Denver-Boulder-Greeley CSA AA, while performance in the areas subject to limited-scope reviews was below the state rating in the Fort Collins MSA AA and consistent with the state rating in the Mountain and Colorado Springs MSA AAs. The following are specific examples of responsive investments made by the bank in the state of Colorado:

- The bank purchased two bonds for \$8.2MM that provided funding to acquire a 50-unit and a 72-unit senior affordable housing facility. All the units are restricted to individuals with annual incomes of 50 percent or less than the area MFI.
- An investment of \$22.3MM for a school bond that financed construction and capital improvements for the largest school district in the state of Colorado, in which 61 percent of students qualified for the free and reduced lunch program.
- An investment of \$4.9MM for revitalization and stabilization efforts in an enterprise zone and blighted area targeted for redevelopment by the Brighton Urban Renewal Authority.

Table 9

Investments, Grants, and Donations – State of Colorado								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	10	13,022	8	79,418	57	1,283	75	93,723
Community Services	11	71,478	1	2,090	344	6,532	356	80,100
Economic Development	2	1,000	0	0	11	40	13	1,040
Revitalization and Stabilization	5	21,782	0	0	1	2	6	21,784
Outside Activities	26	81,427	8	78,674	1	1	35	160,101
Total	54	188,709	17	160,182	414	7,858	485	356,748
¹ Book Value of Investment ² Original Market Value of Investment								

To further demonstrate the bank's commitment to meeting critical AA needs, 413 donations totaling \$7.9MM to various community service organizations were made during the evaluation period. Examples of responsive donations in Colorado include:

- The bank made two donations totaling \$20M to an organization that provides community services promoting educational equity targeted to LMI children.
- The bank made two donations totaling \$23M to an organization that provides community services including ACT/SAT standardized testing preparation and educational enrichment programs targeted to LMI students.
- The bank made two donations totaling \$10M to an organization that provides services directed to affordable housing initiatives, including efforts to construct housing for individuals making 30 to 60 percent of the Boulder MFI.

SERVICE TEST

The bank's overall performance under the service test in the state of Colorado is outstanding.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Colorado are accessible to the bank's various geographies and to individuals of different income levels in each AA. Fifteen of the bank's 85 full-service branches and 16 of the bank's 95 ATMs are located in LMI tracts, which is generally proportional to the percent of census tracts by income level.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, two new branches were opened in upper-income census tracts within the state of Colorado, and eight full-service branches were closed, including one in a middle-, six in upper-, and one in an unknown-income census tract(s).

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent across AAs, with all locations offering similar products and services.

Table 10

Retail Banking and Community Development Services – State of Colorado												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.5	14.1	45.9	35.3	1.2	100.0	4.3	23.3	38.9	31.3	2.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
4.2	12.6	44.2	37.9	1.1	100.0	4.0	24.2	40.2	30.7	1.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	85		2	8			0	0	(1)	(4)	(1)	(6)
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	86	274	26	9	395	201						

¹ Based on 2022 FFIEC census tract definitions.
Note: Total percentages may vary by 0.1 percent due to automated rounding differences. Branch and ATM data is as of December 31, 2022.

Community Development Services

The bank is a leader in providing CD services within the state of Colorado. Bank officers and staff provided 395 CD services to 201 organizations throughout the Colorado AAs. Many of these activities included board service on affordable housing and community service organizations. Examples of CD services provided by bank employees in Colorado include:

- A bank employee served on the board of an organization focusing on revitalizing underdeveloped neighborhoods and investing in community needs such as grocery stores and job training facilities.
- Two bank employees served on the board of a community service organization that provides early education, basic needs, and other essential services to families experiencing homelessness or living in poverty.
- Eight employees served on the boards of organizations that operate as food banks and/or provide meals as part of an array of services targeted to LMI individuals and families.

**DENVER-BOULDER-GREELEY CSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DENVER-BOULDER-GREELEY CSA AA

The bank's Denver-Boulder-Greeley, Colorado CSA AA consists of 12 counties in their entirety (Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park) that encompass the Denver-Aurora-Lakewood, Colorado MSA, the Boulder, Colorado MSA, which is comprised of Boulder County in its entirety, and the Greeley, Colorado MSA, which is comprised of Weld County in its entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The composition of the 2021 AA consisted of 766 total census tracts, including 63 low-, 180 moderate-, 261 middle-, and 253 upper-income census tracts based on 2011-2015 American Community Survey (ACS) data. The AA also included 9 tracts with unknown-income levels. The composition of counties included within each MSA has not changed since the prior evaluation.
- The 2022 AA remains unchanged from the 2021 AA, although it is currently comprised of 868 census tracts, including 45 low-, 211 moderate-, 320 middle-, 269 upper-, and 23 unknown-income census tracts based on the most recent 2016-2020 ACS data.
- The bank operates 64 offices in the AA, including three in low-, eight in moderate-, 29 in middle-, 23 in upper-, and one in an unknown-income census tract(s).
- As of June 30, 2022, the bank held a 13.8 percent market share of deposits in the AA, ranking 3rd out of 78 FDIC-insured financial institutions operating from 757 banking offices in the AA.
- Three community contacts recently conducted as part of the CRA evaluations of other financial institutions with branches in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The three contacts represented a small business development center, an affordable housing agency, and an economic development organization.

Table 11

Population Change			
Assessment Area: Denver-Boulder-Greeley CSA			
Area	2015 Population	2020 Population	Percent Change
Denver-Boulder-Greeley CSA	3,284,952	3,623,560	10.3
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Boulder County, CO	310,032	330,758	6.7
Broomfield County, CO	60,699	74,112	22.1
Clear Creek County, CO	9,136	9,397	2.9
Denver County, CO	649,654	715,522	10.1
Douglas County, CO	306,974	357,978	16.6
Elbert County, CO	23,855	26,062	9.3
Gilpin County, CO	5,605	5,808	3.6
Jefferson County, CO	552,344	582,910	5.5
Park County, CO	16,189	17,390	7.4
Weld County, CO	270,948	328,981	21.4
Boulder, CO MSA	310,032	330,758	6.7
Denver-Aurora-Lakewood, CO MSA	2,703,972	2,963,821	9.6
Greeley, CO MSA	270,948	328,981	21.4
Colorado	5,278,906	5,773,714	9.4

*Source: 2020 U.S. Census Bureau Decennial Census
2011 - 2015 U.S. Census Bureau: American Community Survey*

- There was significant population growth throughout the AA, with the highest levels in Broomfield, Douglas, and Weld Counties, with growth rates that significantly outpaced a number of other AA counties.
- The Denver-Boulder-Greeley CSA AA accounts for 62.8 percent of the population of the state of Colorado.
- A majority of the AA population reside within Adams, Arapahoe, Denver, and Jefferson Counties, which includes 2,473,074 residents, or 68.3 percent of the AA population and 42.8 percent of population of the state. The AA is diverse and is also comprised of the sparsely populated counties of Clear Creek, Elbert, Gilpin, and Park, which are rural in nature and located on the outer fringes of the CSA.

Table 12

Median Family Income Change			
Assessment Area: Denver-Boulder-Greeley CSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Denver-Boulder-Greeley CSA	87,809	102,312	16.5
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Boulder County, CO	105,899	118,307	11.7
Broomfield County, CO	106,948	129,207	20.8
Clear Creek County, CO	94,577	109,327	15.6
Denver County, CO	76,243	93,236	22.3
Douglas County, CO	125,984	137,589	9.2
Elbert County, CO	105,472	115,382	9.4
Gilpin County, CO	82,701	111,832	35.2
Jefferson County, CO	94,579	108,867	15.1
Park County, CO	75,643	90,338	19.4
Weld County, CO	76,980	85,167	10.6
Boulder, CO MSA	105,899	118,307	11.7
Denver-Aurora-Lakewood, CO MSA	88,302	103,157	16.8
Greeley, CO MSA	76,980	85,167	10.6
Colorado	81,753	92,752	13.5
<i>Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The change in AA MFI from 2015 to 2020 outpaced the entire state and reflected positive growth throughout all of the AA counties. The highest growth rates occurred in Broomfield, Denver, and Gilpin Counties, with increases exceeding 20 percent.
- Based on 2016-2020 ACS data, the percentage of AA families living below the poverty level was 5.4 percent, which is below the Colorado statewide figure of 6.1 percent. Within the AA, Denver County had the highest percentage of families living below the poverty level, at 8.4 percent, while Clear Creek County had the lowest, at 1.2 percent.

Table 13

Housing Cost Burden						
Assessment Area: Denver-Boulder-Greeley CSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver-Boulder-Greeley CSA	80.2	49.1	46.3	65.0	38.8	21.1
Adams County, CO	82.5	47.4	50.3	66.1	34.5	24.0
Arapahoe County, CO	84.3	51.5	48.8	66.9	40.5	21.4
Boulder County, CO	84.0	55.5	52.8	62.3	35.2	20.4
Broomfield County, CO	83.1	68.7	40.7	55.2	33.2	17.1
Clear Creek County, CO	67.3	21.1	43.5	42.2	21.3	21.2
Denver County, CO	74.7	45.4	43.0	66.6	36.6	22.8
Douglas County, CO	88.4	67.6	39.9	71.2	50.6	18.0
Elbert County, CO	45.3	20.0	23.5	73.7	47.7	26.8
Gilpin County, CO	84.8	16.7	42.1	63.8	29.9	24.5
Jefferson County, CO	84.3	48.2	47.5	61.8	37.7	19.4
Park County, CO	73.7	57.1	53.7	48.4	41.7	22.6
Weld County, CO	72.7	38.6	42.1	64.6	43.7	21.5
Boulder, CO MSA	84.0	55.5	52.8	62.3	35.2	20.4
Denver-Aurora-Lakewood, CO MSA	80.2	49.3	45.8	65.3	38.5	21.1
Greeley, CO MSA	72.7	38.6	42.1	64.6	43.7	21.5
Colorado	79.1	46.6	46.3	62.5	37.5	21.2

Source: U.S. Department of Housing and Urban Development (HUD), 2015 – 2019 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- Housing affordability was constrained, yet similar, throughout the AA counties with the greatest cost burden to low-income renters in Douglas County and to low-income homeowners in Elbert and Douglas Counties.
- The housing affordability ratio¹ in the AA was low, at 20.0 percent, although it was consistent with the state of Colorado figure of 20.3 percent. Housing affordability ratios within the 12 AA counties ranged from 16.2 percent in Boulder County to 24.6 percent in Douglas County.
- The median housing value in the AA counties ranged from a low of \$326,100 in Weld County to a high of \$539,100 in Boulder County, compared to the state of Colorado figure of \$369,900.
- A community contact affiliated with an affordable housing organization noted that the pandemic contributed to increasing home values when a significant number of individuals migrated to Colorado after working from home and virtual schooling became more prevalent.

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Table 14

Unemployment Rates					
Assessment Area: Denver-Boulder-Greeley CSA					
Area	2017	2018	2019	2020	2021
Denver-Boulder-Greeley CSA	2.5	2.9	2.5	7.0	5.4
Adams County, CO	2.8	3.2	2.8	7.6	6.2
Arapahoe County, CO	2.6	3.0	2.5	7.5	5.8
Boulder County, CO	2.2	2.6	2.2	5.8	4.4
Broomfield County, CO	2.4	2.7	2.3	6.2	4.5
Clear Creek County, CO	2.4	2.8	2.3	8.2	5.5
Denver County, CO	2.5	2.9	2.5	7.8	5.9
Douglas County, CO	2.2	2.6	2.2	5.4	4.1
Elbert County, CO	2.2	2.6	2.1	4.4	3.8
Gilpin County, CO	1.9	2.3	2.2	10.9	6.2
Jefferson County, CO	2.4	2.8	2.4	6.8	5.0
Park County, CO	2.2	2.6	2.3	5.5	4.1
Weld County, CO	2.5	2.8	2.4	6.6	5.7
Boulder, CO MSA	2.2	2.6	2.2	5.8	4.4
Denver-Aurora-Lakewood, CO MSA	2.5	2.9	2.5	7.1	5.5
Greeley, CO MSA	2.5	2.8	2.4	6.6	5.7
Colorado	2.6	3.0	2.6	6.9	5.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA remained relatively aligned with the statewide figure for Colorado. During 2020, unemployment rates increased throughout the AA due to the pandemic lockdown before decreasing in 2021, although rates were still higher than pre-pandemic levels.
- The AA labor force participation rate according to 2016-2020 ACS data was 70.6 percent, which is above the Colorado statewide figure of 68.2 percent.
- Major employers in the Denver-Boulder-Greeley CSA include Denver International Airport (35,000 employees), HealthONE Corporation (11,050), Lockheed Martin (14,000), Centura Health (8,310), SCL Health Systems (8,270), and Century Link (6,500).
- The largest economic sectors in the AA are professional, scientific, and technical services; health care and social assistance; and retail trade.
- A community contact affiliated with an economic development organization noted that physical space is a common need for area businesses. While many businesses would like to acquire additional real estate or expand their geographic footprint, the task of locating property within their lending capability that also meets their business need is challenging in the current market due to the sharp increase in real estate prices in recent years.
- The contact also noted that area financial institutions tend to focus on lending to established businesses or long-term borrowers, making it more difficult for new borrowers and start-up businesses to obtain funding.

- Another community contact affiliated with an economic development organization noted that businesses cannot meet current demand and are faced with labor shortages, particularly among skilled employees.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER-BOULDER-GREELEY CSA AA

LENDING TEST

The bank's performance under the lending test in the Denver-Boulder-Greeley CSA AA is good and was bolstered by the bank's leadership in originating CD loans. The bank's home mortgage lending carried greater weight in the analysis due to the larger volume of lending compared to small business lending.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 10,407 home mortgage loans and 7,984 small business loans originated between January 1, 2021 and December 31, 2022.

The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible lending products is discussed in the overall Institution section description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage and small business loans both reflect adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2021 home mortgage loans among low-income tracts was above the aggregate lending data by number, significantly above by dollar volume, and comparable to the demographic figure which represents the percentage of owner-occupied housing units in each census tract income level. Lending levels in moderate-income tracts were comparable to the aggregate lending data by number, dollar volume, and to the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected penetration consistent with 2021 lending patterns.

An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2021 home purchase lending in low-income census tracts was above the aggregate lending data by number and dollar volume, and significantly above the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number, dollar volume, and to the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected penetration consistent with 2021 lending patterns.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2021 home refinance lending was comparable to the aggregate lending data by number, dollar volume, and to the demographic figure in low- and moderate-income census tracts.

The geographic distribution of home refinance lending in 2022 reflected penetration consistent with 2021 lending patterns.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The bank's 2021 home improvement lending in low-income census tracts was comparable to the aggregate lending data by number, dollar volume, and to the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume and below the demographic figure.

The geographic distribution of home improvement lending in 2022 was consistent with 2021 lending patterns.

Multifamily Loans

The geographic distribution of multifamily lending is adequate. The bank's 2021 multifamily lending in low-income census tracts was above the aggregate lending data by number, and significantly above by dollar volume and in comparison to the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume, and to the demographic figure.

The geographic distribution of multifamily lending in 2022 reflected penetration consistent with 2021 lending patterns.

Other Purpose Lines of Credit

The geographic distribution of other purpose lines of credit (LOCs) lending is adequate. The bank's 2021 other purpose LOC lending in low-income census tracts was significantly below the aggregate lending data by number and dollar volume and was significantly below the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number, below by dollar volume, and below the demographic figure.

The geographic distribution of other purpose LOC lending in 2022 reflected penetration below 2021 lending patterns, although the higher number of originations in 2022 supported the overall rating.

Other Purpose Closed-End Loans

The geographic distribution of other purpose closed-end lending is adequate. The bank's 2021 closed-end lending in low-income census tracts was comparable to the aggregate lending data by number, and above by dollar volume, and below the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume and to the demographic figure.

The geographic distribution of other purpose closed-end lending in 2022 reflected penetration consistent with 2021 lending patterns.

Table 15 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	142	7.2	4.9	44,996	4.7	3.8	4.3
Moderate	393	19.8	18.8	122,346	12.9	14.8	18.7
Middle	620	31.2	35.3	267,795	28.2	32.5	36.0
Upper	829	41.8	41.0	515,630	54.2	49.0	40.9
Unknown	1	0.1	0.0	375	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,985	100.0	100.0	951,142	100.0	100.0	100.0
Refinance Loans							
Low	72	3.9	3.6	18,128	2.8	2.8	4.3
Moderate	344	18.5	16.8	79,535	12.2	13.1	18.7
Middle	577	31.0	34.9	169,001	25.9	31.8	36.0
Upper	871	46.7	44.7	384,959	59.1	52.2	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,864	100.0	100.0	651,623	100.0	100.0	100.0
Home Improvement Loans							
Low	32	3.0	2.8	2,851	2.4	2.4	4.3
Moderate	118	11.2	12.9	12,502	10.5	10.3	18.7
Middle	314	29.8	31.3	28,179	23.6	28.2	36.0
Upper	590	56.0	53.0	75,741	63.5	59.0	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,054	100.0	100.0	119,273	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	42	23.0	17.5	60,742	12.8	8.0	14.3
Moderate	66	36.1	30.3	108,886	22.9	23.2	29.9
Middle	44	24.0	33.8	125,628	26.4	42.4	37.3
Upper	31	16.9	18.3	181,083	38.0	26.4	18.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	183	100.0	100.0	476,339	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	296	5.3	4.0	128,015	5.6	3.4	4.3
Moderate	979	17.5	17.2	328,292	14.4	14.1	18.7
Middle	1,705	30.5	34.8	609,472	26.8	32.4	36.0
Upper	2,605	46.6	44.0	1,211,944	53.2	50.2	40.9
Unknown	1	0.0	0.0	375	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5,586	100.0	100.0	2,278,098	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table 15 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	2	0.7	2.5	215	0.5	1.8	4.3
Moderate	28	9.6	12.8	2,333	5.6	9.2	18.7
Middle	77	26.4	32.4	10,503	25.1	28.2	36.0
Upper	185	63.4	52.3	28,772	68.8	60.7	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	292	100.0	100.0	41,823	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	6	2.9	3.5	1,083	2.9	1.9	4.3
Moderate	30	14.4	15.2	2,690	7.1	9.1	18.7
Middle	73	35.1	33.7	8,366	22.1	24.3	36.0
Upper	99	47.6	47.6	25,759	68.0	64.6	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	208	100.0	100.0	37,898	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	6.5	0	0.0	4.4	4.3
Moderate	0	0.0	32.8	0	0.0	24.3	18.7
Middle	0	0.0	32.3	0	0.0	30.5	36.0
Upper	0	0.0	28.4	0	0.0	40.8	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of 2021 small business loans was comparable in low- and moderate-income census tracts to the aggregate lending data by number, dollar volume, and to the demographic figure, which represents the percentage of AA businesses in each census tract income level.

The geographic distribution of small business lending in 2022 reflected penetration consistent with 2021 lending patterns.

An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the overall conclusion.

Table 16

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	383	6.0	6.9	49,235	9.7	9.5	6.6
Moderate	1,110	17.3	19.3	94,501	18.7	22.5	19.8
Middle	2,001	31.2	32.4	151,728	30.0	30.8	33.6
Upper	2,903	45.3	40.5	208,120	41.2	36.5	39.8
Unknown	9	0.1	0.2	1,696	0.3	0.5	0.3
Tract-Unk	0	0.0	0.6	0	0.0	0.1	
Total	6,406	100.0	100.0	505,280	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of small business lending reflected good performance, while the distribution of home mortgage lending reflected adequate performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2021 home mortgage loans among low-income borrowers was comparable to the aggregate lending data by number and dollar volume, and below the demographic figure, which represents the percentage of AA families by family income level. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The borrower distribution of home mortgage lending in 2022 was above the level noted in 2021, although higher loan volume during 2021 supported the overall rating.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 home mortgage purchases among low-income borrowers was comparable to the aggregate lending data by number, above by dollar volume, and significantly below the demographic figure. Lending among moderate-income borrowers was below the aggregate lending data by number and dollar volume and below the demographic figure.

The borrower distribution of home purchase lending in 2022 reflected significantly higher performance above 2021 levels, which contributed to the overall rating.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of 2021 home refinance loans among low-income borrowers was above the aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Lending among moderate-income borrowers was comparable to aggregate lending data by number and by dollar volume and to the demographic figure.

The borrower distribution of home refinance lending in 2022 reflected performance consistent with 2021 levels.

Home Improvement Loans

The borrower distribution of home improvement lending is good. The distribution of 2021 home improvement loans among low-income borrowers was comparable to the aggregate lending data by number and dollar volume and significantly below the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number and dollar volume and below the demographic figure.

The borrower distribution of home improvement lending in 2022 reflected performance and lending volume above 2021 levels, which supported the overall rating.

Other Purpose Lines of Credit

The borrower distribution of other purpose LOC lending is adequate. The distribution of 2021 other purpose LOC loans among low-income borrowers was comparable to the aggregate lending data by number and dollar volume and significantly below the demographic figure. Lending among moderate-income borrowers was below the aggregate lending data by number and dollar volume and the below demographic figure.

The borrower distribution of other purpose LOC lending in 2022 reflected performance above 2021 levels, although higher lending volume in 2021 supported the overall rating.

Other Purpose Closed-End Loans

The borrower distribution of other purpose closed-end lending is excellent. The distribution of 2021 other purpose closed-end loans among low-income borrowers was significantly above the aggregate lending data by number, above by dollar volume, and comparable to the demographic figure. Lending among moderate-income borrowers was above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The borrower distribution of other purpose closed-end lending in 2022 reflected consistent performance with the 2021 distribution, which supported the overall rating.

Table 17 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	107	5.4	4.9	29,837	3.1	2.5	21.3
Moderate	218	11.0	19.5	68,692	7.2	14.2	17.5
Middle	219	11.0	23.7	82,532	8.7	21.9	20.4
Upper	949	47.8	34.8	532,249	56.0	44.1	40.7
Unknown	492	24.8	17.0	237,832	25.0	17.4	0.0
Total	1,985	100.0	100.0	951,142	100.0	100.0	100.0
Refinance Loans							
Low	210	11.3	8.3	33,997	5.2	4.9	21.3
Moderate	298	16.0	18.5	65,544	10.1	14.5	17.5
Middle	295	15.8	22.2	84,245	12.9	20.9	20.4
Upper	841	45.1	31.9	386,431	59.3	39.7	40.7
Unknown	220	11.8	19.2	81,406	12.5	19.9	0.0
Total	1,864	100.0	100.0	651,623	100.0	100.0	100.0
Home Improvement Loans							
Low	54	5.1	5.3	3,467	2.9	4.1	21.3
Moderate	122	11.6	13.6	8,388	7.0	10.3	17.5
Middle	224	21.3	23.6	18,822	15.8	18.8	20.4
Upper	553	52.5	54.8	72,126	60.5	61.6	40.7
Unknown	101	9.6	2.8	16,470	13.8	5.2	0.0
Total	1,054	100.0	100.0	119,273	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	427	7.9	7.0	71,744	4.0	4.0	21.3
Moderate	708	13.1	18.5	147,294	8.2	14.2	17.5
Middle	826	15.3	22.7	195,044	10.8	21.1	20.4
Upper	2,595	48.0	34.2	1,039,509	57.7	42.0	40.7
Unknown	847	15.7	17.6	348,168	19.3	18.7	0.0
Total	5,403	100.0	100.0	1,801,759	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table 17 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		%
Other Purpose LOC							
Low	20	6.8	5.8	1,180	2.8	3.9	21.3
Moderate	28	9.6	14.7	1,773	4.2	9.0	17.5
Middle	53	18.2	24.0	7,017	16.8	17.9	20.4
Upper	170	58.2	53.0	27,841	66.6	65.8	40.7
Unknown	21	7.2	2.5	4,012	9.6	3.5	0.0
Total	292	100.0	100.0	41,823	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	36	17.3	11.1	3,263	8.6	5.9	21.3
Moderate	42	20.2	13.7	2,897	7.6	6.7	17.5
Middle	35	16.8	19.8	2,428	6.4	12.3	20.4
Upper	82	39.4	44.0	20,862	55.0	60.5	40.7
Unknown	13	6.3	11.4	8,448	22.3	14.5	0.0
Total	208	100.0	100.0	37,898	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.7	0	0.0	0.5	21.3
Moderate	0	0.0	0.9	0	0.0	0.8	17.5
Middle	0	0.0	0.1	0	0.0	0.2	20.4
Upper	0	0.0	0.9	0	0.0	1.3	40.7
Unknown	0	0.0	97.4	0	0.0	97.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The borrower distribution of small business lending is good. The bank originated a high number of PPP loans in 2021 in which the collection of revenue information was not required, although 24.7 percent of the small business loans originated by the bank during that year had revenues reported. A review of loans with reported revenues resulted in lending to small businesses above aggregate lending data by number volume, comparable by dollar volume, and significantly below the demographic figure. In addition, 91.7 percent of all the small business loans originated during 2021 were in amounts of \$250,000 or less, which is generally consistent with funding levels requested by smaller business entities and supports the overall conclusion.

The distribution of small business loans originated in 2022 reflected consistent performance with 2021 levels.

Table 18

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Denver-Boulder-Greeley CSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	1,260	19.7	47.8	134,742	26.7	25.9	92.8
Over \$1 Million	322	5.0		78,320	15.5		6.2
Revenue Unknown	4,824	75.3		292,218	57.8		1.0
Total	6,406	100.0		505,280	100.0		100.0
By Loan Size							
\$100,000 or Less	5,205	81.3	91.9	120,609	23.9	33.6	
\$100,001 - \$250,000	666	10.4	4.3	109,642	21.7	17.3	
\$250,001 - \$1 Million	535	8.4	3.8	275,029	54.4	49.1	
Total	6,406	100.0	100.0	505,280	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	993	78.8		8,978	6.7		
\$100,001 - \$250,000	65	5.2		12,203	9.1		
\$250,001 - \$1 Million	202	16.0		113,561	84.3		
Total	1,260	100.0		134,742	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 192 CD loans totaling \$535.5MM in this AA. A significant number of the bank’s CD loans in this AA were responsive to affordable housing needs, followed by economic development. The affordable housing loans were considered particularly responsive to area community development needs and initiatives based on the significant impact to an untold number of individuals and families. These loans, in conjunction with numerous flexible and innovative lending programs, were a primary consideration in assessing the bank’s leadership position related to CD lending efforts within the AA. Examples of CD loans include:

- The bank originated a loan for \$39.0MM as part of a LIHTC project to acquire and rehabilitate 185 apartments that will provide affordable housing to individuals and families making less than 60.0 percent of the area MFI.

- The bank originated a loan for \$70.0MM to build an industrial complex as part of an effort to revitalize and stabilize a portion of the Adams County Enterprise Zone. The complex will create permanent employment for LMI individuals.
- The bank originated a loan for \$34.4MM for the construction of multifamily attainable housing in a moderate-income tract as part of a plan to revitalize and stabilize the area.

Table 19

Community Development Loans – Denver-Boulder-Greeley CSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	94	254,151
Community Services	38	15,717
Economic Development	46	113,154
Revitalization and Stabilization	14	152,524
Total Loans	192	535,545

INVESTMENT TEST

The bank’s performance under the investment test in the Denver-Boulder-Greeley CSA AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA. The bank utilizes a variety of investment instruments in this AA that support a number of CD initiatives. The following are examples of qualified AA investment activities:

- The bank purchased a \$2.1MM school bond that provides funding for the construction of a new high school and various renovations for existing facilities in a school district where greater than 50 percent of the students qualified for the free and reduced lunch program.
- The bank provided \$9.9MM in new investment funds for the construction of a 53 unit affordable housing apartment complex in Denver with all units restricted to renters making 80 percent or less of the area MFI.
- An investment of \$21.6MM for a school bond that paid for a Denver school district’s capital improvements. There are 231 schools in the district and 67 percent of the students qualify for the subsidized free and reduced lunch program.

Table 20

Investments, Grants, and Donations – Denver-Boulder-Greeley CSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	7	9,509	3	20,475	42	1,213	52	31,197
Community Services	10	62,457	1	2,090	259	6,332	270	70,879
Economic Development	1	500	0	0	9	30	10	530
Revitalization and Stabilization	4	8,715	0	0	1	2	5	8,717
Total	22	81,182	4	22,565	311	7,576	337	111,322
¹ <i>Book Value of Investment</i> ² <i>Original Market Value of Investment</i>								

The bank’s level of philanthropic activity was consistent with its overall level of investment activity in the AA, which consisted of 311 donations totaling \$7.6MM. Examples of responsive donations in the AA include:

- The bank made a \$4.5MM donation to a foundation that provides scholarships for students from LMI families to attend college.
- The bank made \$1.0MM in donations to an organization that provides down payment assistance to new homeowners, in support of affordable housing initiatives.

SERVICE TEST

The bank’s performance under the service test in the Denver-Boulder-Greeley CSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. Eleven of the bank’s 64 branches and 12 of the bank’s 73 ATMs are located in LMI tracts. The distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI tracts within the AA.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank opened one branch and closed five branches in the AA. All opening and closure activities occurred in the bank’s upper-income census tracts, with the exception of one branch closure that was located in an unknown-income census tract.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Branch hours do not vary and generally range from 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table 21

Retail Banking and Community Development Services – Denver-Boulder-Greeley CSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.7	12.5	45.3	35.9	1.6	100.0	5.2	24.3	36.9	31.0	2.6	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
5.5	11.0	43.8	38.4	1.4	100.0	4.7	25.4	37.6	31.0	1.3	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches		Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	64		1	5		0	0	0	(3)	(1)	(4)	
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
	60	238	23	9		330	166					
¹ Based on 2022 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences. Branch and ATM data is as of December 31, 2022.												

Community Development Services

The bank is a leader in providing CD services. As illustrated in the table above, bank employees supported 166 organizations throughout the AA, providing 330 CD services. Examples of services provided by bank employees include:

- Six bank employees served on the boards of local chapters of a national organization that constructs and assists with the financing of affordable housing for LMI individuals and families.
- Seven bank employees served on the boards of a nationally franchised organization that provides legal advocacy services for LMI children who have experienced abuse or neglect.
- Two bank employees provided financial expertise by serving on the committees of an organization that works with vulnerable populations to increase self-sufficiency.

OTHER COLORADO METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE FORT COLLINS MSA
AA**

The bank's AA is comprised of the Fort Collins-Loveland, Colorado MSA, which is comprised of Larimer County in its entirety. Refer to Appendix C for a map of the AA.

- The composition of the 2021 AA consisted of 73 census tracts, including three low-, 20 moderate-, 36 middle-, and 13 upper-, and one unknown-income census tract(s) based on 2011-2015 ACS data.
- The 2022 AA comprises 86 census tracts including one low-, 16 moderate-, 52 middle-, 16 upper-, and one unknown-income census tract(s) based on the most recent 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 359,066, which reflects a 12.8 percent increase from the 2015 ACS data.
- The AA is home to 83,921 total families. According to 2020 ACS data, 19.2 percent of families are low-, 18.3 percent are moderate-, 23.6 percent are middle-, and 38.9 percent are upper-income.
- The bank operates four full-service branches in the AA, with one located in a moderate-income census tract and three in middle-income census tracts. The bank closed one branch in a middle-income tract during the evaluation period.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank held a 9.6 percent market share of deposits, ranking 5th of 24 financial institutions operating from 90 banking offices in the AA.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE COLORADO SPRINGS
MSA AA**

The bank's AA is comprised of the Colorado Springs, Colorado MSA, which includes Teller and El Paso Counties in their entirety. Refer to Appendix C for a map of the AA.

- The composition of the 2021 AA consisted of 136 census tracts, including seven low-, 41 moderate-, 53 middle-, 33 upper-, and two unknown-income census tracts based on 2011-2015 ACS data.
- The 2022 AA is comprised of 175 census tracts, including four low-, 48 moderate-, 72 middle-, 49 upper-, and two unknown-income census tracts based on the most recent 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 755,105, which reflects a 11.3 percent increase from the 2015 ACS data.

- The AA is home to 185,712 total families. According to 2020 ACS data, 18.8 percent of families are low-, 18.8 are percent moderate-, 21.9 percent are middle-, and 40.5 percent are upper-income.
- The bank operates six banking offices within the AA, including two in moderate-, three in middle-, and one in an upper-income census tract(s). The bank closed one branch in an upper-income census tract during the evaluation period.
- As of the June 30, 2022 FDIC Deposit Market Share Report, the bank held a 7.9 percent market share of deposits in the AA, ranking 4th of 40 FDIC-insured financial institutions operating from 129 banking offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LIMITED-SCOPE COLORADO METROPOLITAN AREAS

The state of Colorado AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution’s CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank’s performance in these areas do not change the rating for the state of Colorado.

Table 22

Assessment Area	Lending Test	Investment Test	Service Test
Fort Collins MSA	Consistent	Below	Consistent
Colorado Springs MSA	Consistent	Consistent	Consistent

**OTHER COLORADO NONMETROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MOUNTAIN AA

The AA is comprised of Eagle, Garfield, Grand, Lake, Pitkin, and Summit Counties in their entireties. Refer to Appendix C for a map of the AA.

- The composition of the 2021 AA consisted of 39 census tracts, including 14 middle- and 25 upper-income census tracts based on 2011-2015 ACS data.
- The 2022 AA is comprised of 55 census tracts, including one low-, one moderate-, 17 middle-, and 36 upper-income census tract(s) based on the most recent 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 188,982, which reflects a 6.3 percent increase from the 2015 ACS data.
- The AA is home to 43,123 total families. According to 2020 ACS data, 12.2 percent of families are low-, 12.7 percent are moderate-, 21.8 percent are middle-, and 53.3 percent are upper-income.
- The bank operates 11 full-service branches in the AA, with one located in a moderate-, four in middle-, and six in upper-income census tract(s). The bank opened one branch and closed one branch in upper-income census tracts since the prior CRA evaluation.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank held 24.2 percent market share of deposits in the AA, ranking 2nd of 17 financial institutions operating from 90 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MOUNTAIN AA

The state of Colorado AA listed in the table below was reviewed using limited-scope examination procedures. The conclusions regarding the bank's performance in this area do not change the rating for the state of Colorado.

Table 23

Assessment Area	Lending Test	Investment Test	Service Test
Mountain	Consistent	Consistent	Consistent

**STATE OF ARIZONA/
PHOENIX METROPOLITAN STATISTICAL ASSESSMENT AREA
(Full-Scope Review)**

CRA rating for **Arizona**: **Outstanding**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is good.
- The bank's distribution of loans including LMI is adequate.
- The bank is a leader in making CD loans within its AA, which bolstered the overall rating.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to the credit and CD needs throughout its Arizona AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Arizona AA and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Arizona was consistent with the overall scope for the institution. A full-scope review was conducted for the Phoenix MSA AA, the bank's only delineated AA in the state of Arizona. The overall state rating was based solely on the bank's performance in this AA. Therefore, the statewide performance will be discussed concurrently with the bank's performance in the Phoenix MSA AA.

A total of 1,985 loans were reviewed in the state of Arizona, including 1,459 home mortgage and 526 small business loans originated between January 1, 2021 and December 31, 2022. More weight was applied to the bank's home mortgage lending based on higher lending volume.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

The bank delineates one of its six AAs and operates 14 of its 103 branches in the state of Arizona. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on home mortgage and small business lending. Detailed descriptions of the bank's operations in the Phoenix MSA AA are provided in the analysis of the AA that follows.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX MSA AA

The bank's Phoenix MSA AA consists of Maricopa and Pinal counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The composition of the 2021 AA consisted of 991 total census tracts, including 110 low-, 231 moderate-, 326 middle-, 311 upper-, and 13 unknown-income census tracts based on 2011-2015 ACS data.
- The 2022 AA remains unchanged from the bank's 2021 delineated AA, although it is currently comprised of 1,104 census tracts, including 68 low-, 294 moderate-, 362 middle-, 354 upper-, and 26 unknown-income census tracts based on the most recent 2016-2020 ACS data.
- The bank operates 14 offices in the AA. One banking office is located in a low-income census tract, two are in moderate-, five are in middle-, and six are in upper-income census tracts.
- As of June 30, 2022, the bank held an 0.8 percent market share of deposits in the AA, ranking 14th out of 61 FDIC-insured financial institutions operating from 709 banking offices in the AA.
- A community contact recently conducted as part of the CRA evaluation of another financial institution with branches in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions.

The contact represented an organization that provides affordable housing coupled with supportive services.

Table 24

Population Change			
Assessment Area: Phoenix MSA			
Area	2015 Population	2020 Population	Percent Change
Phoenix MSA	4,407,915	4,845,832	9.9
Maricopa County, AZ	4,018,143	4,420,568	10.0
Pinal County, AZ	389,772	425,264	9.1
Arizona	6,641,928	7,151,502	7.7
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			

- The AA population reflected growth that outpaced the state of Arizona between 2015 and 2020.
- The Phoenix MSA includes 67.8 percent of Arizona’s population, and Maricopa County contains 91.2 percent of the MSA population.

Table 25

Median Family Income Change			
Assessment Area: Phoenix MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Phoenix MSA	69,582	78,930	13.4
Maricopa County, AZ	70,745	80,161	13.3
Pinal County, AZ	60,487	69,494	14.9
Arizona	64,986	73,456	13.0
<i>Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The 2020 MFI in the AA exceeded the statewide figure and was primarily weighted by the significantly larger population and higher MFI in Maricopa County when compared to Pinal County.
- Based on 2020 ACS data, the percentage of AA families living below the poverty level, at 9.1 percent, was slightly below the statewide figure of 10.1 percent.

Table 26

Housing Cost Burden						
Assessment Area: Phoenix MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Phoenix MSA	79.0	47.6	43.0	60.2	35.6	20.4
Maricopa County, AZ	79.7	48.3	43.2	61.2	36.7	20.4
Pinal County, AZ	67.9	36.5	39.8	54.1	28.1	20.2
Arizona	77.6	46.9	42.8	57.9	34.5	20.3

Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The cost burden for LMI renters in the AA is generally consistent with the Arizona statewide figure.
- The housing affordability ratio of 24.8 percent denotes relatively low affordability and is similar to the statewide Arizona ratio of 25.4 percent.
- The low affordability of rents, specifically among low-income renters in Maricopa County, may hinder the ability of LMI individuals and families to afford home ownership absent special loan programs that offer down-payment assistance or interest rate subsidies.
- A community contact discussed the lack of affordable rental properties and significant housing supply shortage, noting that Phoenix ranks as one of the least affordable cities in the nation for housing.

Table 27

Unemployment Rates					
Assessment Area: Phoenix MSA					
Area	2017	2018	2019	2020	2021
Phoenix MSA	4.3	4.2	4.2	7.2	4.5
Maricopa County, AZ	4.3	4.1	4.2	7.2	4.5
Pinal County, AZ	5.1	5.0	5.0	7.3	4.7
Arizona	5.0	4.8	4.9	7.7	4.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- From 2017 through 2021, unemployment rates in the AA were below the overall statewide figures for Arizona. Similar to other parts of the country, unemployment rates increased in 2020 due to the pandemic before decreasing in 2021 and more closely aligning with pre-pandemic levels.
- The labor force participation rate in the AA was 63.3 percent, which is above the Arizona statewide figure of 60.1 percent.
- Top employers in Phoenix and greater Arizona include the State of Arizona (49,800 employees), Wal-Mart Stores, Inc. (30,634), Banner Health (24,825), City of Phoenix (15,100), Wells Fargo (13,308), and Bank of America (13,300).

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA /
PHOENIX MSA AA**

LENDING TEST

The bank's performance under the lending test in the state of Arizona is High Satisfactory based on good performance in the Phoenix MSA AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible lending products is discussed in the overall Institution section description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage loans reflected excellent penetration, while small business loans reflected adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2021 home mortgage loans among low-income tracts was significantly above the aggregate lending data by number and dollar volume, and significantly above the demographic figure of the percentage of owner-occupied units. Lending in moderate-income tracts was above the aggregate lending data by number, significantly above by dollar volume, and comparable to the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected penetration below 2021 lending patterns although the higher volume of lending in 2021 supported the overall rating.

An analysis of the dispersion of loans was conducted and revealed gaps that included LMI tracts. A review of the bank's lending patterns over the two-year evaluation period revealed concentrations of lending in and around areas where the bank's branches are located, with gaps often noted in areas that extended beyond where the bank could reasonably be expected to serve. Moreover, the gaps and lapses also included middle- and upper-income census tracts. In 2021, 215 of the AA's 341 LMI tracts, or 63.1 percent, had no home mortgage loan originations, compared to 347 of the AA's 650 middle-, upper-, and unknown-income tracts with no loans, comprising 53.4 percent. Although the disparity was higher in the AA's LMI census tracts, this data indicates that 562 of the AA's

991 census tracts had no home mortgage loan originations during 2021, with similar statistics noted in 2022. Considering the aforementioned factors as well as the overall geographic size of Maricopa County in the AA of 9,202 square miles, the overall conclusion was not impacted.

Home Purchase Loans

The geographic distribution of home purchase lending is good. The bank's 2021 home purchase lending in low-income census tracts was significantly above the aggregate lending data and the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected penetration below 2021 lending patterns, and supported the overall rating based on higher lending volume in 2022.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank's 2021 home refinance lending in low-income census tracts was significantly above the aggregate lending data by number, above by dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected penetration below 2021 lending patterns, although higher loan volume in 2021 supported the overall rating.

Home Improvement Loans

The geographic distribution of home improvement lending is poor. The bank did not originate any home improvement loans in area low-income census during 2021, which was significantly below the aggregate lending data and the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume and below the demographic figure.

The geographic distribution of home improvement lending in 2022 reflected penetration above 2021 lending patterns, although the rating was supported by slightly higher lending volume during 2021.

Multifamily Loans

The geographic distribution of multifamily lending is adequate. The bank's 2021 multifamily lending in low-income census tracts was comparable to the aggregate lending data by number and dollar volume, and significantly above the demographic figure.

Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume and above the demographic figure.

The geographic distribution of multifamily lending in 2022 reflected penetration consistent with 2021 lending patterns.

Table 28 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	39	11.4	4.8	10,082	7.6	3.1	4.5
Moderate	75	22.0	17.3	18,025	13.6	12.4	19.6
Middle	109	32.0	41.4	29,859	22.5	36.0	37.1
Upper	118	34.6	36.0	75,029	56.4	47.9	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	341	100.0	100.0	132,995	100.0	100.0	100.0
Refinance Loans							
Low	10	4.4	2.6	1,998	2.4	1.7	4.5
Moderate	38	16.8	13.5	6,213	7.6	9.7	19.6
Middle	68	30.1	38.7	14,026	17.2	33.2	37.1
Upper	110	48.7	44.7	59,401	72.8	54.8	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	226	100.0	100.0	81,638	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.0	0	0.0	1.6	4.5
Moderate	8	8.2	10.6	979	7.8	8.5	19.6
Middle	33	33.7	34.9	2,884	23.0	28.9	37.1
Upper	57	58.2	52.0	8,652	69.1	60.4	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	98	100.0	100.0	12,515	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	20	29.9	26.6	21,456	13.2	14.8	18.8
Moderate	26	38.8	40.8	60,033	37.0	32.5	31.0
Middle	15	22.4	18.4	39,695	24.5	25.7	31.0
Upper	6	9.0	13.3	40,991	25.3	25.9	18.7
Unknown	0	0.0	1.0	0	0.0	1.2	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	67	100.0	100.0	162,175	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	69	9.2	3.3	33,536	8.5	2.7	4.5
Moderate	147	19.6	14.6	85,250	21.7	11.5	19.6
Middle	231	30.8	39.4	87,125	22.2	33.8	37.1
Upper	304	40.5	42.2	187,167	47.6	51.4	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	751	100.0	100.0	393,078	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table 28 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	1.3	0	0.0	0.7	4.5
Moderate	0	0.0	9.1	0	0.0	5.7	19.6
Middle	2	22.2	34.3	100	5.5	25.6	37.1
Upper	7	77.8	54.8	1,730	94.5	67.7	38.7
Unknown	0	0.0	0.5	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	1,830	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.2	0	0.0	1.0	4.5
Moderate	0	0.0	12.2	0	0.0	6.1	19.6
Middle	4	40.0	34.4	561	29.1	17.6	37.1
Upper	6	60.0	50.7	1,364	70.9	75.1	38.7
Unknown	0	0.0	0.6	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,925	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	6.6	0	0.0	4.4	4.5
Moderate	0	0.0	22.6	0	0.0	18.0	19.6
Middle	0	0.0	46.8	0	0.0	42.5	37.1
Upper	0	0.0	23.8	0	0.0	34.8	38.7
Unknown	0	0.0	0.2	0	0.0	0.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of 2021 small business loans in low-income census tracts was comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure of total businesses. Lending in moderate-income census tracts was comparable to the aggregate lending data by number, significantly above by dollar volume, and comparable to the demographic figure.

The geographic distribution of small business lending in 2022 reflected penetration above 2021 lending patterns, although higher lending volume in 2021 supported the overall rating.

An analysis of loan dispersion revealed conspicuous gaps and lapses that included LMI census tracts. Similar to home mortgage lending, the bank’s small business loans were generally concentrated near its branch locations, and the gaps noted throughout the AA were comprised of LMI census tracts as well as a substantial number of middle- and upper-income tracts. Based on these factors as well as the large geographic area of Maricopa County in the AA, the dispersion of lending in the AA had no impact on the overall rating.

Table 29

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	18	4.6	6.4	2,751	6.0	9.2	6.5
Moderate	75	19.0	16.4	15,615	33.8	19.2	17.2
Middle	108	27.3	29.0	10,252	22.2	26.7	30.0
Upper	192	48.6	46.9	17,368	37.6	43.6	45.8
Unknown	2	0.5	0.6	153	0.3	1.1	0.5
Tract-Unk	0	0.0	0.6	0	0.0	0.1	
Total	395	100.0	100.0	46,139	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

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

The bank’s lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The distribution of small business lending reflected good performance, while the distribution of home mortgage lending was adequate.

Home mortgage lending in this market included a substantial number of loans with unknown incomes. These loans were primarily comprised of business loans to purchase, refinance or improve investment properties and are exempt from HMDA income reporting requirements. Accordingly, the evaluation of home mortgage lending and the ratings that follow exclusively focused on consumer lending to borrowers of different income levels based on loans with reported incomes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2021 loans to low-income borrowers was comparable to the aggregate lending data by number and dollar volume, and significantly below the demographic figure of the percentage of families by family income. Lending to moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and below the demographic figure.

The borrower distribution of home mortgage lending in 2022 was below the 2021 distribution, although higher lending volume in 2021 supported the overall rating.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 home purchase loans with reported incomes among low-income borrowers was significantly above the aggregate lending data by number and dollar volume and significantly below the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and below the demographic figure.

The borrower distribution of home purchase lending in 2022 reflected performance consistent with 2021 levels.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of 2021 home mortgage refinance loans among low-income borrowers was significantly above the aggregate lending data by number, comparable by dollar volume, and significantly below the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and below the demographic figure.

The borrower distribution of home refinance lending in 2022 reflected performance below 2021 levels, although higher lending volume in 2021 supported the overall rating.

Home Improvement Loans

The borrower distribution of home improvement lending is poor. The distribution of 2021 home improvement loans with reported incomes among both low- and moderate-income borrowers was below the aggregate lending data by number and dollar volume, and significantly below the demographic figure.

The borrower distribution of home improvement lending in 2022 reflected performance consistent with 2021 levels.

Table 30 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	14	4.1	3.3	2,538	1.9	1.7	21.9
Moderate	25	7.3	15.8	5,386	4.0	11.1	17.3
Middle	24	7.0	20.2	5,178	3.9	17.5	19.5
Upper	103	30.2	39.6	53,811	40.5	50.4	41.3
Unknown	175	51.3	21.0	66,082	49.7	19.3	0.0
Total	341	100.0	100.0	132,995	100.0	100.0	100.0
Refinance Loans							
Low	16	7.1	6.4	2,186	2.7	3.7	21.9
Moderate	26	11.5	17.2	4,181	5.1	12.6	17.3
Middle	22	9.7	20.5	4,036	4.9	18.3	19.5
Upper	75	33.2	36.4	35,475	43.5	45.7	41.3
Unknown	87	38.5	19.5	35,760	43.8	19.8	0.0
Total	226	100.0	100.0	81,638	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.0	4.3	90	0.7	3.0	21.9
Moderate	5	5.1	12.7	264	2.1	9.8	17.3
Middle	16	16.3	20.6	772	6.2	17.4	19.5
Upper	49	50.0	59.0	6,274	50.1	64.0	41.3
Unknown	26	26.5	3.4	5,115	40.9	5.7	0.0
Total	98	100.0	100.0	12,515	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	32	4.7	5.3	4,814	2.1	2.9	21.9
Moderate	57	8.3	16.4	10,056	4.4	11.9	17.3
Middle	65	9.5	20.3	10,141	4.4	17.8	19.5
Upper	237	34.6	38.4	98,105	42.5	48.0	41.3
Unknown	293	42.8	19.5	107,787	46.7	19.4	0.0
Total	684	100.0	100.0	230,903	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table 30 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	0	0.0	4.1	0	0.0	3.3	21.9
Moderate	0	0.0	10.6	0	0.0	6.1	17.3
Middle	0	0.0	19.3	0	0.0	12.1	19.5
Upper	5	55.6	60.3	1,280	69.9	71.3	41.3
Unknown	4	44.4	5.8	550	30.1	7.2	0.0
Total	9	100.0	100.0	1,830	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	7.9	0	0.0	3.7	21.9
Moderate	1	10.0	11.7	225	11.7	5.6	17.3
Middle	3	30.0	17.4	155	8.1	7.9	19.5
Upper	5	50.0	53.7	1,265	65.7	69.6	41.3
Unknown	1	10.0	9.2	280	14.5	13.2	0.0
Total	10	100.0	100.0	1,925	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.6	0	0.0	0.2	21.9
Moderate	0	0.0	0.7	0	0.0	0.5	17.3
Middle	0	0.0	0.5	0	0.0	0.6	19.5
Upper	0	0.0	0.1	0	0.0	0.1	41.3
Unknown	0	0.0	98.1	0	0.0	98.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The borrower distribution of small business lending is good. The bank originated a high number of PPP loans in 2021 where the collection of business revenue was not required, resulting in a large percentage of loans with unknown revenue. Further review of loans with reported revenues indicated performance above the aggregate data by number, significantly above by dollar volume, and comparable to the demographic data of the percentage of businesses. In addition, 85.8 percent of the small business loans were for \$250,000 or less, which are generally amounts requested by smaller businesses.

The distribution of loans originated in 2022 to small businesses reflected performance below 2021 levels, although lending volume was higher in 2021 and supported the overall rating.

Table 31

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Phoenix MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	88	22.3	48.2	18,017	39.0	25.0	93.3
Over \$1 Million	29	7.3		6,858	14.9		5.5
Revenue Unknown	278	70.4		21,264	46.1		1.2
Total	395	100.0		46,139	100.0		100.0
By Loan Size							
\$100,000 or Less	283	71.6	93.6	6,987	15.1	38.9	
\$100,001 - \$250,000	56	14.2	3.4	9,650	20.9	16.2	
\$250,001 - \$1 Million	56	14.2	2.9	29,502	63.9	44.9	
Total	395	100.0	100.0	46,139	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	45	51.1		707	3.9		
\$100,001 - \$250,000	16	18.2		3,092	17.2		
\$250,001 - \$1 Million	27	30.7		14,218	78.9		
Total	88	100.0		18,017	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 21 CD loans totaling \$59.2MM in this AA. A significant number of the bank’s CD loans in the AA are responsive to economic development needs, while the affordable housing loans were impactful and provided living quarters to a substantial number of LMI individuals and families. Examples of CD loans include:

- The bank originated a loan for \$28.3MM for the construction of multifamily attainable workforce housing, with rents lower than comparable properties in the area and targeted to renters earning less than 80 percent of the area MFI.
- The bank originated a loan for \$11.6MM for the construction of an industrial manufacturing building that will provide a majority of jobs to LMI individuals.
- The bank originated a loan for \$20.0M to a non-profit organization that provides food to families in need.

Table 32

Community Development Loans Phoenix MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	3	28,770
Community Services	1	20
Economic Development	17	30,454
Revitalization and Stabilization	0	0
Total Loans	21	59,244

INVESTMENT TEST

The bank’s performance under the investment test in the state of Arizona is outstanding based on excellent performance in the Phoenix MSA. The bank has an excellent level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA. A significant number of the bank’s investments by number and dollar volume were based on efforts to provide community services to LMI individuals and geographies. The following are examples of AA investment activities:

- The bank’s 12 community service investments totaling \$20.5MM were bonds issued by local school districts in which the majority of students qualified for the free and reduced lunch program. The bonds provided funding for construction, renovations, improvements, technology and equipment, and transportation to schools in the Phoenix area.
- An investment for \$1.0MM provided funding for an organization that offers down payment assistance and other affordable housing services for LMI individuals and families.

Table 33

Investments, Grants, and Donations Phoenix MSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	1	1,000	0	0	7	523	8	1,523
Community Services	12	20,525	0	0	27	1,646	39	22,171
Economic Development	1	500	0	0	2	6	3	506
Revitalization and Stabilization	1	413	0	0	0	0	1	413
Total	15	22,438	0	0	36	2,175	51	24,613

¹ Book Value of Investment
² Original Market Value of Investment

The bank's level of philanthropic activity was consistent with its overall level of investment activity in the AA and consisted of 36 donations totaling \$2.2MM. Examples of responsive donations in the AA include:

- Three donations totaling \$503M to an organization that provides affordable housing services to LMI individuals. The donations provided funding for the organization's down payment assistance and grant program.
- Two donations totaling \$185M to an organization that provides needs-based scholarships to LMI students.
- Two donations totaling \$6.5M to an organization that provides services and resources to LMI individuals, primarily those experiencing homelessness.

SERVICE TEST

The bank's performance under the service test in the state of Arizona is outstanding based on excellent performance in the Phoenix MSA AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. Three of the bank's 14 branches with onsite ATMs are located in LMI tracts. The distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI tracts within the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches in this AA during the review period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operation and product offerings and services are generally consistent with those in the bank's other markets, which is discussed in the overall retail banking services section of this report.

Table 34

Retail Banking and Community Development Services – Phoenix MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	7.1	14.3	35.7	42.9	0.0	100.0	6.2	26.6	32.8	32.1	2.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
7.1	14.3	35.7	42.9	0.0	100.0	5.2	26.8	35.2	32.5	0.4	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	14		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	9	25	0	0	34	20						

¹ Based on 2022 FFIEC census tract definitions.
 Note: Total percentages may vary by 0.1 percent due to automated rounding differences. Branch and ATM data is as of December 31, 2022.

Community Development Services

The bank is a leader in providing CD services. As illustrated in the table above, bank employees supported 20 organizations throughout the AA, providing 34 services. Examples of such services provided by bank employees include:

- A bank employee served on the board of an organization that provides assistance to LMI individuals experiencing chronic illness and/or physical disability. The services allow individuals to remain in their homes independently.
- A bank employee served on the board of an organization that provides clothing and essentials to LMI individuals.

**STATE OF CALIFORNIA/
COACHELLA VALLEY METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)**

CRA rating for **California**: **Outstanding**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is poor.
- The bank's distribution of loans including LMI is good.
- The bank is a leader in making CD loans within its AAs, which bolstered the lending test rating.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to the credit and CD needs throughout its California AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its California AA and is responsive to available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of California was consistent with the overall scope for the institution. A full-scope review was conducted for the Coachella Valley Metropolitan AA, the bank's only delineated AA in the state of California. The overall state rating was based solely on the bank's performance in this AA. Therefore, the statewide performance will be discussed concurrently with the bank's performance in the Coachella Valley Metropolitan AA.

A total of 671 loans were reviewed in the state of California, including 362 home mortgage and 309 small business loans. Weighting of loan products was relatively equal among home mortgage and small business loans based on similar lending volumes. Additionally, multifamily mortgage loans were not evaluated for this AA due to lending volumes too low to render a meaningful analysis.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA

The bank delineates one of its six AAs and operates four of its 103 branches in the state of California. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on home mortgage and small business lending. Detailed descriptions of the bank's operations in the Coachella Valley Metropolitan AA are provided in the analysis that follows.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE COACHELLA VALLEY METROPOLITAN AA

The bank's Coachella Valley Metropolitan AA consists of 119 of 518 census tracts in Riverside County, California, which is one of two counties that combine to form the Riverside-San Bernardino-Ontario, California MSA. The bank only delineates a portion of Riverside County, as the Coachella Valley is a geographically isolated group of communities surrounded almost entirely by three mountain ranges and the Salton Sea to the south within the central portion of Riverside County. The area is unique given its topographical makeup, mountainous terrain, and uninhabitable desert land. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The composition of the 2021 AA consisted of 102 total census tracts, including five low-, 36 moderate-, 36 middle-, and 25 upper-income census tracts based on 2011-2015 ACS data.
- The 2022 AA delineation remains unchanged from the 2021 AA, although the AA is currently comprised of 119 census tracts, including nine low-, 36 moderate-, 41 middle-, 31 upper-, and two unknown-income census tracts based on the most recent 2016-2020 ACS data.

- The bank operates four offices in the AA. Two banking offices are located in moderate-, one is located in a middle-, and one is located in an upper-income census tract(s). As of June 30, 2022, the bank held a 6.2 percent market share of deposits in the AA, ranking 4th out of 20 FDIC-insured financial institutions with 78 banking offices operating in the AA.
- A community contact recently conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those needs, and for perspectives on local economic conditions. The contact represented a small business development corporation (SBDC).

Table 35

Population Change			
Assessment Area: Coachella Valley Metropolitan¹			
Area	2015 Population	2020 Population	Percent Change
Riverside County	2,298,032	2,418,185	5.2
Riverside-San Bernardino-Ontario, CA MSA	4,392,801	4,599,839	4.7
California	38,421,464	39,538,223	2.9

*Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey*

¹All data presented is at the county level and is different than data for this AA which includes a partial county.

- The 2020 population of the Coachella Valley AA was 440,227, which represents 18.2 percent of the population of Riverside County and 9.6 percent of the total MSA population.
- The AA had a larger population of residents aged 65 and older, at 24.9 percent, than Riverside County and the state of California, at 14.6 percent and 14.3 percent, respectively.

Table 36

Median Family Income Change			
Assessment Area: Coachella Valley Metropolitan¹			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Riverside County	69,638	81,271	16.7
Riverside-San Bernardino-Ontario, CA MSA	67,201	76,686	14.1
California	77,267	89,798	16.2

*Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

¹All data presented is at the county level and is different than data for this AA which includes a partial county.

- The MFI in the AA was \$53,363 in 2015 and \$68,060 in 2020, representing an increase of 27.5 percent.
- The AA has a higher percentage of families living below the poverty level, at 11.9 percent, compared to MSA and state of California statistics, at 10.5 percent and 9.0 percent, respectively.

Table 37

Housing Cost Burden						
Assessment Area: Coachella Valley Metropolitan¹						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Riverside County	82.6	64.5	53.4	69.1	52.0	31.7
Riverside-San Bernardino-Ontario, CA MSA	83.3	61.2	52.8	67.8	50.2	30.7
California	80.6	50.9	50.0	65.9	46.8	29.5

Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.
¹All data presented is at the county level and is different than data for this AA which includes a partial county.

- The percentage of owner-occupied units in the AA, at 49.9 percent, is below the MSA figure of 56.3 percent and similar to the statewide figure of 51.0 percent.
- The AA housing affordability ratio of 17.4 percent represents relatively low affordability and falls slightly below the MSA ratio of 19.0 percent and above the state figure of 14.6 percent.
- The percentage of vacant units in the AA, at 27.0 percent, was more than double the Riverside County and Riverside-San Bernardino-Ontario MSA statistics of 12.9 percent and 12.1 percent, respectively. The AA vacancy rate is based on a high volume of vacation properties and secondary homes along with a large population of transient retirees who reside in this area on a seasonal basis.
- The AA's lower affordability ratio and higher rents in relation to income, as well as the demand for vacation and secondary residences, may hinder the ability of LMI individuals and families to afford home ownership without subsidized loan programs or grants offering down-payment assistance or lower interest rates.

Table 38

Unemployment Rates					
Assessment Area: Coachella Valley Metropolitan¹					
Area	2017	2018	2019	2020	2021
Riverside County	5.3	4.5	4.3	10.2	7.3
Riverside-San Bernardino-Ontario, CA MSA	5.1	4.3	4.1	10.0	7.4
California	4.8	4.3	4.1	10.2	7.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics
¹All data presented is at the county level and is different than data for this AA which includes a partial county.

- Unemployment rates in Riverside County remained relatively aligned with the MSA and overall statewide figures for California. The Riverside County unemployment rate was steady from 2017 to 2019, before experiencing an increase in 2020 due to the pandemic. The unemployment rate decreased throughout the AA in 2021, although it remained well above pre-pandemic levels.
- Top employment sectors in the area include full service restaurants, casinos, hotels and motels, general medical and surgical hospitals, and elementary and secondary schools. A community contact stated that businesses have continued to encounter adversity after the pandemic, with restaurants and retail services experiencing the most difficulty.
- The contact also noted a demand and opportunity for local financial institutions to lend to small business. According to the contact, small businesses seeking traditional financing have found it difficult to obtain capital, particularly restaurants and start-up entities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA / COACHELLA VALLEY METROPOLITAN AA

LENDING TEST

The bank’s performance under the lending test in the state of California is High Satisfactory based on good lending test performance in the Coachella Valley Metropolitan AA.

Lending Activity

The bank’s lending activities reflect adequate responsiveness to AA credit needs. The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible lending products is discussed in the overall Institution section description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects poor distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage loans was adequate while the distribution of small business loans reflects poor penetration. Multifamily loans were not evaluated based on lending levels too low to render a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2021 home mortgage loans among low-income tracts was significantly above the aggregate lending data by number, above by dollar volume, and comparable to the demographic figure of the percentage of owner-occupied units. Lending in moderate-income tracts was comparable to the aggregate lending data by number and dollar volume and comparable to the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected penetration below 2021 lending patterns, although the higher volume of lending in 2021 supported the overall rating.

The bank's loan dispersion among geographies of different income levels revealed gaps that included LMI census tracts. The dispersion of lending was partially impacted by the distance of the bank's four branches from a number of the AA's LMI census tracts. Moreover, a review of census tracts with loans indicated that 23 of the AA's LMI census tracts had no loan originations by the bank compared to 19 census tracts with no loans in the AA's middle- and upper-income tracts. Based on the aforementioned factors, the bank's dispersion did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2021 home mortgage purchases among low-income census tracts was significantly above the aggregate lending data by number and dollar volume, and significantly above the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected lending volume and performance that fell below 2021 levels.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2021 home refinance lending was comparable to the aggregate lending data by number, dollar volume, and the demographic figure in low- and moderate-income census tracts.

The geographic distribution of home refinance lending in 2022 reflected performance consistent with 2021 levels.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The bank's 2021 home improvement lending in low-income census tracts was comparable to the aggregate lending data by number and dollar volume, and significantly below the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The geographic distribution of home improvement lending in 2022 reflected performance consistent with 2021 lending patterns.

Table 39 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	6	6.6	2.4	1,586	2.9	1.5	4.0
Moderate	24	26.4	24.6	7,417	13.4	19.9	29.5
Middle	18	19.8	36.0	17,497	31.5	33.5	33.6
Upper	43	47.3	37.0	28,964	52.2	45.0	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	91	100.0	100.0	55,464	100.0	100.0	100.0
Refinance Loans							
Low	2	3.0	2.5	447	1.6	1.6	4.0
Moderate	16	23.9	22.0	3,594	13.0	17.2	29.5
Middle	20	29.9	37.3	7,145	25.8	34.2	33.6
Upper	29	43.3	38.3	16,519	59.6	47.1	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	67	100.0	100.0	27,705	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.4	0	0.0	0.2	4.0
Moderate	5	20.8	19.8	448	11.3	17.1	29.5
Middle	7	29.2	37.3	1,684	42.5	33.2	33.6
Upper	12	50.0	42.5	1,834	46.2	49.4	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	3,966	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	4.5	0	0.0	5.5	9.1
Moderate	1	33.3	44.8	345	12.0	29.7	38.1
Middle	2	66.7	32.8	2,540	88.0	31.2	34.0
Upper	0	0.0	17.9	0	0.0	33.7	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	2,885	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	8	4.1	2.4	2,033	2.2	1.6	4.0
Moderate	48	24.5	23.0	12,954	14.0	18.3	29.5
Middle	48	24.5	36.6	28,886	31.2	33.6	33.6
Upper	92	46.9	38.0	48,759	52.6	46.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	196	100.0	100.0	92,632	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table 39 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$(000)	
Other Purpose LOC							
Low	0	0.0	0.4	0	0.0	0.2	4.0
Moderate	1	20.0	19.4	150	15.5	20.1	29.5
Middle	1	20.0	36.9	20	2.1	31.2	33.6
Upper	3	60.0	43.3	800	82.5	48.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	970	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	1	16.7	15.5	1,000	60.9	7.4	29.5
Middle	0	0.0	29.0	0	0.0	25.3	33.6
Upper	5	83.3	55.5	642	39.1	67.3	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	1,642	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.9	0	0.0	2.9	4.0
Moderate	0	0.0	41.9	0	0.0	26.8	29.5
Middle	0	0.0	33.3	0	0.0	37.6	33.6
Upper	0	0.0	20.9	0	0.0	32.7	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is poor. The distribution of 2021 small business loans was below the aggregate lending data by number, comparable by dollar volume, and below the demographic figure of the percentage of businesses in low- and moderate-income census tracts.

The geographic distribution of small business lending in 2022 reflected performance above 2021 lending patterns, although more weight was applied to 2021 performance based on higher lending volume.

The bank’s loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI tracts. The gaps in lending supported the overall conclusion.

Table 40

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	3	1.2	3.1	1,290	3.6	3.1	2.6
Moderate	38	15.7	31.3	9,118	25.7	32.2	32.7
Middle	79	32.6	31.3	6,604	18.6	25.8	30.2
Upper	122	50.4	34.2	18,459	52.0	38.8	34.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	242	100.0	100.0	35,471	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage and small business lending both reflected good performance. To ensure a more meaningful analyses, the distribution of home mortgage lending by borrower income level focused on loans with reported incomes, as a majority of the loans with incomes not reported were business-purpose loans to purchase, refinance, or improve residential investment properties.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The penetration of 2021 loans to low-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and significantly below the demographic figure of the percentage of families by family income. Lending to moderate-income borrowers was above the aggregate data by number, significantly above by dollar volume, and below the demographic figure.

The borrower distribution of home mortgage lending in 2022 was consistent with 2021 levels.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The distribution of 2021 home purchase loans among low-income borrowers was significantly below the aggregate lending data by number and dollar volume and significantly below the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data by number, significantly below by dollar volume, and significantly below the demographic figure.

The borrower distribution of home purchase lending in 2022 reflected performance and loan volume above 2021 levels and supported the overall rating.

Home Refinance Loans

The borrower distribution of home refinance lending is excellent. The distribution of 2021 home mortgage refinance loans among low-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and significantly below the demographic figure. Lending among moderate-income borrowers was significantly above both aggregate lending figures and comparable to the demographic figure.

The borrower distribution of home refinance lending in 2022 reflected performance consistent with 2021 levels.

Home Improvement Loans

The borrower distribution of home improvement lending is excellent. The distribution of 2021 home improvement loans among low-income borrowers was significantly above the aggregate lending data by number and dollar volume and below the demographic figure. Lending among moderate-income borrowers was below the aggregate data by number, comparable by dollar, and significantly below the demographic figure.

The borrower distribution of home improvement lending in 2022 reflected performance and loan volume above 2021 levels, which supported the overall rating.

Table 41 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.4	0	0.0	0.7	26.9
Moderate	3	3.3	7.1	395	0.7	3.9	19.4
Middle	4	4.4	15.4	2,427	4.4	10.7	17.5
Upper	34	37.4	58.9	28,236	50.9	67.4	36.1
Unknown	50	54.9	17.2	24,406	44.0	17.4	0.0
Total	91	100.0	100.0	55,464	100.0	100.0	100.0
Refinance Loans							
Low	2	3.0	4.0	252	0.9	2.4	26.9
Moderate	12	17.9	11.7	4,389	15.8	7.2	19.4
Middle	11	16.4	16.8	3,070	11.1	12.6	17.5
Upper	20	29.9	49.1	11,115	40.1	57.7	36.1
Unknown	22	32.8	18.4	8,879	32.0	20.0	0.0
Total	67	100.0	100.0	27,705	100.0	100.0	100.0
Home Improvement Loans							
Low	3	12.5	4.3	365	9.2	3.0	26.9
Moderate	1	4.2	9.1	133	3.4	5.5	19.4
Middle	4	16.7	13.5	239	6.0	8.1	17.5
Upper	8	33.3	67.3	1,355	34.2	72.6	36.1
Unknown	8	33.3	5.9	1,874	47.3	10.8	0.0
Total	24	100.0	100.0	3,966	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	2.6	3.0	617	0.7	1.7	26.9
Moderate	17	8.8	9.7	4,937	5.5	5.6	19.4
Middle	22	11.4	16.0	6,451	7.2	11.4	17.5
Upper	65	33.7	53.4	42,048	46.9	62.4	36.1
Unknown	84	43.5	17.9	35,694	39.8	18.9	0.0
Total	193	100.0	100.0	89,747	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table 41 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	0	0.0	3.6	0	0.0	3.7	26.9
Moderate	1	20.0	6.7	20	2.1	4.2	19.4
Middle	2	40.0	12.3	700	72.2	8.6	17.5
Upper	0	0.0	67.9	0	0.0	71.5	36.1
Unknown	2	40.0	9.5	250	25.8	11.9	0.0
Total	5	100.0	100.0	970	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.2	0	0.0	3.5	26.9
Moderate	0	0.0	6.9	0	0.0	2.4	19.4
Middle	1	16.7	8.4	15	0.9	2.3	17.5
Upper	3	50.0	69.3	1,342	81.7	72.7	36.1
Unknown	2	33.3	10.3	285	17.4	19.0	0.0
Total	6	100.0	100.0	1,642	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	26.9
Moderate	0	0.0	0.0	0	0.0	0.0	19.4
Middle	0	0.0	0.0	0	0.0	0.0	17.5
Upper	0	0.0	0.0	0	0.0	0.0	36.1
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is good. The bank originated a high number of PPP loans in 2021 for which the collection of revenue information was not required, resulting in a large percentage of loans with unknown revenues. The bank’s distribution of lending to small businesses with reported revenue was above aggregate lending data by number, significantly above by dollar volume, and significantly below the demographic figure of the percentage of businesses. In addition, 82.6 percent of the loans were for \$250,000 or less, which are generally amounts requested by smaller businesses.

The distribution of loans originated in 2022 to small businesses reflected performance below 2021 levels, although the rating was supported by considerably higher lending volume during 2021.

Table 42

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Coachella Valley Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	47	19.4	48.2	14,962	42.2	27.9	94.0
Over \$1 Million	19	7.9		5,633	15.9		5.5
Revenue Unknown	176	72.7		14,876	41.9		0.5
Total	242	100.0		35,471	100.0		100.0
By Loan Size							
\$100,000 or Less	162	66.9	94.5	4,481	12.6	42.4	
\$100,001 - \$250,000	38	15.7	3.1	6,597	18.6	15.6	
\$250,001 - \$1 Million	42	17.4	2.5	24,393	68.8	42.0	
Total	242	100.0	100.0	35,471	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	22	46.8		198	1.3		
\$100,001 - \$250,000	4	8.5		833	5.6		
\$250,001 - \$1 Million	21	44.7		13,931	93.1		
Total	47	100.0		14,962	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 13 CD loans totaling \$31.4MM in this AA. The majority of the bank’s CD loans in the AA were responsive to economic development needs. Examples of CD loans include:

- The bank originated a loan for \$4.0MM to an organization that constructs affordable housing and offers related services for LMI individuals and families.
- The bank originated a loan for \$3.6MM to an organization that provides transitional housing for LMI mothers and children facing significant hardship. The loan was for the expansion of a housing facility.

Table 43

Community Development Loans Coachella Valley Metropolitan AA		
Community Development Purpose	#	\$(000)
Affordable Housing	1	4,000
Community Services	1	3,619
Economic Development	11	23,736
Revitalization and Stabilization	0	0
Total Loans	13	31,355

INVESTMENT TEST

The bank’s performance under the investment test in the state of California is outstanding based on excellent performance in the Coachella Valley Metropolitan AA. The bank has an excellent level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA. A majority of the bank’s investments by number and dollar volume focused on community services to LMI individuals and geographies. The bank also made one qualifying investment for \$3.3MM outside of the AA in the broader statewide area of California. The following are examples of AA investment activities:

- An investment for \$8.3MM for a school bond where 69.0 percent of the students in the district qualify for the free and reduced lunch program. The bonds provided funding for construction, renovations, and improvements to district facilities.
- An investment for \$3.4MM to a municipality that provides funding for affordable housing projects targeted to LMI individuals.

Table 44

Investments, Grants, and Donations Coachella Valley Metropolitan AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	2	4,426	0	0	4	49	6	4,475
Community Services	7	14,656	0	0	17	52	24	14,708
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Outside Activities	1	3,314	0	0	0	0	1	3,314
Total	10	22,397	0	0	21	101	31	22,497

¹ Book Value of Investment
² Original Market Value of Investment

The bank's level of philanthropic activity was consistent with its overall level of investment activity in the AA and consisted of 21 donations totaling \$101M. Examples of responsive donations in the AA include:

- A donation totaling \$15M to an organization that provides community education, youth development, and skill-building services to children in LMI communities.
- Three donations totaling \$28.6M to an organization that provides affordable housing construction and offers rental housing to LMI individuals as an intermediary step to homeownership.

SERVICE TEST

The bank's performance under the service test in the state of California is excellent based on excellent performance in the Coachella Valley Metropolitan AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four branches with onsite ATMs in the Coachella Valley AA. Two of the bank's four branches are located in LMI tracts, which compares favorably to the concentration of LMI tracts within the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches in this AA during the review period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operations and product offerings and services are generally consistent with those in the bank's other markets, which is discussed in the overall retail banking services in the Institution section of this report.

Table 45

Retail Banking and Community Development Services – Coachella Valley Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	50.0	25.0	25.0	0.0	100.0	7.6	30.3	34.5	26.1	1.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	50.0	25.0	25.0	0.0	100.0	6.1	33.0	35.0	24.3	1.5	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	4		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	4	22	1	0	27	14						

¹ Based on 2022 FFIEC census tract definitions.
 Note: Total percentages may vary by 0.1 percent due to automated rounding differences. Branch and ATM data is as of December 31, 2022.

Community Development Services

The bank is a leader in providing CD services. As illustrated in the table above, bank employees supported 14 organizations throughout the AA, providing 27 services. Examples of CD services provided by bank employees include:

- A bank employee served on the board of the local chapter of a national organization that provides community services targeted to children from LMI homes.
- A bank employee served on the board of an organization that offers a variety of community services, including access to a food pantry, meal delivery, and low-cost medical devices targeted to LMI seniors.
- A bank employee served on the board of the local chapter of a national organization that provides affordable housing to LMI individuals and families.

APPENDIX A – SCOPE OF THE EXAMINATION

Table A-1

Scope of Examination			
<u>Financial Institution</u> FIRSTBANK Lakewood, Colorado		<u>Products/Services Reviewed</u> <ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 	
<u>Time Period</u> <u>HMDA LAR and CRA Small Business Loans:</u> January 1, 2021 to December 31, 2022 <u>Community Development Activities:</u> July 1, 2021 to December 31, 2022			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
FirstBank Holding Company	Holding Company	None	
1031 Corporation	Sub of Bank	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>COLORADO</u> MSA 14500, 19740, 24540 (Denver-Boulder-Greeley CSA) MSA 22660 (Fort Collins MSA) MSA 17820 (Colorado Springs MSA) MSA 99999 (Mountain)	Full Review Limited Review Limited Review Limited Review	One None None None	3 prior
<u>ARIZONA</u> MSA 38060 (Phoenix MSA)	Full Review	None	1 prior
<u>CALIFORNIA</u> MSA 40140 (Coachella Valley Metropolitan)	Full Review	None	1 prior

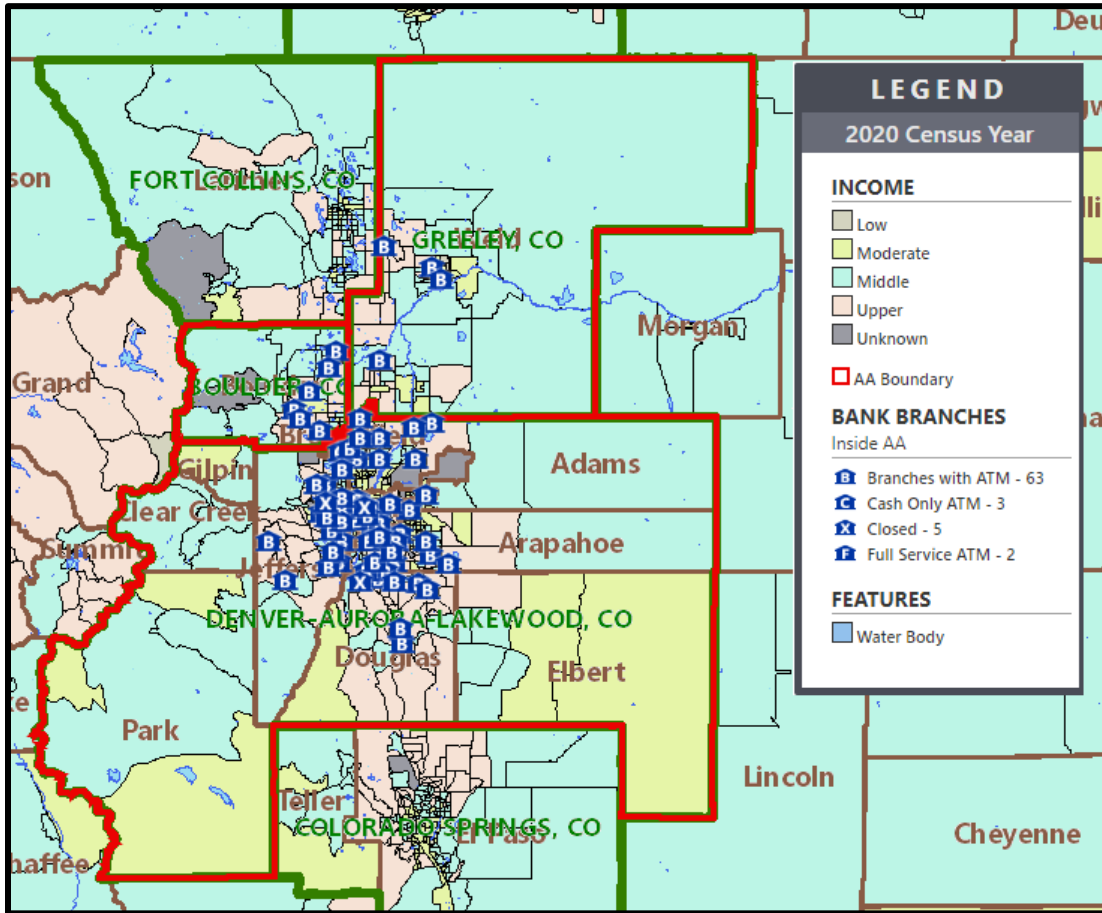
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

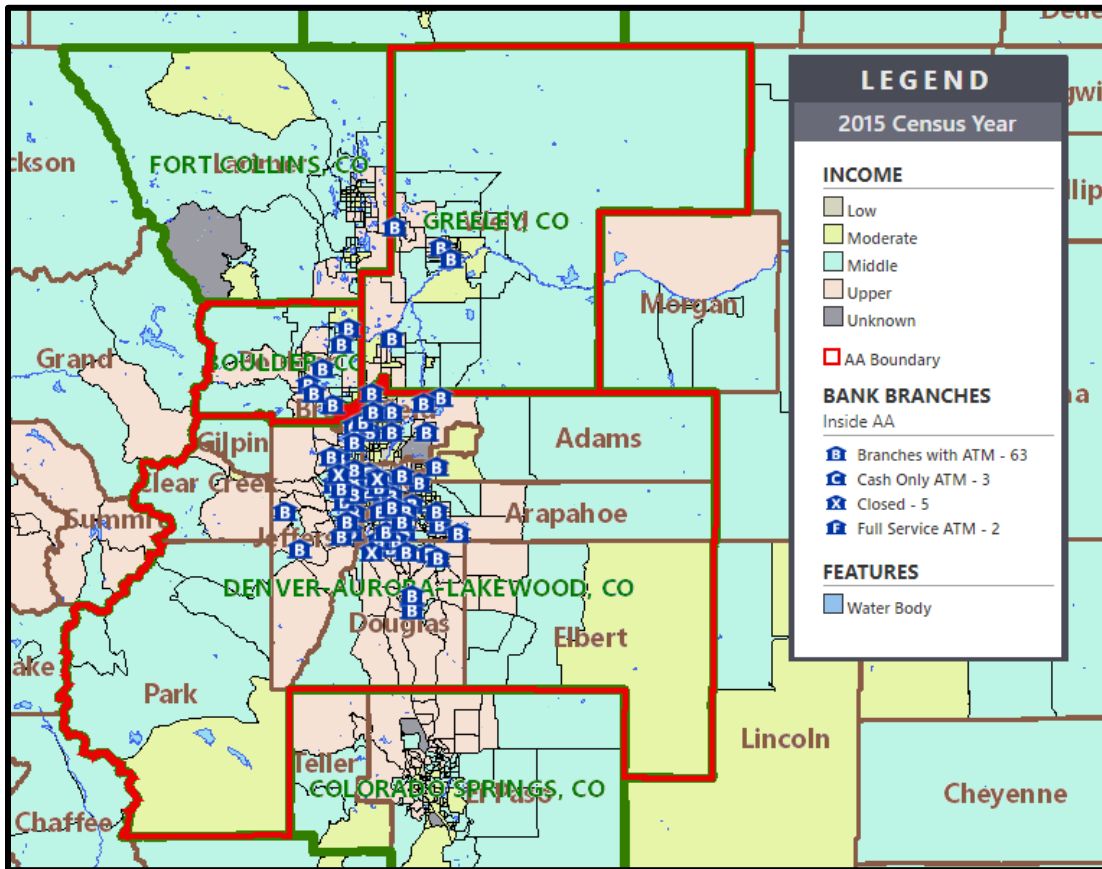
State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Arizona	High Satisfactory	Outstanding	Outstanding	Outstanding
California	High Satisfactory	Outstanding	Outstanding	Outstanding

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

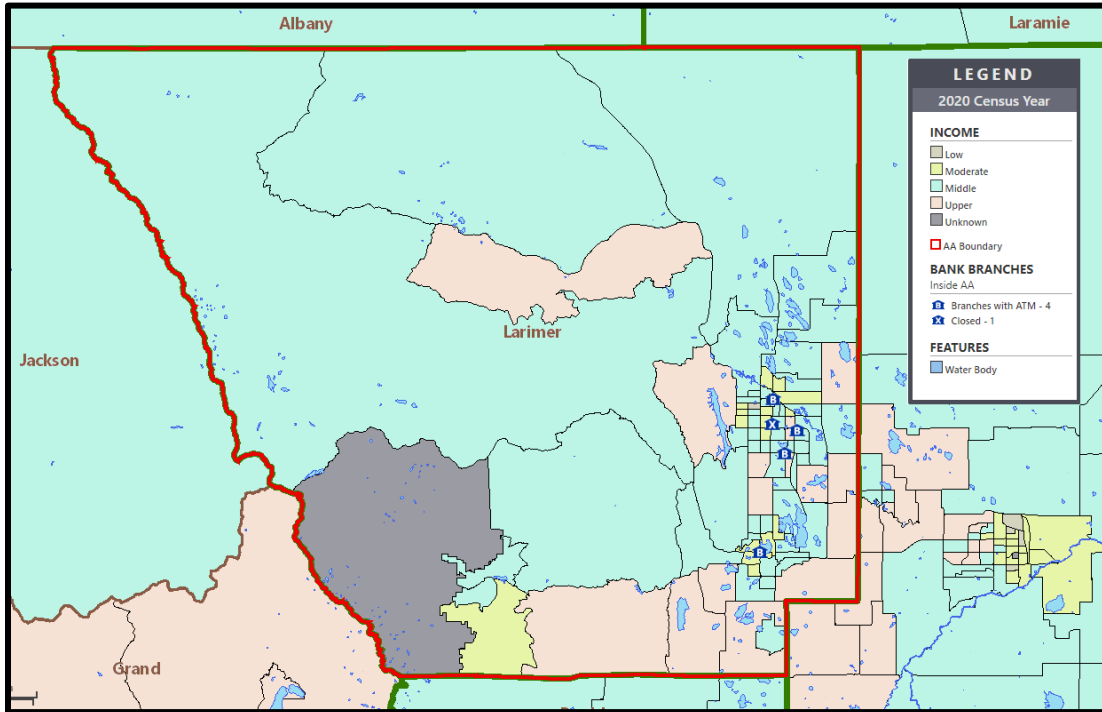
Denver-Boulder-Greeley CSA AA
Map C-1
2022



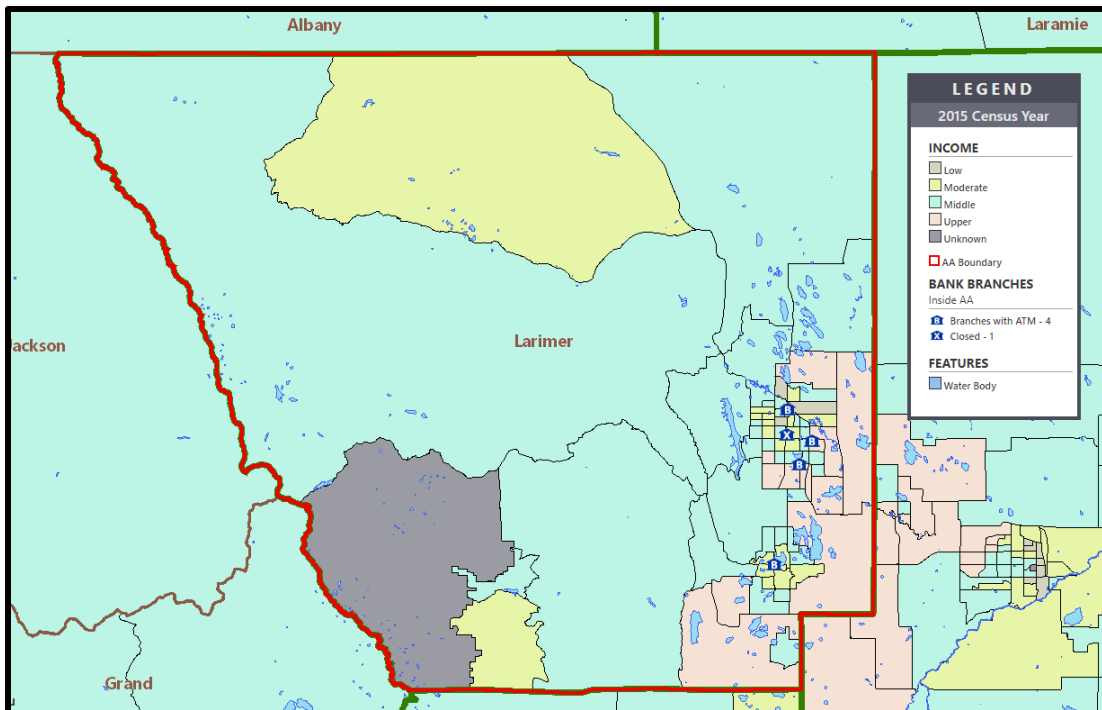
Map C-2
2021



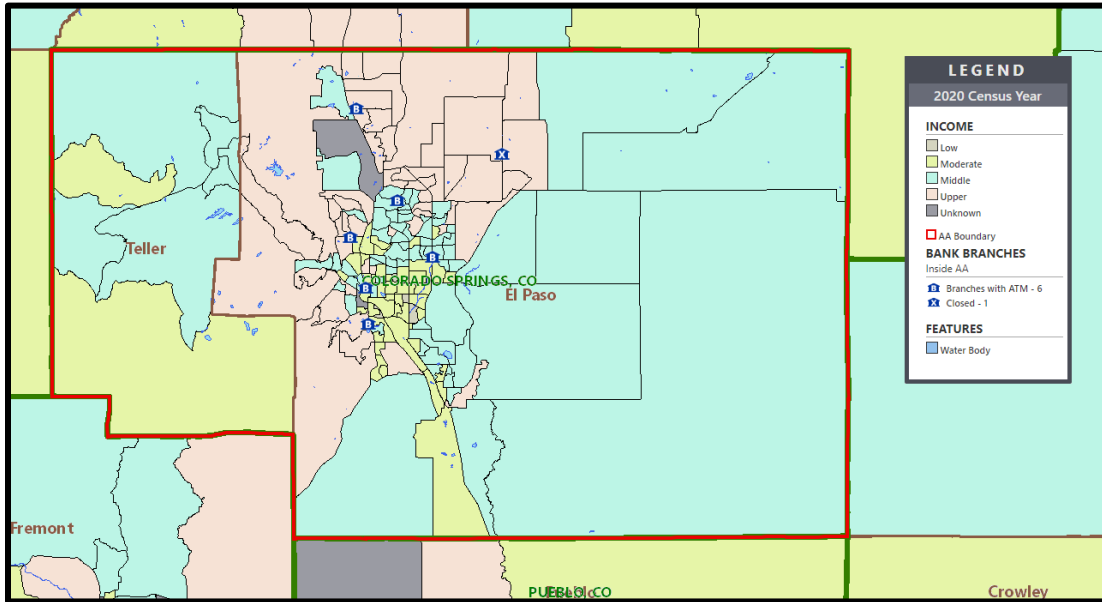
Fort Collins MSA AA
Map C-3
2022



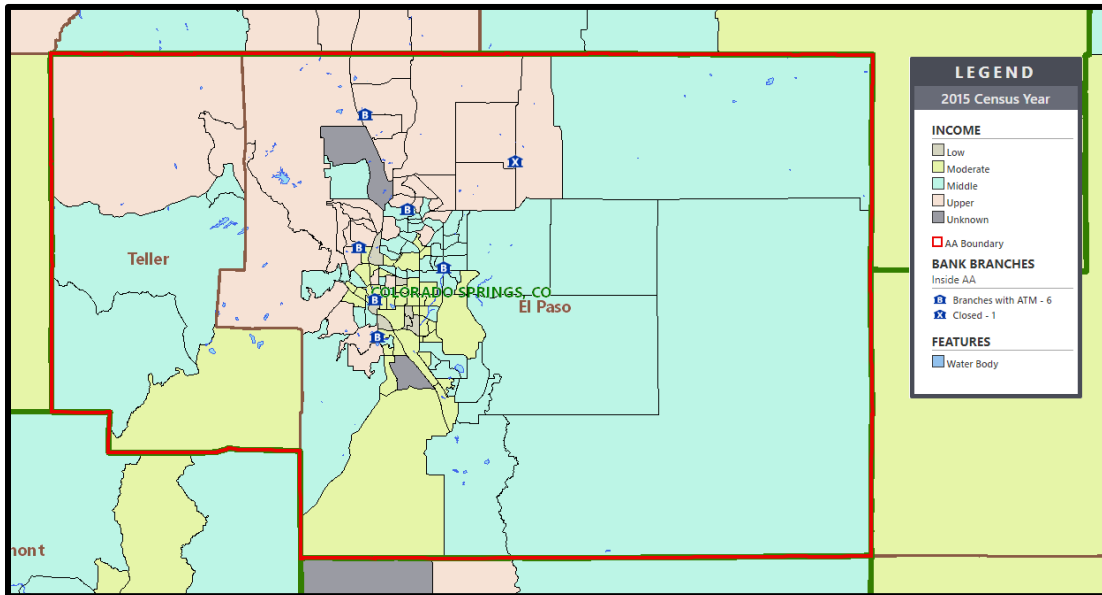
Map C-4
2021



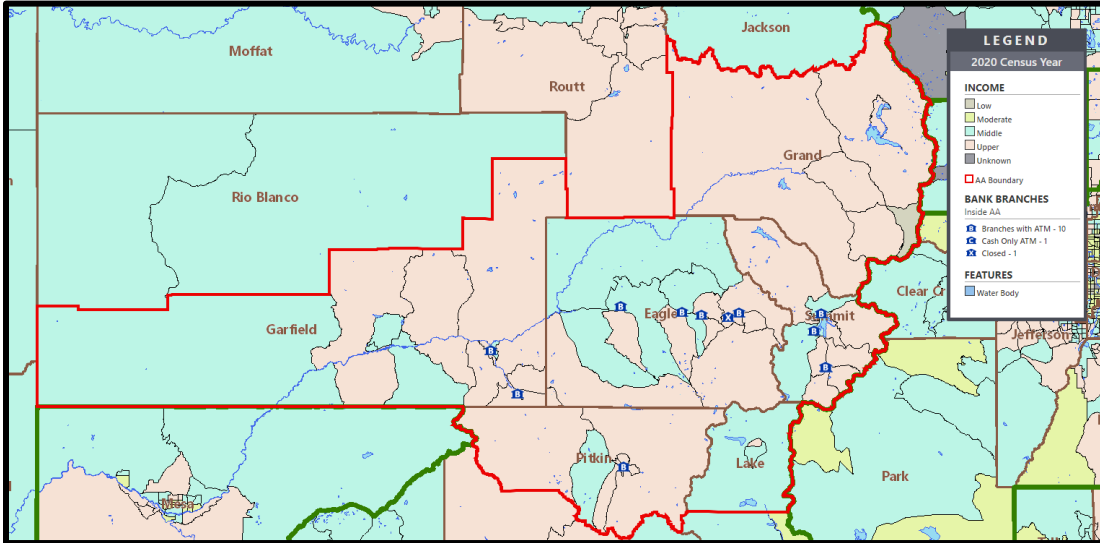
Colorado Springs MSA AA
Map C-5
2022



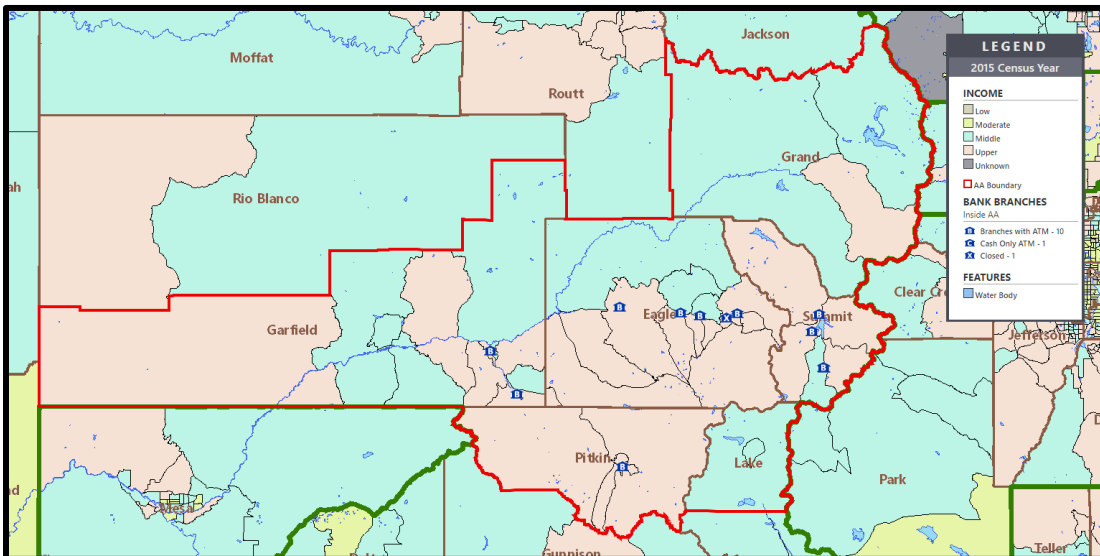
Map C-8
2021



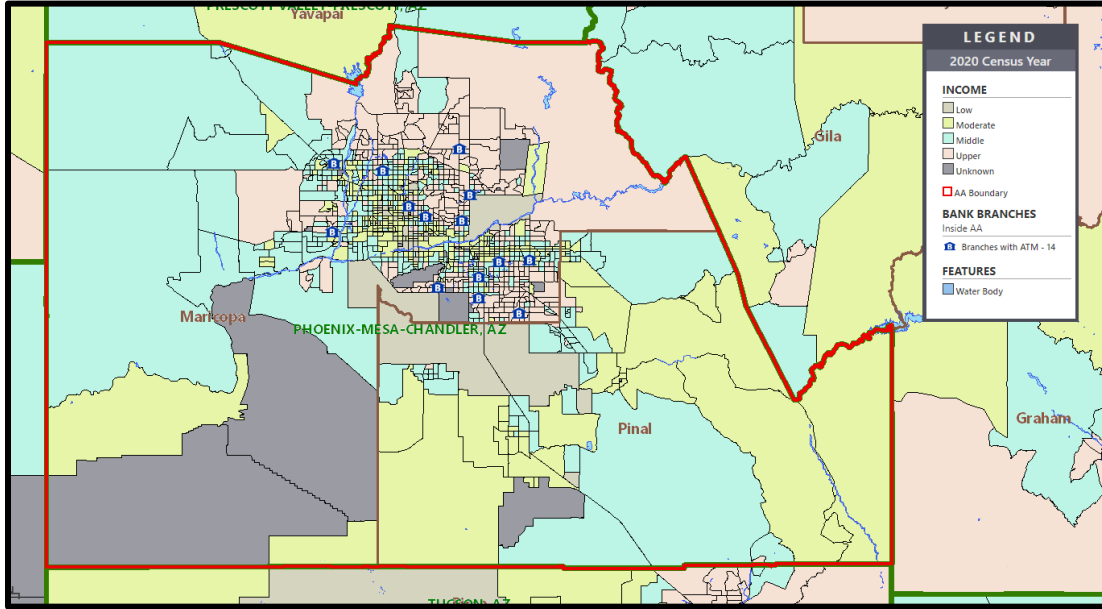
Mountain AA
Map C-7
2022



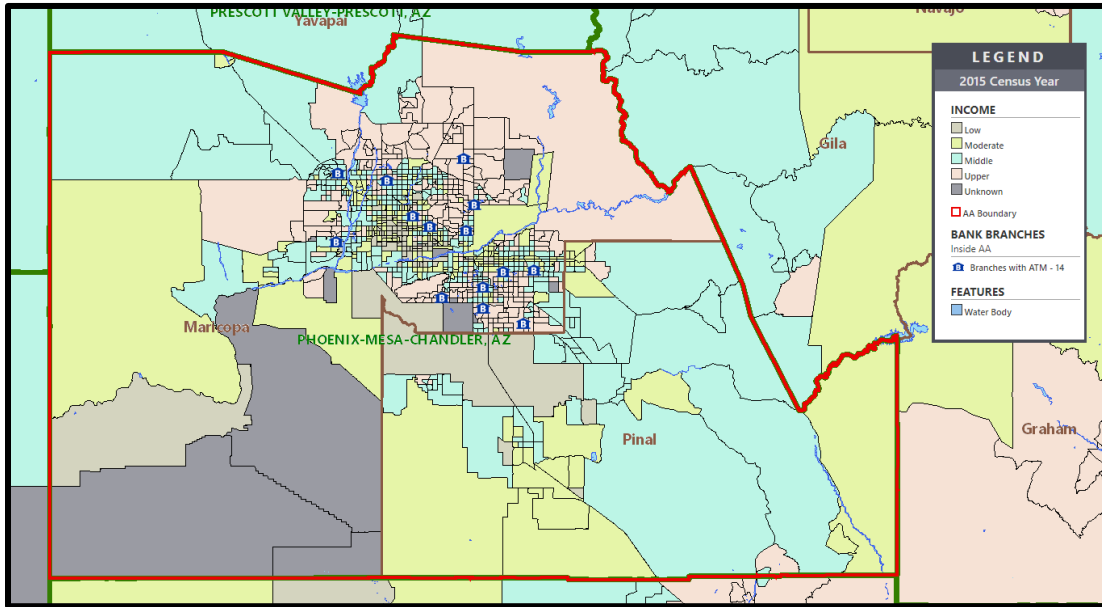
Map C-8
2021



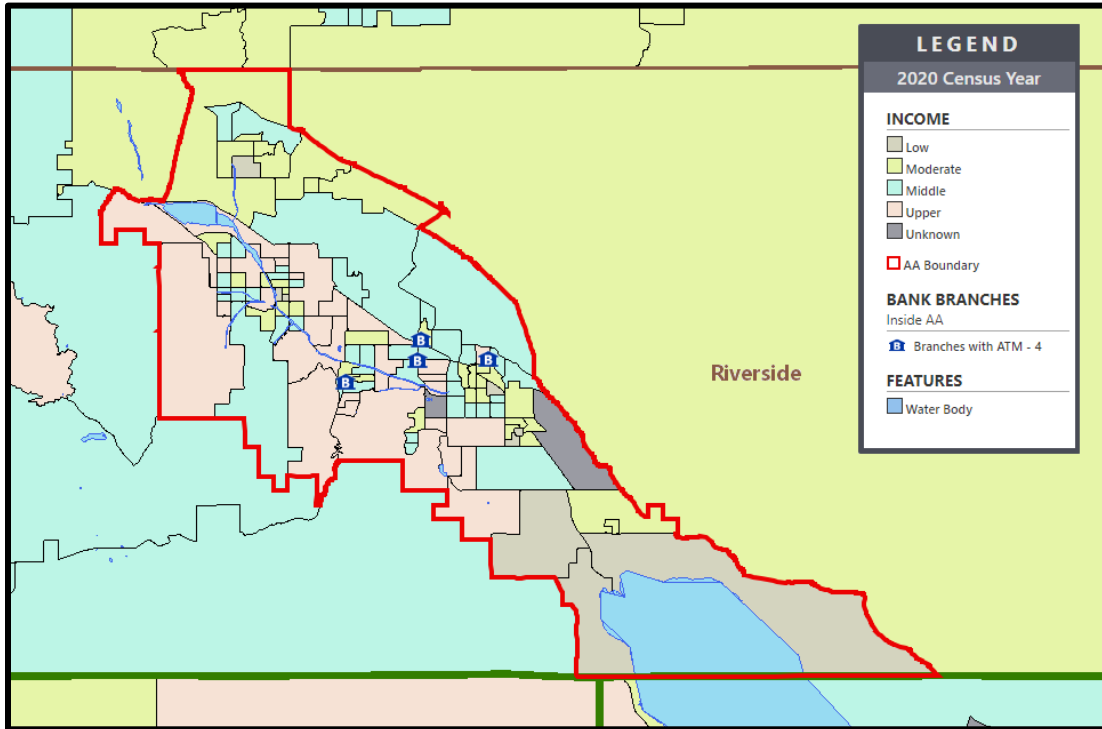
Phoenix MSA AA
Map C-9
2022



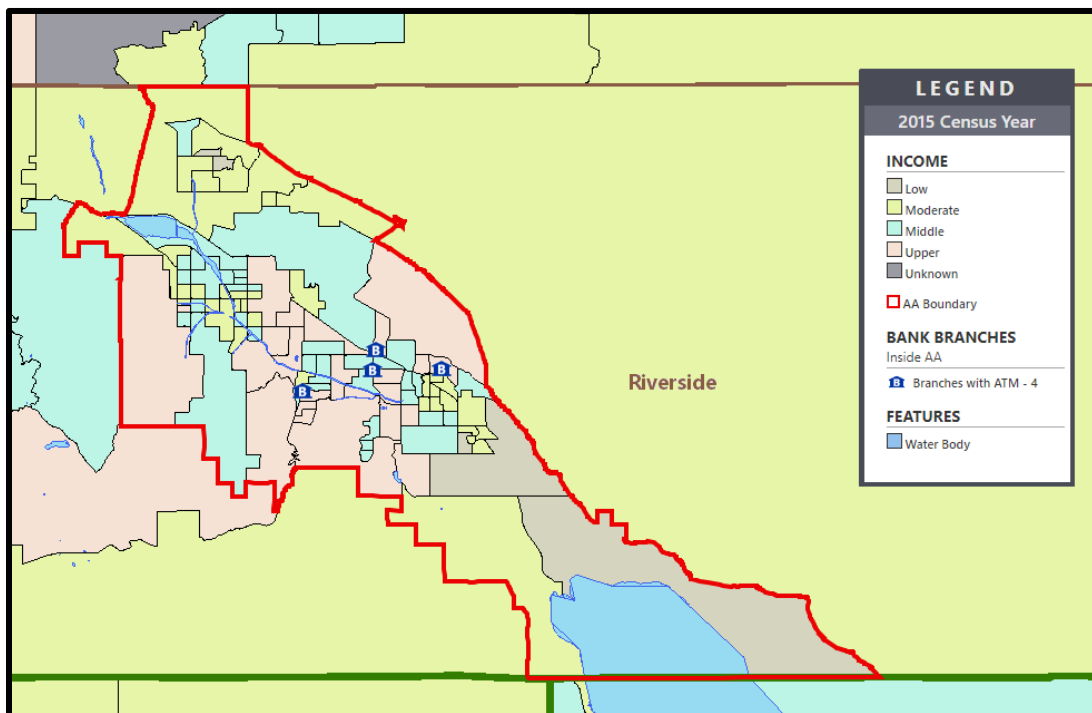
Map C-10
2021



Coachella Valley Metropolitan AA
Map C-11
2022



Map C-12
2021



APPENDIX D – DEMOGRAPHIC INFORMATION

Table D-1

2022 Denver-Boulder-Greeley CSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.2	33,783	4.0	6,697	19.8	168,456	20.2
Moderate	211	24.3	196,830	23.6	18,713	9.5	151,493	18.1
Middle	320	36.9	310,312	37.1	12,159	3.9	183,305	21.9
Upper	269	31.0	289,612	34.7	6,053	2.1	332,170	39.8
Unknown	23	2.6	4,887	0.6	1,185	24.2	0	0.0
Total AA	868	100.0	835,424	100.0	44,807	5.4	835,424	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	66,304	22,690	2.6	34.2	40,161	60.6	3,453	5.2
Moderate	357,581	175,732	20.2	49.1	160,873	45.0	20,976	5.9
Middle	526,652	339,150	39.1	64.4	160,130	30.4	27,372	5.2
Upper	429,049	326,366	37.6	76.1	85,165	19.8	17,518	4.1
Unknown	18,615	4,381	0.5	23.5	12,437	66.8	1,797	9.7
Total AA	1,398,201	868,319	100.0	62.1	458,766	32.8	71,116	5.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	8,547	3.9	7,667	3.7	809	6.0	71	3.1
Moderate	46,008	20.7	42,330	20.6	3,337	24.6	341	14.9
Middle	78,484	35.4	73,693	35.8	4,041	29.7	750	32.8
Upper	82,858	37.3	77,282	37.5	4,548	33.5	1,028	44.9
Unknown	5,952	2.7	5,000	2.4	854	6.3	98	4.3
Total AA	221,849	100.0	205,972	100.0	13,589	100.0	2,288	100.0
Percentage of Total Businesses:				92.8		6.1		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	60	2.0	53	1.8	7	9.0	0	0.0
Moderate	465	15.8	452	15.8	13	16.7	0	0.0
Middle	1,370	46.5	1,329	46.4	40	51.3	1	100.0
Upper	1,007	34.2	992	34.6	15	19.2	0	0.0
Unknown	42	1.4	39	1.4	3	3.8	0	0.0
Total AA	2,944	100.0	2,865	100.0	78	100.0	1	100.0
Percentage of Total Farms:				97.3		2.6		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-2

2021 Denver-Boulder-Greeley CSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	63	8.2	56,067	7.0	16,239	29.0	170,413	21.3
Moderate	180	23.5	173,722	21.7	23,764	13.7	139,991	17.5
Middle	261	34.1	276,919	34.7	15,568	5.6	163,406	20.4
Upper	253	33.0	292,357	36.6	7,923	2.7	325,272	40.7
Unknown	9	1.2	17	0.0	0	0.0	0	0.0
Total AA	766	100.0	799,082	100.0	63,494	7.9	799,082	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	109,702	34,582	4.3	31.5	67,527	61.6	7,593	6.9
Moderate	311,220	150,037	18.7	48.2	143,107	46.0	18,076	5.8
Middle	482,638	288,237	36.0	59.7	163,268	33.8	31,133	6.5
Upper	430,761	327,597	40.9	76.1	84,499	19.6	18,665	4.3
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,334,388	800,469	100.0	60.0	458,444	34.4	75,475	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	14,404	6.6	12,804	6.3	1,477	10.8	123	5.8
Moderate	43,374	19.8	39,930	19.6	3,149	23.1	295	13.9
Middle	73,658	33.6	68,723	33.8	4,242	31.1	693	32.6
Upper	87,293	39.8	81,686	40.1	4,599	33.7	1,008	47.3
Unknown	617	0.3	436	0.2	171	1.3	10	0.5
Total AA	219,346	100.0	203,579	100.0	13,638	100.0	2,129	100.0
Percentage of Total Businesses:				92.8		6.2		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	116	3.9	107	3.7	9	11.5	0	0.0
Moderate	399	13.6	387	13.5	12	15.4	0	0.0
Middle	1,259	42.8	1,217	42.5	41	52.6	1	100.0
Upper	1,148	39.0	1,133	39.6	15	19.2	0	0.0
Unknown	18	0.6	17	0.6	1	1.3	0	0.0
Total AA	2,940	100.0	2,861	100.0	78	100.0	1	100.0
Percentage of Total Farms:				97.3		2.7		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-3

2022 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.2	653	0.8	116	17.8	16,127	19.2
Moderate	16	18.6	13,425	16.0	1,046	7.8	15,377	18.3
Middle	52	60.5	54,206	64.6	2,318	4.3	19,784	23.6
Upper	16	18.6	15,637	18.6	436	2.8	32,633	38.9
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	86	100.0	83,921	100.0	3,916	4.7	83,921	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	2,434	309	0.3	12.7	2,046	84.1	79	3.2
Moderate	25,291	13,129	14.8	51.9	10,580	41.8	1,582	6.3
Middle	94,518	57,198	64.3	60.5	29,482	31.2	7,838	8.3
Upper	22,207	18,238	20.5	82.1	3,101	14.0	868	3.9
Unknown	133	85	0.1	63.9	17	12.8	31	23.3
Total AA	144,583	88,959	100.0	61.5	45,226	31.3	10,398	7.2
Total Businesses by Tract	Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	100	0.4	98	0.5	2	0.2	0	0.0
Moderate	3,737	16.5	3,486	16.4	221	19.9	30	13.3
Middle	14,823	65.6	13,964	65.7	720	64.7	139	61.8
Upper	3,938	17.4	3,712	17.5	170	15.3	56	24.9
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	22,600	100.0	21,262	100.0	1,113	100.0	225	100.0
Percentage of Total Businesses:			94.1		4.9		1.0	
Total Farms by Tract	Farms by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	43	9.4	42	9.4	1	10.0	0	0.0
Middle	284	62.1	279	62.6	4	40.0	1	100.0
Upper	127	27.8	122	27.4	5	50.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	457	100.0	446	100.0	10	100.0	1	100.0
Percentage of Total Farms:			97.6		2.2		0.2	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-4

2021 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	828	3.7	710	3.4	109	9.9	9	4.4
Moderate	6,442	28.8	6,070	28.8	320	28.9	52	25.5
Middle	9,466	42.3	9,033	42.9	355	32.1	78	38.2
Upper	5,644	25.2	5,257	24.9	322	29.1	65	31.9
Unknown	4	0.0	4	0.0	0	0.0	0	0.0
Total AA	22,384	100.0	21,074	100.0	1,106	100.0	204	100.0
Percentage of Total Businesses:				94.1		4.9		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.8	8	1.8	0	0.0	0	0.0
Moderate	68	15.1	67	15.2	0	0.0	1	100.0
Middle	223	49.4	221	50.0	2	25.0	0	0.0
Upper	151	33.5	145	32.8	6	75.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	451	100.0	442	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.0		1.8		0.2
<small>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>								

Table D-5

2022 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	2.3	3,334	1.8	875	26.2	34,957	18.8
Moderate	48	27.4	44,074	23.7	5,829	13.2	34,861	18.8
Middle	72	41.1	77,514	41.7	4,058	5.2	40,722	21.9
Upper	49	28.0	60,481	32.6	1,266	2.1	75,172	40.5
Unknown	2	1.1	309	0.2	26	8.4	0	0.0
Total AA	175	100.0	185,712	100.0	12,054	6.5	185,712	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,745	2,150	1.2	37.4	3,354	58.4	241	4.2
Moderate	80,756	35,922	20.0	44.5	38,853	48.1	5,981	7.4
Middle	119,893	77,994	43.4	65.1	35,906	29.9	5,993	5.0
Upper	82,452	63,375	35.2	76.9	14,775	17.9	4,302	5.2
Unknown	962	456	0.3	47.4	455	47.3	51	5.3
Total AA	289,808	179,897	100.0	62.1	93,343	32.2	16,568	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	472	1.2	434	1.2	30	1.7	8	2.4
Moderate	10,546	27.2	9,756	26.6	697	39.5	93	28.3
Middle	14,555	37.5	13,976	38.1	485	27.5	94	28.6
Upper	12,952	33.4	12,298	33.5	521	29.6	133	40.4
Unknown	285	0.7	254	0.7	30	1.7	1	0.3
Total AA	38,810	100.0	36,718	100.0	1,763	100.0	329	100.0
Percentage of Total Businesses:				94.6		4.5		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	95	20.6	91	20.1	4	50.0	0	0.0
Middle	222	48.2	220	48.6	2	25.0	0	0.0
Upper	138	29.9	136	30.0	2	25.0	0	0.0
Unknown	5	1.1	5	1.1	0	0.0	0	0.0
Total AA	461	100.0	453	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-6

2021 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	274,475	161,082	100.0	58.7	93,786	34.2	19,607	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low	2,832	7.4	2,547	7.0	261	14.8	24	8.2
Moderate	8,743	22.8	8,165	22.6	521	29.5	57	19.5
Middle	12,821	33.5	12,314	34.0	413	23.4	94	32.1
Upper	13,813	36.1	13,132	36.3	564	31.9	117	39.9
Unknown	55	0.1	47	0.1	7	0.4	1	0.3
Total AA	38,264	100.0	36,205	100.0	1,766	100.0	293	100.0
Percentage of Total Businesses:				94.6		4.6		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low	16	3.4	16	3.5	0	0.0	0	0.0
Moderate	73	15.7	73	15.9	0	0.0	0	0.0
Middle	225	48.3	220	47.9	5	71.4	0	0.0
Upper	152	32.6	150	32.7	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	466	100.0	459	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-7

2022 Mountain AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.8	208	0.5	0	0.0	5,259	12.2
Moderate	1	1.8	711	1.6	100	14.1	5,477	12.7
Middle	17	30.9	15,985	37.1	771	4.8	9,407	21.8
Upper	36	65.5	26,219	60.8	1,007	3.8	22,980	53.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	55	100.0	43,123	100.0	1,878	4.4	43,123	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,196	232	0.5	7.3	391	12.2	2,573	80.5
Moderate	2,326	398	0.8	17.1	787	33.8	1,141	49.1
Middle	38,924	17,642	37.1	45.3	7,549	19.4	13,733	35.3
Upper	78,156	29,256	61.6	37.4	12,621	16.1	36,279	46.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	122,602	47,528	100.0	38.8	21,348	17.4	53,726	43.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	130	1.0	119	1.0	8	0.9	3	1.9
Moderate	225	1.8	195	1.7	28	3.1	2	1.3
Middle	3,529	28.4	3,227	28.4	270	30.2	32	20.4
Upper	8,527	68.7	7,818	68.8	589	65.8	120	76.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,411	100.0	11,359	100.0	895	100.0	157	100.0
Percentage of Total Businesses:			91.5		7.2		1.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	1.0	3	1.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	107	35.4	103	34.7	2	66.7	2	100.0
Upper	192	63.6	191	64.3	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	302	100.0	297	100.0	3	100.0	2	100.0
Percentage of Total Farms:			98.3		1.0		0.7	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-8

2021 Mountain AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,559	13.5
Moderate	0	0.0	0	0.0	0	0.0	6,422	15.6
Middle	14	35.9	15,376	37.3	1,488	9.7	7,441	18.1
Upper	25	64.1	25,830	62.7	1,336	5.2	21,784	52.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	41,206	100.0	2,824	6.9	41,206	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	38,764	14,265	33.6	36.8	8,916	23.0	15,583	40.2
Upper	80,045	28,230	66.4	35.3	13,039	16.3	38,776	48.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	118,809	42,495	100.0	35.8	21,955	18.5	54,359	45.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4,158	34.4	3,813	34.5	303	33.3	42	27.6
Upper	7,943	65.6	7,226	65.5	607	66.7	110	72.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,101	100.0	11,039	100.0	910	100.0	152	100.0
Percentage of Total Businesses:				91.2		7.5		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	135	45.6	133	45.9	1	25.0	1	50.0
Upper	161	54.4	157	54.1	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	296	100.0	290	100.0	4	100.0	2	100.0
Percentage of Total Farms:				98.0		1.4		0.7
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table D-9

2022 Phoenix MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	68	6.2	55,575	4.8	17,579	31.6	237,588	20.6
Moderate	294	26.6	281,382	24.4	43,459	15.4	210,743	18.3
Middle	362	32.8	404,720	35.1	28,593	7.1	233,930	20.3
Upper	354	32.1	408,984	35.4	14,387	3.5	471,624	40.9
Unknown	26	2.4	3,224	0.3	764	23.7	0	0.0
Total AA	1,104	100.0	1,153,885	100.0	104,782	9.1	1,153,885	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	100,529	28,941	2.6	28.8	61,379	61.1	10,209	10.2
Moderate	528,802	243,525	21.7	46.1	223,447	42.3	61,830	11.7
Middle	683,450	413,162	36.8	60.5	200,910	29.4	69,378	10.2
Upper	623,707	435,736	38.8	69.9	131,919	21.2	56,052	9.0
Unknown	7,325	2,046	0.2	27.9	4,154	56.7	1,125	15.4
Total AA	1,943,813	1,123,410	100.0	57.8	621,809	32.0	198,594	10.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	9,078	3.6	8,019	3.4	983	7.2	76	2.4
Moderate	47,645	18.9	43,233	18.4	3,903	28.5	509	16.2
Middle	76,544	30.4	72,289	30.8	3,511	25.7	744	23.6
Upper	116,344	46.3	109,550	46.7	4,990	36.5	1,804	57.3
Unknown	1,832	0.7	1,529	0.7	289	2.1	14	0.4
Total AA	251,443	100.0	234,620	100.0	13,676	100.0	3,147	100.0
Percentage of Total Businesses:			93.3		5.4		1.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	36	1.8	33	1.7	3	3.2	0	0.0
Moderate	341	16.6	314	16.0	27	28.7	0	0.0
Middle	652	31.8	623	31.8	29	30.9	0	0.0
Upper	1,010	49.2	975	49.8	35	37.2	0	0.0
Unknown	14	0.7	14	0.7	0	0.0	0	0.0
Total AA	2,053	100.0	1,959	100.0	94	100.0	0	0.0
Percentage of Total Farms:			95.4		4.6		0.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-10

2021 Phoenix MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	110	11.1	89,438	8.6	38,136	42.6	227,358	21.9
Moderate	231	23.3	221,107	21.3	44,951	20.3	179,229	17.3
Middle	326	32.9	359,550	34.7	31,768	8.8	202,220	19.5
Upper	311	31.4	366,049	35.3	14,716	4.0	427,610	41.3
Unknown	13	1.3	273	0.0	66	24.2	0	0.0
Total AA	991	100.0	1,036,417	100.0	129,637	12.5	1,036,417	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	171,684	43,139	4.5	25.1	100,504	58.5	28,041	16.3
Moderate	437,948	189,893	19.6	43.4	178,876	40.8	69,179	15.8
Middle	651,320	359,336	37.1	55.2	196,439	30.2	95,545	14.7
Upper	569,032	374,888	38.7	65.9	125,323	22.0	68,821	12.1
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
Total AA	1,832,045	967,478	100.0	52.8	602,639	32.9	261,928	14.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low	16,295	6.5	14,160	6.0	1,895	13.7	240	7.9
Moderate	43,126	17.2	39,562	16.9	3,194	23.1	370	12.2
Middle	75,373	30.0	71,115	30.4	3,514	25.5	744	24.5
Upper	114,840	45.8	108,203	46.2	4,974	36.0	1,663	54.9
Unknown	1,352	0.5	1,113	0.5	225	1.6	14	0.5
Total AA	250,986	100.0	234,153	100.0	13,802	100.0	3,031	100.0
Percentage of Total Businesses:				93.3		5.5		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low	80	3.8	70	3.5	10	10.6	0	0.0
Moderate	349	16.7	327	16.4	22	23.4	0	0.0
Middle	656	31.4	623	31.2	33	35.1	0	0.0
Upper	996	47.7	967	48.5	29	30.9	0	0.0
Unknown	8	0.4	8	0.4	0	0.0	0	0.0
Total AA	2,089	100.0	1,995	100.0	94	100.0	0	0.0
Percentage of Total Farms:				95.5		4.5		0.0
<small>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>								

Table D-11

2022 Coachella Valley Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	7.6	5,877	5.7	1,616	27.5	27,362	26.5
Moderate	36	30.3	33,630	32.5	5,339	15.9	18,901	18.3
Middle	41	34.5	36,490	35.3	3,733	10.2	18,769	18.1
Upper	31	26.1	25,827	25.0	1,403	5.4	38,407	37.1
Unknown	2	1.7	1,615	1.6	248	15.4	0	0.0
Total AA	119	100.0	103,439	100.0	12,339	11.9	103,439	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	12,564	6,336	5.1	50.4	4,867	38.7	1,361	10.8
Moderate	74,592	36,437	29.2	48.8	23,927	32.1	14,228	19.1
Middle	85,000	46,034	36.9	54.2	17,958	21.1	21,008	24.7
Upper	73,897	34,336	27.5	46.5	9,994	13.5	29,567	40.0
Unknown	4,055	1,613	1.3	39.8	1,197	29.5	1,245	30.7
Total AA	250,108	124,756	100.0	49.9	57,943	23.2	67,409	27.0
Total Businesses by Tract	Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	504	2.6	474	2.6	26	2.5	4	3.7
Moderate	5,367	27.3	5,069	27.4	266	25.1	32	29.4
Middle	6,600	33.6	6,228	33.7	343	32.4	29	26.6
Upper	6,818	34.7	6,379	34.5	399	37.6	40	36.7
Unknown	370	1.9	340	1.8	26	2.5	4	3.7
Total AA	19,659	100.0	18,490	100.0	1,060	100.0	109	100.0
Percentage of Total Businesses:			94.1		5.4		0.6	
Total Farms by Tract	Farms by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	37	17.8	28	15.2	8	36.4	1	50.0
Moderate	42	20.2	39	21.2	3	13.6	0	0.0
Middle	52	25.0	51	27.7	0	0.0	1	50.0
Upper	64	30.8	58	31.5	6	27.3	0	0.0
Unknown	13	6.3	8	4.3	5	22.7	0	0.0
Total AA	208	100.0	184	100.0	22	100.0	2	100.0
Percentage of Total Farms:			88.5		10.6		1.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-12

2021 Coachella Valley Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	4.9	8,066	7.9	3,275	40.6	27,629	26.9
Moderate	36	35.3	35,642	34.7	8,726	24.5	19,909	19.4
Middle	36	35.3	31,772	31.0	2,910	9.2	17,993	17.5
Upper	25	24.5	27,126	26.4	1,670	6.2	37,075	36.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	102,606	100.0	16,581	16.2	102,606	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,534	4,011	4.0	34.8	6,111	53.0	1,412	12.2
Moderate	70,401	29,965	29.5	42.6	24,684	35.1	15,752	22.4
Middle	76,499	34,111	33.6	44.6	19,294	25.2	23,094	30.2
Upper	69,235	33,357	32.9	48.2	9,810	14.2	26,068	37.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	227,669	101,444	100.0	44.6	59,899	26.3	66,326	29.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	507	2.6	477	2.6	23	2.2	7	6.9
Moderate	6,299	32.7	5,884	32.5	383	36.4	32	31.7
Middle	5,829	30.2	5,507	30.4	298	28.3	24	23.8
Upper	6,644	34.5	6,258	34.5	348	33.1	38	37.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19,279	100.0	18,126	100.0	1,052	100.0	101	100.0
Percentage of Total Businesses:				94.0		5.5		0.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	42	20.8	34	19.0	7	31.8	1	100.0
Moderate	61	30.2	49	27.4	12	54.5	0	0.0
Middle	42	20.8	42	23.5	0	0.0	0	0.0
Upper	57	28.2	54	30.2	3	13.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	202	100.0	179	100.0	22	100.0	1	100.0
Percentage of Total Farms:				88.6		10.9		0.5
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

APPENDIX E – 2022 FULL-SCOPE REVIEW LENDING TABLES

Denver-Boulder-Greeley CSA
Table E-1 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	55	3.0	2.6	20,894	2.2	1.7	2.6
Moderate	420	23.0	18.6	135,271	14.5	13.2	20.2
Middle	596	32.6	35.3	267,862	28.7	30.7	39.1
Upper	740	40.5	43.0	495,561	53.1	53.8	37.6
Unknown	17	0.9	0.5	13,707	1.5	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,828	100.0	100.0	933,295	100.0	100.0	100.0
Refinance Loans							
Low	35	3.4	2.4	9,071	2.3	1.7	2.6
Moderate	156	15.3	18.6	40,779	10.4	13.2	20.2
Middle	323	31.7	34.7	113,433	28.8	27.8	39.1
Upper	496	48.7	44.0	224,756	57.1	57.0	37.6
Unknown	9	0.9	0.3	5,793	1.5	0.4	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,019	100.0	100.0	393,832	100.0	100.0	100.0
Home Improvement Loans							
Low	22	1.7	1.3	2,613	1.6	1.0	2.6
Moderate	159	12.0	12.3	13,547	8.3	9.0	20.2
Middle	489	36.9	33.4	49,392	30.3	27.1	39.1
Upper	646	48.8	52.7	95,522	58.7	62.5	37.6
Unknown	9	0.7	0.3	1,700	1.0	0.4	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,325	100.0	100.0	162,774	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	20	15.7	11.8	82,808	16.5	8.7	8.3
Moderate	48	37.8	37.4	149,277	29.7	30.2	33.4
Middle	32	25.2	26.5	200,092	39.8	31.7	34.9
Upper	23	18.1	22.0	62,822	12.5	27.2	20.0
Unknown	4	3.1	2.3	7,363	1.5	2.2	3.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	127	100.0	100.0	502,362	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	136	2.8	2.4	116,531	5.6	2.3	2.6
Moderate	842	17.5	17.8	343,995	16.6	14.5	20.2
Middle	1,634	33.9	34.6	653,237	31.6	29.3	39.1
Upper	2,167	44.9	44.7	923,947	44.7	53.2	37.6
Unknown	42	0.9	0.4	30,438	1.5	0.7	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4,821	100.0	100.0	2,068,148	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-1 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	3	1.1	1.3	545	1.4	0.8	2.6
Moderate	17	6.3	12.4	1,497	3.8	7.6	20.2
Middle	104	38.8	32.6	13,497	34.1	25.0	39.1
Upper	143	53.4	53.5	23,952	60.5	66.3	37.6
Unknown	1	0.4	0.2	100	0.3	0.3	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	268	100.0	100.0	39,591	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	0.4	1.4	600	1.7	0.6	2.6
Moderate	42	16.5	14.5	3,624	10.0	5.5	20.2
Middle	90	35.4	31.0	8,961	24.7	14.8	39.1
Upper	119	46.9	52.7	21,334	58.8	78.5	37.6
Unknown	2	0.8	0.4	1,775	4.9	0.7	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	254	100.0	100.0	36,294	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	3.9	0	0.0	2.2	2.6
Moderate	0	0.0	28.5	0	0.0	33.6	20.2
Middle	0	0.0	37.3	0	0.0	33.8	39.1
Upper	0	0.0	29.9	0	0.0	30.0	37.6
Unknown	0	0.0	0.4	0	0.0	0.3	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-2 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	142	7.8	2.2	34,794	3.7	1.1	20.2
Moderate	226	12.4	9.4	73,052	7.8	4.9	18.1
Middle	245	13.4	18.5	101,868	10.9	12.8	21.9
Upper	861	47.1	51.5	522,014	55.9	62.7	39.8
Unknown	354	19.4	18.3	201,567	21.6	18.6	0.0
Total	1,828	100.0	100.0	933,295	100.0	100.0	100.0
Refinance Loans							
Low	87	8.5	9.4	14,530	3.7	6.0	20.2
Moderate	161	15.8	15.1	36,058	9.2	9.3	18.1
Middle	144	14.1	19.8	36,949	9.4	14.9	21.9
Upper	442	43.4	40.8	218,736	55.5	52.2	39.8
Unknown	185	18.2	14.9	87,559	22.2	17.5	0.0
Total	1,019	100.0	100.0	393,832	100.0	100.0	100.0
Home Improvement Loans							
Low	73	5.5	3.8	5,302	3.3	2.9	20.2
Moderate	197	14.9	10.5	15,124	9.3	6.0	18.1
Middle	317	23.9	20.5	26,544	16.3	14.2	21.9
Upper	605	45.7	60.6	87,463	53.7	70.3	39.8
Unknown	133	10.0	4.5	28,341	17.4	6.6	0.0
Total	1,325	100.0	100.0	162,774	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	351	7.5	5.3	58,239	3.7	3.0	20.2
Moderate	685	14.6	11.7	131,336	8.4	6.4	18.1
Middle	818	17.4	19.2	176,777	11.3	13.4	21.9
Upper	2,138	45.5	48.6	875,489	55.9	59.3	39.8
Unknown	702	15.0	15.3	323,945	20.7	17.9	0.0
Total	4,694	100.0	100.0	1,565,786	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table E-2 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	21	7.8	4.7	2,210	5.6	4.3	20.2
Moderate	33	12.3	11.1	2,545	6.4	5.5	18.1
Middle	56	20.9	20.1	5,455	13.8	12.4	21.9
Upper	139	51.9	57.2	25,641	64.8	69.5	39.8
Unknown	19	7.1	6.8	3,740	9.4	8.3	0.0
Total	268	100.0	100.0	39,591	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	28	11.0	5.7	1,403	3.9	2.7	20.2
Moderate	68	26.8	11.1	4,557	12.6	3.4	18.1
Middle	56	22.0	17.6	5,961	16.4	5.6	21.9
Upper	91	35.8	54.1	21,635	59.6	66.6	39.8
Unknown	11	4.3	11.5	2,738	7.5	21.6	0.0
Total	254	100.0	100.0	36,294	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.7	0	0.0	0.2	20.2
Moderate	0	0.0	1.0	0	0.0	0.4	18.1
Middle	0	0.0	0.2	0	0.0	0.1	21.9
Upper	0	0.0	0.2	0	0.0	0.0	39.8
Unknown	0	0.0	98.0	0	0.0	99.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-3

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Denver-Boulder-Greeley CSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	81	5.1	19,053	9.0	3.9
Moderate	344	21.8	48,012	22.6	20.7
Middle	573	36.3	72,949	34.3	35.4
Upper	530	33.6	63,743	30.0	37.3
Unknown	50	3.2	8,749	4.1	2.7
Tract-Unk	0	0.0	0	0.0	
Total	1,578	100.0	212,506	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table E-4

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Denver-Boulder-Greeley CSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	1,174	74.4	122,909	57.8	92.8
Over \$1 Million	358	22.7	79,150	37.2	6.1
Revenue Unknown	46	2.9	10,447	4.9	1.0
Total	1,578	100.0	212,506	100.0	100.0
By Loan Size					
\$100,000 or Less	1,132	71.7	18,598	8.8	
\$100,001 - \$250,000	176	11.2	33,347	15.7	
\$250,001 - \$1 Million	270	17.1	160,561	75.6	
Total	1,578	100.0	212,506	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	936	79.7	8,667	7.1	
\$100,001 - \$250,000	69	5.9	13,154	10.7	
\$250,001 - \$1 Million	169	14.4	101,088	82.2	
Total	1,174	100.0	122,909	100.0	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Phoenix MSA
Table E-5 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	7	1.8	2.5	2,549	1.6	1.6	2.6
Moderate	101	26.6	19.7	30,751	19.3	14.1	21.7
Middle	132	34.7	40.9	42,758	26.8	35.8	36.8
Upper	140	36.8	36.8	83,326	52.3	48.4	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	380	100.0	100.0	159,384	100.0	100.0	100.0
Refinance Loans							
Low	3	2.2	2.0	1,373	2.4	1.3	2.6
Moderate	22	16.4	19.2	5,703	9.9	13.9	21.7
Middle	49	36.6	40.8	14,107	24.5	35.4	36.8
Upper	60	44.8	37.9	36,374	63.2	49.3	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	134	100.0	100.0	57,557	100.0	100.0	100.0
Home Improvement Loans							
Low	4	4.1	1.4	303	2.3	1.0	2.6
Moderate	7	7.2	12.2	645	4.9	9.0	21.7
Middle	28	28.9	34.4	3,437	26.3	28.0	36.8
Upper	58	59.8	52.0	8,701	66.5	62.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	97	100.0	100.0	13,086	100.0	100.0	100.0
Multifamily Loans							
Low	17	28.8	14.3	118,695	52.3	16.2	9.9
Moderate	23	39.0	43.0	65,168	28.7	33.4	36.4
Middle	12	20.3	27.0	20,752	9.1	28.3	29.9
Upper	7	11.9	15.5	22,435	9.9	21.6	22.9
Unknown	0	0.0	0.2	0	0.0	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	59	100.0	100.0	227,050	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	31	4.4	2.2	122,920	26.3	2.8	2.6
Moderate	158	22.3	18.6	102,912	22.0	15.5	21.7
Middle	233	32.9	39.9	83,327	17.8	34.3	36.8
Upper	286	40.4	39.3	158,045	33.8	47.2	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	708	100.0	100.0	467,204	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-5 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.8	0	0.0	0.5	2.6
Moderate	0	0.0	11.4	0	0.0	7.2	21.7
Middle	3	17.6	32.6	300	6.1	22.8	36.8
Upper	14	82.4	55.2	4,658	93.9	69.6	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	4,958	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.4	0	0.0	0.6	2.6
Moderate	5	23.8	14.5	645	12.5	6.8	21.7
Middle	9	42.9	34.9	1,973	38.2	18.2	36.8
Upper	7	33.3	49.1	2,551	49.4	74.4	38.8
Unknown	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	5,169	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.5	0	0.0	0.9	2.6
Moderate	0	0.0	25.3	0	0.0	23.9	21.7
Middle	0	0.0	49.7	0	0.0	37.7	36.8
Upper	0	0.0	22.5	0	0.0	37.4	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-6 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	8	2.1	3.5	1,455	0.9	1.4	20.6
Moderate	27	7.1	13.8	8,367	5.2	9.3	18.3
Middle	24	6.3	21.3	6,502	4.1	18.1	20.3
Upper	128	33.7	41.1	55,902	35.1	51.0	40.9
Unknown	193	50.8	20.4	87,158	54.7	20.1	0.0
Total	380	100.0	100.0	159,384	100.0	100.0	100.0
Refinance Loans							
Low	6	4.5	11.3	869	1.5	6.9	20.6
Moderate	8	6.0	21.5	1,464	2.5	16.5	18.3
Middle	12	9.0	21.6	3,013	5.2	20.1	20.3
Upper	42	31.3	30.4	22,833	39.7	39.7	40.9
Unknown	66	49.3	15.1	29,378	51.0	16.8	0.0
Total	134	100.0	100.0	57,557	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.1	10.1	38	0.3	7.3	20.6
Moderate	9	9.3	12.8	563	4.3	8.8	18.3
Middle	17	17.5	21.1	870	6.6	16.4	20.3
Upper	56	57.7	52.2	8,591	65.7	62.9	40.9
Unknown	13	13.4	3.9	3,024	23.1	4.6	0.0
Total	97	100.0	100.0	13,086	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	17	2.6	6.9	2,402	1.0	3.5	20.6
Moderate	51	7.9	16.3	10,797	4.5	11.5	18.3
Middle	55	8.5	21.3	10,486	4.4	18.5	20.3
Upper	245	37.8	38.7	93,739	39.0	48.0	40.9
Unknown	281	43.3	16.8	122,730	51.1	18.5	0.0
Total	649	100.0	100.0	240,154	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table E-6 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	0	0.0	4.5	0	0.0	3.7	20.6
Moderate	2	11.8	11.8	200	4.0	6.2	18.3
Middle	0	0.0	19.7	0	0.0	12.5	20.3
Upper	10	58.8	52.2	2,558	51.6	65.1	40.9
Unknown	5	29.4	11.7	2,200	44.4	12.5	0.0
Total	17	100.0	100.0	4,958	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	4.8	6.4	40	0.8	4.3	20.6
Moderate	5	23.8	14.1	203	3.9	6.0	18.3
Middle	2	9.5	20.8	101	2.0	9.2	20.3
Upper	9	42.9	48.2	3,855	74.6	65.3	40.9
Unknown	4	19.0	10.5	970	18.8	15.1	0.0
Total	21	100.0	100.0	5,169	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.6	0	0.0	0.2	20.6
Moderate	0	0.0	0.7	0	0.0	0.7	18.3
Middle	0	0.0	0.6	0	0.0	0.7	20.3
Upper	0	0.0	0.3	0	0.0	0.2	40.9
Unknown	0	0.0	97.9	0	0.0	98.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-7

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Phoenix MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	2	1.5	803	2.2	3.6
Moderate	35	26.7	12,577	33.8	18.9
Middle	24	18.3	5,537	14.9	30.4
Upper	70	53.4	18,306	49.2	46.3
Unknown	0	0.0	0	0.0	0.7
Tract-Unk	0	0.0	0	0.0	
Total	131	100.0	37,223	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table E-8

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Phoenix MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	88	67.2	29,212	78.5	93.3
Over \$1 Million	38	29.0	7,517	20.2	5.4
Revenue Unknown	5	3.8	494	1.3	1.3
Total	131	100.0	37,223	100.0	100.0
By Loan Size					
\$100,000 or Less	56	42.7	1,848	5.0	
\$100,001 - \$250,000	27	20.6	5,106	13.7	
\$250,001 - \$1 Million	48	36.6	30,269	81.3	
Total	131	100.0	37,223	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	37	42.0	1,041	3.6	
\$100,001 - \$250,000	10	11.4	2,062	7.1	
\$250,001 - \$1 Million	41	46.6	26,109	89.4	
Total	88	100.0	29,212	100.0	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Coachella Valley Metropolitan
Table E-9 (1 of 2)**

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	3	3.4	2.4	1,485	2.4	1.5	5.1
Moderate	9	10.2	23.8	3,615	5.7	17.9	29.2
Middle	37	42.0	37.9	12,579	19.9	34.9	36.9
Upper	38	43.2	34.8	44,919	71.2	44.4	27.5
Unknown	1	1.1	1.0	500	0.8	1.2	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	88	100.0	100.0	63,098	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.2	0	0.0	1.3	5.1
Moderate	9	26.5	22.2	1,985	19.6	15.4	29.2
Middle	13	38.2	40.8	3,708	36.6	36.0	36.9
Upper	12	35.3	33.4	4,447	43.9	45.9	27.5
Unknown	0	0.0	1.2	0	0.0	1.4	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	10,140	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.9	0	0.0	0.7	5.1
Moderate	5	15.2	15.5	500	7.1	11.6	29.2
Middle	15	45.5	39.3	4,748	67.5	32.3	36.9
Upper	11	33.3	42.3	1,540	21.9	52.9	27.5
Unknown	2	6.1	1.9	250	3.6	2.5	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	33	100.0	100.0	7,038	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	8.0	0	0.0	5.7	5.5
Moderate	0	0.0	36.0	0	0.0	16.3	37.1
Middle	0	0.0	40.0	0	0.0	28.4	33.4
Upper	0	0.0	14.0	0	0.0	38.8	21.6
Unknown	0	0.0	2.0	0	0.0	10.7	2.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	3	1.8	2.2	1,485	1.7	1.6	5.1
Moderate	23	13.9	22.5	6,100	7.2	16.3	29.2
Middle	69	41.6	38.6	21,826	25.7	33.8	36.9
Upper	67	40.4	35.5	54,101	63.7	46.5	27.5
Unknown	4	2.4	1.2	1,398	1.6	1.8	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	166	100.0	100.0	84,910	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-9 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.4	0	0.0	0.2	5.1
Moderate	0	0.0	19.3	0	0.0	10.4	29.2
Middle	2	50.0	34.2	400	30.8	23.1	36.9
Upper	2	50.0	43.9	900	69.2	63.1	27.5
Unknown	0	0.0	2.3	0	0.0	3.2	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	1,300	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.0	0	0.0	0.6	5.1
Moderate	0	0.0	15.3	0	0.0	6.0	29.2
Middle	2	28.6	28.0	391	11.7	15.7	36.9
Upper	4	57.1	53.6	2,295	68.8	75.4	27.5
Unknown	1	14.3	2.2	648	19.4	2.2	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	3,334	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	6.1	0	0.0	4.2	5.1
Moderate	0	0.0	32.7	0	0.0	15.5	29.2
Middle	0	0.0	42.9	0	0.0	45.2	36.9
Upper	0	0.0	18.4	0	0.0	35.2	27.5
Unknown	0	0.0	0.0	0	0.0	0.0	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-10 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	1.4	0	0.0	0.7	26.5
Moderate	10	11.4	6.0	1,620	2.6	2.9	18.3
Middle	5	5.7	13.7	1,441	2.3	9.2	18.1
Upper	36	40.9	59.3	25,779	40.9	67.4	37.1
Unknown	37	42.0	19.6	34,258	54.3	19.8	0.0
Total	88	100.0	100.0	63,098	100.0	100.0	100.0
Refinance Loans							
Low	2	5.9	9.4	152	1.5	6.1	26.5
Moderate	9	26.5	14.8	1,633	16.1	9.3	18.3
Middle	2	5.9	17.8	403	4.0	13.1	18.1
Upper	8	23.5	41.0	2,417	23.8	51.0	37.1
Unknown	13	38.2	17.0	5,535	54.6	20.5	0.0
Total	34	100.0	100.0	10,140	100.0	100.0	100.0
Home Improvement Loans							
Low	2	6.1	3.5	305	4.3	3.1	26.5
Moderate	3	9.1	8.2	400	5.7	4.6	18.3
Middle	2	6.1	17.5	60	0.9	9.3	18.1
Upper	18	54.5	63.7	4,293	61.0	75.8	37.1
Unknown	8	24.2	7.1	1,980	28.1	7.3	0.0
Total	33	100.0	100.0	7,038	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	2.4	4.5	457	0.5	2.6	26.5
Moderate	22	13.3	9.3	3,653	4.3	4.9	18.3
Middle	10	6.0	15.3	2,204	2.6	10.0	18.1
Upper	68	41.0	53.2	33,575	39.5	62.8	37.1
Unknown	62	37.3	17.7	45,021	53.0	19.7	0.0
Total	166	100.0	100.0	84,910	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table E-10 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	0	0.0	5.9	0	0.0	5.3	26.5
Moderate	0	0.0	5.7	0	0.0	2.9	18.3
Middle	0	0.0	15.4	0	0.0	7.8	18.1
Upper	2	50.0	60.2	800	61.5	67.2	37.1
Unknown	2	50.0	12.7	500	38.5	16.9	0.0
Total	4	100.0	100.0	1,300	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.1	0	0.0	2.6	26.5
Moderate	0	0.0	8.2	0	0.0	2.0	18.3
Middle	1	14.3	9.4	300	9.0	2.3	18.1
Upper	4	57.1	65.8	286	8.6	75.7	37.1
Unknown	2	28.6	12.5	2,748	82.4	17.4	0.0
Total	7	100.0	100.0	3,334	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	26.5
Moderate	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	18.1
Upper	0	0.0	0.0	0	0.0	0.0	37.1
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table E-11

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Coachella Valley Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	2.6
Moderate	18	26.9	4,286	31.9	27.3
Middle	25	37.3	2,438	18.2	33.6
Upper	24	35.8	6,707	49.9	34.7
Unknown	0	0.0	0	0.0	1.9
Tract-Unk	0	0.0	0	0.0	
Total	67	100.0	13,431	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table E-12

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Coachella Valley Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	43	64.2	7,443	55.4	94.1
Over \$1 Million	19	28.4	5,135	38.2	5.4
Revenue Unknown	5	7.5	853	6.4	0.6
Total	67	100.0	13,431	100.0	100.0
By Loan Size					
\$100,000 or Less	40	59.7	560	4.2	
\$100,001 - \$250,000	10	14.9	2,029	15.1	
\$250,001 - \$1 Million	17	25.4	10,842	80.7	
Total	67	100.0	13,431	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	30	69.8	382	5.1	
\$100,001 - \$250,000	2	4.7	450	6.0	
\$250,001 - \$1 Million	11	25.6	6,611	88.8	
Total	43	100.0	7,443	100.0	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX F – LIMITED SCOPE REVIEW ASSESSMENT AREA LENDING TABLES

Fort Collins MSA
Table F-1 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Fort Collins MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	4	1.9	3.2	1,652	1.9	3.0	1.5
Moderate	51	24.6	20.1	22,881	25.7	18.5	20.5
Middle	80	38.6	45.1	31,263	35.1	43.1	52.7
Upper	72	34.8	31.6	33,247	37.3	35.4	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	207	100.0	100.0	89,043	100.0	100.0	100.0
Refinance Loans							
Low	1	0.4	1.2	457	0.6	1.1	1.5
Moderate	58	25.8	20.0	16,688	23.1	17.6	20.5
Middle	80	35.6	48.0	21,659	30.0	45.3	52.7
Upper	86	38.2	30.8	33,373	46.2	35.9	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	225	100.0	100.0	72,177	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.1	0	0.0	0.9	1.5
Moderate	18	23.1	19.7	1,685	20.8	20.0	20.5
Middle	38	48.7	45.6	2,952	36.4	43.1	52.7
Upper	22	28.2	33.6	3,473	42.8	36.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	78	100.0	100.0	8,110	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	5.9	0	0.0	4.9	3.4
Moderate	3	50.0	58.8	7,623	15.7	45.6	46.2
Middle	1	16.7	15.7	503	1.0	8.5	34.4
Upper	2	33.3	19.6	40,301	83.2	40.9	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	48,427	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	1.1	1.8	2,159	1.0	2.0	1.5
Moderate	134	23.9	20.0	49,482	22.2	19.2	20.5
Middle	222	39.6	46.8	58,440	26.3	42.8	52.7
Upper	199	35.5	31.3	112,435	50.5	36.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	561	100.0	100.0	222,516	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-1 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Fort Collins MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	1	3.2	1.3	50	1.4	0.9	1.5
Moderate	2	6.5	17.2	550	15.2	14.6	20.5
Middle	16	51.6	46.6	1,830	50.6	43.1	52.7
Upper	12	38.7	34.8	1,187	32.8	41.4	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	3,617	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.4	0	0.0	0.1	1.5
Moderate	2	14.3	21.0	55	4.8	20.0	20.5
Middle	7	50.0	40.8	233	20.4	37.3	52.7
Upper	5	35.7	37.8	854	74.8	42.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,142	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	1.5
Moderate	0	0.0	13.3	0	0.0	7.8	20.5
Middle	0	0.0	66.7	0	0.0	76.7	52.7
Upper	0	0.0	20.0	0	0.0	15.5	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-2 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Fort Collins MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	2	1.0	0.5	580	0.6	0.4	0.3
Moderate	29	15.0	13.1	9,829	9.5	11.6	14.8
Middle	117	60.6	61.6	62,069	60.2	60.1	64.3
Upper	45	23.3	24.7	30,554	29.7	27.9	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	193	100.0	100.0	103,032	100.0	100.0	100.0
Refinance Loans							
Low	1	0.8	0.5	733	1.9	0.4	0.3
Moderate	11	8.7	13.2	2,067	5.3	11.3	14.8
Middle	90	70.9	63.7	27,798	71.8	61.7	64.3
Upper	25	19.7	22.7	8,134	21.0	26.7	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	127	100.0	100.0	38,732	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.2	0	0.0	0.2	0.3
Moderate	15	12.5	11.6	1,376	9.8	11.2	14.8
Middle	90	75.0	63.2	10,874	77.5	60.4	64.3
Upper	15	12.5	25.0	1,781	12.7	28.3	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	120	100.0	100.0	14,031	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	3.1	0	0.0	1.3	6.3
Moderate	5	50.0	31.3	34,261	68.4	15.0	19.4
Middle	5	50.0	53.1	15,844	31.6	44.7	67.4
Upper	0	0.0	12.5	0	0.0	39.0	6.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	50,105	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	4	0.8	0.5	1,403	0.7	0.4	0.3
Moderate	69	13.2	12.8	48,565	22.5	11.5	14.8
Middle	342	65.5	62.3	121,458	56.3	59.7	64.3
Upper	107	20.5	24.4	44,328	20.5	28.3	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	522	100.0	100.0	215,754	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table F-2 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Fort Collins MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.2	0	0.0	0.3	0.3
Moderate	5	10.9	12.3	550	8.5	8.8	14.8
Middle	27	58.7	61.4	3,860	60.0	60.7	64.3
Upper	14	30.4	26.0	2,027	31.5	30.2	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	6,437	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	3.8	0.3	90	2.6	0.1	0.3
Moderate	4	15.4	9.4	482	14.1	8.6	14.8
Middle	13	50.0	61.9	1,013	29.6	58.6	64.3
Upper	8	30.8	28.3	1,832	53.6	32.6	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	3,417	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.3
Moderate	0	0.0	15.4	0	0.0	11.3	14.8
Middle	0	0.0	61.5	0	0.0	59.9	64.3
Upper	0	0.0	23.1	0	0.0	28.8	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-3 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	8	3.9	3.8	2,538	2.9	2.1	20.5
Moderate	14	6.8	17.0	5,094	5.7	13.1	17.2
Middle	26	12.6	22.8	8,393	9.4	21.8	22.6
Upper	84	40.6	37.4	47,255	53.1	43.8	39.6
Unknown	75	36.2	19.1	25,763	28.9	19.3	0.0
Total	207	100.0	100.0	89,043	100.0	100.0	100.0
Refinance Loans							
Low	21	9.3	7.3	4,604	6.4	4.5	20.5
Moderate	31	13.8	18.7	7,005	9.7	15.1	17.2
Middle	29	12.9	22.2	7,125	9.9	21.4	22.6
Upper	113	50.2	32.2	44,924	62.2	38.2	39.6
Unknown	31	13.8	19.6	8,519	11.8	20.8	0.0
Total	225	100.0	100.0	72,177	100.0	100.0	100.0
Home Improvement Loans							
Low	4	5.1	5.7	190	2.3	4.7	20.5
Moderate	14	17.9	14.2	1,064	13.1	12.6	17.2
Middle	19	24.4	26.4	1,752	21.6	24.3	22.6
Upper	34	43.6	51.7	3,434	42.3	54.6	39.6
Unknown	7	9.0	1.9	1,670	20.6	3.8	0.0
Total	78	100.0	100.0	8,110	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	36	6.5	6.1	7,487	4.3	3.6	20.5
Moderate	62	11.2	17.8	13,233	7.6	14.2	17.2
Middle	85	15.3	22.6	17,957	10.3	21.5	22.6
Upper	258	46.5	35.1	99,322	57.1	40.8	39.6
Unknown	114	20.5	18.4	36,090	20.7	19.9	0.0
Total	555	100.0	100.0	174,089	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-3 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	2	6.5	6.6	150	4.1	5.4	20.5
Moderate	2	6.5	16.7	32	0.9	11.0	17.2
Middle	6	19.4	26.0	400	11.1	22.0	22.6
Upper	20	64.5	48.4	2,897	80.1	58.3	39.6
Unknown	1	3.2	2.3	138	3.8	3.2	0.0
Total	31	100.0	100.0	3,617	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	7.1	8.6	5	0.4	5.4	20.5
Moderate	1	7.1	10.7	38	3.3	10.1	17.2
Middle	5	35.7	18.5	287	25.1	11.8	22.6
Upper	7	50.0	47.6	812	71.1	52.9	39.6
Unknown	0	0.0	14.6	0	0.0	19.8	0.0
Total	14	100.0	100.0	1,142	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.5
Moderate	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	0.0	0	0.0	0.0	22.6
Upper	0	0.0	0.0	0	0.0	0.0	39.6
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-4 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	4	2.1	3.9	1,124	1.1	1.8	19.2
Moderate	13	6.7	14.7	3,782	3.7	10.6	18.3
Middle	25	13.0	22.8	8,920	8.7	20.6	23.6
Upper	96	49.7	39.3	62,158	60.3	47.5	38.9
Unknown	55	28.5	19.4	27,048	26.3	19.4	0.0
Total	193	100.0	100.0	103,032	100.0	100.0	100.0
Refinance Loans							
Low	14	11.0	13.0	1,846	4.8	8.3	19.2
Moderate	15	11.8	20.7	2,995	7.7	17.1	18.3
Middle	23	18.1	21.5	6,875	17.8	20.9	23.6
Upper	48	37.8	30.2	19,955	51.5	38.1	38.9
Unknown	27	21.3	14.6	7,061	18.2	15.5	0.0
Total	127	100.0	100.0	38,732	100.0	100.0	100.0
Home Improvement Loans							
Low	6	5.0	7.4	780	5.6	5.2	19.2
Moderate	15	12.5	15.7	1,499	10.7	11.7	18.3
Middle	23	19.2	25.3	1,817	12.9	20.7	23.6
Upper	66	55.0	49.4	8,757	62.4	59.7	38.9
Unknown	10	8.3	2.2	1,178	8.4	2.7	0.0
Total	120	100.0	100.0	14,031	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	32	6.3	7.1	5,124	3.1	3.8	19.2
Moderate	59	11.5	16.9	10,090	6.1	12.4	18.3
Middle	87	17.0	23.2	19,291	11.6	20.7	23.6
Upper	240	46.9	38.3	95,707	57.8	45.9	38.9
Unknown	94	18.4	14.6	35,437	21.4	17.3	0.0
Total	512	100.0	100.0	165,649	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-4 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	3	6.5	7.0	400	6.2	6.0	19.2
Moderate	8	17.4	19.5	1,166	18.1	14.6	18.3
Middle	10	21.7	28.3	940	14.6	22.4	23.6
Upper	23	50.0	42.0	3,781	58.7	54.4	38.9
Unknown	2	4.3	3.1	150	2.3	2.6	0.0
Total	46	100.0	100.0	6,437	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	5	19.2	10.7	974	28.5	7.2	19.2
Moderate	8	30.8	18.6	648	19.0	11.3	18.3
Middle	6	23.1	24.1	739	21.6	12.9	23.6
Upper	7	26.9	40.4	1,056	30.9	58.5	38.9
Unknown	0	0.0	6.2	0	0.0	10.1	0.0
Total	26	100.0	100.0	3,417	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	7.7	0	0.0	2.5	19.2
Moderate	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	23.6
Upper	0	0.0	0.0	0	0.0	0.0	38.9
Unknown	0	0.0	92.3	0	0.0	97.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-5

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Fort Collins MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	18	3.7	4.6	2,107	4.8	7.1	3.7
Moderate	147	30.6	26.2	15,500	35.2	30.2	28.8
Middle	169	35.1	39.5	14,470	32.8	33.9	42.3
Upper	147	30.6	28.6	11,980	27.2	28.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.2	
Total	481	100.0	100.0	44,057	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-6

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Fort Collins MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.4
Moderate	25	16.3	3,280	11.8	16.5
Middle	94	61.4	18,896	67.8	65.6
Upper	34	22.2	5,697	20.4	17.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	153	100.0	27,873	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-7

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Fort Collins MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	88	18.3	47.9	12,732	28.9	30.7	94.1
Over \$1 Million	25	5.2		6,502	14.8		4.9
Revenue Unknown	368	76.5		24,823	56.3		0.9
Total	481	100.0		44,057	100.0		100.0
By Loan Size							
\$100,000 or Less	378	78.6	91.6	10,200	23.2	33.9	
\$100,001 - \$250,000	53	11.0	4.5	9,185	20.8	17.4	
\$250,001 - \$1 Million	50	10.4	3.9	24,672	56.0	48.6	
Total	481	100.0	100.0	44,057	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	57	64.8		921	7.2		
\$100,001 - \$250,000	13	14.8		2,373	18.6		
\$250,001 - \$1 Million	18	20.5		9,438	74.1		
Total	88	100.0		12,732	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table F-8

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Fort Collins MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	112	73.2	16,724	60.0	94.1
Over \$1 Million	31	20.3	8,694	31.2	4.9
Revenue Unknown	10	6.5	2,455	8.8	1.0
Total	153	100.0	27,873	100.0	100.0
By Loan Size					
\$100,000 or Less	94	61.4	1,968	7.1	
\$100,001 - \$250,000	22	14.4	4,365	15.7	
\$250,001 - \$1 Million	37	24.2	21,540	77.3	
Total	153	100.0	27,873	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	79	70.5	1,037	6.2	
\$100,001 - \$250,000	10	8.9	2,110	12.6	
\$250,001 - \$1 Million	23	20.5	13,577	81.2	
Total	112	100.0	16,724	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Colorado Springs MSA
Table F-9 (1 of 2)**

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	21	9.8	2.2	6,860	8.7	1.5	3.2
Moderate	56	26.0	17.5	16,202	20.6	13.9	19.8
Middle	59	27.4	44.6	18,770	23.9	41.6	42.1
Upper	79	36.7	35.7	36,668	46.7	42.9	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	215	100.0	100.0	78,500	100.0	100.0	100.0
Refinance Loans							
Low	5	3.6	2.2	1,132	2.9	1.5	3.2
Moderate	22	15.9	16.3	4,642	11.8	12.6	19.8
Middle	43	31.2	43.8	9,536	24.3	39.8	42.1
Upper	68	49.3	37.7	23,885	60.9	46.1	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	138	100.0	100.0	39,195	100.0	100.0	100.0
Home Improvement Loans							
Low	1	2.1	1.9	50	0.9	1.2	3.2
Moderate	6	12.8	15.6	1,117	20.8	13.4	19.8
Middle	9	19.1	36.7	794	14.8	31.4	42.1
Upper	31	66.0	45.9	3,407	63.5	54.0	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	5,368	100.0	100.0	100.0
Multifamily Loans							
							Multi-family Units %
Low	3	6.0	11.9	5,370	5.8	7.1	11.6
Moderate	37	74.0	53.2	49,047	53.1	34.1	45.3
Middle	8	16.0	26.6	9,595	10.4	40.1	28.0
Upper	2	4.0	8.3	28,323	30.7	18.7	15.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	50	100.0	100.0	92,335	100.0	100.0	100.0
Total Home Mortgage Loans							
							Owner Occupied Units %
Low	30	6.3	2.2	13,412	6.2	1.7	3.2
Moderate	123	26.0	16.7	71,258	32.7	14.0	19.8
Middle	127	26.8	43.7	39,181	18.0	40.4	42.1
Upper	193	40.8	37.4	93,902	43.1	43.9	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	473	100.0	100.0	217,753	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-9 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	1.7	0	0.0	1.1	3.2
Moderate	1	10.0	15.7	100	9.2	12.5	19.8
Middle	3	30.0	40.4	240	22.0	33.5	42.1
Upper	6	60.0	42.1	750	68.8	52.8	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,090	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.7	0	0.0	0.8	3.2
Moderate	1	7.7	15.8	150	11.9	12.4	19.8
Middle	5	38.5	37.2	246	19.4	30.8	42.1
Upper	7	53.8	45.3	869	68.7	56.0	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,265	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	8.3	0	0.0	4.8	3.2
Moderate	0	0.0	25.0	0	0.0	32.3	19.8
Middle	0	0.0	52.5	0	0.0	45.1	42.1
Upper	0	0.0	14.2	0	0.0	17.7	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-10 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	7	3.5	1.6	2,092	2.6	1.1	1.2
Moderate	51	25.5	18.2	16,538	20.6	14.4	20.0
Middle	67	33.5	39.0	22,598	28.2	36.1	43.4
Upper	75	37.5	41.0	38,864	48.5	48.2	35.2
Unknown	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	200	100.0	100.0	80,092	100.0	100.0	100.0
Refinance Loans							
Low	2	2.7	1.8	235	1.2	1.2	1.2
Moderate	13	17.6	20.2	2,690	13.4	15.7	20.0
Middle	27	36.5	44.1	5,903	29.3	40.9	43.4
Upper	32	43.2	33.7	11,302	56.1	42.1	35.2
Unknown	0	0.0	0.2	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	20,130	100.0	100.0	100.0
Home Improvement Loans							
Low	1	1.5	0.9	15	0.2	0.6	1.2
Moderate	9	13.4	15.3	782	12.4	12.4	20.0
Middle	29	43.3	40.1	2,801	44.3	34.6	43.4
Upper	27	40.3	43.4	2,684	42.5	52.2	35.2
Unknown	1	1.5	0.3	40	0.6	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	67	100.0	100.0	6,322	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	1.3	0	0.0	2.6	4.3
Moderate	9	42.9	47.5	14,087	16.4	50.9	45.1
Middle	10	47.6	41.3	18,136	21.1	34.7	33.1
Upper	2	9.5	10.0	53,700	62.5	11.8	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	85,923	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	10	2.5	1.5	2,342	1.2	1.2	1.2
Moderate	87	22.1	18.1	34,513	17.6	16.8	20.0
Middle	145	36.9	40.6	50,387	25.8	37.1	43.4
Upper	150	38.2	39.6	108,365	55.4	44.8	35.2
Unknown	1	0.3	0.2	40	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	393	100.0	100.0	195,647	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-10 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	1.0	0	0.0	0.6	1.2
Moderate	1	9.1	13.4	35	3.8	10.5	20.0
Middle	4	36.4	41.2	445	48.6	35.8	43.4
Upper	6	54.5	44.2	435	47.5	52.9	35.2
Unknown	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	915	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.0	0	0.0	0.9	1.2
Moderate	4	20.0	16.7	381	16.8	11.5	20.0
Middle	8	40.0	38.5	504	22.3	29.5	43.4
Upper	8	40.0	43.8	1,380	60.9	58.1	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	2,265	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.2	0	0.0	0.4	1.2
Moderate	0	0.0	27.9	0	0.0	18.5	20.0
Middle	0	0.0	51.2	0	0.0	53.4	43.4
Upper	0	0.0	19.8	0	0.0	27.7	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-11 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	9	4.2	1.9	2,311	2.9	1.0	20.2
Moderate	20	9.3	15.7	6,055	7.7	11.9	18.5
Middle	15	7.0	24.8	4,403	5.6	23.0	20.3
Upper	95	44.2	35.2	40,178	51.2	41.0	41.0
Unknown	76	35.3	22.3	25,553	32.6	23.1	0.0
Total	215	100.0	100.0	78,500	100.0	100.0	100.0
Refinance Loans							
Low	8	5.8	5.3	1,008	2.6	3.0	20.2
Moderate	16	11.6	13.9	2,855	7.3	10.5	18.5
Middle	23	16.7	18.1	5,682	14.5	16.5	20.3
Upper	65	47.1	28.4	22,549	57.5	32.9	41.0
Unknown	26	18.8	34.3	7,101	18.1	37.0	0.0
Total	138	100.0	100.0	39,195	100.0	100.0	100.0
Home Improvement Loans							
Low	3	6.4	4.2	192	3.6	2.9	20.2
Moderate	7	14.9	14.3	950	17.7	11.4	18.5
Middle	5	10.6	21.7	336	6.3	18.7	20.3
Upper	25	53.2	58.2	3,206	59.7	64.5	41.0
Unknown	7	14.9	1.5	684	12.7	2.5	0.0
Total	47	100.0	100.0	5,368	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	22	5.2	4.0	3,651	2.9	2.1	20.2
Moderate	44	10.4	14.6	9,880	7.9	11.1	18.5
Middle	48	11.3	20.8	10,728	8.6	19.5	20.3
Upper	197	46.6	33.0	67,321	53.7	37.3	41.0
Unknown	112	26.5	27.7	33,838	27.0	30.0	0.0
Total	423	100.0	100.0	125,418	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-11 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	2	20.0	4.2	140	12.8	2.6	20.2
Moderate	0	0.0	14.0	0	0.0	9.5	18.5
Middle	2	20.0	24.0	200	18.3	19.9	20.3
Upper	4	40.0	56.8	400	36.7	66.4	41.0
Unknown	2	20.0	1.0	350	32.1	1.6	0.0
Total	10	100.0	100.0	1,090	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.0	0	0.0	3.7	20.2
Moderate	1	7.7	15.1	20	1.6	9.8	18.5
Middle	3	23.1	20.8	107	8.5	15.5	20.3
Upper	8	61.5	48.3	988	78.1	60.0	41.0
Unknown	1	7.7	9.7	150	11.9	11.0	0.0
Total	13	100.0	100.0	1,265	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.8	0	0.0	0.2	20.2
Moderate	0	0.0	0.0	0	0.0	0.0	18.5
Middle	0	0.0	1.7	0	0.0	2.2	20.3
Upper	0	0.0	0.8	0	0.0	0.8	41.0
Unknown	0	0.0	96.7	0	0.0	96.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-12 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	7	3.5	2.4	1,447	1.8	1.2	18.8
Moderate	21	10.5	16.9	6,646	8.3	12.8	18.8
Middle	22	11.0	25.7	7,579	9.5	23.6	21.9
Upper	90	45.0	36.1	41,874	52.3	42.6	40.5
Unknown	60	30.0	18.9	22,546	28.2	19.9	0.0
Total	200	100.0	100.0	80,092	100.0	100.0	100.0
Refinance Loans							
Low	10	13.5	11.5	1,383	6.9	7.0	18.8
Moderate	8	10.8	20.7	1,582	7.9	16.9	18.8
Middle	11	14.9	24.3	2,411	12.0	24.0	21.9
Upper	32	43.2	26.9	10,889	54.1	33.5	40.5
Unknown	13	17.6	16.7	3,865	19.2	18.7	0.0
Total	74	100.0	100.0	20,130	100.0	100.0	100.0
Home Improvement Loans							
Low	5	7.5	5.2	118	1.9	3.4	18.8
Moderate	6	9.0	14.8	413	6.5	10.3	18.8
Middle	17	25.4	25.4	1,079	17.1	21.0	21.9
Upper	33	49.3	53.6	3,842	60.8	64.1	40.5
Unknown	6	9.0	1.0	870	13.8	1.3	0.0
Total	67	100.0	100.0	6,322	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	25	6.7	5.4	3,080	2.8	2.8	18.8
Moderate	43	11.6	17.6	9,135	8.3	13.7	18.8
Middle	58	15.6	25.4	11,668	10.6	23.5	21.9
Upper	162	43.5	36.5	57,410	52.3	41.5	40.5
Unknown	84	22.6	15.0	28,431	25.9	18.5	0.0
Total	372	100.0	100.0	109,724	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-12 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	1	9.1	5.8	10	1.1	3.5	18.8
Moderate	2	18.2	16.8	100	10.9	11.4	18.8
Middle	3	27.3	28.2	155	16.9	23.4	21.9
Upper	4	36.4	47.4	550	60.1	59.7	40.5
Unknown	1	9.1	1.8	100	10.9	2.0	0.0
Total	11	100.0	100.0	915	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	10.0	7.5	122	5.4	4.9	18.8
Moderate	6	30.0	18.4	394	17.4	11.6	18.8
Middle	5	25.0	22.5	444	19.6	15.5	21.9
Upper	3	15.0	44.3	255	11.3	58.1	40.5
Unknown	4	20.0	7.3	1,050	46.4	9.9	0.0
Total	20	100.0	100.0	2,265	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.2	0	0.0	0.3	18.8
Moderate	0	0.0	2.3	0	0.0	1.7	18.8
Middle	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	96.5	0	0.0	98.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-13

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	41	8.9	7.1	7,422	17.8	11.5	7.4
Moderate	88	19.0	21.5	10,613	25.4	24.5	22.8
Middle	111	24.0	32.7	11,906	28.5	28.3	33.5
Upper	222	48.1	37.8	11,769	28.2	35.4	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.9	0	0.0	0.2	
Total	462	100.0	100.0	41,710	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-14

Distribution of 2022 Small Business Lending By Income Level of Geography						
Assessment Area: Colorado Springs MSA						
Geographic Income Level	Bank Loans				Total Businesses %	
	#	#%	\$(000)	%		
Low	3	2.2	84	0.6	1.2	
Moderate	47	34.3	7,641	53.3	27.2	
Middle	48	35.0	4,312	30.1	37.5	
Upper	38	27.7	2,288	15.9	33.4	
Unknown	1	0.7	20	0.1	0.7	
Tract-Unk	0	0.0	0	0.0		
Total	137	100.0	14,345	100.0	100.0	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-15

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Colorado Springs MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	126	27.3	54.9	15,602	37.4	31.9	94.6
Over \$1 Million	34	7.4		6,871	16.5		4.6
Revenue Unknown	302	65.4		19,237	46.1		0.8
Total	462	100.0		41,710	100.0		100.0
By Loan Size							
\$100,000 or Less	353	76.4	94.7	8,070	19.3	39.5	
\$100,001 - \$250,000	66	14.3	2.9	11,028	26.4	16.3	
\$250,001 - \$1 Million	43	9.3	2.4	22,612	54.2	44.1	
Total	462	100.0	100.0	41,710	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	97	77.0		939	6.0		
\$100,001 - \$250,000	7	5.6		1,483	9.5		
\$250,001 - \$1 Million	22	17.5		13,180	84.5		
Total	126	100.0		15,602	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-16

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Colorado Springs MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	102	74.5	5,403	37.7	94.6
Over \$1 Million	29	21.2	7,188	50.1	4.5
Revenue Unknown	6	4.4	1,754	12.2	0.8
Total	137	100.0	14,345	100.0	100.0
By Loan Size					
\$100,000 or Less	105	76.6	1,400	9.8	
\$100,001 - \$250,000	15	10.9	3,081	21.5	
\$250,001 - \$1 Million	17	12.4	9,864	68.8	
Total	137	100.0	14,345	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	89	87.3	718	13.3	
\$100,001 - \$250,000	4	3.9	647	12.0	
\$250,001 - \$1 Million	9	8.8	4,038	74.7	
Total	102	100.0	5,403	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Mountain
Table F-17 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	158	28.4	32.3	94,317	21.6	23.7	33.6
Upper	398	71.6	67.5	341,508	78.4	76.3	66.4
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	556	100.0	100.0	435,825	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	89	25.1	31.5	35,002	17.1	22.8	33.6
Upper	265	74.9	68.5	169,700	82.9	77.2	66.4
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	354	100.0	100.0	204,702	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	27	22.3	26.5	4,833	21.1	22.4	33.6
Upper	94	77.7	73.5	18,102	78.9	77.6	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	121	100.0	100.0	22,935	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	58.3	53.1	18,155	72.3	69.8	24.6
Upper	5	41.7	46.9	6,955	27.7	30.2	75.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	25,110	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	302	27.0	31.5	158,787	22.3	23.2	33.6
Upper	818	73.0	68.4	552,997	77.7	76.8	66.4
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,120	100.0	100.0	711,784	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-17 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	12	29.3	31.8	3,380	38.4	23.6	33.6
Upper	29	70.7	68.2	5,420	61.6	76.4	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	41	100.0	100.0	8,800	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	25.0	21.6	3,100	21.5	8.3	33.6
Upper	27	75.0	78.4	11,312	78.5	91.7	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	36	100.0	100.0	14,412	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	48.6	0	0.0	39.5	33.6
Upper	0	0.0	51.4	0	0.0	60.5	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-18 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	12	2.7	4.5	8,813	2.5	3.8	0.5
Moderate	25	5.6	1.5	12,892	3.6	1.2	0.8
Middle	141	31.5	34.6	102,854	29.1	29.8	37.1
Upper	270	60.3	59.4	228,679	64.7	65.2	61.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	448	100.0	100.0	353,238	100.0	100.0	100.0
Refinance Loans							
Low	4	2.1	2.1	1,870	1.6	1.2	0.5
Moderate	6	3.2	0.7	2,173	1.8	0.5	0.8
Middle	48	25.7	31.1	29,599	24.9	21.4	37.1
Upper	129	69.0	66.1	85,350	71.7	76.9	61.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	187	100.0	100.0	118,992	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.1	0	0.0	2.6	0.5
Moderate	6	3.4	0.9	536	1.5	0.5	0.8
Middle	57	32.0	29.9	10,618	30.5	24.9	37.1
Upper	115	64.6	67.1	23,659	68.0	72.0	61.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	178	100.0	100.0	34,813	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	3.5
Moderate	0	0.0	0.0	0	0.0	0.0	4.7
Middle	3	37.5	36.4	32,520	57.0	43.7	31.4
Upper	5	62.5	63.6	24,530	43.0	56.3	60.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	57,050	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	16	1.8	3.3	10,683	1.8	2.5	0.5
Moderate	43	4.8	1.2	19,628	3.3	0.9	0.8
Middle	278	31.0	32.4	182,627	31.0	27.0	37.1
Upper	560	62.4	63.1	376,979	63.9	69.6	61.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	897	100.0	100.0	589,917	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-18 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	2.5	0	0.0	2.5	0.5
Moderate	2	5.3	1.3	1,500	11.8	1.7	0.8
Middle	14	36.8	23.9	3,453	27.2	17.9	37.1
Upper	22	57.9	72.3	7,758	61.0	77.8	61.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	12,711	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.7	0	0.0	0.6	0.5
Moderate	4	10.5	2.5	2,527	19.3	1.0	0.8
Middle	15	39.5	29.7	3,583	27.3	24.1	37.1
Upper	19	50.0	66.1	7,003	53.4	74.4	61.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	13,113	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.6	0	0.0	13.3	0.5
Moderate	0	0.0	0.0	0	0.0	0.0	0.8
Middle	0	0.0	33.3	0	0.0	22.5	37.1
Upper	0	0.0	61.1	0	0.0	64.2	61.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-19 (1 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	5	0.9	0.9	4,580	1.1	0.3	13.5
Moderate	24	4.3	5.7	7,311	1.7	2.0	15.6
Middle	28	5.0	12.2	11,636	2.7	5.5	18.1
Upper	335	60.3	66.1	228,696	52.5	68.4	52.9
Unknown	164	29.5	15.1	183,602	42.1	23.7	0.0
Total	556	100.0	100.0	435,825	100.0	100.0	100.0
Refinance Loans							
Low	7	2.0	1.9	2,102	1.0	0.9	13.5
Moderate	18	5.1	7.3	4,393	2.1	3.4	15.6
Middle	37	10.5	16.1	9,671	4.7	9.3	18.1
Upper	214	60.5	59.1	112,540	55.0	64.8	52.9
Unknown	78	22.0	15.6	75,996	37.1	21.6	0.0
Total	354	100.0	100.0	204,702	100.0	100.0	100.0
Home Improvement Loans							
Low	1	0.8	1.1	600	2.6	0.8	13.5
Moderate	9	7.4	4.7	1,457	6.4	2.6	15.6
Middle	9	7.4	9.4	988	4.3	4.2	18.1
Upper	84	69.4	75.6	14,295	62.3	73.9	52.9
Unknown	18	14.9	9.2	5,595	24.4	18.5	0.0
Total	121	100.0	100.0	22,935	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	14	1.3	1.5	7,292	1.1	0.7	13.5
Moderate	53	4.8	6.5	13,273	1.9	2.6	15.6
Middle	84	7.6	14.2	23,427	3.4	7.1	18.1
Upper	691	62.4	62.6	373,419	54.4	66.4	52.9
Unknown	266	24.0	15.1	269,263	39.2	23.2	0.0
Total	1,108	100.0	100.0	686,674	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-19 (2 of 2)

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	1	2.4	1.2	10	0.1	1.8	13.5
Moderate	0	0.0	4.5	0	0.0	2.2	15.6
Middle	4	9.8	15.2	335	3.8	5.3	18.1
Upper	34	82.9	75.8	6,705	76.2	72.9	52.9
Unknown	2	4.9	3.3	1,750	19.9	17.8	0.0
Total	41	100.0	100.0	8,800	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.7	0	0.0	1.5	13.5
Moderate	2	5.6	1.5	112	0.8	0.1	15.6
Middle	6	16.7	6.7	797	5.5	0.9	18.1
Upper	24	66.7	72.6	11,183	77.6	63.4	52.9
Unknown	4	11.1	17.4	2,320	16.1	34.1	0.0
Total	36	100.0	100.0	14,412	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	13.5
Moderate	0	0.0	0.0	0	0.0	0.0	15.6
Middle	0	0.0	2.7	0	0.0	3.8	18.1
Upper	0	0.0	0.0	0	0.0	0.0	52.9
Unknown	0	0.0	97.3	0	0.0	96.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-20 (1 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	7	1.6	1.0	3,273	0.9	0.4	12.2
Moderate	10	2.2	5.4	2,684	0.8	1.5	12.7
Middle	33	7.4	11.0	10,911	3.1	4.5	21.8
Upper	267	59.6	66.5	203,366	57.6	66.4	53.3
Unknown	131	29.2	16.1	133,004	37.7	27.2	0.0
Total	448	100.0	100.0	353,238	100.0	100.0	100.0
Refinance Loans							
Low	5	2.7	4.0	2,599	2.2	1.9	12.2
Moderate	11	5.9	8.0	2,182	1.8	2.9	12.7
Middle	18	9.6	14.6	5,304	4.5	5.8	21.8
Upper	110	58.8	56.5	71,675	60.2	56.8	53.3
Unknown	43	23.0	16.8	37,232	31.3	32.7	0.0
Total	187	100.0	100.0	118,992	100.0	100.0	100.0
Home Improvement Loans							
Low	3	1.7	1.4	225	0.6	1.0	12.2
Moderate	9	5.1	5.8	1,059	3.0	2.3	12.7
Middle	20	11.2	13.2	1,503	4.3	6.0	21.8
Upper	109	61.2	71.4	20,812	59.8	80.3	53.3
Unknown	37	20.8	8.2	11,214	32.2	10.4	0.0
Total	178	100.0	100.0	34,813	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	16	1.8	2.1	6,107	1.1	1.0	12.2
Moderate	32	3.6	6.1	5,978	1.1	1.9	12.7
Middle	83	9.3	12.2	20,184	3.8	4.6	21.8
Upper	533	60.0	64.2	312,679	58.7	63.9	53.3
Unknown	225	25.3	15.4	187,919	35.3	28.6	0.0
Total	889	100.0	100.0	532,867	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table F-20 (2 of 2)

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
Other Purpose LOC							
Low	1	2.6	3.2	10	0.1	1.7	12.2
Moderate	0	0.0	5.3	0	0.0	1.9	12.7
Middle	5	13.2	10.9	1,760	13.8	3.8	21.8
Upper	23	60.5	72.9	6,837	53.8	85.1	53.3
Unknown	9	23.7	7.8	4,104	32.3	7.5	0.0
Total	38	100.0	100.0	12,711	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.7	0	0.0	1.2	12.2
Moderate	2	5.3	3.2	53	0.4	1.1	12.7
Middle	7	18.4	8.1	706	5.4	2.0	21.8
Upper	24	63.2	69.8	9,989	76.2	63.9	53.3
Unknown	5	13.2	17.2	2,365	18.0	31.8	0.0
Total	38	100.0	100.0	13,113	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	12.2
Moderate	0	0.0	0.0	0	0.0	0.0	12.7
Middle	0	0.0	5.6	0	0.0	7.1	21.8
Upper	0	0.0	0.0	0	0.0	0.0	53.3
Unknown	0	0.0	94.4	0	0.0	92.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table F-21

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	252	29.0	28.8	26,668	32.0	30.2	34.4
Upper	618	71.0	64.5	56,566	68.0	68.9	65.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	6.7	0	0.0	1.0	
Total	870	100.0	100.0	83,234	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-22

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Mountain					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	1.0
Moderate	8	3.8	2,613	7.9	1.8
Middle	80	37.9	11,215	33.9	28.4
Upper	123	58.3	19,249	58.2	68.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	211	100.0	33,077	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-23

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Mountain							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	170	19.5	48.2	19,954	24.0	35.4	91.2
Over \$1 Million	75	8.6		16,672	20.0		7.5
Revenue Unknown	625	71.8		46,608	56.0		1.3
Total	870	100.0		83,234	100.0		100.0
By Loan Size							
\$100,000 or Less	651	74.8	90.0	16,376	19.7	32.2	
\$100,001 - \$250,000	126	14.5	5.8	22,037	26.5	21.8	
\$250,001 - \$1 Million	93	10.7	4.2	44,821	53.8	46.0	
Total	870	100.0	100.0	83,234	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	126	74.1		2,205	11.1		
\$100,001 - \$250,000	12	7.1		2,213	11.1		
\$250,001 - \$1 Million	32	18.8		15,536	77.9		
Total	170	100.0		19,954	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-24

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Mountain					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	133	63.0	12,775	38.6	91.5
Over \$1 Million	75	35.5	20,207	61.1	7.2
Revenue Unknown	3	1.4	95	0.3	1.3
Total	211	100.0	33,077	100.0	100.0
By Loan Size					
\$100,000 or Less	145	68.7	3,439	10.4	
\$100,001 - \$250,000	24	11.4	4,929	14.9	
\$250,001 - \$1 Million	42	19.9	24,709	74.7	
Total	211	100.0	33,077	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	106	79.7	1,250	9.8	
\$100,001 - \$250,000	10	7.5	2,172	17.0	
\$250,001 - \$1 Million	17	12.8	9,353	73.2	
Total	133	100.0	12,775	100.0	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

APPENDIX G – 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).

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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). 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 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.