



## **PUBLIC DISCLOSURE**

August 19, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Verus Bank of Commerce  
RSSD# 3322468

3700 South College Avenue, Unit 102  
Fort Collins, Colorado 80525

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 bank. 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 ..... 2  
Scope of Examination ..... 2  
Description of Institution ..... 2  
Description of Assessment Area ..... 3  
Conclusions With Respect to Performance Criteria ..... 6  
Fair Lending or Other Illegal Credit Practices Review ..... 9  
Appendix A – Map of the Assessment Area ..... 10  
Appendix B – Demographic Information..... 11  
Appendix C – Additional Lending Tables..... 16  
Appendix D – Glossary..... 19

## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

**Verus Bank of Commerce** (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

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

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small 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. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 20-quarter average NLTD ratio; and
- A universe of 84 outstanding small business loans originated between August 20, 2019, to December 31, 2023.

## **DESCRIPTION OF INSTITUTION**

Verus Bank of Commerce is a community bank headquartered in Fort Collins, Colorado. The bank's characteristics include:

- Verus Acquisition Group, Inc. (company) owns 86 percent of the bank, while the remainder is widely held by 191 shareholders with no shareholder owning more than one percent.
- The bank has total assets of \$207.2 million as of March 31, 2024.
- The bank operates from one location in Fort Collins, Colorado.
- The bank does not operate any automated teller machines.
- As shown in the table below, the bank's primary business focus is commercial lending.

**Table 1**

<b>Composition of Loan Portfolio as of March 31, 2024</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	6,118	3.7
Farmland	309	0.2
1- to 4-Family Residential Real Estate	24,525	14.8
Multifamily Residential Real Estate	778	0.5
Nonfarm Nonresidential Real Estate	119,277	72.1
Agricultural	0	0.0
Commercial and Industrial	13,698	8.3
Consumer	709	0.4
Other	23	0.0
<b>Gross Loans</b>	<b>165,437</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its August 19, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

**DESCRIPTION OF ASSESSMENT AREA**

The bank’s Fort Collins MSA AA consists of the entirety of Larimer County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The bank’s AA delineation remains unchanged from the previous evaluation.
- The AA consists of 86 total census tracts; comprised of 1 low-, 16 moderate-, 52 middle-, 16 upper-, and 1 unknown-income census tract.
- Prior to 2022, the AA had 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tract.
- The Federal Deposit Insurance Corporation (FDIC) Market Share Report for June 30, 2023, indicates that the bank holds 1.4 percent of the market share, ranking 11<sup>th</sup> out of 26 FDIC-insured depository institutions operating from 90 offices in the AA.
- To further augment the evaluation, an interview was conducted with a community member to ascertain the credit needs of the area, responsiveness of the area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member represents an economic development organization that serves the AA.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Fort Collins MSA</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Fort Collins MSA	318,227	359,066	12.8
Colorado	5,278,906	5,773,714	9.4
<i>Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			

- Population growth in the AA was above the Colorado statewide average.
- Fort Collins is the largest city in the AA with a population of 169,810 comprising 47.3 percent of the AA population.
- The community member stated that while natural population growth was slowing in the area, residents are moving in from elsewhere to pursue jobs in high paying local industries, such as technology and healthcare.
- Within the AA, 5.7 percent of the population moved from a different state in the last year, which is above the statewide figure of 4.0 percent.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: Fort Collins MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Fort Collins MSA	84,004	96,221	14.5
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 AA has a lower rate of families below poverty at 4.7 percent, when compared to the Colorado state figure of 6.1 percent.
- Within the AA, 37.5 percent of families are considered low- and moderate-income (LMI), which is slightly below the statewide rate of 38.1 percent.
- According to the community member, Larimer County has experienced wage growth since the Coronavirus 2019 pandemic (COVID-19 pandemic), with some industries reporting wage growth as high as 30.0 percent.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Fort Collins MSA</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Fort Collins MSA	81.0	44.5	48.7	58.1	37.8	19.8
Colorado	79.7	47.9	46.5	63.2	37.3	21.4

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy*

- Housing cost burdens for LMI renters and homeowners in the AA are similar to the Colorado statewide figures.
- The median housing value for the AA is \$390,591, which is higher than the median statewide value of \$369,900.
- In addition to housing being less affordable, rent prices are generally higher in the AA with 51.4 percent of renters paying rent greater than 30.0 percent of their income. This is above the Colorado statewide figure of 48.7 percent.
- The community member noted that housing costs are high and cause some of the local workforce to commute to jobs in the AA from neighboring Weld County, where housing costs are lower.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Fort Collins MSA</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Fort Collins MSA	2.6	2.3	5.9	4.7	2.7
Colorado	3.0	2.7	6.8	5.4	3.0

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Major employers in the AA include University of Colorado Health, Hewlett Packard, Banner Health, and Avago Technologies.
- AA unemployment rates held steady from 2018 to 2019 before experiencing an increase in 2020 due to the COVID-19 pandemic. Unemployment rates have fallen since this time to near pre-pandemic levels and remain slightly below the statewide figure.
- The community member stated that Larimer County economy has shown resilience in recovering quickly from broader economic challenges such as the COVID-19 pandemic and is on an upward trajectory.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

The bank’s overall lending test performance is Satisfactory. The conclusion was reached based on a more than reasonable NLTD ratio, a majority of loans originated in the bank’s AA, as well as reasonable distribution of lending by income level of geography, and a reasonable distribution of lending to businesses of different revenue sizes.

For the geographic and borrower analyses, loan data for 2022 and 2023 was combined and evaluated aggregately and compared to 2023 demographic data. Loan data for 2019, 2020, and 2021 were combined and evaluated aggregately in comparison to 2021 demographic data. See Appendix C for 2019, 2020, and 2021 lending data tables.

**Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and area where they operate.

The bank’s NLTD ratio is more than reasonable, as it was above the NLTD ratios of four similarly situated institutions used for comparison.

**Table 6**

<b>Comparative NLTD Ratios June 30, 2019 – March 31, 2024</b>			
<b>Institution</b>	<b>Location</b>	<b>Asset Size \$(000)</b>	<b>NLTD Ratio (%)</b>
			<b>20 Quarter Average</b>
<b>Verus Bank of Commerce</b>	Fort Collins, CO	207,192	96.8
<b>Similarly Situated Institutions</b>			
High Plains Bank	Flagler, CO	389,518	90.6
FMS Bank	Fort Morgan, CO	305,916	87.2
Mountain Valley Bank	Walden, CO	543,546	76.9
Bank of Estes Park	Estes Park, CO	145,813	51.5

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside the AA.

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	58	69.0	\$18,355	62.3	26	31.0	\$11,096	37.7
<b>TOTAL LOANS</b>	<b>58</b>	<b>69.0</b>	<b>\$18,355</b>	<b>62.3</b>	<b>26</b>	<b>31.0</b>	<b>\$11,096</b>	<b>37.7</b>

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

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. In 2022 and 2023, the bank originated no loans in the low-income census tract, as illustrated in Table 8, which is comparable to the demographic figure, which represents the percentage of businesses in each census tract income level. The percentage of small business loans originated in moderate-income census tracts was also comparable to the demographic figure. The bank’s performance in 2019-2021 was consistent with performance in 2022- 2023.

Loan dispersion analysis revealed conspicuous lending gaps that included LMI tracts. The gaps were due to a relatively low number of small business loans dispersed among the AA’s 86 census tracts, and thus, did not impact the overall conclusion.

**Table 8**

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Fort Collins MSA									
Geographic Income Level	Bank Loans By Year								Total Businesses %
	2022				2023				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
<b>Low</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.4
<b>Moderate</b>	1	14.3	400	13.3	3	12.0	993	12.1	16.6
<b>Middle</b>	6	85.7	2,600	86.7	15	60.0	5,111	62.1	65.6
<b>Upper</b>	0	0.0	0	0.0	7	28.0	2,127	25.8	17.3
<b>Unknown</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>3,000</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>8,230</b>	<b>100.0</b>	<b>100.0</b>

Source: 2023 FFIEC Census Data  
2023 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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



**Lending to Businesses of Different Sizes**

This performance criterion evaluates the bank’s lending to businesses of different revenue sizes. The bank’s lending has a reasonable distribution among businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. In 2022 and 2023, lending to businesses with annual revenues less than or equal to \$1 million was comparable to the demographic figure, which represents the total percentage of small businesses in the AA, as noted in Table 9. While aggregate CRA data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of the overall demand for small business lending in the AA. A review of aggregate CRA data submitted by CRA reporters in the AA for 2020, 2021, and 2022 noted average lending to businesses with \$1 million or less in gross annual revenue was 48.4 percent by number volume and 31.3 percent by dollar volume. This is reflective of loan demand that is lower than the demographic figure. The bank’s performance in 2019-2021 was consistent with performance in 2022-2023.

**Table 9**

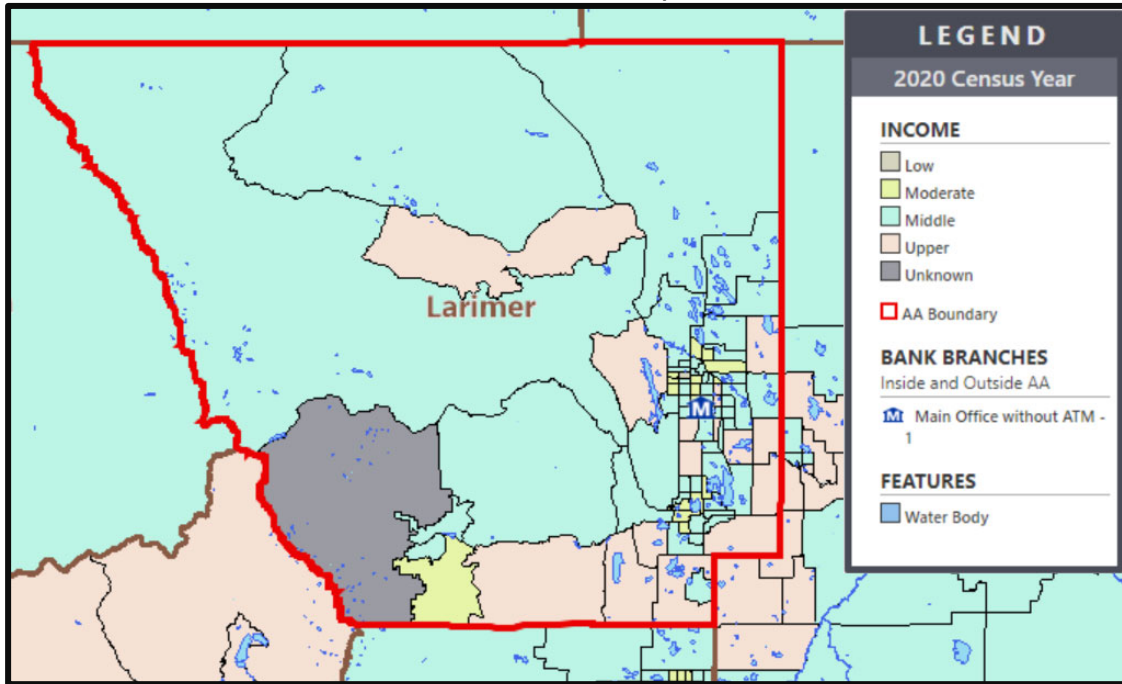
<b>Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses</b>									
<b>Assessment Area: Fort Collins MSA</b>									
	<b>Bank Loans By Year</b>								<b>Total Businesses %</b>
	<b>2022</b>				<b>2023</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>									
<b>\$1 Million or Less</b>	5	71.4	2,349	78.3	16	64.0	6,551	79.6	94.1
<b>Over \$1 Million</b>	2	28.6	651	21.7	8	32.0	1,379	16.8	4.9
<b>Revenue Unknown</b>	0	0.0	0	0.0	1	4.0	300	3.6	1.0
<b>Total</b>	7	100.0	3,000	100.0	25	100.0	8,230	100.0	100.0
<b>By Loan Size</b>									
<b>\$100,000 or Less</b>	1	14.3	51	1.7	8	32.0	389	4.7	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	4	16.0	800	9.7	
<b>\$250,001 - \$1 Million</b>	6	85.7	2,949	98.3	13	52.0	7,042	85.6	
<b>Total</b>	7	100.0	3,000	100.0	25	100.0	8,230	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>									
<b>\$100,000 or Less</b>	1	20.0	51	2.2	4	25.0	211	3.2	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	2	12.5	400	6.1	
<b>\$250,001 - \$1 Million</b>	4	80.0	2,298	97.8	10	62.5	5,940	90.7	
<b>Total</b>	5	100.0	2,349	100.0	16	100.0	6,551	100.0	
<i>Source: 2023 FFIEC Census Data 2023 Dun &amp; 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>									

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

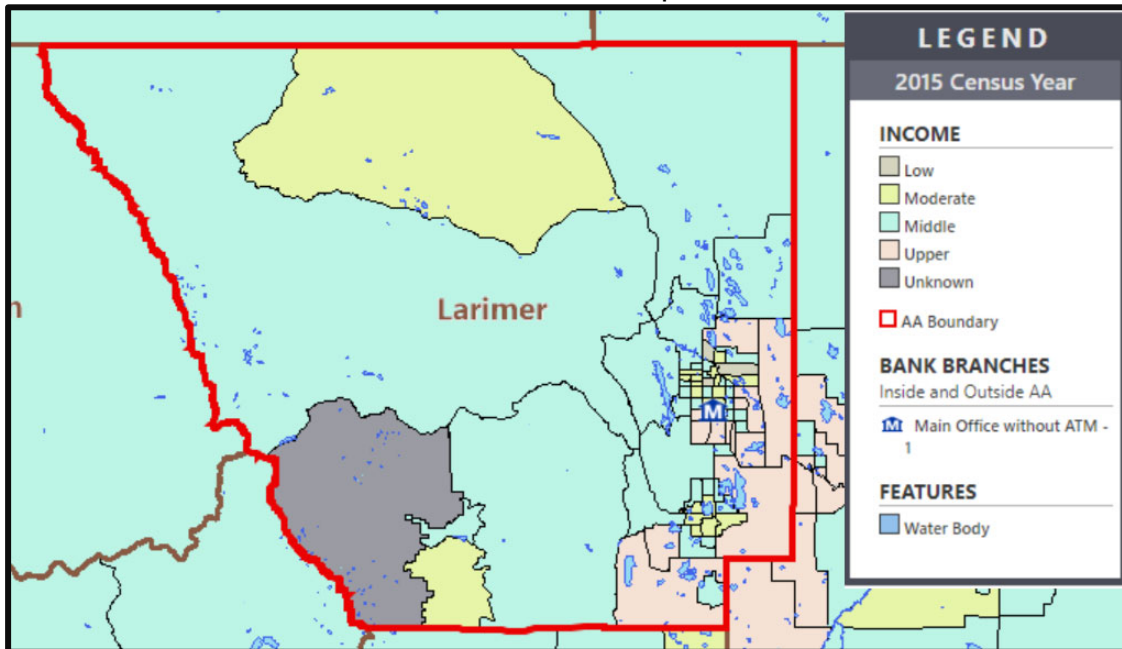
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited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

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1  
2022-2023 Map



Map A-2  
2019-2021 Map



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2023 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
<b>Total AA</b>	<b>86</b>	<b>100.0</b>	<b>83,921</b>	<b>100.0</b>	<b>3,916</b>	<b>4.7</b>	<b>83,921</b>	<b>100.0</b>
	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
<b>Total AA</b>	<b>144,583</b>	<b>88,959</b>	<b>100.0</b>	<b>61.5</b>	<b>45,226</b>	<b>31.3</b>	<b>10,398</b>	<b>7.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	101	0.4	99	0.5	2	0.2	0	0.0
Moderate	3,736	16.6	3,496	16.5	213	19.3	27	12.6
Middle	14,758	65.6	13,903	65.7	724	65.7	131	61.2
Upper	3,886	17.3	3,667	17.3	163	14.8	56	26.2
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>22,483</b>	<b>100.0</b>	<b>21,167</b>	<b>100.0</b>	<b>1,102</b>	<b>100.0</b>	<b>214</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>94.1</b>		<b>4.9</b>		<b>1.0</b>	
	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	40	8.6	39	8.6	1	9.1	0	0.0
Middle	298	63.9	293	64.5	4	36.4	1	100.0
Upper	125	26.8	119	26.2	6	54.5	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
<b>Total AA</b>	<b>466</b>	<b>100.0</b>	<b>454</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.4</b>		<b>2.4</b>		<b>0.2</b>	
<i>Source: 2023 FFIEC Census Data 2023 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table B-2**

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
<b>Total AA</b>	<b>86</b>	<b>100.0</b>	<b>83,921</b>	<b>100.0</b>	<b>3,916</b>	<b>4.7</b>	<b>83,921</b>	<b>100.0</b>
	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
<b>Total AA</b>	<b>144,583</b>	<b>88,959</b>	<b>100.0</b>	<b>61.5</b>	<b>45,226</b>	<b>31.3</b>	<b>10,398</b>	<b>7.2</b>
	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
<b>Total AA</b>	<b>22,600</b>	<b>100.0</b>	<b>21,262</b>	<b>100.0</b>	<b>1,113</b>	<b>100.0</b>	<b>225</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>94.1</b>		<b>4.9</b>		<b>1.0</b>
	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
<b>Total AA</b>	<b>457</b>	<b>100.0</b>	<b>446</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.6</b>		<b>2.2</b>		<b>0.2</b>
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 B-3**

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
<b>Total AA</b>	<b>73</b>	<b>100.0</b>	<b>78,216</b>	<b>100.0</b>	<b>5,035</b>	<b>6.4</b>	<b>78,216</b>	<b>100.0</b>
	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
<b>Total AA</b>	<b>136,851</b>	<b>80,264</b>	<b>100.0</b>	<b>58.7</b>	<b>44,874</b>	<b>32.8</b>	<b>11,713</b>	<b>8.6</b>
	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
<b>Total AA</b>	<b>22,384</b>	<b>100.0</b>	<b>21,074</b>	<b>100.0</b>	<b>1,106</b>	<b>100.0</b>	<b>204</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>94.1</b>		<b>4.9</b>		<b>0.9</b>	
	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
<b>Total AA</b>	<b>451</b>	<b>100.0</b>	<b>442</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.0</b>		<b>1.8</b>		<b>0.2</b>	
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 B-4**

2020 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
<b>Total AA</b>	<b>73</b>	<b>100.0</b>	<b>78,216</b>	<b>100.0</b>	<b>5,035</b>	<b>6.4</b>	<b>78,216</b>	<b>100.0</b>
	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
<b>Total AA</b>	<b>136,851</b>	<b>80,264</b>	<b>100.0</b>	<b>58.7</b>	<b>44,874</b>	<b>32.8</b>	<b>11,713</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	793	3.5	680	3.2	106	9.3	7	3.6
Moderate	6,471	28.9	6,085	28.9	338	29.5	48	24.7
Middle	9,511	42.5	9,056	43.1	381	33.3	74	38.1
Upper	5,584	25.0	5,200	24.7	319	27.9	65	33.5
Unknown	4	0.0	4	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>22,363</b>	<b>100.0</b>	<b>21,025</b>	<b>100.0</b>	<b>1,144</b>	<b>100.0</b>	<b>194</b>	<b>100.0</b>
Percentage of Total Businesses:				94.0		5.1		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.7	8	1.8	0	0.0	0	0.0
Moderate	73	15.8	72	15.9	0	0.0	1	100.0
Middle	224	48.6	222	49.1	2	25.0	0	0.0
Upper	155	33.6	149	33.0	6	75.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
<b>Total AA</b>	<b>461</b>	<b>100.0</b>	<b>452</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				98.0		1.7		0.2
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-5**

2019 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
<b>Total AA</b>	<b>73</b>	<b>100.0</b>	<b>78,216</b>	<b>100.0</b>	<b>5,035</b>	<b>6.4</b>	<b>78,216</b>	<b>100.0</b>
	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
<b>Total AA</b>	<b>136,851</b>	<b>80,264</b>	<b>100.0</b>	<b>58.7</b>	<b>44,874</b>	<b>32.8</b>	<b>11,713</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	771	3.5	650	3.2	112	9.5	9	4.7
Moderate	6,347	29.2	5,951	29.2	351	29.7	45	23.7
Middle	9,265	42.6	8,789	43.1	401	34.0	75	39.5
Upper	5,381	24.7	5,003	24.5	317	26.8	61	32.1
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,766</b>	<b>100.0</b>	<b>20,395</b>	<b>100.0</b>	<b>1,181</b>	<b>100.0</b>	<b>190</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.7</b>		<b>5.4</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7	1.5	7	1.5	0	0.0	0	0.0
Moderate	65	14.0	64	14.0	0	0.0	1	100.0
Middle	236	50.9	234	51.3	2	28.6	0	0.0
Upper	155	33.4	150	32.9	5	71.4	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
<b>Total AA</b>	<b>464</b>	<b>100.0</b>	<b>456</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.5</b>		<b>0.2</b>
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



**APPENDIX C – ADDITIONAL LENDING TABLES**

**Table C-1**

<b>Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography</b>									
<b>Assessment Area: Fort Collins MSA</b>									
<b>Geographic Income Level</b>	<b>Bank Loans By Year</b>								<b>Total Businesses %</b>
	<b>2020</b>				<b>2021</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	0	0.0	0	0.0	3.7
<b>Moderate</b>	6	37.5	960	22.5	4	44.4	1,474	58.5	28.8
<b>Middle</b>	7	43.8	1,384	32.4	4	44.4	864	34.3	42.3
<b>Upper</b>	3	18.8	1,931	45.2	1	11.1	180	7.1	25.2
<b>Unknown</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total</b>	16	100.0	4,274	100.0	9	100.0	2,518	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 C-2**

<b>Distribution of 2019 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Fort Collins MSA</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	3.5
<b>Moderate</b>	0	0.0	0	0.0	29.2
<b>Middle</b>	0	0.0	0	0.0	42.6
<b>Upper</b>	1	100.0	333	100.0	24.7
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	1	100.0	333	100.0	100.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table C-3**

<b>Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses</b>									
<b>Assessment Area: Fort Collins MSA</b>									
	<b>Bank Loans By Year</b>								<b>Total Businesses %</b>
	<b>2020</b>				<b>2021</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>By Revenue</b>									
<b>\$1 Million or Less</b>	12	75.0	4,209	98.5	7	77.8	2,268	90.1	94.1
<b>Over \$1 Million</b>	1	6.3	50	1.2	2	22.2	250	9.9	4.9
<b>Revenue Unknown</b>	3	18.8	15	0.4	0	0.0	0	0.0	0.9
<b>Total</b>	16	100.0	4,274	100.0	9	100.0	2,518	100.0	100.0
<b>By Loan Size</b>									
<b>\$100,000 or Less</b>	7	43.8	150	3.5	1	11.1	100	4.0	
<b>\$100,001 - \$250,000</b>	1	6.3	250	5.8	3	33.3	514	20.4	
<b>\$250,001 - \$1 Million</b>	8	50.0	3,874	90.6	5	55.6	1,904	75.6	
<b>Total</b>	16	100.0	4,274	100.0	9	100.0	2,518	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>									
<b>\$100,000 or Less</b>	3	25.0	85	2.0	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	1	8.3	250	5.9	2	28.6	364	16.0	
<b>\$250,001 - \$1 Million</b>	8	66.7	3,874	92.0	5	71.4	1,904	84.0	
<b>Total</b>	12	100.0	4,209	100.0	7	100.0	2,268	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; 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 C-4**

<b>Distribution of 2019 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Fort Collins MSA</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	1	100.0	333	100.0	93.7
<b>Over \$1 Million</b>	0	0.0	0	0.0	5.4
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.9
<b>Total</b>	1	100.0	333	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	100.0	333	100.0	
<b>Total</b>	1	100.0	333	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	100.0	333	100.0	
<b>Total</b>	1	100.0	333	100.0	
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; 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>					

## APPENDIX D – 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, 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.