



PUBLIC DISCLOSURE

July 19, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

NBH Bank
RSSD# 4210227

7800 East Orchard Road, Suite 300
Greenwood Village, Colorado 80111

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

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

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INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **SATISFACTORY**

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

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

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

SUMMARY OF THE MAJOR FACTORS SUPPORTING THE RATING

Lending Test

- Lending levels reflect adequate responsiveness to assessment area (AA) credit needs, and the bank makes limited use of innovative and/or flexible lending practices in serving AA credit needs.
- A high percentage 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 and farms of different sizes (borrower distribution) is adequate.
- The bank makes an adequate level of community development (CD) loans.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits good 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 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 provides an adequate level of CD services and is responsive to its available service opportunities.

INSTITUTION

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. For this evaluation, full-scope reviews were performed on 9 of the bank's 20 delineated AAs, while the remaining AAs received limited-scope reviews. The following data was reviewed in conducting the evaluation:

- The bank's home mortgage loans reported on the bank's 2018 and 2019 Home Mortgage Disclosure Act Loan/Application Registers;
- The bank's 2018 and 2019 small business and small farm loans reported as CRA loan data;
- CD loans originated from January 1, 2018 through December 31, 2020;
- Qualified investments that were made from January 1, 2018 through December 31, 2020, qualified investments made prior to but still outstanding during this period, and qualifying grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2018 through December 31, 2020.

Refer to Table 1 below for additional information regarding the type of review for each AA, the bank's presence in each AA by numbers of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2020 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

**TABLE 1
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
Kansas City, MO-KS Multistate MSA AA	Full	26	19.4		35.8		2.7	9 th of 120
State of Colorado		45	64.5	100.0	42.5	100.0		
Denver MSA AA	Full	11	19.5	30.3	15.4	36.2	0.8	16 th of 67
Colorado Springs MSA AA	Full	5	28.4	44.0	5.1	12.0	2.7	7 th of 39
Western Colorado AA	Limited	21	9.0	9.0	16.2	38.1	5.3	6 th of 47
Greeley MSA AA	Limited	4	3.4	3.4	4.1	9.6	4.4	8 th of 23
Ft. Collins MSA AA	Limited	1	1.8	1.8	0.9	2.2	0.5	19 th of 25
Pueblo MSA AA	Limited	1	1.0	1.0	0.3	0.8	0.9	14 th of 14
Boulder MSA AA	Limited	1	1.0	1.0	0.1	0.2	0.0	32 nd of 32
Grand Junction MSA AA	Limited	1	0.3	0.3	0.4	0.9	0.7	12 th of 13
State of Kansas		2	4.3	100.0	2.6	100.0		
Lawrence MSA AA	Full	1	3.1	70.6	1.0	38.4	1.8	12 th of 22
Franklin County AA	Limited	1	1.3	29.4	1.6	61.6	17.4	2 nd of 9
State of Missouri		9	4.8	100.0	11.8	100.0		
St. Joseph Metropolitan AA	Full	3	1.8	36.8	3.8	32.2	8.7	4 th of 19
Northwest Missouri AA	Full	3	1.6	34.5	3.5	29.6	20.1	2 nd of 8
North Central Missouri AA	Limited	2	0.8	16.2	1.8	15.3	12.0	4 th of 9
Northeast Missouri AA	Limited	1	0.6	12.4	2.7	22.8	21.7	2 nd of 6
State of New Mexico		5	1.3	100.0	3.7	100.0		
Taos County AA	Full	4	0.8	65.5	3.0	80.2	26.4	3 rd of 3
Albuquerque Metropolitan AA	Limited	1	0.4	34.5	0.7	19.8	0.3	17 th of 22
State of Texas		2	0.8	100.0	3.3	100.0		
Dallas Metropolitan AA	Full	1	0.4	45.7	2.7	82.9	0.1	58 th of 111
Austin Metropolitan AA	Limited	1	0.5	54.3	0.6	17.1	0.1	43 rd of 52
State of Utah		1	4.9	100.0	0.3	100.0		
Salt Lake City CSA AA	Full	1	4.9	100.0	0.3	100.0	0.0	46 th of 49

¹ Based on the bank's number of HMDA and CRA originations for 2018 and 2019.
² Based on the June 30, 2020 FDIC's Market Share Report.
³ Based on the bank's ranking among FDIC-insured financial institutions in each AA.

DESCRIPTION OF INSTITUTION

The bank is an interstate financial institution headquartered in Greenwood Village, Colorado. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of National Bank Holdings Corporation, a one-bank holding company also located in Greenwood Village.
- As of March 31, 2021, the bank reported total assets of \$6.9 billion.
- The bank operates 90 full-service banking offices throughout its geographic footprint in the states of Colorado (45), Missouri (23), Kansas (14), New Mexico (5), Texas (2), and Utah (1).
- The bank utilizes the following unique brand names within the different states: Community Banks of Colorado (Colorado), Bank Midwest (Kansas and Missouri), and Hillcrest Bank (Texas, New Mexico, and Utah).
- The bank’s primary business focus is commercial lending to small- and medium-sized businesses, as well as residential real estate lending. Refer to Table 2 below for additional detail on the bank’s loan portfolio composition.
- The bank has not engaged in any merger or acquisition activities since the prior evaluation; however, the acquisition of a financial institution in January 2018 resulted in the addition of twenty full-service branches that were not included in the prior evaluation. This acquisition also expanded the bank’s branching presence in the states of Colorado and New Mexico, as well as the Kansas City, Missouri-Kansas (MO-KS) region. Additionally, a loan production office (LPO) in the Salt Lake City, Utah region was converted to a full-service banking office, resulting in the establishment of a new AA in the state of Utah.

TABLE 2 COMPOSITION OF LOAN PORTFOLIO AS OF MARCH 31, 2021		
Loan Type	\$(000)	%
Commercial	2,601,314	57.4
Residential Real Estate	879,174	19.4
Other	851,033	18.8
Agricultural	182,548	4.0
Consumer	18,065	0.4
Gross Loans	4,532,134	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its September 17, 2018 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions with respect to the lending performance for AAs that received a full-scope review are reflected in the body of this report. Lending data for AAs that received limited-scope reviews can be found in Appendix E. The performance evaluation first discusses the bank's overall performance followed by an in-depth analysis of the bank's record of lending, investment, and service activities in each state and specific AA.

For this evaluation, the most weight was placed on the state of Colorado in determining the overall institutional rating, followed by the Kansas City, MO-KS Multistate Metropolitan Statistical Area (MSA) AA, given the significant proportion of banking offices, loans, and deposits located within each of these areas. The bank's performance in the remaining five states is detailed in their respective sections of this report, although less consideration was given to the conclusions in those states in determining the overall institutional rating.

LENDING TEST

The bank's overall performance under the lending test is low satisfactory. Four of the seven state/multistate lending tests (Colorado, Missouri, Texas, and Utah) are similarly rated as low satisfactory, while the lending tests for the Kansas City, MO-KS Multistate MSA AA, state of Kansas, and state of New Mexico are rated as high satisfactory.

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 adequate responsiveness to AA credit needs. Table 3 below summarizes the bank's lending activity considered in this performance analysis.

**TABLE 3
SUMMARY OF LENDING ACTIVITY REVIEWED**

Loan Type	2019				2018			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	3,125	873,458	45.0	50.1	3,377	905,008	60.2	68.1
Home Refinance	2,171	589,363	31.3	33.8	1,021	216,851	18.2	16.3
Home Improvement	294	19,065	4.2	1.1	263	16,991	4.7	1.3
Multifamily	14	43,649	0.2	2.5	11	23,494	0.2	1.8
Other Closed/Exempt	122	8,897	1.8	0.5	100	8,956	1.8	0.7
Other Open	121	8,849	1.7	0.5	290	22,556	5.2	1.7
N/A	1	127	0.0	0.0	0	0	0.0	0.0
Total HMDA Loans	5,848	1,543,408	84.3	88.6	5,062	1,193,856	84.4	87.7
Small Business Loans	937	183,853	13.5	10.6	778	151,054	13.9	11.4
Small Farms Loans	154	14,763	2.2	0.8	161	15,979	2.9	1.2
Total Loans	6,939	1,742,024	100.0	100.0	6,001	1,360,889	100.0	100.0

The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank did participate in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in serving the credit needs of its communities. Specific lending programs offered by the bank include Federal Housing Administration (FHA), Veterans Administration (VA), and United States Department of Agriculture (USDA) loans for consumers seeking residential real estate loans. Additionally, Small Business Administration (SBA) loans are available for the bank’s commercial customers, including SBA Program 504 and 7a loans. All flexible lending programs are offered and available throughout each of the bank’s AAs.

For the three-year period analyzed for this evaluation, the bank originated 3,089 VA loans, 2,655 SBA loans, 1,560 FHA loans, and 142 USDA loans. Included within the bank’s reported SBA loan volume is 2,381 loans, or approximately 90.0 percent of the total SBA loans, resulting from the bank’s participation in the SBA’s Paycheck Protection Program (PPP). These loans were originated in 2020 as a response to the nationwide Coronavirus Disease 2019 (COVID-19) pandemic and were considered particularly responsive to the financial burden placed on consumers, small businesses, and small farms related to the pandemic.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. As illustrated in Table 4, a high percentage of the bank’s total loans, by number and dollar volume, were originated inside the bank’s AAs. All loan products reflect a high percentage of originations within the bank’s AAs.

**TABLE 4
LENDING INSIDE AND OUTSIDE THE AAs**

Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	5,183	79.7	1,493,954	84.0	1,319	20.3	284,512	16.0
Home Refinance	2,766	86.7	690,989	85.7	426	13.3	115,225	14.3
Home Improvement	535	96.1	34,853	96.7	22	3.9	1,203	3.3
Multifamily	20	80.0	49,200	73.3	5	20.0	17,943	26.7
Other Closed/Exempt	209	94.1	14,883	83.4	13	5.9	2,970	16.6
Other Open	400	97.3	30,774	98.0	11	2.7	631	2.0
N/A	0	0.0	0	0.0	1	100.0	127	100.0
Total HMDA Loans	9,113	83.5	2,314,653	84.6	1,797	16.5	422,611	15.4
Small Business Loans	1,588	92.6	295,148	88.1	127	7.4	39,759	11.9
Small Farm Loans	297	94.3	27,780	90.4	18	5.7	2,962	9.6
Total Loans	10,998	85.0	2,637,581	85.0	1,942	15.0	465,332	15.0

Note: Percentages may not add to 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. The bank’s overall geographic distribution of lending reflects adequate penetration throughout its AAs. This conclusion was supported based on adequate penetration noted in the state of Colorado, which contains two of the three most weighted AAs in this analysis. The state ratings for Missouri and Utah also are consistent with the overall rating, while the bank’s performance in the Kansas City, MO-KS Multistate MSA AA and the state ratings for Kansas, Texas, and New Mexico all reflect good penetration.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different sizes. The bank’s lending has an overall adequate penetration among individuals of different income levels and businesses and farms of different sizes. The state ratings for Colorado, Texas, New Mexico, and Utah are consistent with the overall rating, while the bank’s performance in the Kansas City, MO-KS Multistate MSA AA and the state ratings for Missouri and Kansas each reflect good penetration. The adequate penetration levels noted in the state of Colorado were a primary factor in determining the overall rating given the state contains two of the three most weighted AAs in this analysis.

Community Development Lending

This performance criterion evaluates the bank’s level of CD lending. The bank makes an adequate level of CD loans when considering the bank’s capacity and the need and availability of such opportunities. The state ratings for Colorado, Texas, and Utah, as well as the Kansas City, MO-KS Multistate MSA AA, are all consistent with the overall rating. Additionally, the state ratings for Kansas and New Mexico reflect a relatively high level of CD lending, while the state rating for Missouri reflects a low level of CD lending.

Table 5 illustrates the bank’s total volume of CD loans by number and dollar volume based on the respective CD purpose. The bank’s overall CD lending by dollar volume reflects a 16.4 percent decrease when compared to the bank’s CD lending at the prior evaluation. However, while the overall dollar volume is lower, the number of CD loans reflects a 47.1 percent increase. It is noted that the prior evaluation was based on a two-year review period, whereas this evaluation considered three years of lending data in the analysis.

Additional details of the bank’s CD lending performance are further discussed in the specific analysis of each state/multistate AA throughout this report. Examples of the bank’s CD lending activities that were considered responsive to area credit needs across the bank’s AAs include:

- A \$15.0 million (MM) loan was originated to fund the acquisition and operation of a 149-unit multifamily housing property that supported area affordable housing needs through income-restricted residency requirements.
- A \$2.3MM loan was originated to a non-profit organization that provides a substantial variety of community services to LMI individuals and families, such as emergency shelter, access to food, and transitional services. The proceeds of the loan specifically supported a homeless shelter and transitional housing facility.
- A \$35.0MM loan was originated for the construction of a large property in the hospitality and service industry that supported the economic development of an urban renewal district, while also providing job creation for LMI individuals.

TABLE 5 COMMUNITY DEVELOPMENT LOANS ALL AAs		
Community Development Purpose	#	\$(000's)
Affordable Housing	5	28,502
Community Services	23	25,151
Economic Development	37	146,124
Revitalization and Stabilization	10	11,927
TOTAL LOANS	75	211,705

INVESTMENT TEST

The bank's overall performance under the investment test is high satisfactory. The state ratings for Colorado and New Mexico, as well as the Kansas City, MO-KS Multistate MSA AA, are all consistent with the overall rating. Additionally, the state ratings for Missouri, Texas, and Utah were considered low satisfactory, while the state rating for Kansas is needs to improve.

This performance criterion evaluates the bank's level of qualifying investments, grants, donations, or in-kind contributions of property made since the prior evaluation that have a primary purpose of community development. Overall, the bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. Consistent with prior performance evaluations, the bank's strategy continues to focus on selecting CD investments that are comprised entirely of mortgage-backed securities (MBS) that contain residential mortgages originated to LMI borrowers or for residential real estate located in LMI geographies.

For purposes of illustrating a concise representation of the bank's overall level of CD investments, refer to Table 6 for the total number of purchased MBS investment pools, which contain individually bundled mortgages in groups ranging from 5 mortgages to 26 mortgages, respectively. The bundled pools contain individual mortgages that may be distributed across multiple AAs and, as such, the following AA analyses will illustrate the dollar volume of mortgages respective to their specific AAs, along with the numbers of MBS investment pools.

In addition to the MBS investments, the bank's level of CD donations was particularly responsive to area organizations that provide community services for LMI individuals and families. The bank's philanthropic activities included donations to 107 different area organizations, including well-known, non-profit entities and local grassroots agencies, as well as organizations that promote and support economic development activities. Additionally, the bank's overall dollar volume of donations increased significantly, with an annual increase of 71.5 percent when compared to the prior evaluation. While growth in donation volume is expected given the bank's expansion into new AAs, this level of increased donation volume far outpaced the bank's growth and favorably impacted the overall investment rating for the institution. Examples of the bank's donations that were considered responsive include:

- A total of \$48,038 was donated to an area organization that provides a variety of community services to area LMI individuals and families, including emergency shelter, access to medical services, and social support programs.
- A total of \$40,000 was donated to an area organization that provides year-round supplemental educational and social support programs for underserved youth from LMI homes. The organization stated that 90.0 percent of its student body is eligible for free or reduced lunches under the National School Lunch Program (NLSP).
- A total of \$50,000 was donated to an area organization that provides an array of services to adolescent children that are primarily from LMI homes. Services include emergency shelter, health and therapy services, vocational training, parenting skills, and emotional rehabilitative services.

**TABLE 6
INVESTMENTS, GRANTS, AND DONATIONS
ALL AAs**

Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	19	14,910	4	15,110	15	36	38	30,056
Community Services	0	0	0	0	129	526	129	526
Economic Development	0	0	0	0	20	57	20	57
Revitalization and Stabilization	0	0	0	0	1	5	1	5
TOTAL	19	14,910	4	15,110	165	624	188	30,644

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s overall performance under the service test is low satisfactory. The state ratings for Colorado, Missouri, Texas, and New Mexico, as well as the Kansas City, MO-KS Multistate MSA AA, are all consistent with the overall rating. Additionally, the state ratings for Kansas and Utah were considered high satisfactory.

Retail Banking Services

This performance criterion evaluates the bank’s level of service-delivery systems provided in each geography classification. Refer to Table 7 below for the distribution of banking offices and full-service automated teller machines (ATMs) by income level of geographies, as well as the number of branch openings/closings 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. The overall distribution of the bank’s branch offices and full-service ATMs generally align with the total percentage of census tracts by income level throughout its AAs.

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. As discussed previously, the bank has undergone significant structural changes since the prior evaluation, which includes the opening of two full-service banking offices and the consolidation or closing of 15 full-service banking offices. With respect to the branch closures, a limited-service branch and a full-service branch located in LMI census tracts were replaced with full-service ATM units, while a third branch closure resulted from the consolidation of a full-service branch in a moderate-income census tract into a nearby branch located in the same census tract.

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 hours and drive-through services vary by

branch location, with branch lobbies generally operating seven-to-nine hours per day Monday through Friday and offering extended drive-through hours daily. Additionally, Saturday drive-through hours are available at a majority of the bank's branches.

TABLE 7 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES ALL AAs												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.3	20.0	51.1	25.6	0.0	100.0	10.4	25.4	34.5	27.9	1.8	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
3.0	22.7	45.5	28.8	0.0	100.0	10.4	25.4	34.5	27.9	1.8	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches		Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	90		2	15		(1)	(2)	(5)	(5)	0	(13)	
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	16		101		11		0		128		71	
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

This performance criterion evaluates the bank's level of CD services. Overall, the bank provides an adequate level of CD services. The state ratings for Colorado, New Mexico, and Texas, as well as the Kansas City, MO-KS Multistate MSA AA, are all consistent with the overall rating. Additionally, the state ratings for Kansas and Utah reflect a relatively high level of CD services, while the state rating for Missouri reflects a limited level of CD services.

As illustrated in Table 7, bank representatives provided 128 total services to 71 area organizations, with a significant portion of services provided to local grassroots and well-known organizations that provide varying levels of community services to LMI individuals and families. Examples of the bank's CD services that were considered responsive include:

- Two bank representatives served annually throughout the evaluation period as board members for an area organization that provides transitional housing for homeless families, as well as access to affordable housing for LMI individuals, credit counseling, and budget services.

- Two bank representatives served annually throughout the evaluation period as board members for an organization that provides an array of community services for LMI individuals and families that reside in a rural portion in one of the bank's AAs that may not have readily available access to such services.
- A bank representative served on the board for an area economic development organization that provides targeted resources for area small businesses in response to the COVID-19 pandemic, including access to business interruption assistance programs.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

**KANSAS CITY, MO-KS MULTISTATE AA
MULTISTATE METROPOLITAN AREA**

CRA RATING FOR KANSAS CITY, MO-KS MULTISTATE AA¹:	Satisfactory
<i>The lending test is rated:</i>	<i>High Satisfactory</i>
<i>The investment test is rated:</i>	<i>High Satisfactory</i>
<i>The service test is rated:</i>	<i>Low Satisfactory</i>

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses and farms of different sizes is good.
- The bank makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits good responsiveness to the credit and CD needs throughout its 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 its AA, particularly LMI geographies and/or individuals.
- The bank provides an adequate level of CD services within its AA and is responsive to its available service opportunities.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

SCOPE OF EXAMINATION

The scope of the review for the Kansas City, MO-KS Multistate MSA AA was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Refer to the chart in Appendix A for further detail.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KANSAS CITY, MO-KS MULTISTATE MSA AA

The bank's AA includes the entirety of all 14 counties that comprise the Kansas City, MO-KS MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 530 total census tracts, including 79 low-, 120 moderate-, 176 middle-, 136 upper-, and 19 unknown-income census tracts. Since the prior evaluation, the AA experienced a reduction of 17 total census tracts, which included the elimination of one low-income census tract.
- The bank operates 26 full-service branches in the AA, including one branch in a low-, eight in moderate-, nine in middle-, and eight in upper-income census tracts. Additionally, the bank's network of 34 full-service ATMs are distributed across 3 low-, 10 moderate-, 10 middle-, and 11 upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 2.7 percent market share, ranking 9th out of 120 FDIC-insured depository institutions operating in the AA.
- Two recent community contacts conducted as part of the public evaluations of other financial institutions in the area were reviewed for relevant information to help gain a better perspective of the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting such needs. One contact was a representative of an area organization that provides assistance for housing-related services for LMI individuals and families. The second contact was a representative for an area organization that promotes economic development through various programs and advising services.

TABLE 8 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Kansas City, MO-KS MSA AA	2,009,342	2,055,675	2.3
Johnson County, KS	544,179	566,814	4.2
Leavenworth County, KS	76,227	78,227	2.6
Linn County, KS	9,656	9,528	(1.3)
Miami County, KS	32,787	32,688	(0.3)
Wyandotte County, KS	157,505	160,806	2.1
Bates County, MO	17,049	16,643	(2.4)
Caldwell County, MO	9,424	9,083	(3.6)
Cass County, MO	99,478	100,781	1.3
Clay County, MO	221,939	230,361	3.8
Clinton County, MO	20,743	20,498	(1.2)
Jackson County, MO	674,158	680,905	1.0
Lafayette County, MO	33,381	32,916	(1.4)
Platte County, MO	89,322	93,394	4.6
Ray County, MO	23,494	23,031	(2.0)
Kansas	2,853,118	2,892,987	1.4
Missouri	5,988,927	6,045,448	0.9

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- Population trends between 2010 and 2015 remained relatively stable throughout the AA, with the largest growth rates occurring in Platte County, Missouri and Johnson County, Kansas. The overall growth rate for the MSA exceeded the growth rates experienced at the state level for both Kansas and Missouri.

**TABLE 9
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Kansas City, MO-KS MSA AA	74,970	72,623	(3.1)
Johnson County, KS	98,419	94,850	(3.6)
Leavenworth County, KS	80,028	76,579	(4.3)
Linn County, KS	57,896	58,151	0.4
Miami County, KS	76,491	74,751	(2.3)
Wyandotte County, KS	51,892	47,117	(9.2)
Bates County, MO	55,116	53,598	(2.8)
Caldwell County, MO	55,788	54,589	(2.1)
Cass County, MO	73,424	71,696	(2.4)
Clay County, MO	77,325	75,104	(2.9)
Clinton County, MO	65,764	64,760	(1.5)
Jackson County, MO	64,064	61,076	(4.7)
Lafayette County, MO	63,679	64,480	1.3
Platte County, MO	86,541	84,309	(2.6)
Ray County, MO	67,671	63,074	(6.8)
Kansas	67,977	66,389	(2.3)
Missouri	62,790	60,809	(3.2)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The median family incomes (MFI) throughout the AA vary significantly, with all but two counties seeing a decline over the five-year period from 2010 to 2015.

**TABLE 10
HOUSING COST BURDEN**

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kansas City MO-KS MSA AA	75.7	28.2	41.7	62.9	35.3	20.2
Johnson County, KS	80.5	37.5	36.9	70.5	46.9	17.9
Leavenworth County, KS	72.3	22.8	35.1	56.2	31.0	18.8
Linn County, KS	63.9	2.2	35.6	63.1	11.3	21.3
Miami County, KS	74.7	27.9	46.7	62.0	35.5	20.7
Wyandotte County, KS	70.3	23.1	45.8	59.7	26.3	26.3
Bates County, MO	68.8	28.9	37.9	65.3	24.0	21.1
Caldwell County, MO	58.5	2.1	38.1	49.3	13.6	16.9
Cass County, MO	68.7	25.2	38.7	64.4	34.0	20.8
Clay County, MO	79.1	19.6	37.5	61.6	33.2	17.7
Clinton County, MO	70.9	22.7	36.9	51.9	28.5	18.4
Jackson County, MO	75.9	26.5	45.9	62.2	34.9	22.5
Lafayette County, MO	60.3	7.9	37.1	61.5	15.9	16.6
Platte County, MO	84.4	36.0	40.4	65.6	45.2	18.3
Ray County, MO	62.8	13.5	37.4	55.4	21.5	18.9
Kansas	73.1	30.6	39.3	60.1	30.3	17.8
Missouri	74.3	31.1	42.4	61.3	32.9	20.0

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Housing affordability within the AA varied from the most affordable housing located in Linn County, Missouri and Caldwell County, Missouri at 52.0 percent and 45.0 percent, respectively, whereas the least affordable housing is in Johnson County, Kansas at 35.3 percent. A community contact also confirmed the need for affordable housing in the AA, particularly in the Johnson County, Kansas area.

**TABLE 11
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Kansas City, MO-KS MSA AA	4.8	4.3	3.8	3.3	3.3
Johnson County, KS	3.4	3.3	3.0	2.8	2.8
Leavenworth County, KS	4.5	4.3	3.9	3.6	3.4
Linn County, KS	6.4	6.4	5.9	5.8	5.9
Miami County, KS	4.3	4.2	3.8	3.5	3.3
Wyandotte County, KS	6.0	5.6	5.2	4.8	4.3
Bates County, MO	6.1	5.3	4.4	3.8	4.0
Caldwell County, MO	4.6	4.7	4.0	3.1	3.2
Cass County, MO	4.8	4.2	3.5	3.0	3.0
Clay County, MO	4.6	3.9	3.6	2.9	2.9
Clinton County, MO	4.9	4.2	4.0	3.2	3.0
Jackson County, MO	5.9	5.1	4.4	3.7	3.7
Lafayette County, MO	4.9	4.3	3.8	3.2	3.1
Platte County, MO	4.2	3.6	3.2	2.5	2.7
Ray County, MO	5.5	4.9	4.8	3.6	3.6
Kansas	4.2	4.0	3.6	3.3	3.2
Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA remained relatively aligned with the overall statewide figures for both Kansas and Missouri.
- Major employment industries within the AA include healthcare and social assistance, as well as retail trade. Top employers include Cerner, Walmart, and Ford Motor Company.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY, MO-KS MULTISTATE MSA AA

LENDING TEST

The bank’s performance under the lending test in the Kansas City, MO-KS Multistate MSA AA is high satisfactory. For this evaluation, the bank’s home mortgage lending was generally weighted more heavily given the higher product volume, followed by small business lending. Additionally, an evaluation of multifamily, other purpose line of credit (LOC), other purpose closed/exempt, and purpose not applicable loans was not conducted due to limited origination volumes.

Lending Activity

The bank’s lending activities reflect good responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including to LMI borrowers.

For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the AA included 1,515 home mortgage, 573 small business, and 50 small farm loans originated during the two-year period between January 1, 2018 and December 31, 2019. The loan products and origination volumes appear consistent with the general credit needs of the AA and align with the bank's strategic focus in the area as a commercial and residential real estate lender.

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA. The bank's small farm lending reflects excellent penetration among geographies of different income levels, while home mortgage and small business lending reflects good penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The distribution of 2019 home mortgage loans among low-income census tracts is comparable to aggregate lending data but below the percentage of owner-occupied units in such tracts (the demographic figure). The penetration of home mortgage lending in moderate-income census tracts is above aggregate lending data and comparable to the demographic figure. It is noted that lending in moderate-income census tracts had considerably larger volume, which had a positive impact on the overall conclusion for this product, as well as the analysis for each of the bank's home mortgage lending sub-products.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, with a distribution of loans generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is good. The distribution of 2019 home purchase loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Lending in moderate-income census tracts is above aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, with a distribution of loans generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The distribution of 2019 home refinance loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Lending in moderate-income census tracts is above aggregate lending data and comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of home improvement lending is excellent. The distribution of 2019 home improvement loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Lending in moderate-income census tracts is above aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019; however, the bank's lending penetration levels, particularly in low-income census tracts, were still above aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

**Table 12
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Kansas City MO-KS MSA AA**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	12	3.5	2.8	797	1.2	1.3	10	3.0	3.2	1,001	1.6	1.6	5.5
Moderate	59	17.4	17.0	7,617	11.6	10.4	83	24.9	17.1	10,897	17.1	10.6	18.4
Middle	149	44.0	40.9	26,709	40.6	36.0	139	41.6	41.2	26,656	41.7	36.6	40.9
Upper	119	35.1	39.2	30,711	46.6	52.1	102	30.5	38.3	25,339	39.7	51.2	35.0
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	339	100.0	100.0	65,834	100.0	100.0	334	100.0	100.0	63,893	100.0	100.0	100.0
Refinance Loans													
Low	3	1.7	2.6	330	1.5	1.4	2	0.8	1.6	309	0.8	0.9	5.5
Moderate	39	21.7	15.6	3,449	15.6	9.9	46	17.6	11.7	4,757	11.6	7.2	18.4
Middle	69	38.3	41.6	8,038	36.3	37.1	111	42.4	39.2	13,546	33.1	33.6	40.9
Upper	68	37.8	40.1	10,133	45.8	51.4	103	39.3	47.3	22,252	54.5	58.1	35.0
Unknown	1	0.6	0.2	184	0.8	0.2	0	0.0	0.1	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	180	100.0	100.0	22,134	100.0	100.0	262	100.0	100.0	40,864	100.0	100.0	100.0
Home Improvement Loans													
Low	5	5.4	2.4	178	3.3	2.1	2	1.9	2.6	128	2.3	1.8	5.5
Moderate	12	13.0	10.4	392	7.3	7.9	29	27.9	11.2	1,429	25.9	8.2	18.4
Middle	33	35.9	35.9	2,158	40.4	33.3	36	34.6	36.4	1,842	33.4	32.3	40.9
Upper	42	45.7	51.1	2,618	49.0	56.6	37	35.6	49.6	2,121	38.4	57.6	35.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	92	100.0	100.0	5,346	100.0	100.0	104	100.0	100.0	5,520	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	20.3	0	0.0	10.5	1	100.0	16.1	320	100.0	8.7	14.5
Moderate	0	0.0	26.8	0	0.0	20.5	0	0.0	33.3	0	0.0	21.9	26.2
Middle	2	100.0	35.5	400	100.0	37.4	0	0.0	34.9	0	0.0	44.5	37.4
Upper	0	0.0	15.2	0	0.0	26.6	0	0.0	14.6	0	0.0	24.7	20.3
Unknown	0	0.0	2.2	0	0.0	5.0	0	0.0	1.1	0	0.0	0.2	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	400	100.0	100.0	1	100.0	100.0	320	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	24	3.3	2.8	1,455	1.4	2.2	18	2.3	2.6	1,850	1.6	1.9	5.5
Moderate	132	18.2	16.3	12,597	12.6	11.2	179	22.7	14.9	17,900	15.6	10.2	18.4
Middle	296	40.8	40.5	39,558	39.4	36.2	320	40.5	40.1	43,701	38.0	36.0	40.9
Upper	272	37.5	40.3	46,556	46.4	49.9	273	34.6	42.3	51,560	44.8	51.8	35.0
Unknown	1	0.1	0.1	184	0.2	0.6	0	0.0	0.1	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	725	100.0	100.0	100,350	100.0	100.0	790	100.0	100.0	115,011	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 13													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Kansas City MO-KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	3	4.1	1.2	120	2.5	1.0	0	0.0	1.4	0	0.0	1.1	5.5
Moderate	13	17.6	10.0	865	18.0	7.0	6	19.4	10.4	230	13.9	6.5	18.4
Middle	26	35.1	34.6	1,479	30.9	29.3	11	35.5	34.2	376	22.7	28.2	40.9
Upper	32	43.2	54.0	2,329	48.6	62.6	14	45.2	54.0	1,054	63.5	64.1	35.0
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	4,793	100.0	100.0	31	100.0	100.0	1,660	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	2.6	3.1	30	1.6	1.8	3	5.2	3.6	92	3.3	2.2	5.5
Moderate	9	23.7	17.6	274	14.9	11.8	15	25.9	18.2	587	21.3	11.1	18.4
Middle	17	44.7	40.7	774	42.0	33.8	23	39.7	38.8	1,281	46.5	32.5	40.9
Upper	11	28.9	38.4	765	41.5	52.4	17	29.3	39.4	794	28.8	54.2	35.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	1,843	100.0	100.0	58	100.0	100.0	2,754	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.4	0	0.0	0.0	0	0.0	6.3	0	0.0	3.5	5.5
Moderate	0	0.0	16.7	0	0.0	0.0	0	0.0	25.1	0	0.0	17.3	18.4
Middle	0	0.0	38.1	0	0.0	0.0	0	0.0	45.9	0	0.0	45.8	40.9
Upper	0	0.0	42.5	0	0.0	0.0	0	0.0	22.7	0	0.0	33.3	35.0
Unknown	0	0.0	0.3	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 good. The distribution of 2019 small business loans among low-income census tracts is above aggregate lending data and the percentage of business (the demographic figure). Lending in moderate-income census tracts also is above aggregate lending data and is comparable to the demographic figure.

The bank’s lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 14 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Kansas City MO-KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	23	8.7	6.5	4,411	11.9	8.8	35	11.4	6.5	7,030	14.9	8.7	7.0
Moderate	68	25.7	17.2	9,857	26.6	17.0	74	24.0	17.6	11,126	23.6	18.8	19.8
Middle	98	37.0	33.4	11,530	31.2	31.4	108	35.1	32.9	14,856	31.5	29.6	36.4
Upper	71	26.8	39.5	9,613	26.0	36.9	83	26.9	39.3	11,883	25.2	36.7	35.0
Unknown	5	1.9	2.4	1,603	4.3	5.6	8	2.6	2.2	2,302	4.9	5.7	1.8
Tract-Unk	0	0.0	1.1	0	0.0	0.3	0	0.0	1.4	0	0.0	0.5	
Total	265	100.0	100.0	37,014	100.0	100.0	308	100.0	100.0	47,197	100.0	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.

Small Farm Lending

The geographic distribution of small farm lending is excellent. The distribution of 2019 small farm loans among low-income census tracts is comparable to aggregate lending data and the percentage of farms (the demographic figure). Lending in moderate-income census tracts is above aggregate lending data and the demographic figure.

The bank’s lending performance for 2018 reflected penetration levels below that of 2019; however, the bank’s lending penetration levels, particularly in moderate-income census tracts, were still above aggregate lending data.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 15 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Kansas City MO-KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.9	0	0.0	0.2	1.2
Moderate	6	28.6	19.2	225	11.0	18.0	11	37.9	20.3	396	19.1	18.7	16.9
Middle	5	23.8	59.8	384	18.8	62.5	8	27.6	57.0	490	23.6	56.5	54.9
Upper	10	47.6	19.5	1,435	70.2	18.8	10	34.5	20.6	1,187	57.3	24.3	26.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	1.1	0	0.0	0.3	0	0.0	1.0	0	0.0	0.2	
Total	21	100.0	100.0	2,044	100.0	100.0	29	100.0	100.0	2,073	100.0	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.

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

The bank’s lending reflects good penetration among individuals of different income levels and businesses and farms of different sizes. The bank’s small farm lending reflects excellent penetration levels, followed by good penetration for home mortgage lending and adequate penetration for small business lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the percentage of families (the demographic figure). Lending to moderate-income borrowers also is above aggregate lending data and the demographic figure.

The bank’s lending performance for 2018 was below that of 2019, with a distribution of loans to LMI borrowers generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data and comparable to the demographic figure.

Lending to moderate-income borrowers also is above aggregate lending data and the demographic figure.

The bank's lending performance for 2018 was below that of 2019, with a distribution of loans to LMI borrowers generally comparable to aggregate lending data.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 was below that of 2019, with a distribution of loans to LMI borrowers generally comparable to aggregate lending data.

Home Improvement Loans

The borrower distribution of home improvement lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers also is above aggregate lending data and is comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Table 16 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Kansas City MO-KS MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	42	12.4	8.7	3,722	5.7	4.4	48	14.4	9.8	5,605	8.8	5.1	21.3
Moderate	83	24.5	21.7	12,472	18.9	15.8	97	29.0	22.0	13,552	21.2	16.2	17.5
Middle	83	24.5	22.5	14,501	22.0	21.1	75	22.5	22.9	16,067	25.1	21.6	20.6
Upper	122	36.0	33.0	32,531	49.4	45.3	102	30.5	33.5	26,320	41.2	46.0	40.6
Unknown	9	2.7	14.1	2,608	4.0	13.3	12	3.6	11.8	2,349	3.7	11.0	0.0
Total	339	100.0	100.0	65,834	100.0	100.0	334	100.0	100.0	63,893	100.0	100.0	100.0
Refinance Loans													
Low	18	10.0	9.4	1,389	6.3	5.4	31	11.8	6.8	1,837	4.5	3.4	21.3
Moderate	33	18.3	20.1	2,507	11.3	15.1	48	18.3	15.4	4,502	11.0	10.5	17.5
Middle	48	26.7	22.5	5,636	25.5	20.8	54	20.6	21.3	7,727	18.9	18.6	20.6
Upper	70	38.9	34.2	11,295	51.0	45.4	99	37.8	38.1	21,168	51.8	49.0	40.6
Unknown	11	6.1	13.8	1,307	5.9	13.3	30	11.5	18.3	5,630	13.8	18.5	0.0
Total	180	100.0	100.0	22,134	100.0	100.0	262	100.0	100.0	40,864	100.0	100.0	100.0
Home Improvement Loans													
Low	8	8.7	5.7	235	4.4	4.0	10	9.6	6.6	335	6.1	4.5	21.3
Moderate	15	16.3	13.5	575	10.8	9.8	21	20.2	13.5	983	17.8	11.0	17.5
Middle	30	32.6	21.8	1,802	33.7	18.8	17	16.3	21.2	1,008	18.3	18.1	20.6
Upper	38	41.3	52.6	2,701	50.5	57.1	48	46.2	53.7	2,829	51.3	59.6	40.6
Unknown	1	1.1	6.5	33	0.6	10.4	8	7.7	5.0	365	6.6	6.9	0.0
Total	92	100.0	100.0	5,346	100.0	100.0	104	100.0	100.0	5,520	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	77	10.7	8.4	5,780	5.8	4.2	102	12.9	8.3	8,174	7.1	4.1	21.3
Moderate	150	20.7	20.1	16,468	16.5	13.9	186	23.6	18.6	19,728	17.2	12.6	17.5
Middle	192	26.6	22.0	23,586	23.6	18.9	166	21.0	21.9	26,194	22.8	18.6	20.6
Upper	280	38.7	34.6	50,092	50.1	41.5	282	35.7	36.5	52,133	45.5	43.9	40.6
Unknown	24	3.3	15.0	4,024	4.0	21.5	53	6.7	14.7	8,462	7.4	20.8	0.0
Total	723	100.0	100.0	99,950	100.0	100.0	789	100.0	100.0	114,691	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table 17 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Kansas City MO-KS MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$(000)	%	%	#	%	#	\$(000)	%	%	
Other Purpose LOC													
Low	3	4.1	5.5	142	3.0	4.1	1	3.2	4.9	25	1.5	2.9	21.3
Moderate	8	10.8	14.9	378	7.9	11.1	8	25.8	13.5	274	16.5	9.0	17.5
Middle	18	24.3	23.2	1,151	24.0	19.2	4	12.9	22.5	279	16.8	16.5	20.6
Upper	43	58.1	54.8	3,091	64.5	64.0	16	51.6	56.2	974	58.7	68.5	40.6
Unknown	2	2.7	1.6	31	0.6	1.6	2	6.5	2.9	108	6.5	3.1	0.0
Total	74	100.0	100.0	4,793	100.0	100.0	31	100.0	100.0	1,660	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	6	15.8	9.7	292	15.8	6.1	12	20.7	11.2	372	13.5	8.0	21.3
Moderate	11	28.9	17.2	536	29.1	12.4	12	20.7	17.0	417	15.1	11.2	17.5
Middle	13	34.2	21.5	496	26.9	15.1	16	27.6	22.1	1,113	40.4	17.1	20.6
Upper	7	18.4	44.9	474	25.7	56.6	17	29.3	44.0	842	30.6	54.8	40.6
Unknown	1	2.6	6.7	45	2.4	9.9	1	1.7	5.7	10	0.4	8.9	0.0
Total	38	100.0	100.0	1,843	100.0	100.0	58	100.0	100.0	2,754	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	0.5	0	0.0	0.2	21.3
Moderate	0	0.0	2.0	0	0.0	1.1	0	0.0	1.1	0	0.0	1.1	17.5
Middle	0	0.0	2.0	0	0.0	0.9	0	0.0	0.9	0	0.0	1.5	20.6
Upper	0	0.0	2.3	0	0.0	1.2	0	0.0	1.1	0	0.0	3.3	40.6
Unknown	0	0.0	92.7	0	0.0	96.3	0	0.0	96.4	0	0.0	93.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 adequate. The distribution of 2019 loan originations to businesses with revenues of \$1MM or less is comparable to aggregate lending data but below the percentage of small businesses in the AA.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Table 18 Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Kansas City MO-KS MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	123	46.4	43.4	8,044	21.7	28.9	158	51.3	46.0	15,787	33.4	31.5	90.2
Over \$1 Million	136	51.3		26,792	72.4		150	48.7		31,410	66.6		8.9
Revenue Unknown	6	2.3		2,178	5.9		0	0.0		0	0.0		0.9
Total	265	100.0		37,014	100.0		308	100.0		47,197	100.0		100.0
By Loan Size													
\$100,000 or Less	170	64.2	91.4	7,515	20.3	27.5	193	62.7	91.6	8,199	17.4	29.3	
\$100,001 - \$250,000	55	20.8	3.8	9,792	26.5	14.4	53	17.2	3.8	9,539	20.2	14.7	
\$250,001 - \$1 Million	40	15.1	4.8	19,707	53.2	58.1	62	20.1	4.6	29,459	62.4	56.0	
Total	265	100.0	100.0	37,014	100.0	100.0	308	100.0	100.0	47,197	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	104	84.6		4,020	50.0		119	75.3		4,601	29.1		
\$100,001 - \$250,000	16	13.0		2,628	32.7		23	14.6		3,924	24.9		
\$250,001 - \$1 Million	3	2.4		1,396	17.4		16	10.1		7,262	46.0		
Total	123	100.0		8,044	100.0		158	100.0		15,787	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.													

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of 2019 loan originations to farms with revenues of \$1MM or less is above aggregate lending data and comparable to the percentage of small farms in the AA. Support for the bank’s excellent lending performance is attributed to 28 of the bank’s 29 small farm loans being originated in amounts of \$250,000 or less, which demonstrates excellent responsiveness to the credit needs of smaller farming operations.

The bank’s lending performance for 2018 was below that of 2019; however, the bank’s lending penetration levels were still above aggregate lending data.

Table 19 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Kansas City MO-KS MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$(000)	#	%	%	\$(000)	%	\$(000)	
By Revenue													
\$1 Million or Less	16	76.2	52.1	994	48.6	69.2	28	96.6	56.5	1,923	92.8	75.7	97.7
Over \$1 Million	5	23.8		1,050	51.4		1	3.4		150	7.2		1.8
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.5
Total	21	100.0		2,044	100.0		29	100.0		2,073	100.0		100.0
By Loan Size													
\$100,000 or Less	14	66.7	83.7	519	25.4	33.1	22	75.9	84.4	690	33.3	32.7	
\$100,001 - \$250,000	6	28.6	10.6	1,025	50.1	30.7	6	20.7	10.3	1,083	52.2	32.6	
\$250,001 - \$500,000	1	4.8	5.7	500	24.5	36.2	1	3.4	5.3	300	14.5	34.7	
Total	21	100.0	100.0	2,044	100.0	100.0	29	100.0	100.0	2,073	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	13	81.3		469	47.2		22	78.6		690	35.9		
\$100,001 - \$250,000	3	18.8		525	52.8		5	17.9		933	48.5		
\$250,001 - \$500,000	0	0.0		0	0.0		1	3.6		300	15.6		
Total	16	100.0		994	100.0		28	100.0		1,923	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 provides an adequate level of CD loans. The bank originated 16 CD loans totaling \$65.9MM in the AA, which comprised 21.3 percent of bank-wide CD loan volume by number and 30.8 percent by dollar volume. The bank’s CD lending was generally responsive to the economic development needs within the AA, along with lending to area organizations that provide various community services to LMI individuals and families. Examples of the bank’s CD lending activities that were considered responsive credit needs in the AA include:

- A \$35.0MM loan was originated for the construction of a large property in the hospitality and service industry that supports the economic development of an urban renewal district, while also providing job creation for LMI individuals.

- Two loans totaling \$14.0MM were originated to an area school district that contains a student population of greater than 50.0 percent that are eligible for free or reduced lunches. The proceeds of the loans assisted with the district’s ongoing financing needs during the school year while the district awaited its annual tax allocations.
- Eight loans totaling \$2.7MM were PPP loans made to area organizations that were considered responsive to area CD needs in each of the four CD purpose categories, respectively.

TABLE 20 COMMUNITY DEVELOPMENT LOANS KANSAS CITY, MO-KS MULTISTATE MSA AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	1	50
Community Services	7	16,644
Economic Development	5	45,168
Revitalization and Stabilization	3	4,024
TOTAL LOANS	16	65,886

INVESTMENT TEST

The bank’s performance under the investment test in the Kansas City, MO-KS Multistate MSA AA is high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AA. As discussed in the overall Investment Test section of this evaluation, the bank’s investment activity consists entirely of MBS that support affordable housing, as well as philanthropic donations to area organizations that provide community services to LMI individuals and families. The bank increased its dollar volume of annual donations in the AA by approximately 88.8 percent when compared to the prior evaluation, which favorably impacted the AA’s investment test rating.

Table 21 illustrates the breakdown of the bank’s CD investments within the AA, including prior period investments that remain on the bank’s ledger, current period investments purchased during the current evaluation period, and CD donations made since the prior evaluation. Examples of responsive CD donations include:

- A total of \$48,038 was donated to an area organization that provides multiple community services to area LMI individuals and families, including emergency shelter, access to medical services, and social support programs.
- Two donations totaling \$55,000 were raised from fundraising activities that benefited two area organization that provide multiple community services targeted to LMI individuals and families.

- As a responsive action during the pandemic, the bank made an in-kind donation valued at \$3,000 in the form of hand sanitizer that was distributed among four area non-profit agencies that provide essential community services to LMI individuals and families.

TABLE 21 INVESTMENTS, GRANTS, AND DONATIONS KANSAS CITY, MO-KS MULTISTATE MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	14	6,675	3	5,921	0	0	17	12,596
Community Services	0	0	0	0	33	247	33	247
Economic Development	0	0	0	0	4	26	4	26
Revitalization and Stabilization	0	0	0	0	1	5	1	5
TOTAL	14	6,675	3	5,921	38	278	55	12,874
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

The bank’s performance under the service test in the Kansas City, MO-KS Multistate MSA AA is low satisfactory.

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 9 of its 26 full-service branches in LMI tracts, including one in a low- and eight in moderate-income census tracts. Additionally, 13 of the bank’s 34 full-service ATMs are located in LMI tracts, including 3 units in low- and 10 units in moderate-income census tracts. The concentration of branches and ATMs compares favorably to the proportion of LMI tracts in the AA and does not reveal any obvious barriers that would prevent banking accessibility throughout 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. As discussed in the overall Service Test section of this evaluation, acquisition activities since the prior evaluation resulted in the closing or consolidation of four branches in the AA, including two branches in LMI tracts. One full-service branch located in a moderate-income census tract was consolidated with an existing location in the same census tract, and a limited-service branch located in a low-income census tract was closed. It is noted that a full-service ATM still remains on the premises where the limited-service branch was located.

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. Bank operations and product offerings in the AA generally mirror that of the overall institution, which are described in the overall Retail Banking Services section of this evaluation.

TABLE 22 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES KANSAS CITY, MO-KS MULTISTATE MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.9	30.8	34.6	30.8	0.0	100.0	14.9	22.6	33.2	25.7	3.6	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
8.8	29.4	29.4	32.4	0.0	100.0	14.9	22.6	33.2	25.7	3.6	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	26		0	4			(1)	(1)	(1)	(1)	0	(4)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	1		32		2		0		35		16	
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services. As illustrated in Table 22, bank employees supported 16 area organizations in the AA by providing 35 total CD services. The services were generally provided through board membership for area agencies that provide community services for LMI individuals and families. Examples of services performed by bank employees include:

- Two bank representatives served annually throughout the evaluation period as board members for an organization that provides an array of community services for LMI individuals and families that reside in a rural portion of the bank’s AA.
- Three bank representatives served annually throughout the evaluation period as board members for an organization that provides multiple services for women and children seeking emergency assistance from domestic violence, including emergency shelter, social support programs, access to educational programs, and job placement.
- One bank representative served as a board member for an economic development organization in 2018 and 2019. During the 2019 service period, the organization was particularly responsive to area small businesses through pandemic relief aid, including financial assistance for small businesses and educational programs to support the significant interruption to small businesses.

STATE OF COLORADO

CRA RATING FOR COLORADO:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

High Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes an adequate level of CD loans within its AAs.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits good responsiveness to the credit and CD needs throughout its Colorado AAs.

Service Test

- The bank's delivery systems are reasonably 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 provides an adequate level of CD services within its Colorado AAs and is responsive to its 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, including evaluations under the lending, investment, and service tests. Full-scope reviews were conducted for the Denver-Aurora-Lakewood MSA (Denver MSA) and Colorado Springs MSA AAs. The overall state rating was based predominantly on the bank's performance in the two aforementioned AAs given the larger composition of loans, deposits, and branch offices in these markets. Weighting

among AAs was generally placed more heavily on the bank's performance in the Denver MSA AA when determining the overall state rating. Additionally, while the bank's Western Colorado AA received a limited-scope review at this evaluation, the AA comprises an expansive geographic footprint and contains higher numbers of branch offices, and, as such, received increased consideration when determining the overall state rating.

Limited-scope reviews were conducted for the Western Colorado AA, Greeley Colorado MSA AA, Ft. Collins MSA AA, Pueblo MSA AA, Boulder MSA AA, and the Grand Junction MSA AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates 8 of its 20 AAs and operates 45 of its 90 branches in the state of Colorado. Loan and deposit products and services offered in the state generally mirror those discussed in the overall Institution section of this evaluation, with a varying mix of lending products based on the needs of the bank's populated urban markets and lessor populated rural markets. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is low satisfactory. The lending test conclusions in the Denver MSA and Colorado Springs MSA AAs are considered adequate, which is consistent with the overall state rating. Overall, the bank's performance in its AAs where limited-scope reviews were conducted supported the bank's low satisfactory rating for the state.

Lending Activity

The bank's lending activities in the state of Colorado reflect adequate responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the state included 6,258 home mortgage, 723 small business, and 109 small farm loans originated during the two-year period between January 1, 2018 and December 31, 2019. The loan products and origination volumes appear consistent with the credit needs of the bank's Colorado AAs.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Colorado reflects adequate penetration. This performance is consistent across the bank's Denver MSA and Colorado Springs MSA AAs.

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

The bank's lending within the state of Colorado has an overall adequate penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the bank's Denver MSA and Colorado Springs MSA AAs.

Community Development Lending

In the state of Colorado, the bank provides an adequate level of CD loans. The bank originated 37 CD loans totaling \$98.6MM within the state, which comprises 49.3 percent of overall bank-wide CD loan volume by number and 46.8 percent by dollar volume. The level of CD lending was relatively high in the Denver MSA AA, while the bank originated an adequate level in the Colorado Springs MSA AA. Additionally, it is noted that nearly one-third of the bank's CD lending occurred in the Western Colorado AA, which is comprised of 30 nonmetropolitan counties and received a limited-scope review at this evaluation.

TABLE 23 COMMUNITY DEVELOPMENT LOANS STATE OF COLORADO		
Community Development Purpose	#	\$(000's)
Affordable Housing	4	28,452
Community Services	9	4,633
Economic Development	20	61,866
Revitalization and Stabilization	4	3,611
TOTAL LOANS	37	98,562

INVESTMENT TEST

The bank's performance under the investment test in the state of Colorado is high satisfactory. The investment test conclusions in the Denver MSA and Colorado Springs MSA AAs are considered good, which is consistent with the overall state rating. Generally, the bank's performance in its AAs that received limited-scope reviews was below the performance in the full-scope review areas and the state.

The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. As illustrated in Table 24, the bank maintains a balanced level of prior period and current period investments that are responsive to area

affordable housing needs. Additionally, the bank’s level of donations is particularly responsive to area organizations that support community services for LMI individuals.

TABLE 24 INVESTMENTS, GRANTS, AND DONATIONS STATE OF COLORADO								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	8	5,222	3	8,409	14	33	25	13,664
Community Services	0	0	0	0	63	213	63	213
Economic Development	0	0	0	0	10	24	10	24
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	8	5,222	3	8,409	87	270	98	13,901

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s performance under the service test in the state of Colorado is low satisfactory. The service test conclusions in the Denver MSA and Colorado Springs MSA AAs are considered adequate, which is consistent with the overall state rating. Generally, the bank’s performance in its AAs that received limited-scope reviews was below the performance in the full-scope review areas and the state.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in each AA. Of the bank’s 45 full-service offices, 10 are located in LMI tracts. Additionally, the bank operates 16 of its 69 full-service ATMs in LMI tracts.

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. No new branches were opened in the state since the prior evaluation. Five full-service branches were closed, including two located in middle- and three in upper-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. The bank’s operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

The bank provides an adequate level of CD services in its Colorado AAs. This conclusion is consistent across all the bank's Colorado AAs. During the evaluation period, bank representatives performed 71 total CD services to 44 organizations throughout the state, with the services being most responsive to organizations providing community services to LMI individuals and families.

**DENVER-AURORA-LAKEWOOD MSA AA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DENVER-AURORA-LAKEWOOD MSA AA

The bank's AA includes the entirety of all ten counties that comprise the Denver-Aurora-Lakewood, Colorado MSA, including Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties. Refer to Appendix C for a map of the AA.

- The AA is comprised of 621 total census tracts, including 51 low-, 150 moderate-, 205 middle-, 207 upper-, and 8 unknown-income census tracts. Since the prior evaluation, the AA was expanded to include Broomfield, Clear Creek, Gilpin, and Park Counties.
- The bank operates 11 banking offices in the AA, including its headquarters in Greenwood Village. Two banking offices are located in moderate-income census tracts, six banking offices are located within middle-income census tracts, and three banking offices are located within upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.8 percent market share, ranking 16th out of 67 FDIC-insured depository institutions operating in the AA.
- Two recent community contacts conducted as part of the public evaluations of other financial institutions in the area were reviewed for relevant information to help gain a better perspective of the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. One contact was a representative of an affordable housing organization, and the second contact was a representative of a small business organization.

TABLE 25 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Denver-Aurora-Lakewood, CO MSA AA	2,543,482	2,703,972	6.3
Adams County, CO	441,603	471,206	6.7
Arapahoe County, CO	572,003	608,310	6.3
Broomfield County, CO	55,889	60,699	8.6
Clear Creek County, CO	9,088	9,136	0.5
Denver County, CO	600,158	649,654	8.2
Douglas County, CO	285,465	306,974	7.5
Elbert County, CO	23,086	23,855	3.3
Gilpin County, CO	5,441	5,605	3.0
Jefferson County, CO	534,543	552,344	3.3
Park County, CO	16,206	16,189	(0.1)
Colorado	5,029,196	5,278,906	5.0

Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- Population trends between 2010 and 2015 reflect growth throughout the AA, with slightly higher growth noted in the overall MSA when compared to the overall growth at the state level.

TABLE 26 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Denver-Aurora-Lakewood, CO MSA AA	81,781	80,820	(1.2)
Adams County, CO	68,456	66,619	(2.7)
Arapahoe County, CO	78,904	76,437	(3.1)
Broomfield County, CO	102,508	97,886	(4.5)
Clear Creek County, CO	79,639	86,563	8.7
Denver County, CO	62,268	69,783	12.1
Douglas County, CO	118,274	115,309	(2.5)
Elbert County, CO	90,464	96,535	6.7
Gilpin County, CO	89,982	75,694	(15.9)
Jefferson County, CO	88,353	86,565	(2.0)
Park County, CO	80,381	69,234	(13.9)
Colorado	76,277	74,826	(1.9)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- MFI reported throughout the AA varies significantly, with a majority (70.0 percent) of the counties experiencing negative growth rates.

TABLE 27 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver-Aurora-Lakewood, CO MSA AA	80.1	45.8	45.7	68.3	48.5	24
Adams County, CO	80.1	45.3	47.9	69.0	48.6	27
Arapahoe County, CO	83.9	47.4	48.6	71.1	50.2	23
Broomfield County, CO	81.1	68.7	40.8	68.9	43.2	21
Clear Creek County, CO	71.6	26.5	39.2	55.4	48.1	23
Denver County, CO	76.4	40.4	44.7	65.7	43.7	24
Douglas County, CO	82.2	69.1	37.1	74.5	62.3	21
Elbert County, CO	79.0	21.9	35.8	77.9	61.2	31
Gilpin County, CO	87.1	42.1	41.2	87.0	55.9	35
Jefferson County, CO	83.7	46.4	45.7	66.2	46.4	22
Park County, CO	75.9	49.7	49.1	57.2	49.3	31
Colorado	79.5	46.1	46.5	65.2	45.7	24

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The overall affordability ratio within the AA is 24.5 percent, which mirrors that of the state of Colorado at 24.5 percent.
- A community contacted noted the state of Colorado continues to see an influx of population growth into the state. As a result, the available housing stock has not met the demand, while rent and housing costs have continued to rise.

TABLE 28 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Denver-Aurora-Lakewood, CO MSA AA	3.7	3.1	2.7	3.0	2.7
Adams County, CO	4.4	3.6	3.0	3.3	2.9
Arapahoe County, CO	3.7	3.1	2.8	3.1	2.7
Broomfield County, CO	3.3	2.9	2.6	2.8	2.4
Clear Creek County, CO	3.7	3.2	2.6	2.9	2.5
Denver County, CO	3.7	3.1	2.7	3.1	2.7
Douglas County, CO	3.1	2.7	2.4	2.7	2.4
Elbert County, CO	3.2	2.6	2.4	2.7	2.2
Gilpin County, CO	3.1	2.4	2.0	2.4	2.3
Jefferson County, CO	3.5	3.0	2.6	2.9	2.5
Park County, CO	3.5	2.8	2.3	2.7	2.5
Colorado	3.9	3.3	2.8	3.2	2.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Primary employment sectors in the AA include aerospace, broadcast and telecommunications, healthcare, financial services, bioscience, energy, and IT software.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER-AURORA-LAKEWOOD MSA AA

LENDING TEST

The bank’s performance under the lending test in the Denver MSA AA is adequate. For this evaluation, the bank’s home mortgage lending generally carried more weight as it comprised a larger volume of lending and was a strategic emphasis in the AA, followed by small business lending. Additionally, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, as well as multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans in the evaluation of the bank’s home mortgage lending.

Lending Activity

The bank’s lending activities reflect adequate responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank’s flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total volume of loans in the AA included 1,911 home mortgage, 228 small business, and 6 small farm loans originated during the two-year period between January 1, 2018 and December 31, 2019.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. For this evaluation, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, while home mortgage and small business lending reflect adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2019 home mortgage loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. The penetration of home mortgage lending in moderate-income census tracts also is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, with a distribution of loans generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2019 home purchase loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. Lending in moderate-income census tracts also is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2019 home refinance loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. Lending in moderate-income census tracts also is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of home improvement lending is poor. The distribution of 2019 home improvement loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Additionally, lending in moderate-income census tracts is below aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, although lending in moderate-income census tracts was comparable to aggregate lending data.

Due to the overall low volumes of home improvement loan originations in the low- and moderate-income census tracts in both 2018 and 2019, significant gaps were noted in the bank's loan dispersion among geographies of different income levels, supporting the overall poor rating for this product.

**Table 29
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Aurora-Lakewood CO MSA AA**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	32	5.8	5.0	9,433	4.8	3.9	22	4.4	5.0	6,181	3.4	4.0	4.6
Mo derate	120	21.7	18.7	33,980	17.4	14.8	90	17.9	18.8	27,293	14.9	14.5	18.7
Middle	177	32.1	32.8	56,881	29.2	29.7	173	34.5	33.8	60,719	33.1	30.5	34.4
Upper	223	40.4	43.5	94,540	48.5	51.6	217	43.2	42.4	89,135	48.6	51.0	42.3
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	552	100.0	100.0	194,834	100.0	100.0	502	100.0	100.0	183,328	100.0	100.0	100.0
Refinance Loans													
Lo w	9	5.1	4.8	1,820	3.6	3.7	17	3.6	4.0	5,224	3.4	3.2	4.6
Mo derate	41	23.4	21.1	8,758	17.2	16.6	85	18.2	18.2	23,206	14.9	14.2	18.7
Middle	65	37.1	36.4	17,604	34.6	33.6	161	34.4	34.5	50,507	32.5	31.3	34.4
Upper	60	34.3	37.6	22,626	44.5	46.1	205	43.8	43.3	76,376	49.2	51.3	42.3
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	175	100.0	100.0	50,808	100.0	100.0	468	100.0	100.0	155,313	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	3.5	0	0.0	2.9	1	2.0	3.2	30	0.7	2.5	4.6
Mo derate	5	11.9	15.4	565	16.3	13.5	4	8.0	14.3	236	5.6	11.1	18.7
Middle	19	45.2	34.1	1,452	41.9	30.9	14	28.0	33.4	1,387	33.1	30.9	34.4
Upper	18	42.9	47.0	1,452	41.9	52.7	31	62.0	49.1	2,542	60.6	55.5	42.3
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	42	100.0	100.0	3,469	100.0	100.0	50	100.0	100.0	4,195	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	18.3	0	0.0	8.5	0	0.0	20.3	0	0.0	11.9	13.6
Mo derate	1	50.0	30.7	4,000	96.4	35.3	1	100.0	31.2	480	100.0	24.7	29.8
Middle	1	50.0	29.6	150	3.6	34.3	0	0.0	33.4	0	0.0	36.6	37.4
Upper	0	0.0	21.3	0	0.0	21.9	0	0.0	15.1	0	0.0	26.8	19.2
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	2	100.0	100.0	4,150	100.0	100.0	1	100.0	100.0	480	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	43	5.1	4.7	11,392	4.4	4.1	42	3.9	4.4	11,508	3.3	4.0	4.6
Mo derate	177	20.9	19.2	47,858	18.4	16.8	184	17.3	18.1	51,521	14.8	14.8	18.7
Middle	286	33.8	34.3	78,077	30.1	31.2	356	33.4	34.2	113,379	32.6	31.2	34.4
Upper	340	40.2	41.8	122,420	47.1	47.8	483	45.4	43.3	171,098	49.2	49.9	42.3
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	846	100.0	100.0	259,747	100.0	100.0	1,065	100.0	100.0	347,506	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 30 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	1	1.6	3.2	110	2.0	2.3	2	6.7	3.0	73	2.3	2.4	4.6
Moderate	9	14.3	15.2	355	6.6	10.6	2	6.7	13.9	200	6.4	9.5	18.7
Middle	17	27.0	33.7	1,461	27.0	27.9	6	20.0	34.1	622	19.9	28.2	34.4
Upper	36	57.1	47.8	3,492	64.5	59.1	20	66.7	49.0	2,226	71.3	59.9	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	63	100.0	100.0	5,418	100.0	100.0	30	100.0	100.0	3,121	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	8.3	3.2	29	2.7	2.6	0	0.0	3.6	0	0.0	2.0	4.6
Moderate	1	8.3	15.6	200	18.7	11.2	2	14.3	18.6	106	9.9	11.8	18.7
Middle	7	58.3	33.6	529	49.5	22.2	2	14.3	34.3	144	13.5	26.3	34.4
Upper	3	25.0	47.6	310	29.0	64.0	10	71.4	43.6	819	76.6	59.9	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,068	100.0	100.0	14	100.0	100.0	1,069	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.5	0	0.0	5.3	0	0.0	6.7	0	0.0	3.5	4.6
Moderate	0	0.0	23.4	0	0.0	16.6	0	0.0	22.5	0	0.0	23.3	18.7
Middle	0	0.0	36.3	0	0.0	33.2	0	0.0	36.5	0	0.0	29.8	34.4
Upper	0	0.0	34.9	0	0.0	44.9	0	0.0	34.2	0	0.0	43.2	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 2019 small business loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. Lending in moderate-income census tracts also is comparable to aggregate lending data and the demographic figure.

The bank’s lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 31													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	8	8.3	7.8	2,900	9.9	10.8	11	8.3	7.7	3,045	8.6	10.4	6.9
Moderate	22	22.9	18.4	8,557	29.2	20.4	24	18.2	18.4	6,204	17.6	19.8	18.6
Middle	28	29.2	30.5	5,687	19.4	29.7	46	34.8	30.5	13,728	39.0	30.1	32.6
Upper	38	39.6	41.8	12,133	41.4	37.2	51	38.6	41.9	12,228	34.7	38.1	41.6
Unknown	0	0.0	0.4	0	0.0	1.1	0	0.0	0.3	0	0.0	0.8	0.3
Tract-Unk	0	0.0	1.1	0	0.0	0.7	0	0.0	1.2	0	0.0	0.8	
Total	96	100.0	100.0	29,277	100.0	100.0	132	100.0	100.0	35,205	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 32													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.8	0	0.0	3.9	0	0.0	4.9	0	0.0	5.8	6.0
Moderate	0	0.0	9.9	0	0.0	5.0	0	0.0	8.2	0	0.0	4.9	14.0
Middle	1	33.3	35.5	25	6.4	47.7	1	33.3	34.2	172	29.5	42.7	33.7
Upper	2	66.7	47.3	366	93.6	42.0	2	66.7	50.7	412	70.5	45.1	45.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.9
Tract-Unk	0	0.0	3.5	0	0.0	1.4	0	0.0	2.0	0	0.0	1.5	
Total	3	100.0	100.0	391	100.0	100.0	3	100.0	100.0	584	100.0	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.

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

The bank's lending reflects an adequate penetration among individuals of different income levels and businesses of different sizes. The bank's home mortgage lending reflects adequate penetration, while poor penetration is noted for lending to small businesses.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The penetration of 2019 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. However, lending to moderate-income borrowers is comparable to both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, with a distribution of loans to LMI borrowers generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The penetration of 2019 loan originations to low-income borrowers is comparable to aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were above that of 2019, as lending to moderate-income borrowers exceeded aggregate lending data and the demographic figure.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The penetration of 2019 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. However, lending to moderate-income borrowers is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Home Improvement Loans

The borrower distribution of home improvement lending is poor. The penetration of 2019 loan originations to low-income borrowers is comparable to aggregate lending data but below the demographic figure. Additionally, lending to moderate-income borrowers is below aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with that of 2019.

Table 33 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	21	3.8	3.7	3,492	1.8	1.8	16	3.2	4.2	3,160	1.7	2.1	21.3
Moderate	130	23.6	17.6	36,119	18.5	12.6	101	20.1	19.8	27,614	15.1	14.1	17.5
Middle	140	25.4	23.3	45,907	23.6	21.4	134	26.7	23.9	47,128	25.7	21.6	20.5
Upper	260	47.1	38.7	108,976	55.9	47.5	242	48.2	37.9	103,064	56.2	47.6	40.8
Unknown	1	0.2	16.7	340	0.2	16.6	9	1.8	14.2	2,362	1.3	14.6	0.0
Total	552	100.0	100.0	194,834	100.0	100.0	502	100.0	100.0	183,328	100.0	100.0	100.0
Refinance Loans													
Low	11	6.3	9.5	1,674	3.3	5.8	15	3.2	6.5	2,128	1.4	3.7	21.3
Moderate	41	23.4	21.3	9,095	17.9	17.1	81	17.3	17.3	20,995	13.5	12.9	17.5
Middle	48	27.4	23.2	12,436	24.5	22.6	120	25.6	22.2	37,401	24.1	20.4	20.5
Upper	71	40.6	31.1	26,843	52.8	39.0	206	44.0	35.0	77,540	49.9	42.6	40.8
Unknown	4	2.3	14.8	760	1.5	15.5	46	9.8	19.0	17,249	11.1	20.4	0.0
Total	175	100.0	100.0	50,808	100.0	100.0	468	100.0	100.0	155,313	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.9	0	0.0	3.5	2	4.0	5.4	80	1.9	4.0	21.3
Moderate	5	11.9	15.7	424	12.2	12.2	5	10.0	15.6	490	11.7	12.3	17.5
Middle	13	31.0	23.9	796	22.9	19.8	8	16.0	24.1	732	17.4	20.2	20.5
Upper	23	54.8	49.5	2,166	62.4	51.8	32	64.0	52.3	2,749	65.5	59.2	40.8
Unknown	1	2.4	6.1	83	2.4	12.7	3	6.0	2.7	144	3.4	4.4	0.0
Total	42	100.0	100.0	3,469	100.0	100.0	50	100.0	100.0	4,195	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	35	4.1	6.0	5,479	2.1	3.0	36	3.4	5.5	5,499	1.6	2.8	21.3
Moderate	196	23.2	18.6	46,790	18.3	12.9	193	18.1	18.1	49,516	14.3	12.5	17.5
Middle	223	26.4	23.2	61,083	23.9	19.8	271	25.5	23.0	85,937	24.8	19.6	20.5
Upper	384	45.5	37.1	141,062	55.2	41.3	502	47.2	37.5	186,050	53.6	42.6	40.8
Unknown	6	0.7	15.1	1,183	0.5	23.0	62	5.8	15.9	20,024	5.8	22.4	0.0
Total	844	100.0	100.0	255,597	100.0	100.0	1,064	100.0	100.0	347,026	100.0	100.0	100.0
<p><i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i></p>													

Table 34 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	1	1.6	6.5	18	0.3	3.9	1	3.3	6.5	25	0.8	4.1	21.3
Moderate	17	27.0	17.0	1,033	19.1	10.8	4	13.3	16.8	273	8.7	10.3	17.5
Middle	18	28.6	25.1	1,519	28.0	19.2	7	23.3	24.7	610	19.5	18.9	20.5
Upper	27	42.9	50.3	2,848	52.6	64.2	15	50.0	50.3	1,963	62.9	64.9	40.8
Unknown	0	0.0	1.2	0	0.0	1.8	3	10.0	1.7	250	8.0	1.8	0.0
Total	63	100.0	100.0	5,418	100.0	100.0	30	100.0	100.0	3,121	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	2	16.7	7.2	295	27.6	4.3	2	14.3	8.7	106	9.9	5.1	21.3
Moderate	3	25.0	16.9	119	11.1	9.6	2	14.3	18.6	144	13.5	10.2	17.5
Middle	4	33.3	23.9	425	39.8	15.3	2	14.3	23.3	66	6.2	13.5	20.5
Upper	3	25.0	47.0	229	21.4	63.6	7	50.0	43.6	734	68.7	59.3	40.8
Unknown	0	0.0	5.1	0	0.0	7.3	1	7.1	5.8	19	1.8	11.9	0.0
Total	12	100.0	100.0	1,068	100.0	100.0	14	100.0	100.0	1,069	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.3	0	0.0	1.2	0	0.0	0.3	0	0.0	0.2	21.3
Moderate	0	0.0	3.2	0	0.0	2.1	0	0.0	1.1	0	0.0	0.9	17.5
Middle	0	0.0	2.4	0	0.0	2.0	0	0.0	2.7	0	0.0	3.2	20.5
Upper	0	0.0	3.5	0	0.0	3.8	0	0.0	4.2	0	0.0	5.1	40.8
Unknown	0	0.0	88.6	0	0.0	90.9	0	0.0	91.8	0	0.0	90.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 poor. The distribution of 2019 loan originations to businesses with revenues of \$1MM or less is below aggregate lending data and the percentage of small businesses in the AA.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Table 35													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	38	39.6	48.4	8,631	29.5	32.8	57	43.2	52.4	11,163	31.7	34.1	92.3
Over \$1 Million	55	57.3		19,851	67.8		74	56.1		24,017	68.2		6.7
Revenue Unknown	3	3.1		795	2.7		1	0.8		25	0.1		0.9
Total	96	100.0		29,277	100.0		132	100.0		35,205	100.0		100.0
By Loan Size													
\$100,000 or Less	43	44.8	94.4	2,311	7.9	39.7	61	46.2	94.8	3,252	9.2	41.6	
\$100,001 - \$250,000	14	14.6	2.5	2,727	9.3	12.3	29	22.0	2.4	5,545	15.8	12.0	
\$250,001 - \$1 Million	39	40.6	3.1	24,239	82.8	48.0	42	31.8	2.9	26,408	75.0	46.4	
Total	96	100.0	100.0	29,277	100.0	100.0	132	100.0	100.0	35,205	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	21	55.3		874	10.1		33	57.9		1,420	12.7		
\$100,001 - \$250,000	3	7.9		606	7.0		11	19.3		1,948	17.5		
\$250,001 - \$1 Million	14	36.8		7,151	82.9		13	22.8		7,795	69.8		
Total	38	100.0		8,631	100.0		57	100.0		11,163	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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>													

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 36 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Denver-Aurora-Lakewood CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	2	66.7	61.9	175	44.8	73.9	3	100.0	65.2	584	100.0	71.0	97.9
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.9
Revenue Unknown	1	33.3		216	55.2		0	0.0		0	0.0		0.2
Total	3	100.0		391	100.0		3	100.0		584	100.0		100.0
By Loan Size													
\$100,000 or Less	1	33.3	85.6	25	6.4	31.0	0	0.0	90.2	0	0.0	37.7	
\$100,001 - \$250,000	2	66.7	8.9	366	93.6	29.7	2	66.7	6.1	322	55.1	27.9	
\$250,001 - \$500,000	0	0.0	5.4	0	0.0	39.3	1	33.3	3.7	262	44.9	34.4	
Total	3	100.0	100.0	391	100.0	100.0	3	100.0	100.0	584	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1	50.0		25	14.3		0	0.0		0	0.0		
\$100,001 - \$250,000	1	50.0		150	85.7		2	66.7		322	55.1		
\$250,001 - \$500,000	0	0.0		0	0.0		1	33.3		262	44.9		
Total	2	100.0		175	100.0		3	100.0		584	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.													

Community Development Lending

The bank makes a relatively high level of CD loans. The bank originated 18 CD loans totaling \$50.0MM in the AA. The composition of CD loans was most responsive to area economic development needs, including eight loans totaling \$44.0MM. Additionally, the bank originated eight loans totaling \$4.6MM to area organizations that provide community services for LMI individuals and families, as well as two loans totaling \$1.3MM that supported area revitalization and stabilization efforts. Examples of the bank's CD lending activities in the AA include:

- A \$13.7MM loan was originated to an area organization in the hospitality and service industry that supports the economic development of a low-income area located in an enterprise zone.

- A \$5.0MM loan was originated to a not-for-profit corporation that operates as a CD financial institution that provides access to financing for area businesses when traditional financing is unavailable. This loan was instrumental in providing PPP loan access to small businesses during the COVID-19 pandemic.
- Four loans totaling \$2.5MM were PPP loans made to area organizations. Three of the loans went to agencies that provide community services for LMI individuals, while the remaining loan helped support revitalization and stabilization activities.

INVESTMENT TEST

The bank's performance under the investment test in the Denver MSA AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AA. Similar to other AAs, the bank's investments in this AA are comprised entirely of MBS that support affordable housing. In total, the bank reported seven prior period MBS investments totaling \$2.9MM, as well as two new, current period MBS investments totaling \$5.3MM. Donation volume in the AA was comprised of 28 donations totaling \$148,000, which ranks second in dollar volume among all bank-wide AAs. Examples of the bank's donation activities include:

- A total of \$50,000 was donated to an area organization that provides an array of services to adolescent children that are predominantly from LMI homes. Services include emergency shelter, health and therapy services, vocational training, parenting skills, and emotional rehabilitative services.
- Three donations totaling \$4,500 were provided to the local chapter of a nationwide organization that supports affordable housing initiatives through new construction and rehabilitative projects to provide and/or improve housing for LMI individuals and families.
- A total of \$14,000 was donated to two area economic development organizations that provide various resources to small businesses, including start-up resources and education, as well as services to existing area businesses.

SERVICE TEST

The bank's performance under the service test in the Denver MSA AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates 11 full-service offices in the AA, including its headquarters, with two of the offices located in moderate-income census tracts. Additionally, the bank operates 20 full-service ATMs throughout the AA, including 5 ATMs in moderate-income census tracts.

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 any branches during the evaluation period, while one full-service branch was closed in an upper-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. The bank’s hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are described in the overall Retail Banking Services section of this evaluation.

TABLE 37 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES DENVER-AURORA-LAKEWOOD MSA 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	18.2	54.6	27.3	0.0	100.0	8.2	24.2	33.0	33.3	1.3	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	25.0	35.0	40.0	0.0	100.0	8.2	24.2	33.0	33.3	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		
	11		0	1	0	0	0	(1)	0	(1)		
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	0	13	5	0	18	14						
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services. As illustrated in Table 37, bank employees supported 14 area organizations in the AA by providing 18 total CD services. The services supported agencies that provide community services to LMI individuals and families, as well as organizations that support area economic development efforts. Examples of CD services performed by the bank include:

- A bank representative served annually throughout the evaluation period as a board member for an organization that specializes in providing economic development programs and investment education for minority business owners.
- A bank representative served as a board member and helped teach financial literacy courses for an agency that targets services for children and young adults experiencing homelessness and financial distress.
- A bank representative organized a fundraising event for an area organization that provides a large catalogue of services that significantly impact LMI individuals and families.

**COLORADO SPRINGS MSA AA
METROPOLITAN AREA
(Full-Scope Review)**

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

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

- The AA is comprised of 136 total census tracts, including 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts. Since the prior evaluation, the total number of census tracts remains unchanged; however, the number of LMI tracts decreased by one.
- The bank operates five branch offices within the AA, including one branch in a low-income census tract, three in middle-income census tracts, and one in an upper-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 2.7 percent market share, ranking 7th out of 39 FDIC-insured depository institutions operating in the AA.
- One recent community contact conducted as part of the public evaluation of another financial institution in the area was reviewed for relevant information to help gain a better perspective of the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact was a representative of an organization that promotes area economic development.

TABLE 38 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Colorado Springs MSA AA	645,613	678,364	5.1
El Paso County, CO	622,263	655,024	5.3
Teller County, CO	23,350	23,340	0.0
Colorado	5,029,196	5,278,906	5.0

Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- El Paso County experienced similar population growth between 2010 and 2015 as the overall AA and the state of Colorado. Comparatively, the population of Teller County remained unchanged over the same five-year period.

TABLE 39 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Colorado Springs MSA AA	74,920	71,351	(4.8)
El Paso County, CO	74,934	71,174	(5.0)
Teller County, CO	74,406	76,540	2.9
Colorado	76,277	74,826	(1.9)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- MFI declined in El Paso County at a similar rate as the overall AA, which outpaced the reduction in MFI observed in the state of Colorado.

TABLE 40 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Colorado Springs MSA AA	81.5	45.6	46.6	65.2	48.3	23.7
El Paso County, CO	81.5	45.7	46.5	65.4	48.3	23.6
Teller County, CO	82.6	41.0	50.7	62.6	47.3	26.4
Colorado	79.5	46.1	46.5	65.2	45.7	23.9

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Housing cost burden is greater overall on renters, particularly those considered low income. The median gross rent in the AA is \$976, which is in line with that of El Paso and Teller Counties at \$976 and \$985, respectively.
- The affordability ratio of the AA at 26.6 percent is in line with that of El Paso and Teller Counties at 26.7 percent and 26.1 percent, respectively, while slightly better than the affordability ratio of the state of Colorado at 24.5 percent.

TABLE 41 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Colorado Springs MSA AA	4.6	3.8	3.2	3.8	3.3
El Paso County, CO	4.6	3.8	3.2	3.8	3.3
Teller County, CO	4.5	3.7	3.2	3.6	3.1
Colorado	3.9	3.3	2.8	3.2	2.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Primary employment industries include aerospace and defense, information technology and cybersecurity, healthcare, sports, and manufacturing.
- A community contacted noted the area is heavily populated with small businesses, many of which are in need of skilled workers. Organizations in the AA are working to help provide programs for unskilled workers to assist in training and filling gaps in the available workforce.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLORADO SPRINGS MSA AA

LENDING TEST

The bank's performance under the lending test in the Colorado Springs MSA AA is adequate. For this evaluation, the bank's home mortgage lending generally carried more weight due to its volume of lending and the product line being a strategic emphasis in the AA. Additionally, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, as well as multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans in the evaluation of the bank's home mortgage lending.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the AA included 3,040 home mortgage and 83 small business loans originated during the two-year period between January 1, 2018 and December 31, 2019.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. For this evaluation, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, while home mortgage and small business lending reflect adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2019 home mortgage loans among low- and moderate-income census tracts is comparable to aggregate lending data and the demographic figure. It is noted the bank's lending levels were considerably higher in moderate-income census tracts, which helped elevate the bank's overall lending performance for this product, as well as the individual sub-products.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, with a distribution of loans generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2019 home purchase loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. Similarly, the bank's lending among moderate-income census tracts also is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2019 home refinance loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Lending among moderate-income census tracts is comparable to both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were generally consistent with 2019, although penetration among moderate-income census tracts was above aggregate lending data and the demographic figure.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The distribution of 2019 home improvement loans among both low- and moderate-income census tracts is below aggregate lending data and the demographic figure.

However, the bank's home improvement lending in 2018 reflected penetration levels that were above 2019. Specifically, the bank's lending among moderate-income census tracts was above aggregate lending data and the demographic figure. When reviewed over the two-year analysis period, the penetration of home improvement loans is considered adequate.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 42 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Colorado Springs CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	24	2.1	2.4	5,312	1.6	1.7	26	2.6	2.7	6,358	2.0	1.9	3.2
Moderate	180	15.9	18.4	42,747	12.8	14.2	170	16.8	18.3	41,283	13.1	14.5	19.8
Middle	482	42.5	44.2	127,039	37.9	40.6	380	37.6	45.4	106,683	34.0	42.1	42.1
Upper	447	39.5	35.0	159,944	47.7	43.5	434	43.0	33.6	159,899	50.9	41.5	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,133	100.0	100.0	335,042	100.0	100.0	1,010	100.0	100.0	314,223	100.0	100.0	100.0
Refinance Loans													
Low	5	2.8	2.9	828	2.1	1.9	10	1.7	2.1	2,140	1.2	1.4	3.2
Moderate	45	25.3	20.0	8,744	21.9	15.3	102	16.9	16.6	21,253	11.9	12.5	19.8
Middle	64	36.0	45.6	14,383	36.0	43.2	264	43.9	44.7	71,135	39.7	40.8	42.1
Upper	64	36.0	31.5	15,950	40.0	39.6	226	37.5	36.6	84,582	47.2	45.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	178	100.0	100.0	39,905	100.0	100.0	602	100.0	100.0	179,110	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.2	0	0.0	1.9	0	0.0	1.6	3.2
Moderate	8	26.7	17.2	697	34.5	16.7	1	4.2	16.4	10	0.8	15.4	19.8
Middle	10	33.3	40.2	344	17.0	36.5	5	20.8	40.4	207	16.5	37.4	42.1
Upper	12	40.0	41.1	982	48.5	45.7	18	75.0	41.2	1,038	82.7	45.6	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	2,023	100.0	100.0	24	100.0	100.0	1,255	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	15.7	0	0.0	13.3	0	0.0	10.0	0	0.0	7.9	11.6
Moderate	0	0.0	38.6	0	0.0	23.8	0	0.0	36.3	0	0.0	25.4	45.3
Middle	0	0.0	35.7	0	0.0	42.1	0	0.0	30.0	0	0.0	24.8	28.0
Upper	0	0.0	10.0	0	0.0	20.8	0	0.0	23.8	0	0.0	41.9	15.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	30	2.2	2.6	6,160	1.6	2.4	36	2.2	2.4	8,498	1.7	2.0	3.2
Moderate	235	17.1	18.7	52,268	13.8	15.1	275	16.5	17.6	62,609	12.6	14.2	19.8
Middle	567	41.2	44.2	143,211	37.7	41.1	665	40.0	44.7	179,031	36.1	40.5	42.1
Upper	545	39.6	34.5	177,990	46.9	41.4	687	41.3	35.3	246,124	49.6	43.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,377	100.0	100.0	379,629	100.0	100.0	1,663	100.0	100.0	496,262	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 43 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Colorado Springs CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	2.5	0	0.0	1.9	0	0.0	2.1	0	0.0	1.5	3.2
Moderate	1	3.8	16.3	60	3.6	13.2	2	13.3	18.2	63	9.4	15.0	19.8
Middle	6	23.1	42.5	530	32.2	36.0	6	40.0	41.8	254	38.1	34.4	42.1
Upper	19	73.1	38.8	1,057	64.2	48.9	7	46.7	38.0	350	52.5	49.1	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	1,647	100.0	100.0	15	100.0	100.0	667	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	10.0	2.4	20	2.0	0.9	0	0.0	2.8	0	0.0	1.4	3.2
Moderate	1	10.0	16.8	20	2.0	9.5	0	0.0	15.5	0	0.0	9.6	19.8
Middle	5	50.0	39.6	915	90.4	31.9	10	83.3	40.6	752	74.7	36.5	42.1
Upper	3	30.0	41.2	57	5.6	57.7	2	16.7	41.1	255	25.3	52.5	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,012	100.0	100.0	12	100.0	100.0	1,007	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.8	0	0.0	1.9	0	0.0	3.9	0	0.0	3.4	3.2
Moderate	0	0.0	25.6	0	0.0	13.2	0	0.0	28.0	0	0.0	20.7	19.8
Middle	0	0.0	47.8	0	0.0	36.0	0	0.0	48.4	0	0.0	48.9	42.1
Upper	0	0.0	21.7	0	0.0	48.9	0	0.0	19.7	0	0.0	27.0	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 2019 small business loans among low-income census tracts is below aggregate lending data, as well as the demographic figure. However, lending among moderate-income census tracts is comparable to aggregate lending data and the demographic figure.

Additionally, the distribution of small business loans in 2018 reflected penetration levels that were above 2019, further supporting the adequate penetration of small business loans over the two-year analysis period.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 44 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Colorado Springs CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	2	5.3	7.2	355	3.5	11.1	2	4.4	6.8	560	4.3	9.5	7.4
Moderate	13	34.2	21.5	2,674	26.5	24.8	9	20.0	21.8	2,446	18.6	25.0	23.0
Middle	13	34.2	33.1	4,781	47.4	29.4	16	35.6	32.5	5,871	44.6	27.2	33.5
Upper	10	26.3	36.8	2,278	22.6	33.4	18	40.0	37.4	4,287	32.6	37.0	35.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	1.3	0	0.0	1.1	0	0.0	1.4	0	0.0	1.2	
Total	38	100.0	100.0	10,088	100.0	100.0	45	100.0	100.0	13,164	100.0	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.

NOTE: The following table is included for informational purposes, as the bank’s small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 45 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Colorado Springs CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	1.3	0	0.0	0.5	0	0.0	1.8	0	0.0	0.4	4.5
Moderate	0	0.0	10.1	0	0.0	10.3	0	0.0	6.2	0	0.0	21.1	15.4
Middle	0	0.0	30.4	0	0.0	20.4	0	0.0	47.8	0	0.0	29.4	45.3
Upper	0	0.0	57.0	0	0.0	67.7	0	0.0	42.5	0	0.0	47.8	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	1.0	0	0.0	1.8	0	0.0	1.3	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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.

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

The bank's lending reflects an adequate penetration among individuals of different income levels and businesses of different sizes. The bank's home mortgage and small business lending both reflect adequate penetration levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The penetration of 2019 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. However, lending to moderate-income borrowers is comparable to aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, with a distribution of loans generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The penetration of 2019 loan originations to low-income borrowers is comparable to aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The penetration of 2019 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. Comparatively, lending to moderate-income borrowers is comparable to aggregate lending data, as well as the demographic figure.

Additionally, the bank's lending performance for 2018 reflected penetration levels that were above 2019, with a distribution of loans generally comparable or above aggregate lending data.

Home Improvement Loans

The borrower distribution of home improvement lending is adequate. The penetration of 2019 loan originations to low- and moderate-income borrowers is below aggregate lending data and the demographic figure.

However, the bank's home improvement lending in 2018 reflected penetration levels that were above 2019. Specifically, the bank's lending to moderate-income borrowers was above aggregate lending data and the demographic figure. When reviewed over the two-year analysis period, the penetration of home improvement loans is considered adequate.

**Table 46
Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level
Assessment Area: Colorado Springs CO MSA AA**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	\$ (000)	%	#	%	#	%	\$ (000)	%	
Home Purchase Loans													
Low	52	4.6	3.8	9,206	2.7	2.2	34	3.4	4.1	5,592	1.8	2.3	20.2
Moderate	274	24.2	21.0	60,820	18.2	16.3	222	22.0	22.0	52,930	16.8	17.3	18.5
Middle	324	28.6	24.3	88,610	26.4	23.1	294	29.1	26.1	86,559	27.5	24.9	20.3
Upper	479	42.3	32.0	175,242	52.3	39.3	455	45.0	32.6	168,193	53.5	39.8	41.0
Unknown	4	0.4	18.9	1,164	0.3	19.0	5	0.5	15.1	949	0.3	15.7	0.0
Total	1,133	100.0	100.0	335,042	100.0	100.0	1,010	100.0	100.0	314,223	100.0	100.0	100.0
Refinance Loans													
Low	22	12.4	9.1	2,666	6.7	5.6	20	3.3	6.3	3,111	1.7	3.7	20.2
Moderate	43	24.2	20.3	7,855	19.7	16.5	89	14.8	13.9	18,319	10.2	10.4	18.5
Middle	46	25.8	23.1	10,678	26.8	22.8	111	18.4	18.3	28,128	15.7	16.4	20.3
Upper	60	33.7	29.7	17,102	42.9	36.6	137	22.8	25.7	44,952	25.1	29.9	41.0
Unknown	7	3.9	17.8	1,604	4.0	18.5	245	40.7	35.8	84,600	47.2	39.6	0.0
Total	178	100.0	100.0	39,905	100.0	100.0	602	100.0	100.0	179,110	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.3	4.8	12	0.6	3.9	0	0.0	8.9	0	0.0	6.2	20.2
Moderate	7	23.3	15.0	690	34.1	13.3	2	8.3	16.8	100	8.0	14.5	18.5
Middle	6	20.0	25.4	349	17.3	22.4	6	25.0	22.3	217	17.3	20.4	20.3
Upper	16	53.3	49.9	972	48.0	49.3	16	66.7	49.9	938	74.7	55.4	41.0
Unknown	0	0.0	4.9	0	0.0	11.1	0	0.0	1.9	0	0.0	3.5	0.0
Total	30	100.0	100.0	2,023	100.0	100.0	24	100.0	100.0	1,255	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	77	5.6	5.5	12,013	3.2	3.0	54	3.2	5.6	8,703	1.8	2.9	20.2
Moderate	334	24.3	19.9	69,803	18.4	15.2	322	19.4	17.8	71,934	14.5	13.2	18.5
Middle	379	27.5	23.7	100,108	26.4	21.5	418	25.1	22.2	115,303	23.2	19.6	20.3
Upper	573	41.6	33.4	194,531	51.2	36.8	619	37.2	30.7	214,773	43.3	33.5	41.0
Unknown	14	1.0	17.5	3,174	0.8	23.6	250	15.0	23.7	85,549	17.2	30.7	0.0
Total	1,377	100.0	100.0	379,629	100.0	100.0	1,663	100.0	100.0	496,262	100.0	100.0	100.0

Source: 2019 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 47 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Colorado Springs CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	6.4	0	0.0	4.4	0	0.0	11.8	0	0.0	8.7	20.2
Moderate	6	23.1	16.7	343	20.8	12.2	5	33.3	16.5	165	24.7	12.3	18.5
Middle	1	3.8	24.6	50	3.0	20.6	3	20.0	23.2	70	10.5	20.6	20.3
Upper	16	61.5	51.8	848	51.5	61.5	7	46.7	48.1	432	64.8	57.7	41.0
Unknown	3	11.5	0.5	406	24.7	1.2	0	0.0	0.5	0	0.0	0.7	0.0
Total	26	100.0	100.0	1,647	100.0	100.0	15	100.0	100.0	667	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	2	20.0	6.8	129	12.7	6.6	0	0.0	7.9	0	0.0	5.8	20.2
Moderate	4	40.0	19.8	95	9.4	10.8	4	33.3	17.3	420	41.7	11.6	18.5
Middle	2	20.0	23.0	421	41.6	18.6	4	33.3	22.1	329	32.7	19.2	20.3
Upper	2	20.0	46.1	367	36.3	52.5	4	33.3	47.5	258	25.6	53.9	41.0
Unknown	0	0.0	4.3	0	0.0	11.5	0	0.0	5.3	0	0.0	9.4	0.0
Total	10	100.0	100.0	1,012	100.0	100.0	12	100.0	100.0	1,007	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.1	0	0.0	0.7	0	0.0	0.5	0	0.0	0.1	20.2
Moderate	0	0.0	1.3	0	0.0	1.7	0	0.0	0.5	0	0.0	0.4	18.5
Middle	0	0.0	1.4	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	3.5	0	0.0	4.2	0	0.0	2.5	0	0.0	4.9	41.0
Unknown	0	0.0	92.6	0	0.0	91.4	0	0.0	96.6	0	0.0	94.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 adequate. The distribution of 2019 loan originations to businesses with revenues of \$1MM or less is comparable to aggregate lending data but below the percentage of small businesses in the AA. It is noted the bank originated a higher volume of loans to small businesses in 2019 than 2018, which resulted in giving more weight to the bank’s 2019 lending performance.

The distribution of 2018 small business loans reflects penetration levels below that of 2019, with the bank's lending below aggregate lending data and the demographic figure.

Table 48													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Colorado Springs CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	13	34.2	52.7	1,848	18.3	38.9	21	46.7	55.2	3,975	30.2	40.2	94.2
Over \$1 Million	24	63.2		8,190	81.2		22	48.9		8,311	63.1		5.1
Revenue Unknown	1	2.6		50	0.5		2	4.4		878	6.7		0.7
Total	38	100.0		10,088	100.0		45	100.0		13,164	100.0		100.0
By Loan Size													
\$100,000 or Less	16	42.1	96.2	808	8.0	47.0	21	46.7	96.6	936	7.1	50.5	
\$100,001 - \$250,000	4	10.5	1.8	722	7.2	11.7	3	6.7	1.6	447	3.4	11.0	
\$250,001 - \$1 Million	18	47.4	2.0	8,558	84.8	41.3	21	46.7	1.8	11,781	89.5	38.6	
Total	38	100.0	100.0	10,088	100.0	100.0	45	100.0	100.0	13,164	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	8	61.5		343	18.6		14	66.7		519	13.1		
\$100,001 - \$250,000	2	15.4		378	20.5		1	4.8		118	3.0		
\$250,001 - \$1 Million	3	23.1		1,127	61.0		6	28.6		3,338	84.0		
Total	13	100.0		1,848	100.0		21	100.0		3,975	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.													

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 49 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Colorado Springs CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	70.9	0	0.0	40.7	0	0.0	67.3	0	0.0	67.0	98.6
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	94.9	0	0.0	50.1	0	0.0	97.3	0	0.0	65.7	
\$100,001 - \$250,000	0	0.0	2.5	0	0.0	12.1	0	0.0	0.9	0	0.0	5.4	
\$250,001 - \$500,000	0	0.0	2.5	0	0.0	37.9	0	0.0	1.8	0	0.0	28.9	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

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.

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated five CD loans totaling \$8.8MM in the AA. The loans predominantly supported economic development in the area, while one CD loan was a PPP loan to an area organization that provides community services targeted to LMI individuals.

INVESTMENT TEST

The bank's performance under the investment test in the Colorado Springs MSA AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership

position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AA.

Similar to other AAs, the bank's investments in this AA are comprised entirely of MBS that support affordable housing efforts. In total, the bank reports three prior period MBS investments totaling \$1.0MM, as well as one new, current period MBS investment totaling \$1.3MM. Donation activity in the AA was comprised of 16 donations totaling \$41,250. The donations were predominantly to area organizations that provide community services for LMI individuals and families, which comprised 15 of the 16 donations and totaled \$40,750. The remaining donation included a \$500 donation to the local chapter of a nationwide agency that provides multiple services that impact affordable housing for LMI individuals. Examples of the bank's donation activities include:

- A \$5,000 donation was provided to an area health agency to be applied to a fund that provides scholarships for low-income individuals to attend a nursing aide training program.
- Two donations totaling \$10,000 were provided to an area organization that provides multiple community services to LMI individuals to achieve self-sufficiency, including access to transitional housing and social support programs.
- Four donations totaling \$3,000 were provided to two area agencies that provide legal services for LMI individuals, particularly young adults who are unable to afford legal services and for youth experiencing transitional housing through foster care.

SERVICE TEST

The bank's performance under the service test in the Colorado Springs MSA AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The AA contains 5 of the bank's 90 branches, including one in a low-, three in middle-, and one in an upper-income census tract. The bank's branching footprint is heavily concentrated in the northwest portion of El Paso County, while Teller County includes two branches that are located in the northern and southern regions of the county. Additionally, the bank operates 11 ATMs throughout the AA, including one ATM in a low-income census tract.

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 any new branches during the evaluation period. One full-service branch was closed in an upper-income census tract, although a full-service ATM remains on the premises of the location.

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 and service offerings in the AA generally mirror that of the overall institution, which are discussed in the overall Retail Banking Services section of this report.

TABLE 50 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES COLORADO SPRINGS, CO MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	20.0	0.0	60.0	20.0	0.0	100.0	5.1	30.1	39.0	24.3	1.5	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
9.1	0.0	63.6	27.3	0.0	100.0	5.1	30.1	39.0	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			
	5	0	1	0	0	0	(1)	0	(1)			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	3	12	0	0	15	6						
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services. As illustrated in Table 50, bank employees supported six area organizations in the AA by providing 15 total CD services. The CD services were predominantly provided to organizations that provide community services benefiting LMI individuals, while three CD services also were directed to affordable housing organizations. Examples of services performed by bank employees include:

- Two bank representatives supported an organization that provides services to LMI families by providing one-year transitional housing in Colorado Springs, as well as supportive services promoting self-sufficiency, financial education, and life skills.
- A bank representative served as a board member for an area organization that provides legal services for children who are victims of abuse, neglect, or domestic conflict. The organization also promotes community awareness of these issues to help ensure safe and permanent homes for the affected children.
- A bank representative served annually throughout the review period as a board member for an organization that promotes the availability of safe and affordable housing for LMI individuals and families.

**OTHER COLORADO METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Reviews)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE COLORADO METROPOLITAN AREAS

GREELEY MSA AA

The bank's AA is comprised of Weld County in its entirety, which also comprises the Greeley, Colorado MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 77 census tracts, including 7 low-, 16 moderate-, 26 middle-, 27 upper-, and 1 unknown-income census tract.
- Based on 2015 American Community Survey (ACS) data, the AA population was 270,948, which reflects a 7.2 percent increase from the 2010 U.S. Census Bureau data.
- The bank operates four full-service branches in the AA, including one in a moderate-, two in middle-, and one in an upper-income census tract. The bank also has one full-service ATM in the AA that is located in an upper-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 4.4 percent market share, ranking 8th out of 23 FDIC-insured depository institutions operating in the AA.

FT. COLLINS MSA AA

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

- The AA is comprised of 73 census tracts, including 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tract.
- Based on 2015 ACS data, the AA population was 318,227, which reflects a 6.2 percent increase from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch in the AA, which is located in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.5 percent market share, ranking 19th out of 25 FDIC-insured depository institutions operating in the AA.

PUEBLO MSA AA

The bank's AA is comprised of Pueblo County in its entirety, which also comprises the Pueblo, Colorado MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 55 census tracts, including 3 low-, 16 moderate-, 18 middle-, 15 upper-, and 3 unknown-income census tracts.
- Based on 2015 ACS data, the AA population was 161,519, which reflects a 1.5 percent increase from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch in the AA, which is located in a moderate-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.9 percent market share, ranking 14th out of 14 FDIC-insured depository institutions operating in the AA.

BOULDER MSA AA

The bank's AA is comprised of Boulder County in its entirety, which also comprises the Boulder, Colorado MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 68 census tracts, including 5 low-, 14 moderate-, 30 middle-, and 19 upper-income census tracts.
- Based on 2015 ACS data, the AA population was 310,032, which reflects a 5.3 percent increase from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch and one LPO within the AA, both of which are located in moderate-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.04 percent market share, ranking 32nd out of 32 FDIC-insured depository institutions operating in the AA.

GRAND JUNCTION MSA AA

The bank's AA is comprised of Mesa County in its entirety, which also comprises the Grand Junction, Colorado MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 29 census tracts, including 7 moderate-, 16 middle-, and 6 upper-income census tracts.
- Based on 2015 ACS data, the AA population was 147,834, which reflects a 0.8 percent increase from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch within the AA, which is located in a middle-income census tract.

- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.7 percent market share, ranking 12th out of 13 FDIC-insured depository institutions operating in the AA.

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

The five Colorado metropolitan 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 did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Greeley MSA AA	Consistent	Consistent	Consistent
Ft. Collins MSA AA	Exceeds	Below	Below
Pueblo MSA AA	Below	Below	Below
Boulder MSA AA	Consistent	Below	Exceeds
Grand Junction MSA AA	Consistent	Below	Below

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

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE COLORADO
NONMETROPOLITAN AREA**

WESTERN COLORADO AA

The bank's AA is comprised of 30 counties in their entirety, including Alamosa, Archuleta, Chafee, Conejos, Costilla, Crowley, Custer, Delta, Dolores, Eagle, Fremont, Garfield, Grand, Gunnison, Hinsdale, Huerfano, Lake, La Plata, Las Animas, Mineral, Montezuma, Montrose, Otero, Ouray, Pitkin, Rio Grande, Saguache, San Juan, San Miguel, and Summit. Refer to Appendix C for a map of the AA.

- The AA is comprised of 139 census tracts, including 1 low-, 29 moderate-, 69 middle-, 37 upper-, and 3 unknown-income census tracts.
- Based on 2015 ACS data, the AA population was 532,483, which reflects a negligible increase of 0.5 percent from the 2010 U.S. Census Bureau data.
- The bank operates 21 full-service branches in the AA, including 1 location in a low-, 3 in moderate-, 11 in middle-, and 6 in upper-income tracts. Additionally, the bank operates 30 ATMs throughout the AA, including 8 ATMs in LMI tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 5.3 percent market share, ranking 6th out of 47 FDIC-insured depository institutions operating in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE COLORADO
NONMETROPOLITAN AREA**

The one Colorado nonmetropolitan AA listed in the table below was 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 did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Western Colorado AA	Exceeds	Below	Consistent

STATE OF KANSAS

CRA RATING FOR KANSAS:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

High Satisfactory

Needs to Improve

High Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses of different sizes is good.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

- The bank makes a poor level of qualified CD investments and grants. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits poor responsiveness to the credit and CD needs throughout its Kansas AAs.

Service Test

- The bank's delivery systems are reasonably 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 provides a relatively high level of CD services within its Kansas AAs and is responsive to its available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Lawrence MSA AA, and the overall state rating was based predominantly on the bank's performance in this AA. In addition, a limited-scope review was conducted for the Franklin County AA to assess the bank's performance in this AA and how it compared to the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS

The bank delineates 2 of its 20 AAs and operates 2 of its 90 branches in the state of Kansas. As discussed in the overall Institution section of this evaluation, the two AAs are new markets for the bank since the prior evaluation due to the acquisition of a financial institution. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this evaluation, with a primary emphasis on home mortgage and small business lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the lending test in the state of Kansas is high satisfactory. The lending test conclusions in the Lawrence MSA AA were considered good, which is consistent with the overall state rating. The bank's performance was below that of the state in the Franklin County AA.

Lending Activity

The bank's lending activities in the state of Kansas reflect good responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the state included 477 home mortgage, 43 small business, and 15 small farm loans originated during the two-year period between January 1, 2018 and December 31, 2019. The loan products and origination volumes appear consistent with the credit needs of the bank's Kansas AAs.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Kansas reflects good penetration. This performance is consistent with the good penetration levels noted throughout the bank's Lawrence MSA AA.

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

The bank's lending within the state of Kansas has an overall good penetration among individuals of different income levels and businesses of different sizes. This performance is consistent with the good penetration noted throughout the bank's Lawrence MSA AA.

Community Development Lending

In the state of Kansas, the bank provides a relatively high level of CD loans given its limited branching presence in the state. The bank originated seven CD loans totaling \$3.8MM within the state, which comprises 12.0 percent of overall bank-wide CD loan volume by number and 5.6 percent by dollar volume. As illustrated in Table 51, the bank’s CD lending was responsive to area economic development needs, as well as to organizations that provide community services to LMI individuals and families.

TABLE 51 COMMUNITY DEVELOPMENT LOANS STATE OF KANSAS		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	6	3,779
Economic Development	1	19
Revitalization and Stabilization	0	0
TOTAL LOANS	7	3,798

INVESTMENT TEST

The bank’s performance under the investment test in the state of Kansas is needs to improve. The investment test conclusions in the Lawrence MSA AA were considered poor, which is consistent with the overall state rating. The bank’s performance in the Franklin County AA was consistent with the overall performance in the state.

The bank has a poor level of qualified CD investments and grants. The bank also makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AAs. For this evaluation, the bank’s only activity within the state was limited to donations to area organizations, as the bank reported no current or prior period investments. The bank’s donation activity consisted of eight donations totaling \$8,850, most of which were made in the Lawrence MSA AA. The donations were generally made to organizations that provide community services to LMI individuals and families, as well as to agencies that support area economic development or affordable housing activities.

**TABLE 52
INVESTMENTS, GRANTS, AND DONATIONS
STATE OF KANSAS**

Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	0	0	0	0	1	3	1	3
Community Services	0	0	0	0	6	4	6	4
Economic Development	0	0	0	0	1	2	1	2
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	8	9	8	9

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s performance under the service test in the state of Kansas is high satisfactory. The service test conclusions in the Lawrence MSA AA were considered good, which is consistent with the overall state rating. The bank’s performance in the Franklin County AA was below that of the overall performance in the state.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in each AA. The bank operates two full-service branches in the state, including one in a middle- and one in an upper-income census tract. Additionally, the bank operates eight full-service ATMs within the state, including three full-service ATMs in moderate-income census tracts.

The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank did not open any new branches but did close three full-service branches, including one in a moderate-income census tract. The branch closings occurred after the acquisition of another financial institution. Each closed branch location still retains a full-service ATM on its premises.

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. The bank’s operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

The bank provides a relatively high level of CD services in its Kansas AAs. For the evaluation period, bank employees performed six CD services to four area organizations throughout the state. The services were primarily responsive to organizations providing community services to LMI individuals and families.

**LAWRENCE MSA AA
METROPOLITAN AREA
(Full-Scope Review)**

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

The bank's AA is comprised of Douglas County in its entirety, which is the sole county that comprises the Lawrence, Kansas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 22 census tracts, including 2 low-, 7 moderate-, 8 middle-, and 5 upper-income census tracts. As previously discussed, this is a new AA for the bank since the prior evaluation.
- The bank operates one full-service branch office within the AA that is located in an upper-income census tract. In addition, there are two stand-alone ATMs located within the AA, one of which is located in a moderate-income census tract and the other in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 1.8 percent market share, ranking 12th out of 22 FDIC-insured depository institutions operating in the AA.
- One community contact was conducted as part of this evaluation to obtain relevant information and help provide additional perspective on the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact was a representative of an organization that provides various programs and services in support of affordable housing throughout the AA.

TABLE 53 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Lawrence MSA AA	110,826	114,967	3.7
Kansas	2,853,118	2,892,987	1.4

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- The AA's population growth outpaced the overall state level between 2010 and 2015.

TABLE 54 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Lawrence MSA AA	74,356	72,755	(2.2)
Kansas	67,977	66,389	(2.3)

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The AA’s MFI is higher than the statewide figure, indicating higher paying employment wages in the AA.
- The percentage of AA families living below the poverty line, at 8.1 percent, is below the statewide figure of 9.1 percent.

TABLE 55 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Lawrence MSA AA	84.6	40.8	49.9	78.7	40.7	20.2
Kansas	73.1	30.6	39.3	60.1	30.3	17.8

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The housing cost burden on all homeowners and renters is greater in the AA than in the state of Kansas.
- The AA’s affordability ratio at 28.3 percent is significantly less affordable than the statewide ratio at 40.0 percent.

TABLE 56 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Lawrence MSA AA	3.7	3.5	3.2	3.0	2.9
Kansas	4.2	4.0	3.6	3.3	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA have consistently remained below the statewide figure.
- The most common employment sectors in the area are educational services (10,789 people), retail trade (7,188 people), and health care and social assistance (5,763 people).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAWRENCE MSA AA

LENDING TEST

The bank's performance under the lending test in the Lawrence MSA AA is good. For this evaluation, the bank's home mortgage lending generally carried more weight due to the volume of lending and the product line being a strategic emphasis in the AA, followed by small business lending. Additionally, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, as well as multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans in the evaluation of the bank's home mortgage lending.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank did participate in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the AA included 320 home mortgage, 15 small business, and 1 small farm loan originated during the two-year period between January 1, 2018 and December 31, 2019.

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA. The bank's small business lending reflects excellent penetration among geographies of different income levels, while home mortgage lending reflects good penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The distribution of 2019 home mortgage loans among low-income census tracts is comparable to aggregate lending data and the demographic figure. Additionally, the penetration of home mortgage loans among moderate-income census tracts is above aggregate lending data and the demographic figure. It is noted that lending in moderate-income census tracts had considerably larger volume, which had a positive impact on the overall conclusion for this product, as well as the analysis for each of the bank's home mortgage lending sub-products.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, with a distribution of loans to LMI tracts that was generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is good. As illustrated in Table 57, the bank did not originate any home purchase loans in 2019 among low-income census tracts; however, this is comparable to aggregate lending data and the demographic figure given only 1.3 percent of all owner-occupied units within the AA are in low-income census tracts. Comparatively, lending in moderate-income census tracts is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, with a distribution of loans to LMI tracts that was generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The distribution of 2019 home refinance loans among low-income census tracts is above aggregate lending data and the demographic figure. Lending in moderate-income census tracts also is above aggregate lending data and comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels above that of 2019, particularly with regard to lending among moderate-income census tracts.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of home improvement lending is good. As illustrated in Table 57, the bank did not originate any home improvement loans in 2019 among low-income census tracts; however, this is comparable to aggregate lending data and the demographic figure given only 1.3 percent of all owner-occupied units within the AA are in low-income census tracts. Comparatively, lending in moderate-income census tracts is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels above that of 2019, particularly with regard to lending among low-income census tracts.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 57 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Lawrence KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	2	18	16	360	1.7	1.7	0	0.0	2.1	0	0.0	2.4	1.3
Moderate	21	18.6	23.9	3,271	15.2	17.9	42	35.9	26.0	7,345	32.4	19.7	25.4
Middle	40	35.4	31.9	7,041	32.8	30.2	37	31.6	32.3	6,425	28.3	31.5	36.9
Upper	50	44.2	42.7	10,816	50.3	50.2	38	32.5	39.6	8,896	39.2	46.3	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	113	100.0	100.0	21,488	100.0	100.0	117	100.0	100.0	22,666	100.0	100.0	100.0
Refinance Loans													
Low	1	3.6	2.8	174	4.2	3.3	2	4.8	1.6	372	4.5	1.8	1.3
Moderate	11	39.3	24.5	1,211	29.1	19.6	11	26.2	19.4	2,109	25.7	14.7	25.4
Middle	9	32.1	37.6	1,751	42.1	37.5	14	33.3	37.1	2,514	30.6	37.6	36.9
Upper	7	25.0	35.2	1,024	24.6	39.6	15	35.7	41.9	3,211	39.1	45.9	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	4,160	100.0	100.0	42	100.0	100.0	8,206	100.0	100.0	100.0
Home Improvement Loans													
Low	1	25.0	5.2	15	6.9	7.5	0	0.0	2.5	0	0.0	4.4	1.3
Moderate	1	25.0	20.3	50	23.1	19.9	2	33.3	22.7	85	47.0	18.7	25.4
Middle	2	50.0	34.0	151	69.9	27.0	3	50.0	32.5	70	38.7	30.8	36.9
Upper	0	0.0	40.5	0	0.0	45.6	1	16.7	42.3	26	14.4	46.1	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	216	100.0	100.0	6	100.0	100.0	181	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	100.0	26.8	239	100.0	3.7	0	0.0	2.9	0	0.0	1.4	13.1
Moderate	0	0.0	29.3	0	0.0	34.6	0	0.0	42.9	0	0.0	40.7	42.9
Middle	0	0.0	22.0	0	0.0	5.5	0	0.0	31.4	0	0.0	9.1	23.0
Upper	0	0.0	22.0	0	0.0	56.1	1	100.0	22.9	1,376	100.0	48.8	20.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	239	100.0	100.0	1	100.0	100.0	1,376	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	5	3.3	2.4	788	3.0	2.5	2	1.2	1.9	372	1.1	2.1	1.3
Moderate	34	22.4	24.0	4,622	17.5	22.0	55	32.7	23.6	9,539	29.2	21.0	25.4
Middle	52	34.2	33.7	9,017	34.1	26.8	54	32.1	34.2	9,009	27.6	30.5	36.9
Upper	61	40.1	39.9	12,045	45.5	48.7	57	33.9	40.3	13,757	42.1	46.4	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	152	100.0	100.0	26,472	100.0	100.0	168	100.0	100.0	32,677	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 58 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Lawrence KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.6	0	0.0	0.2	1.3
Moderate	1	16.7	25.9	90	24.4	15.9	0	0.0	20.3	0	0.0	13.5	25.4
Middle	1	16.7	42.0	74	20.1	31.0	0	0.0	31.3	0	0.0	27.5	36.9
Upper	4	66.7	32.1	205	55.6	53.2	0	0.0	46.9	0	0.0	58.9	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	369	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.0	0	0.0	7.9	0	0.0	1.3	0	0.0	0.4	1.3
Moderate	0	0.0	20.9	0	0.0	32.1	0	0.0	22.7	0	0.0	15.4	25.4
Middle	0	0.0	32.8	0	0.0	28.3	0	0.0	34.7	0	0.0	28.1	36.9
Upper	0	0.0	43.3	0	0.0	31.8	2	100.0	41.3	248	100.0	56.2	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	248	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	2.5	0	0.0	0.0	0	0.0	0.0	1.3
Moderate	0	0.0	29.5	0	0.0	22.0	0	0.0	37.1	0	0.0	29.5	25.4
Middle	0	0.0	37.7	0	0.0	26.8	0	0.0	48.6	0	0.0	61.2	36.9
Upper	0	0.0	32.8	0	0.0	48.7	0	0.0	14.3	0	0.0	9.3	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 excellent. The distribution of 2019 small business loans among low-income census tracts is below aggregate lending data and the demographic figure, as the bank did not originate any loans in such tracts. However, lending in moderate-income census tracts is above aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 59 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Lawrence KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	4.0	0	0.0	3.8	0	0.0	3.7	0	0.0	2.8	5.9
Moderate	4	57.1	32.0	1,775	73.3	32.2	6	75.0	32.0	1,352	80.4	34.4	32.5
Middle	2	28.6	32.2	398	16.4	33.6	1	12.5	32.8	180	10.7	33.2	33.1
Upper	1	14.3	30.3	250	10.3	30.1	1	12.5	29.6	150	8.9	29.1	28.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	0.3	0	0.0	1.9	0	0.0	0.4	
Total	7	100.0	100.0	2,423	100.0	100.0	8	100.0	100.0	1,682	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 60 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Lawrence KS MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	2.4	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.9	0	0.0	3.0	0	0.0	8.2	0	0.0	2.1	18.1
Middle	0	0.0	42.9	0	0.0	48.8	1	100.0	59.2	25	100.0	68.2	58.0
Upper	1	100.0	33.3	156	100.0	45.2	0	0.0	26.5	0	0.0	27.4	23.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	9.5	0	0.0	2.6	0	0.0	6.1	0	0.0	2.3	
Total	1	100.0	100.0	156	100.0	100.0	1	100.0	100.0	25	100.0	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.

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

The bank's lending reflects good penetration among individuals of different income levels and businesses of different sizes. The bank's home mortgage lending reflects good penetration levels, while adequate penetration levels were noted for small business lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers also is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 was below that of 2019, with a distribution of loans to LMI borrowers that was generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers also is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 was below that of 2019, as lending to low-income borrowers was comparable to aggregate lending data.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 was below that of 2019, as reflected by limited loan penetration levels to low-income borrowers. However, lending volumes were lower in 2018 and, as such, the performance did not change the overall home refinance lending conclusion.

Home Improvement Loans

The borrower distribution of home improvement lending is adequate. For 2019, the bank did not originate any home improvement loans to low-income borrowers, which falls below aggregate lending data and the demographic figure. Comparatively, lending to moderate-income borrowers is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 was below that of 2019, as the bank did not originate any home improvement loans to LMI borrowers.

**Table 61
Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level
Assessment Area: Lawrence KS MSA AA**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	12	10.6	10.7	1,498	7.0	6.5	14	12.0	8.1	1,684	7.4	4.4	19.1
Moderate	40	35.4	22.6	6,850	31.9	18.0	35	29.9	21.7	5,725	25.3	16.6	19.6
Middle	28	24.8	23.3	5,497	25.6	23.8	34	29.1	23.7	6,709	29.6	22.3	20.6
Upper	32	28.3	32.3	7,554	35.2	41.6	31	26.5	36.4	7,974	35.2	46.7	40.7
Unknown	1	0.9	11.1	89	0.4	10.1	3	2.6	10.2	574	2.5	10.1	0.0
Total	113	100.0	100.0	21,488	100.0	100.0	117	100.0	100.0	22,666	100.0	100.0	100.0
Refinance Loans													
Low	1	3.6	10.7	68	1.6	5.9	5	11.9	7.9	755	9.2	4.4	19.1
Moderate	4	14.3	20.0	332	8.0	15.4	6	14.3	16.3	1,038	12.6	11.5	19.6
Middle	11	39.3	24.2	1,639	39.4	22.2	9	21.4	21.1	1,708	20.8	18.9	20.6
Upper	9	32.1	33.7	1,939	46.6	44.6	12	28.6	41.0	2,633	32.1	50.7	40.7
Unknown	3	10.7	11.4	182	4.4	11.9	10	23.8	13.7	2,072	25.2	14.5	0.0
Total	28	100.0	100.0	4,160	100.0	100.0	42	100.0	100.0	8,206	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	13.1	0	0.0	12.4	0	0.0	6.1	0	0.0	4.6	19.1
Moderate	0	0.0	15.7	0	0.0	12.5	2	33.3	17.8	55	30.4	13.9	19.6
Middle	0	0.0	19.0	0	0.0	12.8	1	16.7	22.7	26	14.4	20.0	20.6
Upper	3	75.0	41.8	166	76.9	45.7	3	50.0	48.5	100	55.2	53.0	40.7
Unknown	1	25.0	10.5	50	23.1	16.6	0	0.0	4.9	0	0.0	8.4	0.0
Total	4	100.0	100.0	216	100.0	100.0	6	100.0	100.0	181	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	13	8.6	10.5	1,566	6.0	5.0	20	12.0	7.9	2,549	8.1	3.8	19.1
Moderate	46	30.5	21.1	7,272	27.7	13.4	43	25.7	19.2	6,818	21.8	12.3	19.6
Middle	41	27.2	23.1	7,300	27.8	18.2	44	26.3	22.7	8,443	27.0	17.8	20.6
Upper	44	29.1	32.9	9,659	36.8	33.8	47	28.1	38.6	10,845	34.6	41.7	40.7
Unknown	7	4.6	12.4	436	1.7	29.6	13	7.8	11.7	2,646	8.5	24.4	0.0
Total	151	100.0	100.0	26,233	100.0	100.0	167	100.0	100.0	31,301	100.0	100.0	100.0

Source: 2019 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 62 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Lawrence KS MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	7.4	0	0.0	6.3	0	0.0	7.8	0	0.0	3.1	19.1
Moderate	2	33.3	18.5	90	24.4	8.4	0	0.0	17.2	0	0.0	7.4	19.6
Middle	2	33.3	30.9	164	44.4	24.1	0	0.0	25.0	0	0.0	20.2	20.6
Upper	0	0.0	38.3	0	0.0	57.3	0	0.0	45.3	0	0.0	67.4	40.7
Unknown	2	33.3	4.9	115	31.2	4.0	0	0.0	4.7	0	0.0	1.9	0.0
Total	6	100.0	100.0	369	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	11.9	0	0.0	6.3	1	50.0	10.7	110	44.4	8.1	19.1
Moderate	0	0.0	23.9	0	0.0	15.7	0	0.0	17.3	0	0.0	8.3	19.6
Middle	0	0.0	22.4	0	0.0	21.1	0	0.0	30.7	0	0.0	18.3	20.6
Upper	0	0.0	35.8	0	0.0	36.6	1	50.0	38.7	138	55.6	62.7	40.7
Unknown	0	0.0	6.0	0	0.0	20.4	0	0.0	2.7	0	0.0	2.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	248	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.1
Moderate	0	0.0	4.9	0	0.0	2.8	0	0.0	0.0	0	0.0	0.0	19.6
Middle	0	0.0	4.9	0	0.0	8.5	0	0.0	0.0	0	0.0	0.0	20.6
Upper	0	0.0	4.9	0	0.0	15.0	0	0.0	17.1	0	0.0	32.7	40.7
Unknown	0	0.0	85.2	0	0.0	73.7	0	0.0	82.9	0	0.0	67.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 adequate. The distribution of 2019 loan originations to businesses with revenues of \$1MM or less is comparable to aggregate lending data but below the percentage of small businesses in the AA.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Table 63													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Lawrence KS MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	3	42.9	49.0	423	17.5	44.3	4	50.0	50.5	210	12.5	44.7	91.2
Over \$1 Million	4	57.1		2,000	82.5		4	50.0		1,472	87.5		8.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.8
Total	7	100.0		2,423	100.0		8	100.0		1,682	100.0		100.0
By Loan Size													
\$100,000 or Less	1	14.3	91.4	25	1.0	28.5	4	50.0	92.2	102	6.1	31.8	
\$100,001 - \$250,000	4	57.1	4.5	898	37.1	17.7	3	37.5	4.1	580	34.5	17.4	
\$250,001 - \$1 Million	2	28.6	4.1	1,500	61.9	53.8	1	12.5	3.8	1,000	59.5	50.8	
Total	7	100.0	100.0	2,423	100.0	100.0	8	100.0	100.0	1,682	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1	33.3		25	5.9		3	75.0		60	28.6		
\$100,001 - \$250,000	2	66.7		398	94.1		1	25.0		150	71.4		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		423	100.0		4	100.0		210	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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>													

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 64 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Lawrence KS MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	1	100.0	35.7	156	100.0	61.4	1	100.0	46.9	25	100.0	79.4	99.3
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.7
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	1	100.0		156	100.0		1	100.0		25	100.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	92.9	0	0.0	57.3	1	100.0	95.9	25	100.0	70.9	
\$100,001 - \$250,000	1	100.0	7.1	156	100.0	42.7	0	0.0	4.1	0	0.0	29.1	
\$250,001 - \$500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	156	100.0	100.0	1	100.0	100.0	25	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		1	100.0		25	100.0		
\$100,001 - \$250,000	1	100.0		156	100.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		156	100.0		1	100.0		25	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.

Community Development Lending

The bank provides a relatively high level of CD loans. The bank originated six CD loans totaling \$2.8MM in the AA. The bank's CD lending was responsive to area organizations that provide community services to LMI individuals and families, as well as provided funding to support economic development. Examples of the bank's CD lending activities in the AA include:

- Two loans totaling \$2.3MM were made to an organization that provides a multitude of services to area youth, including mentoring and educational programs. The organization specifically serves area youth from schools where greater than 50 percent of students are eligible for free or reduced lunches.

- One loan totaling \$149,000 supported a local non-profit organization that provides temporary, residential group care to children who have been displaced from their homes because of court involvement.
- One loan for \$65,000 was originated to an area non-profit organization that provides access to food sources for LMI individuals and families.

INVESTMENT TEST

The bank's performance under the investment test in the Lawrence MSA AA is poor. The bank has a poor level of qualified CD investments and grants. The bank also makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AA. For this evaluation, the bank's only activity within the AA was limited to donations to area organizations, as the bank reported no current or prior period investments. The bank's donation activity consisted of five donations totaling \$8,000. Based on a review of similarly situated financial institutions, along with the metropolitan composition of the bank's AA, opportunities for investments are present in the AA.

Examples of the bank's donation activities include:

- A total of \$3,000 was donated to an area organization that provides affordable homes to LMI individuals and families, as well as provides home rehabilitation and financial education programs to support home ownership.
- A total of \$1,500 was donated to a local non-profit organization that provides temporary housing to children in need or in foster care.
- A donation of \$1,500 was made to an area organization that supports economic development through various programs intended to provide small business development, equitable wage growth, and workforce development.

SERVICE TEST

The bank's performance under the service test in the Lawrence MSA AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank only operates one full-service branch in the AA, which is located in an upper-income census tract. However, the bank also operates four ATMs throughout the AA, two of which are located in moderate-income census tracts. Although the bank's branch locations fall below the total percentage of census tracts by income level, the number of full-service ATM locations more generally aligns with the demographic figure.

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. Acquisition activities since the prior

evaluation resulted in the initial expansion of the bank’s presence into the city of Lawrence. Since that time, the bank closed two full-service branches, one of which was located in a moderate-income census tract. However, the bank continues to maintain a full-service ATM on the premises of that location. Additionally, the bank’s remaining full-service branch location in the AA is located approximately four miles directly west of the closed moderate-income census tract location and, therefore, did not adversely affect the accessibility of the bank’s services to LMI individuals or geographies.

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 and service offerings in the AA generally mirror that of the overall institution, which are described in the overall Retail Banking Services section of this evaluation.

TABLE 65 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES LAWRENCE MSA 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	0.0	0.0	100.0	0.0	100.0	9.1	31.8	36.4	22.7	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	50.0	50.0	0.0	0.0	100.0	9.1	31.8	36.4	22.7	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches		Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	1		0	2		0	(1)	(1)	0	0	(2)	
Community Development Services	Affordable Housing		Community Services	Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	3		1	0		0		4		2		
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides a relatively high level of CD services given the bank’s limited presence in the market. As illustrated in Table 65, bank employees supported two area organizations in the AA by providing four CD services. The services were primarily responsive to agencies that support affordable housing, as well as community services for LMI individuals and families. Examples of services performed by bank employees include:

- One bank representative served as a board member for an organization that provides community services targeted towards LMI individuals and families, particularly youth from LMI homes.

- One bank representative served annually throughout the evaluation period as a board member for a local organization that provides an array of services in support of affordable housing to LMI individuals.

**OTHER KANSAS NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE KANSAS
NONMETROPOLITAN AREA**

FRANKLIN COUNTY AA

The bank's AA is comprised of Franklin County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of five total census tracts, including one moderate-, three middle-, and one upper-income census tract.
- Based on 2015 ACS data, the AA population was 25,753, which reflects a negligible decrease from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch office in the AA, which is located in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 17.4 percent market share, ranking 2nd out of 9 FDIC-insured depository institutions operating in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE KANSAS
NONMETROPOLITAN AREA**

The one Kansas nonmetropolitan AA listed in the table below was 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 did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Franklin County AA	Below	Consistent	Below

STATE OF MISSOURI

CRA RATING FOR MISSOURI:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses and farms of different sizes is good.
- The bank makes a low level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits adequate responsiveness to the credit and CD needs throughout its Missouri AAs.

Service Test

- The bank's delivery systems are reasonably 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 provides an adequate level of CD services within its Missouri AAs and is responsive to its available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Missouri was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Full-scope reviews were conducted for the St. Joseph Metropolitan and Northwest Missouri AAs. The overall state rating was based predominantly on the bank's performance in the two aforementioned AAs given the larger composition of loans, deposits, and branch offices in these markets. Additionally, the St. Joseph Metropolitan AA experienced a higher volume in home mortgage lending while the relatively rural Northwest Missouri AA reflected a larger volume of small farm loans.

Limited-scope reviews were conducted for the North Central Missouri AA and the Northeast Missouri AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MISSOURI

The bank delineates 4 of its 20 AAs and operates 9 of its 90 branches in the state of Missouri. Loan and deposit products and services offered in the state generally mirror those discussed in the overall Institution section of this evaluation. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

The bank's performance under the lending test in the state of Missouri is low satisfactory. The lending test rating in the Northwest Missouri AA is adequate, which is consistent with the overall state rating, while the lending test rating in the St. Joseph Metropolitan AA is poor. The bank's performance in its limited-scope review AAs supported the lending test rating of low satisfactory.

Lending Activity

The bank's lending activities in the state of Missouri reflect adequate responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the state of Missouri included 338 home mortgage, 122 small farm, and 64 small business loans originated during the two-year period between January 1, 2018 and

December 31, 2019. The loan products and origination volumes appear consistent with the credit needs of the bank's Missouri AAs.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Missouri reflects adequate penetration. This conclusion is supported by adequate penetration levels in the Northwest Missouri AA, while poor performance is noted in the St. Joseph Metropolitan AA.

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

The bank's lending within the state of Missouri has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. This conclusion is based on excellent penetration levels noted in the Northwest Missouri AA, as well as adequate penetration levels in the St. Joseph Metropolitan AA.

Community Development Lending

In the state of Missouri, the bank provides a low level of CD loans. The bank originated four CD loans totaling \$4.3MM within the state. The bank's CD loans were primarily responsive to activities supporting revitalization and stabilization efforts within the bank's markets. It is noted that a substantial portion of the bank's statewide dollar volume was based on a \$4.2MM loan originated in the North Central Missouri AA, which received a limited-scope review at this evaluation. While CD lending within the AA is considered at a low level when compared to the bank's other AAs, this performance did not result in an unfavorable impact on the statewide lending test rating.

TABLE 66 COMMUNITY DEVELOPMENT LOANS STATE OF MISSOURI		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	1	95
Economic Development	1	7
Revitalization and Stabilization	2	4,224
TOTAL LOANS	4	4,326

INVESTMENT TEST

The bank's performance under the investment test in the state of Missouri is low satisfactory. The investment test rating in the Northwest Missouri AA is adequate, which is consistent with the overall state rating, while the investment test rating in the St. Joseph Metropolitan AA is poor. Additionally, the state rating was bolstered by the bank's investment activity in the limited-scope Northeast Missouri AA, which exceeded the overall state performance.

The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits adequate responsiveness to the credit and CD needs of its AAs. For this evaluation, the bank’s investment activity was limited to a single, prior period investment. Comparatively, the bank’s donation activity consisted of 18 donations totaling \$32,000, most of which were to organizations that provide community services to LMI individuals and families, as well as to agencies that support area economic development activities.

TABLE 67 INVESTMENTS, GRANTS, AND DONATIONS STATE OF MISSOURI								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	60	0	0	0	0	1	60
Community Services	0	0	0	0	14	28	14	28
Economic Development	0	0	0	0	4	4	4	4
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	1	60	0	0	18	32	19	92
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

The bank’s performance under the service test in the state of Missouri is low satisfactory. The service test rating in the Northwest Missouri AA is adequate, which is consistent with the overall state rating, while the service test rating in the St. Joseph Metropolitan AA is poor. The bank’s performance in the North Central Missouri AA is also considered poor, while the performance in the Northeast Missouri AA exceeded the performance in the state overall.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in each AA. The bank operates nine full-service branches in the state, two of which are located in moderate-income census tracts. The percentage of branches aligns similarly to the concentration of LMI tracts in the state. Additionally, the bank operates 14 full-service ATMs, which includes two units in moderate-income census tracts.

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 has not opened any new branches in the state. Two branch closures occurred in a middle- and upper-income census tract, respectively.

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. The bank's operations and product and service offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section of this evaluation.

Community Development Services

The bank provides an adequate level of CD services in its Missouri AAs. This conclusion is consistent with the Northwest Missouri AA, where the bank similarly provides an adequate level of CD services, while the St. Joseph Metropolitan AA only provides a limited level of CD services. Additional support for the overall conclusion was based on the relatively large volume of CD services performed in the Northeast Missouri AA (limited-scope review), which exceeded the performance in both the Northwest Missouri and St. Joseph Metropolitan AAs and had a positive impact on the overall state rating.

During the evaluation period, bank representatives performed a total of nine CD services to five area organizations throughout the state. The services were primarily to organizations that provide community services to LMI individuals.

**ST. JOSEPH METROPOLITAN AA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ST. JOSEPH METROPOLITAN AA

The bank's AA is comprised of Andrew, Buchanan, and DeKalb Counties in their entirety, which comprise a portion of the St. Joseph, Missouri-Kansas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 31 census tracts, including 1 low-, 7 moderate-, 17 middle-, and 6 upper-income census tracts. Since the prior evaluation, the total number and delineation of census tracts remains unchanged.
- The bank operates 3 full-service branch offices within the AA, two of which are located in middle-income census tracts and one is located in an upper-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had an 8.7 percent market share, ranking 4th out of 19 FDIC-insured depository institutions operating in the AA.
- One recent community contact conducted as part of the public evaluation of another financial institution in the area was reviewed for relevant information to help gain a better perspective on the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact was a representative of a local insurance organization.

**TABLE 68
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
St. Joseph Metropolitan AA	119,384	119,671	0.2
Andrew County, MO	17,291	17,328	0.2
Buchanan County, MO	89,201	89,561	0.4
DeKalb County, MO	12,892	12,782	(0.9)
St. Joseph, MO-KS MSA	127,329	127,530	0.2
Missouri	5,988,927	6,045,448	0.9

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- The AA's population growth, similar to the state of Missouri, remained relatively stagnant between 2010 and 2015.

**TABLE 69
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
St. Joseph Metropolitan AA	59,186	59,917	1.2
Andrew County, MO	68,284	70,039	2.6
Buchanan County, MO	57,676	58,355	1.2
DeKalb County, MO	58,589	55,087	(6.0)
St. Joseph, MO-KS MSA	59,173	59,820	1.1
Missouri	62,790	60,809	(3.2)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The MFI in DeKalb County is the lowest among the other counties within the AA and also falls below the overall St. Joseph, Missouri-Kansas MSA and the statewide level, revealing lower wages paid in the county.
- The percentage of AA families living below the poverty line, at 12.4 percent, is slightly higher than the statewide figure of 11.1 percent.

**TABLE 70
HOUSING COST BURDEN**

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
St. Joseph Metropolitan AA	71.5	38.5	42.0	61.0	24.7	17.0
Andrew County, MO	52.1	36.5	32.1	52.2	24.5	17.5
Buchanan County, MO	76.2	42.1	44.8	63.1	25.5	17.1
DeKalb County, MO	51.1	15.5	28.8	61.0	18.8	15.1
St. Joseph, MO-KS MSA	71.2	37.0	41.1	60.3	24.4	17.0
Missouri	74.3	31.1	42.4	61.3	32.9	20.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Housing costs varied amongst the counties within the AA and reflected a generally lower burden in rental housing costs in lesser populated portions of the AA.

TABLE 71 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
St. Joseph Metropolitan AA	4.5	4.1	3.5	2.9	3.0
Andrew County, MO	4.2	3.7	3.2	2.6	2.8
Buchanan County, MO	4.6	4.1	3.5	2.9	3.1
DeKalb County, MO	4.7	4.4	3.9	3.1	3.1
St. Joseph, MO-KS MSA	4.5	4.0	3.5	2.9	3.0
Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA have consistently remained below the statewide figure.
- The AA’s primary employment industries are healthcare, food processing, education, government, and animal pharmaceuticals, with the largest employers being Mosaic Life Care, Triumph Foods, and the St. Joseph School District.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. JOSEPH METROPOLITAN AA

LENDING TEST

The bank’s performance under the lending test in the St. Joseph Metropolitan AA is poor. For this evaluation, the bank’s home mortgage lending generally carried more weight due to the volume of lending and the product line being a strategic emphasis in the AA, followed by small business lending. Additionally, small farm lending was not evaluated due to insufficient volume to conduct a meaningful analysis, as well as multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans in the evaluation of the bank’s home mortgage lending.

Lending Activity

The bank’s lending activities reflect poor responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank’s flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the AA included 157 home mortgage, 28 small business, and 8 small farm loans originated during the two-year period between January 1, 2018 and December 31, 2019.

Geographic Distribution of Loans

The geographic distribution of lending reflects poor penetration throughout the AA. The bank's home mortgage and small business lending both reflect poor penetration levels among geographies of different income levels.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. The distribution of 2019 home mortgage loans among low-income census tracts is above aggregate lending data and the demographic figure. Conversely, the penetration of home mortgage lending among moderate-income census tracts is below aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, with a distribution of loans below aggregate lending data in LMI tracts.

Furthermore, significant lending gaps with regard to the dispersion of loans among geographies of different income levels were noted, which is consistent with the low penetration levels in LMI tracts.

Home Purchase Loans

The geographic distribution of home purchase lending is poor. The distribution of 2019 home purchase loans among low-income census tracts is above aggregate lending data and the demographic figure, while lending among moderate-income census tracts is below both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, as lending to low-income census tracts was comparable to aggregate lending data and the demographic figure.

Furthermore, significant lending gaps with regard to the dispersion of loans among geographies of different income levels were noted, which is consistent with the low penetration levels in LMI tracts.

Home Refinance Loans

The geographic distribution of home refinance lending is poor. The distribution of 2019 home refinance loans among low-income census tracts is below aggregate lending data and the demographic figure. Similarly, lending among moderate-income census tracts is below aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels above that of 2019, as lending to moderate-income census tracts was comparable to aggregate lending data.

Furthermore, significant lending gaps with regard to the dispersion of loans among geographies of different income levels were noted, which is consistent with the low penetration levels in LMI tracts.

Home Improvement Loans

The geographic distribution of home improvement lending is poor. The distribution of 2019 home improvement loans among low-income census tracts is below aggregate lending data and the demographic figure. Similarly, lending among moderate-income census tracts is below aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were generally consistent with 2019, although penetration levels for moderate-income census tracts was comparable to aggregate lending data.

Furthermore, significant lending gaps with regard to the dispersion of loans among geographies of different income levels were noted, which is consistent with the low penetration levels in LMI tracts.

Table 72 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: St. Joseph MO Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	0.1	0	0.0	0.1	2	8.7	0.6	238	6.7	0.4	0.6
Moderate	1	2.5	14.7	59	1.2	8.8	1	4.3	14.1	32	0.9	7.9	16.7
Middle	28	70.0	55.2	3,519	73.3	50.0	14	60.9	57.6	2,114	59.6	53.8	56.6
Upper	11	27.5	29.6	1,223	25.5	40.4	6	26.1	27.7	1,163	32.8	37.9	26.1
Unknown	0	0.0	0.4	0	0.0	0.7	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	40	100.0	100.0	4,801	100.0	100.0	23	100.0	100.0	3,547	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.0	0	0.0	0.8	0	0.0	0.2	0	0.0	1.1	0.6
Moderate	2	12.5	14.1	72	4.2	8.9	2	6.1	9.4	124	4.3	5.1	16.7
Middle	10	62.5	55.2	1,157	68.0	52.6	22	66.7	57.6	1,865	64.7	55.2	56.6
Upper	4	25.0	29.8	472	27.7	37.7	9	27.3	32.8	895	31.0	38.6	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,701	100.0	100.0	33	100.0	100.0	2,884	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.9	0	0.0	0.8	0	0.0	0.8	0	0.0	0.1	0.6
Moderate	1	9.1	13.2	21	3.8	8.8	0	0.0	13.3	0	0.0	10.6	16.7
Middle	6	54.5	50.9	288	52.3	48.0	6	66.7	53.1	228	54.2	50.4	56.6
Upper	4	36.4	34.9	242	43.9	42.5	3	33.3	32.8	193	45.8	38.9	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	551	100.0	100.0	9	100.0	100.0	421	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	4.2	0	0.0	2.5	0	0.0	5.0	0	0.0	1.6	9.9
Moderate	0	0.0	25.0	0	0.0	5.2	0	0.0	30.0	0	0.0	55.1	19.7
Middle	0	0.0	58.3	0	0.0	75.3	0	0.0	55.0	0	0.0	38.4	51.7
Upper	0	0.0	12.5	0	0.0	17.1	0	0.0	10.0	0	0.0	5.0	18.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.4	0	0.0	0.4	2	2.7	0.6	238	3.3	0.7	0.6
Moderate	6	7.1	14.6	188	2.4	8.8	4	5.5	13.0	216	3.0	11.1	16.7
Middle	53	63.1	55.3	5,271	67.9	52.0	46	63.0	57.1	4,297	60.5	52.8	56.6
Upper	25	29.8	29.4	2,307	29.7	38.3	21	28.8	29.2	2,357	33.2	35.3	26.1
Unknown	0	0.0	0.2	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	84	100.0	100.0	7,766	100.0	100.0	73	100.0	100.0	7,108	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 73 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: St. Joseph MO Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
Moderate	1	7.7	2.8	14	2.5	0.8	0	0.0	17.9	0	0.0	10.7	16.7
Middle	9	69.2	58.3	307	54.5	54.6	2	66.7	51.3	40	40.0	41.8	56.6
Upper	3	23.1	38.9	242	43.0	44.6	1	33.3	30.8	60	60.0	47.5	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	563	100.0	100.0	3	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
Moderate	1	25.0	13.0	22	14.7	9.0	1	20.0	8.5	60	38.5	7.2	16.7
Middle	0	0.0	50.0	0	0.0	52.6	2	40.0	50.0	50	32.1	49.5	56.6
Upper	3	75.0	37.0	128	85.3	38.4	2	40.0	41.5	46	29.5	43.4	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	150	100.0	100.0	5	100.0	100.0	156	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.3	0	0.0	0.3	0.6
Moderate	0	0.0	20.8	0	0.0	17.1	0	0.0	25.6	0	0.0	23.9	16.7
Middle	0	0.0	64.6	0	0.0	63.4	0	0.0	60.3	0	0.0	58.1	56.6
Upper	0	0.0	14.6	0	0.0	19.5	0	0.0	12.8	0	0.0	17.7	26.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 2019 small business loans in LMI census tracts is below aggregate lending data and the demographic figure, as the bank did not originate any small business loans in such tracts.

The bank’s lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, significant lending gaps with regard to the dispersion of loans among geographies of different income levels were noted, which is consistent with the low penetration levels in LMI tracts.

Table 74 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: St. Joseph MO Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	5.4	0	0.0	8.4	0	0.0	5.1	0	0.0	4.6	5.4
Moderate	1	7.7	13.4	384	13.1	10.4	0	0.0	13.1	0	0.0	13.4	14.3
Middle	7	53.8	48.9	1,569	53.3	46.2	10	66.7	49.8	1,551	87.7	48.7	51.6
Upper	5	38.5	31.9	989	33.6	34.9	5	33.3	30.2	217	12.3	32.8	28.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	1.8	0	0.0	0.5	
Total	13	100.0	100.0	2,942	100.0	100.0	15	100.0	100.0	1,768	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 75 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: St. Joseph MO Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.8	0	0.0	0.2	0	0.0	1.2	0	0.0	0.3	2.2
Middle	6	100.0	74.8	589	100.0	68.4	2	100.0	66.7	60	100.0	48.1	78.9
Upper	0	0.0	24.4	0	0.0	31.4	0	0.0	30.2	0	0.0	51.4	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	1.9	0	0.0	0.2	
Total	6	100.0	100.0	589	100.0	100.0	2	100.0	100.0	60	100.0	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.

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

The bank's lending reflects an adequate penetration among individuals of different income levels and businesses of different sizes. The bank's small business lending reflects good penetration, while adequate penetration is noted in the evaluation of home mortgage lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, as the distribution of loans to LMI borrowers was generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data and comparable to the demographic figure. Comparatively, lending to moderate-income borrowers is below aggregate lending data and comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, although lending to moderate-income borrowers was above aggregate lending and to low-income borrowers was below.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The penetration of 2019 loan originations to low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is above both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, particularly due to a lack of home refinance loans to moderate-income borrowers.

Home Improvement Loans

The borrower distribution of home improvement lending is good. The penetration of 2019 loan originations to low-income borrowers is comparable to aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is above aggregate lending data and comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, particularly due to a lack of home improvement loans to low-income borrowers.

Table 76													
Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: St. Joseph MO Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	3	7.5	9.3	292	6.1	5.0	5	21.7	10.5	486	13.7	5.8	21.2
Moderate	13	32.5	23.7	1,398	29.1	17.7	3	13.0	27.1	296	8.3	20.1	17.9
Middle	14	35.0	25.7	1,544	32.2	25.0	6	26.1	23.2	738	20.8	23.9	22.7
Upper	9	22.5	28.5	1,444	30.1	41.0	6	26.1	27.8	1,264	35.6	39.2	38.3
Unknown	1	2.5	12.7	123	2.6	11.3	3	13.0	11.3	763	21.5	11.0	0.0
Total	40	100.0	100.0	4,801	100.0	100.0	23	100.0	100.0	3,547	100.0	100.0	100.0
Refinance Loans													
Low	2	12.5	8.6	45	2.6	4.7	3	9.1	6.4	198	6.9	3.2	21.2
Moderate	0	0.0	17.1	0	0.0	12.8	8	24.2	18.1	555	19.2	11.7	17.9
Middle	8	50.0	22.7	829	48.7	21.3	11	33.3	16.8	895	31.0	14.6	22.7
Upper	6	37.5	35.2	827	48.6	46.4	10	30.3	39.0	1,180	40.9	48.8	38.3
Unknown	0	0.0	16.3	0	0.0	14.7	1	3.0	19.8	56	1.9	21.7	0.0
Total	16	100.0	100.0	1,701	100.0	100.0	33	100.0	100.0	2,884	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.7	0	0.0	4.5	1	11.1	9.4	80	19.0	8.2	21.2
Moderate	3	27.3	18.9	166	30.1	15.0	2	22.2	14.1	37	8.8	9.8	17.9
Middle	4	36.4	25.5	127	23.0	21.2	4	44.4	18.0	250	59.4	13.3	22.7
Upper	2	18.2	37.7	172	31.2	46.4	2	22.2	50.8	54	12.8	62.3	38.3
Unknown	2	18.2	12.3	86	15.6	12.8	0	0.0	7.8	0	0.0	6.5	0.0
Total	11	100.0	100.0	551	100.0	100.0	9	100.0	100.0	421	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	6.0	8.6	337	4.3	4.7	10	13.7	8.7	824	11.6	4.5	21.2
Moderate	21	25.0	20.6	1,677	21.6	15.3	15	20.5	22.7	973	13.7	15.3	17.9
Middle	29	34.5	23.4	2,643	34.0	22.3	24	32.9	20.3	1,953	27.5	18.4	22.7
Upper	25	29.8	30.3	2,890	37.2	40.3	20	27.4	31.8	2,539	35.7	39.8	38.3
Unknown	4	4.8	17.1	219	2.8	17.4	4	5.5	16.5	819	11.5	22.0	0.0
Total	84	100.0	100.0	7,766	100.0	100.0	73	100.0	100.0	7,108	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table 77 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: St. Joseph MO Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	5.6	0	0.0	1.6	1	33.3	7.7	60	60.0	5.9	21.2
Moderate	5	38.5	19.4	113	20.1	10.2	0	0.0	15.4	0	0.0	6.7	17.9
Middle	2	15.4	11.1	121	21.5	8.6	1	33.3	30.8	20	20.0	21.4	22.7
Upper	5	38.5	55.6	319	56.7	72.2	1	33.3	46.2	20	20.0	66.0	38.3
Unknown	1	7.7	8.3	10	1.8	7.3	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	563	100.0	100.0	3	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	11.1	0	0.0	10.5	0	0.0	8.5	0	0.0	5.6	21.2
Moderate	0	0.0	18.5	0	0.0	18.5	2	40.0	28.0	85	54.5	22.7	17.9
Middle	1	25.0	16.7	22	14.7	18.8	2	40.0	25.6	50	32.1	22.5	22.7
Upper	3	75.0	50.0	128	85.3	48.0	1	20.0	31.7	21	13.5	40.8	38.3
Unknown	0	0.0	3.7	0	0.0	4.3	0	0.0	6.1	0	0.0	8.5	0.0
Total	4	100.0	100.0	150	100.0	100.0	5	100.0	100.0	156	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.9
Middle	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.7
Upper	0	0.0	1.0	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	38.3
Unknown	0	0.0	97.9	0	0.0	98.8	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 distribution of 2019 loan originations to businesses with revenues of \$1MM or less is above aggregate lending data and comparable to the percentage of small businesses in the AA.

The bank's lending performance for 2018 reflected penetration levels that were below that of 2019, as the bank's small business lending was comparable to aggregate lending data.

Table 78													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: St. Joseph MO Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	6	46.2	47.2	509	17.3	31.4	11	73.3	46.4	588	33.3	35.0	89.0
Over \$1 Million	7	53.8		2,433	82.7		3	20.0		1,152	65.2		10.1
Revenue Unknown	0	0.0		0	0.0		1	6.7		28	1.6		0.9
Total	13	100.0		2,942	100.0		15	100.0		1,768	100.0		100.0
By Loan Size													
\$100,000 or Less	6	46.2	91.6	369	12.5	30.7	14	93.3	92.7	768	43.4	31.5	
\$100,001 - \$250,000	3	23.1	4.0	486	16.5	16.3	0	0.0	3.5	0	0.0	14.1	
\$250,001 - \$1 Million	4	30.8	4.4	2,087	70.9	53.1	1	6.7	3.8	1,000	56.6	54.3	
Total	13	100.0	100.0	2,942	100.0	100.0	15	100.0	100.0	1,768	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	66.7		224	44.0		11	100.0		588	100.0		
\$100,001 - \$250,000	2	33.3		285	56.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	6	100.0		509	100.0		11	100.0		588	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.													

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 79 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: St. Joseph MO Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	6	100.0	41.7	589	100.0	74.4	2	100.0	46.3	60	100.0	82.4	99.1
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	6	100.0		589	100.0		2	100.0		60	100.0		100.0
By Loan Size													
\$100,000 or Less	4	66.7	81.9	104	17.7	27.5	2	100.0	84.0	60	100.0	33.8	
\$100,001 - \$250,000	1	16.7	10.2	160	27.2	26.9	0	0.0	10.5	0	0.0	31.2	
\$250,001 - \$500,000	1	16.7	7.9	325	55.2	45.6	0	0.0	5.6	0	0.0	35.1	
Total	6	100.0	100.0	589	100.0	100.0	2	100.0	100.0	60	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	66.7		104	17.7		2	100.0		60	100.0		
\$100,001 - \$250,000	1	16.7		160	27.2		0	0.0		0	0.0		
\$250,001 - \$500,000	1	16.7		325	55.2		0	0.0		0	0.0		
Total	6	100.0		589	100.0		2	100.0		60	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.

Community Development Lending

The bank provides a low level of CD loans. The bank originated only one CD loan totaling \$95,000 to an organization that provides community services to LMI individuals and families. While smaller markets may contain less opportunities for loans that meet the typical CD criteria, a review of similarly situated financial institutions in the area, coupled with the bank's lending volumes and tenured branch presence in this market, indicates that reasonable CD lending opportunities exist.

INVESTMENT TEST

The bank's performance under the investment test in the St. Joseph Metropolitan AA is poor. The bank has a poor level of qualified CD investments and grants. The bank also makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AA. For this evaluation, the bank's investment activity consists entirely of six donations totaling \$2,100. The donations were responsive to four area organizations that provide community services to LMI individuals and families.

SERVICE TEST

The bank's performance under the service test in the St. Joseph Metropolitan AA is poor. This conclusion is primarily derived from the low number of CD services performed by bank representatives within the AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates three of its nine branches in the state of Missouri within the AA, along with three full-service ATMs. However, the concentration of branches and ATMs does not compare favorably to the proportion of LMI tracts in 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, there have been no branch openings or closures in the AA.

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 and service offerings in the AA generally mirror that of the overall institution, which are described in the overall Retail Banking Services section of this evaluation.

TABLE 80 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES ST. JOSEPH 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	0.0	66.7	33.3	0.0	100.0	3.2	22.6	54.8	19.4	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	66.7	33.3	0.0	100.0	3.2	22.6	54.8	19.4	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	3		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development		Revitalization & Stabilization		Total Services		Total Organizations			
	1	0	0		0		1		1			
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides a limited level of CD services. As illustrated in Table 80, only one CD service was provided to an area organization. A bank representative provided their financial expertise as a board member for an agency that provides community services for LMI individuals and families. Specifically, the organization provides rental assistance for low-income residents to help them find affordable housing in the area.

**NORTHWEST MISSOURI AA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHWEST MISSOURI AA

The bank's AA is comprised of Atchison, Holt, and Nodaway Counties in their entirety. Refer to Appendix C for a map of the AA.

- The AA was expanded since the prior evaluation to include Holt County in its entirety. This added three additional census tracts to the AA, which now includes ten total census tracts (eight middle- and two upper-income).
- The bank operates three branches within the AA, all of which are located in middle-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 20.1 percent market share, ranking 2nd out of 8 FDIC-insured depository institutions operating in the AA.
- One community contact was conducted for this evaluation to help ascertain relevant information regarding the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting such needs. The contact was a representative of a local government agency that possessed direct knowledge of the area's economic needs.

TABLE 81 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Northwest Missouri AA	33,967	33,241	(2.1)
Atchison County, MO	5,685	5,440	(4.3)
Holt County, MO	4,912	4,615	(6.0)
Nodaway County, MO	23,370	23,186	(0.8)
NonMSA Missouri	1,556,057	1,550,288	(0.4)
Missouri	5,988,927	6,045,448	0.9

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- The population decline experienced by the AA was at a greater rate than that of other nonmetropolitan areas in the state.

**TABLE 82
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Northwest Missouri AA	58,103	53,153	(8.5)
Atchison County, MO	59,547	57,526	(3.4)
Holt County, MO	52,632	54,469	3.5
Nodaway County, MO	60,144	52,536	(12.6)
NonMSA Missouri	49,277	48,341	(1.9)
Missouri	62,790	60,809	(3.2)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The AA’s MFI is higher than other nonmetropolitan areas in the state, indicating higher paying employment wages in the AA.
- The percentage of AA families living below the poverty line, at 12.4 percent, is lower than other nonmetropolitan areas of the state at 14.2 percent.

**TABLE 83
HOUSING COST BURDEN**

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northwest Missouri AA	70.5	28.1	39.9	53.0	27.8	17.2
Atchison County, MO	58.9	2.5	21.8	47.1	32.8	18.3
Holt County, MO	52.0	7.8	24.1	57.8	23.1	17.0
Nodaway County, MO	74.3	36.8	45.9	54.3	27.0	16.8
NonMSA Missouri	68.5	30.9	38.7	57.1	28.3	19.3
Missouri	74.3	31.1	42.4	61.3	32.9	20.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The median age of housing stock in the AA, at 55 years, is notably higher than the other nonmetropolitan statewide figure and the overall statewide figure of 38 years and 40 years, respectively.
- A community contact indicated that affordable housing remains a top need in Nodaway County. This is reflected in the table above, as Nodaway County reports the highest rent cost burden in the AA, along with exceeding the overall statewide figure.

TABLE 84 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Northwest Missouri AA	4.6	4.4	3.4	2.7	3.1
Atchison County, MO	4.5	4.6	3.5	2.5	3.7
Holt County, MO	3.6	3.2	2.9	2.3	2.8
Nodaway County, MO	4.9	4.7	3.6	2.9	3.0
NonMSA Missouri	5.9	5.5	4.4	3.7	4.0
Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA have consistently remained below the unemployment figures reported in other nonmetropolitan areas of the state and the overall statewide level.
- The AA’s primary employment industries are manufacturing and healthcare and social assistance. The top employers are in healthcare (Mosaic Life Care) and advanced manufacturing (Boehringer Ingelheim).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHWEST MISSOURI AA

LENDING TEST

The bank’s performance under the lending test in the Northwest Missouri AA is adequate. For this evaluation, the bank’s home mortgage and small farm lending were generally weighted equally due to both product lines comprising the largest volume of loans. Small business lending received the least consideration given the bank’s low lending volume. Additionally, multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans were not evaluated as part of the bank’s home mortgage lending due to insufficient volume to conduct a meaningful analysis.

Lending Activity

The bank’s lending activities reflect adequate responsiveness to AA credit needs. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank’s flexible lending products is discussed in the overall Lending Activity section of this evaluation.

For this evaluation, the total loans in the AA included 84 small farm, 79 home mortgage, and 18 small business loans originated during the two-year period between January 1, 2018 and December 31, 2019. The loan products and origination volumes appear consistent with the general credit needs of the AA and align with the bank’s strategic focus in the area.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. The bank's home mortgage, small farm, and small business lending each reflects adequate penetration among geographies of different income levels. As discussed above, the AA includes only middle- and upper-income census tracts.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2019 home mortgage loans among middle-income census tracts is comparable to aggregate lending data and the demographic figure. The penetration of home mortgage lending in upper-income tracts is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, as the distribution of loans was generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2019 home purchase loans among middle-income census tracts is comparable to aggregate lending data but below the demographic figure. Lending in upper-income census tracts is above aggregate lending data but below the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019, as the distribution of loans was generally comparable to aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2019 home refinance loans among middle-income census tracts is comparable to both aggregate lending data and the demographic figure. However, lending in upper-income census tracts is below both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were generally consistent with 2019, although lending in upper-income census tracts was above aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The distribution of 2019 home improvement loans among middle-income census tracts is above aggregate lending data and the demographic figure. Comparatively, lending in upper-income census tracts is below aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were generally consistent with 2019, although lending in upper-income census tracts was above aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 85 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Northwest MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	85.7	93.0	666	96.7	92.0	8	66.7	87.7	821	60.6	86.5	77.1
Upper	1	14.3	6.4	23	3.3	7.4	4	33.3	12.1	534	39.4	13.2	22.9
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	0.3	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	689	100.0	100.0	12	100.0	100.0	1,355	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	16	88.9	94.4	736	85.4	93.6	15	93.8	79.7	721	98.6	81.8	77.1
Upper	2	11.1	4.9	126	14.6	5.6	1	6.3	19.2	10	14	15.8	22.9
Unknown	0	0.0	0.7	0	0.0	0.8	0	0.0	1.1	0	0.0	2.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	862	100.0	100.0	16	100.0	100.0	731	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	85.7	96.2	187	94.9	99.0	6	100.0	73.9	237	100.0	73.7	77.1
Upper	1	14.3	3.8	10	5.1	1.0	0	0.0	21.7	0	0.0	22.5	22.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.3	0	0.0	3.9	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	197	100.0	100.0	6	100.0	100.0	237	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	95.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	35	87.5	93.7	2,171	92.5	93.5	33	84.6	84.7	1,998	78.1	86.7	77.1
Upper	5	12.5	5.8	176	7.5	5.9	6	15.4	14.5	559	21.9	12.3	22.9
Unknown	0	0.0	0.5	0	0.0	0.5	0	0.0	0.8	0	0.0	1.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	40	100.0	100.0	2,347	100.0	100.0	39	100.0	100.0	2,557	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 86 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Northwest MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	85.7	90.9	402	95.9	97.1	3	100.0	75.0	173	100.0	84.2	77.1
Upper	1	14.3	9.1	17	4.1	2.9	0	0.0	25.0	0	0.0	15.8	22.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	419	100.0	100.0	3	100.0	100.0	173	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	85.7	180	100.0	94.7	1	50.0	82.4	46	75.4	80.6	77.1
Upper	0	0.0	14.3	0	0.0	5.3	1	50.0	11.8	15	24.6	8.0	22.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	5.9	0	0.0	11.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	180	100.0	100.0	2	100.0	100.0	61	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	77.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FIEEC 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 2019 small business loans among middle-income census tracts is comparable to aggregate lending data and the demographic figure. Lending in upper-income census tracts is above aggregate lending data, as well as the demographic figure.

The bank's lending performance for 2018 reflected penetration levels that were consistent with 2019.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 87 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Northwest MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	100.0	89.5	656	100.0	94.6	5	71.4	79.3	205	67.9	90.3	80.8
Upper	0	0.0	8.7	0	0.0	3.6	2	28.6	18.6	97	32.1	8.2	19.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.8	0	0.0	1.7	0	0.0	2.1	0	0.0	1.5	
Total	11	100.0	100.0	656	100.0	100.0	7	100.0	100.0	302	100.0	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.

Small Farm Lending

The geographic distribution of small farm lending is adequate. The distribution of 2019 small farm loans among middle-income census tracts is comparable to aggregate lending data and the demographic figure. Lending in upper-income census tracts is above aggregate lending data, as well as the demographic figure.

The bank’s lending performance for 2018 reflected penetration levels that were generally consistent with 2019, although lending in upper-income census tracts was below aggregate lending data and the demographic figure.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Table 88 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Northwest MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$(000)	#	#%	#%	\$(000)	%	\$(000)	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	45	97.8	88.9	4,854	99.0	93.1	18	47.4	65.3	1,808	46.6	67.3	66.2
Upper	1	2.2	10.3	50	1.0	6.5	20	52.6	34.3	2,069	53.4	32.3	33.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.5	0	0.0	0.4	0	0.0	0.3	
Total	46	100.0	100.0	4,904	100.0	100.0	38	100.0	100.0	3,877	100.0	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.

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

The bank’s lending reflects excellent penetration among individuals of different income levels and businesses and farms of different sizes. The bank’s small farm and small business lending reflects excellent penetration levels, followed by good penetration for home mortgage lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The penetration of 2019 loan originations among low-income borrowers is above aggregate lending data but below the demographic figure. Lending among moderate-income borrowers is above aggregate lending data and comparable to the demographic figure.

The bank’s lending performance for 2018 reflected penetration levels below that of 2019, as the distribution of loans to LMI borrowers was generally comparable to aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The penetration of 2019 loan originations among low-income borrowers is above aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, as the distribution of loans to low-income borrowers was below aggregate lending data.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The penetration of 2019 loan originations among low-income borrowers is above aggregate lending data and comparable to the demographic figure. Lending to moderate-income borrowers is above both aggregate lending data and the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, as no home refinance loans were originated to low-income borrowers.

Home Improvement Loans

The borrower distribution of home improvement lending is good. While the bank did not originate any home improvement loans to low-income borrowers in 2019, this performance is considered comparable to aggregate lending data but below the demographic figure. Lending to moderate-income borrowers is above aggregate lending data and comparable to the demographic figure.

The bank's lending performance for 2018 reflected penetration levels below that of 2019, as the distribution of loans to moderate-income borrowers was below aggregate lending data and the demographic figure.

Table 89													
Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Northwest MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.4	0	0.0	1.9	1	8.3	2.1	39	2.9	0.8	16.7
Moderate	1	14.3	20.4	23	3.3	14.9	2	16.7	17.3	275	20.3	13.2	16.4
Middle	3	42.9	25.5	333	48.3	24.0	5	41.7	22.8	342	25.2	20.8	21.7
Upper	3	42.9	40.1	333	48.3	48.7	2	16.7	42.0	520	38.4	50.5	45.1
Unknown	0	0.0	10.6	0	0.0	10.5	2	16.7	15.7	179	13.2	14.7	0.0
Total	7	100.0	100.0	689	100.0	100.0	12	100.0	100.0	1,355	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.2	0	0.0	3.0	3	18.8	4.4	185	25.3	2.3	16.7
Moderate	3	16.7	16.2	119	13.8	13.3	4	25.0	9.9	108	14.8	5.4	16.4
Middle	4	22.2	21.1	128	14.8	17.7	1	6.3	15.9	70	9.6	14.0	21.7
Upper	11	61.1	46.5	615	71.3	52.9	8	50.0	55.5	368	50.3	66.7	45.1
Unknown	0	0.0	12.0	0	0.0	13.1	0	0.0	14.3	0	0.0	11.6	0.0
Total	18	100.0	100.0	862	100.0	100.0	16	100.0	100.0	731	100.0	100.0	100.0
Home Improvement Loans													
Low	1	14.3	3.8	10	5.1	1.0	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	0	0.0	19.2	0	0.0	17.3	1	16.7	8.7	15	6.3	6.1	16.4
Middle	2	28.6	23.1	60	30.5	24.9	1	16.7	26.1	25	10.5	18.4	21.7
Upper	4	57.1	42.3	127	64.5	45.6	4	66.7	60.9	197	83.1	71.6	45.1
Unknown	0	0.0	11.5	0	0.0	11.3	0	0.0	4.3	0	0.0	3.9	0.0
Total	7	100.0	100.0	197	100.0	100.0	6	100.0	100.0	237	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	2.5	3.3	10	0.4	1.8	4	10.3	2.7	224	8.8	1.2	16.7
Moderate	5	12.5	18.4	322	13.7	13.1	7	17.9	14.1	398	15.6	9.1	16.4
Middle	10	25.0	23.0	548	23.3	20.1	8	20.5	20.2	452	17.7	16.1	21.7
Upper	24	60.0	41.2	1,467	62.5	46.2	18	46.2	47.6	1,304	51.0	50.8	45.1
Unknown	0	0.0	14.0	0	0.0	18.7	2	5.1	15.5	179	7.0	22.8	0.0
Total	40	100.0	100.0	2,347	100.0	100.0	39	100.0	100.0	2,557	100.0	100.0	100.0
<p><i>Source: 2019 FFIEC Census Data</i></p> <p><i>2011-2015 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Percentages may not total 100.0 percent due to rounding.</i></p> <p><i>Multifamily loans are not included in the borrower distribution analysis.</i></p>													

Table 90 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Northwest MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	0	0.0	9.1	0	0.0	8.0	0	0.0	0.0	0	0.0	0.0	16.4
Middle	1	14.3	18.2	27	6.4	13.5	0	0.0	12.5	0	0.0	10.9	21.7
Upper	6	85.7	72.7	392	93.6	78.5	3	100.0	87.5	173	100.0	89.1	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	419	100.0	100.0	3	100.0	100.0	173	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	5.9	0	0.0	6.6	16.7
Moderate	1	100.0	28.6	180	100.0	28.5	0	0.0	17.6	0	0.0	12.4	16.4
Middle	0	0.0	14.3	0	0.0	19.7	1	50.0	23.5	15	24.6	20.1	21.7
Upper	0	0.0	57.1	0	0.0	51.8	1	50.0	52.9	46	75.4	60.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	180	100.0	100.0	2	100.0	100.0	61	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	45.1
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 excellent. The distribution of 2019 loan originations to businesses with revenues of \$1MM or less is above aggregate lending data and comparable to the percentage of small businesses in the AA.

The bank’s lending performance for 2018 reflected penetration levels that were consistent with 2019.

Table 91													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Northwest MO AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	10	90.9	56.9	482	73.5	29.8	6	85.7	60.7	202	66.9	30.0	89.2
Over \$1 Million	1	9.1		174	26.5		1	14.3		100	33.1		7.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		3.8
Total	11	100.0		656	100.0		7	100.0		302	100.0		100.0
By Loan Size													
\$100,000 or Less	10	90.9	95.2	482	73.5	48.9	7	100.0	95.2	302	100.0	38.6	
\$100,001 - \$250,000	1	9.1	3.6	174	26.5	24.0	0	0.0	2.1	0	0.0	12.6	
\$250,001 - \$1 Million	0	0.0	1.2	0	0.0	27.2	0	0.0	2.7	0	0.0	48.8	
Total	11	100.0	100.0	656	100.0	100.0	7	100.0	100.0	302	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	10	100.0		482	100.0		6	100.0		202	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	10	100.0		482	100.0		6	100.0		202	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.

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of 2019 loan originations to farms with revenues of \$1MM or less is above aggregate lending data and comparable to the percentage of small farms in the AA.

The bank’s lending performance for 2018 reflected penetration levels that were consistent with 2019, as the distribution of loans was above aggregate lending data. Further support for the bank’s excellent lending performance is attributed to 80 of the bank’s 84 small farms loans being originated to farms with \$1MM or less in annual revenue over the two-year review period, demonstrating excellent responsiveness to the credit needs of smaller farming operations.

Table 92 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Northwest MO AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	44	95.7	41.2	4,799	97.9	60.7	36	94.7	50.8	3,377	87.1	83.3	99.3
Over \$1 Million	1	2.2		60	1.2		2	5.3		500	12.9		0.7
Revenue Unknown	1	2.2		45	0.9		0	0.0		0	0.0		0.0
Total	46	100.0		4,904	100.0		38	100.0		3,877	100.0		100.0
By Loan Size													
\$100,000 or Less	31	67.4	80.7	1,304	26.6	28.2	25	65.8	80.2	929	24.0	26.8	
\$100,001 - \$250,000	8	17.4	13.6	1,285	26.2	38.2	7	18.4	12.9	890	23.0	33.8	
\$250,001 - \$500,000	7	15.2	5.8	2,315	47.2	33.6	6	15.8	6.9	2,058	53.1	39.4	
Total	46	100.0	100.0	4,904	100.0	100.0	38	100.0	100.0	3,877	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	29	65.9		1,199	25.0		24	66.7		829	24.5		
\$100,001 - \$250,000	8	18.2		1,285	26.8		7	19.4		890	26.4		
\$250,001 - \$500,000	7	15.9		2,315	48.2		5	13.9		1,658	49.1		
Total	44	100.0		4,799	100.0		36	100.0		3,377	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 provides a low level of CD loans. For this evaluation, the bank originated only one CD loan totaling \$14,000 in the AA. The loan was made to an area non-profit organization located in a distressed, middle-income census tract that provides health and community services to senior citizens in need. The loan was in response to the COVID-19 pandemic and was essential in providing funding for the retention of jobs in support of the organization's ongoing operations.

INVESTMENT TEST

The bank's performance under the investment test in the Northwest Missouri AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits adequate responsiveness to the credit and CD needs of its AA. For this evaluation, the bank reports one prior

period MBS investment totaling \$60,100. Additionally, the bank's donation volume in the AA was comprised of five donations totaling \$4,000. Examples of the bank's donation activities include:

- A total of \$2,000 was donated to an area economic development organization that provides an array of initiatives to connect small businesses to financing options, as well as workforce development and growth.
- Three donations totaling \$2,000 were made to an area organization that provides an array of community services targeted to LMI youth, including mentoring and educational programs.

SERVICE TEST

The bank's performance under the service test in the Northwest Missouri AA is adequate.

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 three branches and four full-service ATMs in the AA, all of which are located in middle-income census tracts. The concentration of branches and ATMs compares favorably to the proportion of census tracts in 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 closed one branch in the AA that was located in a middle-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. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are described in the overall Retail Banking Services section of this evaluation.

TABLE 93 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES NORTHWEST MISSOURI 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	0.0	100.0	0.0	0.0	100.0	0.0	0.0	80.0	20.0	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	100.0	0.0	0.0	100.0	0.0	0.0	80.0	20.0	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	3		0	1			0	0	(1)	0	0	(1)
Community Development Services	Affordable Housing		Community Services	Economic Development			Revitalization & Stabilization		Total Services		Total Organizations	
	0		3	0			0		3		1	
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services. One bank representative served annually throughout the evaluation period as a board member for an area organization that provides community services for LMI individuals and families.

**OTHER MISSOURI NONMETROPOLITAN ASSESSMENT AREAS
(Limited-Scope Reviews)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE MISSOURI
NONMETROPOLITAN AREAS**

NORTH CENTRAL MISSOURI AA

The bank's AA is comprised of Carroll and Livingston Counties in their entirety. Refer to Appendix C for a map of the AA.

- The AA consists of eight total census tracts, including one moderate-, four middle-, and three upper-income census tracts.
- Based on 2015 ACS data, the AA population was 24,138, which represents a 1.4 percent decline from the 2010 U.S. Census Bureau data.
- The bank operates two full-service branches in the AA, one of which is located in a moderate-income census tract and the other in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 12.0 percent market share, ranking 4th out of 9 FDIC-insured depository institutions operating in the AA.

NORTHEAST MISSOURI AA

The bank's AA is comprised of Adair County in its entirety. Refer to Appendix C for a map of the AA.

- The AA consists of seven total census tracts, including one moderate-, two middle-, three upper-, and one unknown-income census tract.
- Based on 2015 ACS data, the AA population was 25,560, which represents a negligible decline of 0.2 percent from the 2010 U.S. Census Bureau data.
- The bank operates one full-service branch in the AA, which is located in a moderate-income census tract. The bank also operates two full-service ATMs in the AA, one of which is in a middle-income census tract and the other in an upper-income census tract. Additionally, the bank operates one cash-only ATM in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 21.7 percent market share, ranking 2nd out of 6 FDIC-insured depository institutions operating in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE MISSOURI
NONMETROPOLITAN AREAS**

The two Missouri nonmetropolitan 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. Although the lending test performance in both AAs helped to bolster overall lending test performance, the conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
North Central Missouri AA	Exceeds	Below	Consistent
Northeast Missouri AA	Exceeds	Exceeds	Exceeds

STATE OF NEW MEXICO

CRA RATING FOR NEW MEXICO:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

High Satisfactory

High Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to credit and CD needs throughout its New Mexico AAs.

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing of 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 provides an adequate level of CD services within its New Mexico AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of New Mexico was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Taos County New Mexico AA, while a limited-scope review was conducted for the Albuquerque New Mexico Metropolitan AA, to ascertain if the bank's performance in the AA was

generally consistent with its performance in the overall state evaluation. Performance in the Taos County AA was weighted more in the overall state rating, given the bank's larger branch presence, as well as a larger composition of loans and deposits, although not by a considerable amount. The following analysis will highlight where performance in the limited-scope AA had a favorable impact on the overall state conclusion. Additionally, small farm lending is not included in the geographic and borrower evaluation of loans considered in the state due to volumes insufficient to conduct a meaningful analysis.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NEW MEXICO

The bank delineates 2 of its 20 AAs and operates 5 of 90 branches in the state of New Mexico. This evaluation of New Mexico is the first for the bank, as it recently began operating in these markets through the acquisition of an area financial institution prior to the last evaluation. Loan and deposit products and services offered in the state generally mirror those discussed in the overall institution section of this report. Detailed descriptions of the bank's operations are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

The bank's performance under the lending test in the state of New Mexico is high satisfactory. Lending test conclusions in the Taos County AA were considered adequate, while the lending performance in the Albuquerque Metropolitan AA exceeded the Taos County AA performance. The bank's performance in the Albuquerque Metropolitan AA positively impacted the overall state rating.

Lending Activity

The bank's lending activities in the state of New Mexico reflect adequate responsiveness to AA credit needs. The volume of loans originated in New Mexico during the evaluation period includes 85 small business, 56 home mortgage, and 1 small farm loan. The bank makes limited 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 Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within New Mexico reflects good penetration throughout the AAs. Adequate penetration was noted in the Taos County AA, while penetration levels in the Albuquerque Metropolitan AA were above the performance in the full-scope AA and had a positive impact on the state geographic distribution conclusion.

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

The bank’s lending within New Mexico has an overall adequate penetration among individuals of different income levels and businesses of different sizes. Good penetration was noted in the Taos County AA, while the penetration of loans in the Albuquerque Metropolitan AA was below this performance and is reflected in the conclusive rating.

Community Development Lending

In the state of New Mexico, the bank provides a relatively high level of CD loans. The bank originated six CD loans totaling \$10.9MM in the two AAs. The bank originated one CD loan in the Taos County AA, which is considered adequate given that CD lending in amounts of greater than \$1.0MM or for multifamily residential properties are generally less prevalent in rural communities. CD lending in the more densely populated Albuquerque Metropolitan AA included five loans totaling \$9.9MM, which was above the performance of the full-scope reviewed AA and had a positive impact on the overall state rating given the large volume. As Table 94 illustrates, CD lending in the state was most responsive to area small businesses that met the size and purpose test criteria for activities that support economic development.

TABLE 94 COMMUNITY DEVELOPMENT LOANS STATE OF NEW MEXICO		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	0	0
Economic Development	5	10,835
Revitalization and Stabilization	1	69
TOTAL LOANS	6	10,904

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of New Mexico is high satisfactory. The investment test conclusions in the Taos County AA are considered good, which is consistent with the overall state rating.

The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position based on performance in the Taos County AA. While the bank makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs.

**TABLE 95
INVESTMENTS, GRANTS, AND DONATIONS
STATE OF NEW MEXICO**

Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	293	1	300	0	0	2	593
Community Services	0	0	0	0	9	23	9	23
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	1	293	1	300	9	23	11	616

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s performance under the service test in the state of New Mexico is low satisfactory. The service test conclusions in the Taos County AA are considered adequate, which is consistent with the overall state rating. Similar performance was noted in the bank’s Albuquerque Metropolitan AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in each AA. The bank operates five full-service branches and four full-service ATMs throughout the state, all of which are located in middle-income census tracts.

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. As discussed, the bank acquired the current branches in the acquisition of another financial institution. There were no additional branch openings since the prior evaluation, while one full-service branch and one stand-alone, full-service ATM was closed in middle-income 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. The bank’s hours of operation and products and service offerings generally mirror that with the description of services indicated in the overall Retail Banking Services section of this report.

Community Development Services

The bank provides an adequate level of CD services in its New Mexico AAs. The bank performed three CD services, including two in the Taos County AA and one in the Albuquerque Metropolitan AA. The services were comprised of activities supporting organizations that provide community services to LMI individuals and families.

**TAOS COUNTY AA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE TAOS COUNTY AA

The bank's AA is comprised of Taos County in its entirety (see Appendix C for an AA map).

- The AA is comprised of six total census tracts, including one moderate- and five middle-income census tracts.
- The bank operates four full-service branches within the AA, all of which are located in middle-income census tracts. The bank also operates two full-service ATMs, also located in middle-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held a 26.4 percent market share of deposits in the AA, ranking 3rd out of 3 FDIC-insured financial institutions with offices operating in the AA.
- One recent community contact conducted as part of the public evaluation of another financial institution in the area was reviewed for information relevant to the bank's CRA performance criterion and to gain a perspective on local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact was a representative of an organization that promotes area economic development.

TABLE 96 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Taos County NM AA	32,937	32,943	0.0
NonMSA New Mexico	688,655	695,182	0.9
New Mexico	2,059,179	2,084,117	1.2

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- As illustrated in Table 96, the population remained relatively stagnant between 2010 and 2015.

TABLE 97 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Taos County NM AA	47,082	45,439	(3.5)
NonMSA New Mexico	50,477	49,356	(2.2)
New Mexico	57,241	55,049	(3.8)

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- As illustrated in Table 97, the AA MFI has a lower value and declined at a faster rate than the statewide figure and other nonmetropolitan areas in the state, indicating lower paying employment wages in the AA.
- The percentage of families living below the poverty line in the AA at 17.1 percent is above the statewide figure at 15.9 percent.

TABLE 98 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Taos County NM AA	75.5	60.0	51.2	55.5	23.9	25.8
NonMSA New Mexico	68.2	38.3	38.5	45.1	23.5	18.1
New Mexico	74.1	48.2	43.9	55.3	34.9	22.1

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The affordability ratio of the AA at 17.1 percent is significantly less affordable when compared to other nonmetropolitan areas in the state at 34.0 percent and the statewide ratio at 28.1 percent.
- According to the community contact, the area is primarily driven by tourism. As such, inflated housing and food costs exist, placing a burden on local residents.

TABLE 99 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Taos County NM AA	9.1	8.3	7.5	6.4	6.0
NonMSA New Mexico	7.0	7.3	6.3	5.1	5.1
New Mexico	6.5	6.6	5.9	4.9	4.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA remained higher than both the overall statewide figure and other nonmetropolitan areas.
- The most common employment sectors in the area are Retail Trade (416 people), Accommodation & Food Services (325 people), and Other Services, Except Public Administration (240 people).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TAOS COUNTY AA

LENDING TEST

The bank's performance under the lending test in the Taos County AA is adequate. The bank's small business and home mortgage lending received equal weighting in the analysis, due to generally similar loan volumes. Additionally, an evaluation of small farm loans, as well as multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans under home mortgage lending was not conducted given the insufficient volume to perform a meaningful analysis.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The volume of loans originated in the AA is comprised of 48 small business, 44 home mortgage, and 1 small farm loans originated during a two-year period between January 1, 2018 and December 31, 2019. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Lending Activity section.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA for both small business and home mortgage lending. As indicated previously, the AA is comprised solely of moderate- and middle-income tracts; as such, only those two census tract categories were evaluated in the analysis of each loan product.

Home Mortgage Lending

The geographic distribution of 2019 and 2018 home mortgage lending is adequate. The distribution of 2019 home mortgage loans among moderate-income tracts was above the aggregate lending data and the percentage of owner-occupied units in such tracts (demographic figure).

The bank's home mortgage lending in 2018 reflected penetration levels below that of 2019 lending, with a distribution of loans comparable to the aggregate lending data. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses in either year.

Home Purchase Loans

The geographic distribution of 2019 and 2018 home purchase lending is poor. The distribution of 2019 home purchase loans among moderate-income tracts was below the aggregate lending data and the demographic figure.

The bank's home purchase lending in 2018 reflected penetration levels that were consistent with the performance of 2019 lending patterns and below the aggregate lending data. Additionally, the dispersion of loans in both years reveals significant gaps that are consistent with the lack of loan distribution among various income levels, particularly the AA's moderate-income tract.

Home Refinance Loans

The geographic distribution of 2019 and 2018 home refinance lending is adequate. The distribution of 2019 home refinance loans among moderate-income tracts was above the aggregate lending data and the demographic figure.

The bank's home refinance lending performance in 2018 was below that of 2019 lending, with no loans originated in moderate-income tracts. Furthermore, the bank's loan dispersion among geographies of different income levels in both years did not reveal any notable gaps or lapses.

Home Improvement Loans

The geographic distribution of 2019 and 2018 home improvement lending is adequate. The distribution of 2019 home improvement loans among moderate-income tracts was below the aggregate lending data and the demographic figure.

The bank's home improvement lending in 2018 reflected penetration levels above that of 2019 lending, with penetration levels that were above the aggregate lending data. The dispersion of loans in both years reveals significant gaps that are consistent with the lack of loan distribution among various income levels, particularly the AA's moderate-income tract.

Table 100
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Taos County NM AA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o d e r a t e	1	10.0	16.2	252	16.0	18.2	0	0.0	13.9	0	0.0	12.6	20.5
M i d d l e	9	90.0	83.8	1,322	84.0	81.8	8	100.0	86.1	2,282	100.0	87.4	79.5
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	10	100.0	100.0	1,574	100.0	100.0	8	100.0	100.0	2,282	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o d e r a t e	0	0.0	20.3	0	0.0	18.8	5	83.3	25.1	1,042	94.6	23.8	20.5
M i d d l e	6	100.0	79.7	450	100.0	81.2	1	16.7	74.9	60	5.4	76.2	79.5
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	6	100.0	100.0	450	100.0	100.0	6	100.0	100.0	1,102	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o d e r a t e	2	66.7	15.4	105	77.8	8.9	0	0.0	20.0	0	0.0	16.3	20.5
M i d d l e	1	33.3	84.6	30	22.2	91.1	5	100.0	80.0	370	100.0	83.7	79.5
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	3	100.0	100.0	135	100.0	100.0	5	100.0	100.0	370	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o d e r a t e	0	0.0	0.0	0	0.0	0.0	1	50.0	33.3	95	69.3	30.6	4.6
M i d d l e	1	100.0	100.0	549	100.0	100.0	1	50.0	66.7	42	30.7	69.4	95.4
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	1	100.0	100.0	549	100.0	100.0	2	100.0	100.0	137	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M o d e r a t e	4	17.4	17.2	382	12.6	17.6	6	28.6	19.3	1,137	29.2	17.6	20.5
M i d d l e	19	82.6	82.8	2,639	87.4	82.4	15	71.4	80.7	2,754	70.8	82.4	79.5
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	23	100.0	100.0	3,021	100.0	100.0	21	100.0	100.0	3,891	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table 101 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Taos County NM AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.1	0	0.0	11.3	0	0.0	25.0	0	0.0	18.2	20.5
Middle	0	0.0	90.9	0	0.0	88.8	0	0.0	75.0	0	0.0	81.8	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	28.6	25	8.0	20.0	0	0.0	17.6	0	0.0	4.6	20.5
Middle	2	66.7	71.4	288	92.0	80.0	0	0.0	82.4	0	0.0	95.4	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	313	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.1	0	0.0	3.1	0	0.0	50.0	0	0.0	61.7	20.5
Middle	0	0.0	92.9	0	0.0	96.9	0	0.0	50.0	0	0.0	38.3	79.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 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 2019 and 2018 small business lending is adequate. The distribution of 2019 small business loans among moderate-income tracts was below the aggregate lending data, as well as the demographic figure.

The distribution of small business loans in 2018 reflected performance that was above that of 2019 lending where lending was more comparable to aggregate lending data as well as the demographic figure. Furthermore, the bank’s loan dispersion among geographies of different income levels in both years did not reveal any notable gaps or lapses.

Table 102													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Taos County NM AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	16.0	15.4	491	16.5	12.6	2	8.7	14.4	1,200	41.2	22.6	17.9
Middle	21	84.0	72.4	2,483	83.5	81.6	21	91.3	74.5	1,716	58.8	71.1	82.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.2	0	0.0	5.8	0	0.0	11.1	0	0.0	6.3	
Total	25	100.0	100.0	2,974	100.0	100.0	23	100.0	100.0	2,916	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 103													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Taos County NM AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	45.9	1	100.0	33.3	120	100.0	76.4	14.3
Middle	0	0.0	33.3	0	0.0	13.5	0	0.0	66.7	0	0.0	23.6	85.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	33.3	0	0.0	40.5	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	120	100.0	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.

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

The bank's lending has a good penetration among individuals of different income levels and businesses of different sizes. The bank's small business lending reflects good penetration, followed by adequate penetration among home mortgage lending.

Home Mortgage Lending

The borrower distribution of 2019 and 2018 home mortgage lending is adequate. The penetration of 2019 loans among low-income borrowers was below the aggregate lending data and the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data but below the demographic figure.

The penetration levels of 2018 home mortgage lending was consistent with that of 2019 performance, with a distribution of loans generally comparable to the aggregate lending data.

For all home mortgage lending, the analysis considered the high cost of housing in the AA, as well as the large number of second homes as factors that impede the bank's ability to originate loans to low- and moderate-income borrowers.

Home Purchase Loans

The borrower distribution of 2019 and 2018 home purchase lending is adequate. The penetration of 2019 loans among low-income borrowers was below the aggregate lending data, as well as the demographic figure. Lending to moderate-income borrowers was comparable to both the aggregate lending data and the demographic figure.

The penetration levels of 2018 home purchase lending was consistent with that of 2019 performance, with a distribution of loans generally comparable to the aggregate lending data.

Home Refinance Loans

The borrower distribution of 2019 and 2018 home refinance lending is adequate. The penetration of 2019 loans among LMI borrowers was below the aggregate lending data and the demographic figure, as the bank did not originate a loan to a LMI borrower.

The penetration levels of 2018 home refinance lending was above that of 2019 performance. Given the equal lending volumes in both years, the performance over the two-year analysis is adequate.

Home Improvement Loans

The borrower distribution of 2019 and 2018 home improvement lending is adequate. The bank did not originate any home improvement loans to low-income borrowers in 2019; however, this was comparable to aggregate lending data but below the demographic figure. Lending to moderate-income

borrowers consisted of one origination which was above aggregate lending data and the demographic figure.

The penetration levels of 2018 home improvement lending was below the performance of 2019 lending, as the bank did not originate any home improvement loans to LMI borrowers.

Table 104 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Taos County NM AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Lo w	0	0.0	1.2	0	0.0	0.7	0	0.0	2.3	0	0.0	0.9	26.0
Mo d e r a t e	1	10.0	9.7	103	6.5	5.0	1	12.5	10.7	115	5.0	6.2	15.5
M i d d l e	1	10.0	22.7	58	3.7	18.9	1	12.5	19.4	190	8.3	14.2	22.5
U p p e r	8	80.0	57.9	1,413	89.8	68.5	6	75.0	59.9	1,977	86.6	68.9	36.0
U n k n o w n	0	0.0	8.4	0	0.0	6.9	0	0.0	7.8	0	0.0	9.8	0.0
T o t a l	10	100.0	100.0	1,574	100.0	100.0	8	100.0	100.0	2,282	100.0	100.0	100.0
Refinance Loans													
Lo w	1	16.7	7.8	16	3.6	3.4	0	0.0	2.2	0	0.0	1.0	26.0
Mo d e r a t e	1	16.7	13.7	130	28.9	10.4	0	0.0	14.3	0	0.0	8.9	15.5
M i d d l e	1	16.7	17.6	10	2.2	15.0	0	0.0	18.4	0	0.0	16.8	22.5
U p p e r	2	33.3	49.0	69	15.3	59.4	4	66.7	50.7	772	70.1	59.2	36.0
U n k n o w n	1	16.7	11.8	225	50.0	11.9	2	33.3	14.3	330	29.9	14.0	0.0
T o t a l	6	100.0	100.0	450	100.0	100.0	6	100.0	100.0	1,102	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	7.7	0	0.0	24.8	0	0.0	0.0	0	0.0	0.0	26.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	1	20.0	10.0	50	13.5	7.9	15.5
M i d d l e	0	0.0	15.4	0	0.0	13.9	2	40.0	15.0	195	52.7	17.1	22.5
U p p e r	2	66.7	69.2	105	77.8	58.7	1	20.0	70.0	25	6.8	67.8	36.0
U n k n o w n	1	33.3	7.7	30	22.2	2.5	1	20.0	5.0	100	27.0	7.2	0.0
T o t a l	3	100.0	100.0	135	100.0	100.0	5	100.0	100.0	370	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	1	4.5	3.6	16	0.6	1.8	0	0.0	2.4	0	0.0	1.1	26.0
Mo d e r a t e	2	9.1	10.6	233	9.4	6.5	2	10.5	11.4	165	4.4	7.1	15.5
M i d d l e	3	13.6	20.5	106	4.3	16.9	3	15.8	18.8	385	10.3	15.0	22.5
U p p e r	14	63.6	54.2	1,862	75.3	63.1	11	57.9	55.5	2,774	73.9	64.5	36.0
U n k n o w n	2	9.1	11.0	255	10.3	11.6	3	15.8	11.9	430	11.5	12.4	0.0
T o t a l	22	100.0	100.0	2,472	100.0	100.0	19	100.0	100.0	3,754	100.0	100.0	100.0
<i>Source: 2019 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.</i>													

Table 105 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Taos County NM AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	18.2	0	0.0	27.8	0	0.0	0.0	0	0.0	0.0	26.0
Moderate	0	0.0	18.2	0	0.0	17.4	0	0.0	0.0	0	0.0	0.0	15.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.5
Upper	0	0.0	63.6	0	0.0	54.9	0	0.0	100.0	0	0.0	100.0	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	11.8	0	0.0	7.4	26.0
Moderate	0	0.0	7.1	0	0.0	6.6	0	0.0	0.0	0	0.0	0.0	15.5
Middle	1	33.3	42.9	38	12.1	21.7	0	0.0	35.3	0	0.0	15.6	22.5
Upper	2	66.7	50.0	275	87.9	71.7	0	0.0	47.1	0	0.0	74.9	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	5.9	0	0.0	2.1	0.0
Total	3	100.0	100.0	313	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.0
Moderate	0	0.0	7.1	0	0.0	7.3	0	0.0	0.0	0	0.0	0.0	15.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.5
Upper	0	0.0	7.1	0	0.0	0.0	0	0.0	10.0	0	0.0	17.7	36.0
Unknown	0	0.0	85.7	0	0.0	92.7	0	0.0	90.0	0	0.0	82.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 2019 and 2018 small business lending is good. The distribution of 2019 loans to businesses with revenues of \$1MM or less (small businesses) was above the aggregate lending data by number volume and comparable by dollar volume, while comparable to the relative proportion of small businesses in the AA.

The distribution of 2018 loans reflect penetration levels consistent with 2019 lending performance, although lending to small businesses was above the aggregate lending data.

Table 106													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Taos County NM AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	21	84.0	44.1	2,558	86.0	45.0	21	91.3	41.9	1,716	58.8	49.3	92.1
Over \$1 Million	3	12.0		406	13.7		2	8.7		1,200	41.2		6.4
Revenue Unknown	1	4.0		10	0.3		0	0.0		0	0.0		1.5
Total	25	100.0		2,974	100.0		23	100.0		2,916	100.0		100.0
By Loan Size													
\$100,000 or Less	17	68.0	96.7	731	24.6	47.6	17	73.9	96.9	747	25.6	51.0	
\$100,001 - \$250,000	4	16.0	2.0	670	22.5	16.5	4	17.4	2.1	684	23.5	17.0	
\$250,001 - \$1 Million	4	16.0	1.4	1,573	52.9	35.9	2	8.7	1.0	1,485	50.9	32.0	
Total	25	100.0	100.0	2,974	100.0	100.0	23	100.0	100.0	2,916	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	14	66.7		615	24.0		17	81.0		747	43.5		
\$100,001 - \$250,000	4	19.0		670	26.2		3	14.3		484	28.2		
\$250,001 - \$1 Million	3	14.3		1,273	49.8		1	4.8		485	28.3		
Total	21	100.0		2,558	100.0		21	100.0		1,716	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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>													

NOTE: The following table is included for informational purposes, as the bank’s small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 107 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Taos County NM AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	66.7	0	0.0	54.1	1	100.0	66.7	120	100.0	79.6	97.6
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		1	100.0		120	100.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	100.0	0	0.0	100.0	0	0.0	66.7	0	0.0	23.6	
\$100,001 - \$250,000	0	0.0	0.0	0	0.0	0.0	1	100.0	33.3	120	100.0	76.4	
\$250,001 - \$500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	120	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		1	100.0		120	100.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		120	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.													

Community Development Lending

The bank makes an adequate level of CD loans in this AA. The bank originated one CD loan totaling \$1.0MM to a facility that supports area economic development needs. Additionally, while the activities of the organization meet CD criteria for economic development, the facility also provides housing for LMI residents.

While CD lending in the AA is relatively low in comparison to other full-scope reviewed AAs, it is recognized that CD lending opportunities in rural communities are less prevalent. Specifically, loans for multifamily residential housing and loans in excess of the required \$1MM CRA data-reporting threshold to be considered for CD qualification may be in less demand than in more populated markets. As such, the bank’s efforts to meet area CD lending needs is adequate.

INVESTMENT TEST

The bank's performance under the investment test in the Taos County 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 rare use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

The bank's investment portfolio in the AA is comprised entirely of donations, including eight donations totaling \$22,000 to eight area organizations that provide community services to LMI individuals and families. Given the rural composition of the AA and generally limited opportunities for larger investment vehicles, the dollar volume of donations conveyed in the Taos community is considered significant and reflects good responsiveness to such needs. Examples of donation activities include:

- A donation totaling \$10,000 was awarded to an area organization that distributes funding to area charitable organizations that provide services to LMI individuals and families.
- A \$4,400 in-kind donation was awarded to an area educational institution for technology needs. The organization predominantly serves a greater than 50.0 percent population of youth that are eligible for free or reduced lunches under the NLSP.

SERVICE TEST

The bank's performance under the service test in the Taos County AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four full-service branches in the AA, all located in middle-income tracts, which comprised five of six census tracts in the AA. Additionally, two of four branches are situated in a concentrated area that is less than one mile from the AA's only moderate-income tract. The bank also operates full-service ATMs at each branch location and one off-site full-service ATM.

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. There have been no new branches opened since the bank entered the market through its acquisition, and one full-service branch was closed in a middle-income tract. The closing had minimal impact on the accessibility of bank services, as two full-service offices remain within three miles from the closed location.

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 in the AA generally mirror those of the institution, as discussed in the overall Retail Banking Services section of this report.

TABLE 108 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES TAOS COUNTY 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	0.0	100.0	0.0	0.0	100.0	0.0	16.7	83.3	0.0	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	100.0	0.0	0.0	100.0	0.0	16.7	83.3	0.0	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	4		0	1			0	0	(1)	0	0	(1)
Community Development Services	Affordable Housing	Community Services	Economic Development		Revitalization & Stabilization	Total Services	Total Organizations					
	0	2	0		0	2	2					
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services in the AA. Two bank representatives provided services to two area organizations, both of which relate to youth education and contain greater than 50.0 percent of its student population as eligible for free or reduced lunches under the NLSP.

**OTHER NEW MEXICO METROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE NEW MEXICO METROPOLITAN AREA

ALBUQUERQUE METROPOLITAN AA

The bank's AA is comprised of Bernalillo County in its entirety, which is one of four counties that comprise the Albuquerque, New Mexico MSA. Refer to Appendix C for a map of the AA.

- The AA consists of 153 total census tracts, including 10 low-, 46 moderate-, 44 middle-, 51 upper-, and 2 unknown-income census tracts.
- Based on 2015 ACS estimate data, the population of the AA is 673,943, which represents a 1.7 percent increase based on 2010 U.S. Census Bureau data.
- The bank operates one branch in the AA, which is located in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held a 0.3 percent market share of deposits in the AA, ranking 17th out of 22 FDIC-insured financial institutions with offices operating in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE NEW MEXICO METROPOLITAN AREA

The one New Mexico metropolitan AA listed in the table below was 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 did positively impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Albuquerque Metropolitan AA	Exceeds	Below	Consistent

STATE OF TEXAS

CRA RATING FOR TEXAS:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes limited 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 among businesses of different sizes is adequate.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits adequate responsiveness to the credit and CD needs throughout its Texas AAs.

Service Test

- The bank's delivery systems are reasonably 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 provides an adequate level of CD services within its Texas AAs and is responsive to its available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Texas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Dallas Metropolitan AA, and the overall state rating was based predominantly on the bank's performance in this AA. Additionally, a limited-scope review was conducted for the Austin Metropolitan AA to ascertain if the bank's performance in the AA was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS

The bank delineates 2 of its 20 AAs and operates 2 of its 90 branches in the state of Texas. 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 small business lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the lending test in the state of Texas is low satisfactory. The rating was derived from an adequate lending test conclusion in the Dallas Metropolitan AA, which is consistent with the overall state rating. The bank's performance in the Austin Metropolitan AA also is consistent with the state rating.

Lending Activity

The bank's lending activities in the state of Texas reflect adequate responsiveness to AA credit needs. The evaluation of loans in the state includes 9 home mortgage loans and 83 small business loans originated between January 1, 2018 and December 31, 2019. There were zero small farm loans originated in the state during the evaluation period. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Loan products and origination volumes appear consistent with the credit needs of the Texas AAs. A description of flexible lending programs is detailed in the overall institutional Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Texas reflects adequate penetration. Adequate penetration also was noted in the Dallas Metropolitan AA, while penetration levels in the Austin Metropolitan AA were above the performance in the full-scope AA.

Lending to Businesses of Different Sizes

The bank's lending within Texas has an overall adequate penetration among businesses of different sizes. This performance is consistent among its Texas AAs.

Community Development Lending

In the state of Texas, the bank makes a relatively high level of CD loans. The bank originated three CD loans totaling \$25.0MM in AAs within the state, which comprises 4.0 percent of overall CD loan volume bank-wide by number volume and 11.8 percent by dollar volume. The level of CD lending was relatively

high in the Dallas Metropolitan AA, while the bank did not originate any CD loans in the Austin Metropolitan AA.

TABLE 109 COMMUNITY DEVELOPMENT LOANS STATE OF TEXAS		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	0	0
Economic Development	3	24,972
Revitalization and Stabilization	0	0
TOTAL LOANS	3	24,972

INVESTMENT TEST

The bank’s performance under the investment test in the state of Texas is low satisfactory. The rating is supported by an adequate level of qualified CD investments in the Dallas Metropolitan AA, which is consistent with the overall state rating. The bank’s performance in its Austin Metropolitan AA also is consistent with the state rating.

The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits adequate responsiveness to the credit and CD needs of its AA. As illustrated in Table 110, the bank did not present any new debt or equity investments in the state, and the composition of its investment portfolio relies on prior period MBS investments, which were responsive to area affordable housing needs. Additionally, the bank’s statewide donation activity was comprised of activities that were generally responsive to area organizations that support community services for LMI individuals.

TABLE 110 INVESTMENTS, GRANTS, AND DONATIONS STATE OF TEXAS								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	8	2,198	0	0	0	0	8	2,198
Community Services	0	0	0	0	3	5	3	5
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	8	2,198	0	0	4	6	12	2,204

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the state of Texas is low satisfactory. The rating is based on an adequate service test conclusion in the Dallas Metropolitan AA, which is consistent with the overall state rating. The bank's performance in its Austin Metropolitan AA also is consistent with the state rating.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates two branches and three full-service ATMs within the state of Texas; however, all locations are limited to upper-income tracts.

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 has closed one branch with a full-service ATM in the Texas market and the branch was also located in an upper-income tract.

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. The bank's operations and product offerings in the state generally mirror that of the overall institution, which is described in the overall Retail Banking Services section.

Community Development Services

The bank provides an adequate level of CD services in its Texas AAs. This conclusion is consistent among the two Texas AAs. During the evaluation period, bank representatives performed three CD services to three organizations throughout the state. The services were primarily responsive to organizations that provide community services to LMI individuals and families.

**DALLAS METROPOLITAN AA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS METROPOLITAN AA

The bank's AA is comprised of Dallas County in its entirety, which is one of seven counties that comprise the Dallas-Plano-Irving, Texas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 529 total census tracts, including 107 low-, 187 moderate-, 110 middle-, 120 upper-, and 5 unknown-income census tracts.
- The bank operates one full-service branch within the AA, which is located in an upper-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held a 0.06 percent market share of deposits in the AA, ranking 58th out of 111 FDIC-insured financial institutions with offices in the AA.
- One community contact was conducted as part of this public evaluation for information relevant to the bank's CRA performance criterion and to gain a perspective on local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact represented an economic development organization in the Dallas metropolitan area.

TABLE 111 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Dallas, TX Metropolitan AA	2,368,139	2,485,003	4.9
Dallas-Plano-Irving, TX MD	4,230,520	4,519,004	6.8
Texas	25,145,561	26,538,614	5.5

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- As illustrated in Table 111, the population included in the bank's AA comprises more than half of the overall Dallas-Plano-Irving, Texas Metropolitan Division (MD); however, the growth rate of the AA trails that of the overall MD, as illustrated in Table 111.

TABLE 112 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Dallas, TX Metropolitan AA	58,639	55,897	(4.7)
Dallas-Plano-Irving, TX MD	73,150	71,149	(2.7)
Texas	63,314	62,717	(0.9)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- As illustrated in Table 112, MFI in the AA is lower than that of the MD and state of Texas, indicating lower employment wages are paid in the AA.
- The percentage of families below poverty in the AA, at 15.9 percent, is higher than the percentage of families below the poverty level in both the MD and state of Texas, at 11.5 percent and 13.5 percent, respectively.

TABLE 113 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Dallas, TX Metropolitan AA	78.9	35.6	44.0	65.9	37.7	25.3
Dallas-Plano-Irving, TX MD	80.3	40.7	42.9	66.6	42.2	22.8
Texas	77.3	42.7	42.9	59.9	35.2	20.7

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The median age of housing stock in the AA at 43 is notably higher than that of the MSA at 29 and is higher than the statewide figure of 31.
- The median housing value in the AA of \$132,693 is substantially lower than the median housing value in the MSA of \$165,937 and is also lower than the median housing value of the state at \$136,000.

TABLE 114 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Dallas, TX Metropolitan AA	4.3	4.0	3.9	3.8	3.5
Dallas-Plano-Irving, TX MD	4.0	3.8	3.7	3.5	3.3
Texas	4.4	4.6	4.3	3.8	3.5

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA remained relatively aligned with those of the state of Texas, while slightly above those of the MD.
- The primary industry in the AA is the trade, transportation, and utilities sector, followed by professional and business services and the education and health services sectors.
- The largest employers in the AA include Walmart, American Airlines, and Baylor Healthcare System.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Dallas Metropolitan AA is adequate. The evaluation of the bank's lending performance in this AA is based exclusively on its small business loan product, as home mortgage and small farm lending was not evaluated due to insufficient volumes to conduct a meaningful analysis.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The volume of loans originated in the AA includes 40 small business loans and 2 home mortgage loans originated during a two-year evaluation period between January 1, 2018 and December 31, 2019. There were no small farm loans originated during the evaluation period.

The bank makes limited 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 Lending Activity section of this evaluation.

Geographic Distribution of Loans

The geographic distribution of lending reflects an adequate penetration throughout the AA.

NOTE: The following table is included for informational purposes, as the bank's home mortgage lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 115													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Dallas TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$ %	\$ %	#	%	%	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	9.6	0	0.0	6.8	0	0.0	10.6	0	0.0	7.2	10.0
Moderate	0	0.0	27.3	0	0.0	17.7	0	0.0	27.8	0	0.0	18.8	33.4
Middle	0	0.0	27.8	0	0.0	23.0	0	0.0	27.2	0	0.0	22.8	25.6
Upper	1	100.0	34.9	243	100.0	52.2	0	0.0	33.6	0	0.0	50.5	30.8
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.7	0	0.0	0.7	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	243	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.4	0	0.0	3.2	0	0.0	6.0	0	0.0	4.4	10.0
Moderate	0	0.0	26.7	0	0.0	15.7	0	0.0	23.3	0	0.0	13.1	33.4
Middle	0	0.0	30.9	0	0.0	23.4	0	0.0	28.4	0	0.0	20.6	25.6
Upper	1	100.0	36.8	149	100.0	57.5	0	0.0	42.1	0	0.0	61.7	30.8
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	149	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.6	0	0.0	4.5	0	0.0	6.5	0	0.0	4.2	10.0
Moderate	0	0.0	24.1	0	0.0	18.4	0	0.0	24.3	0	0.0	17.5	33.4
Middle	0	0.0	25.1	0	0.0	21.0	0	0.0	26.0	0	0.0	20.7	25.6
Upper	0	0.0	44.9	0	0.0	55.8	0	0.0	43.0	0	0.0	57.1	30.8
Unknown	0	0.0	0.2	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	32.1	0	0.0	25.8	0	0.0	31.1	0	0.0	24.2	31.1
Moderate	0	0.0	34.9	0	0.0	29.1	0	0.0	37.8	0	0.0	25.5	29.3
Middle	0	0.0	16.0	0	0.0	19.8	0	0.0	15.4	0	0.0	22.6	19.9
Upper	0	0.0	16.0	0	0.0	22.6	0	0.0	15.7	0	0.0	27.7	19.2
Unknown	0	0.0	1.0	0	0.0	2.7	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	8.4	0	0.0	9.6	0	0.0	8.8	0	0.0	8.6	10.0
Moderate	0	0.0	27.4	0	0.0	19.6	0	0.0	26.5	0	0.0	18.0	33.4
Middle	0	0.0	28.7	0	0.0	22.5	0	0.0	27.7	0	0.0	22.1	25.6
Upper	2	100.0	35.3	392	100.0	47.6	0	0.0	36.5	0	0.0	50.8	30.8
Unknown	0	0.0	0.3	0	0.0	0.7	0	0.0	0.5	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	392	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 116 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Dallas TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	#	%	#	%	#	%	#	%	
Other Purpose LOC													
Low	0	0.0	4.6	0	0.0	2.7	0	0.0	4.2	0	0.0	1.9	10.0
Moderate	0	0.0	19.6	0	0.0	10.6	0	0.0	19.2	0	0.0	10.6	33.4
Middle	0	0.0	27.3	0	0.0	18.4	0	0.0	25.9	0	0.0	17.1	25.6
Upper	0	0.0	48.2	0	0.0	68.2	0	0.0	50.5	0	0.0	70.3	30.8
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.3	0	0.0	3.2	0	0.0	7.0	0	0.0	2.8	10.0
Moderate	0	0.0	31.6	0	0.0	14.5	0	0.0	27.8	0	0.0	10.9	33.4
Middle	0	0.0	25.1	0	0.0	12.7	0	0.0	26.7	0	0.0	14.9	25.6
Upper	0	0.0	35.0	0	0.0	69.7	0	0.0	38.5	0	0.0	71.3	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.1	0	0.0	5.3	0	0.0	8.0	0	0.0	5.0	10.0
Moderate	0	0.0	38.6	0	0.0	27.3	0	0.0	39.5	0	0.0	26.0	33.4
Middle	0	0.0	34.4	0	0.0	31.1	0	0.0	34.2	0	0.0	30.2	25.6
Upper	0	0.0	18.9	0	0.0	36.2	0	0.0	18.3	0	0.0	38.8	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FIEEC 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 2019 and 2018 small business lending is adequate. As illustrated in Table 117, the distribution of 2019 small business loans among low-income tracts was above the aggregate lending data by number volume and comparable by dollar volume, as well as comparable to the demographic figure. Lending in moderate-income tracts was below both the aggregate lending data and the demographic figure.

The distribution of small business loans in 2018 reflected performance that was consistent with 2019. Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses in either year.

Table 117													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Dallas TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	2	11.1	10.4	400	6.7	11.1	3	13.6	10.5	974	12.5	10.8	11.3
Moderate	4	22.2	27.4	2,276	38.0	28.3	4	18.2	27.8	1,318	17.0	28.0	27.7
Middle	5	27.8	24.5	926	15.5	22.8	3	13.6	24.4	989	12.7	22.7	26.0
Upper	7	38.9	34.8	2,387	39.9	33.7	12	54.5	34.7	4,480	57.7	34.8	33.7
Unknown	0	0.0	1.8	0	0.0	3.6	0	0.0	1.6	0	0.0	3.1	1.2
Tract-Unk	0	0.0	1.0	0	0.0	0.4	0	0.0	1.1	0	0.0	0.5	
Total	18	100.0	100.0	5,989	100.0	100.0	22	100.0	100.0	7,761	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 118													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Dallas TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	3.3	0	0.0	3.3	0	0.0	5.5	0	0.0	7.1	8.2
Moderate	0	0.0	24.0	0	0.0	29.1	0	0.0	20.7	0	0.0	14.0	19.1
Middle	0	0.0	18.0	0	0.0	12.5	0	0.0	22.0	0	0.0	34.6	23.9
Upper	0	0.0	53.3	0	0.0	54.2	0	0.0	50.6	0	0.0	43.6	47.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.1
Tract-Unk	0	0.0	1.3	0	0.0	1.0	0	0.0	1.2	0	0.0	0.8	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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.

Lending to Businesses of Different Sizes

The bank’s lending reflects adequate penetration among businesses of different sizes.

NOTE: The following table is included for informational purposes, as the bank’s home mortgage lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 119 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Dallas TX Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
Home Purchase Loans													
Low	0	0.0	5.4	0	0.0	2.5	0	0.0	6.5	0	0.0	3.0	31.5
Moderate	0	0.0	18.6	0	0.0	11.0	0	0.0	21.4	0	0.0	12.7	18.9
Middle	0	0.0	18.5	0	0.0	14.2	0	0.0	19.6	0	0.0	15.1	17.4
Upper	1	100.0	41.9	243	100.0	59.4	0	0.0	38.9	0	0.0	56.6	32.2
Unknown	0	0.0	15.6	0	0.0	12.9	0	0.0	13.5	0	0.0	12.7	0.0
Total	1	100.0	100.0	243	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	9.6	0	0.0	4.5	0	0.0	7.6	0	0.0	3.1	31.5
Moderate	0	0.0	18.1	0	0.0	10.6	0	0.0	15.4	0	0.0	7.8	18.9
Middle	0	0.0	20.1	0	0.0	14.5	0	0.0	17.9	0	0.0	11.7	17.4
Upper	0	0.0	37.4	0	0.0	57.3	0	0.0	44.0	0	0.0	62.9	32.2
Unknown	1	100.0	14.9	149	100.0	13.1	0	0.0	15.1	0	0.0	14.5	0.0
Total	1	100.0	100.0	149	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.3	0	0.0	4.9	0	0.0	9.2	0	0.0	5.0	31.5
Moderate	0	0.0	14.3	0	0.0	9.2	0	0.0	14.7	0	0.0	9.4	18.9
Middle	0	0.0	17.2	0	0.0	13.4	0	0.0	18.4	0	0.0	13.4	17.4
Upper	0	0.0	52.0	0	0.0	60.8	0	0.0	52.8	0	0.0	65.6	32.2
Unknown	0	0.0	8.1	0	0.0	11.6	0	0.0	4.9	0	0.0	6.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.6	0	0.0	2.4	0	0.0	6.8	0	0.0	2.6	31.5
Moderate	0	0.0	17.5	0	0.0	8.6	0	0.0	18.4	0	0.0	9.2	18.9
Middle	0	0.0	18.2	0	0.0	11.2	0	0.0	18.3	0	0.0	11.7	17.4
Upper	1	50.0	39.8	243	62.0	46.9	0	0.0	40.0	0	0.0	50.2	32.2
Unknown	1	50.0	17.9	149	38.0	30.8	0	0.0	16.5	0	0.0	26.4	0.0
Total	2	100.0	100.0	392	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<p><i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i></p>													

Table 120 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Dallas TX Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	8.8	0	0.0	4.0	0	0.0	9.6	0	0.0	5.3	31.5
Moderate	0	0.0	13.9	0	0.0	8.0	0	0.0	14.0	0	0.0	7.2	18.9
Middle	0	0.0	18.0	0	0.0	11.4	0	0.0	16.9	0	0.0	9.5	17.4
Upper	0	0.0	56.1	0	0.0	73.2	0	0.0	55.5	0	0.0	73.8	32.2
Unknown	0	0.0	3.1	0	0.0	3.3	0	0.0	3.9	0	0.0	4.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.4	0	0.0	2.9	0	0.0	11.1	0	0.0	3.4	31.5
Moderate	0	0.0	17.2	0	0.0	6.4	0	0.0	19.8	0	0.0	7.7	18.9
Middle	0	0.0	18.0	0	0.0	8.2	0	0.0	15.2	0	0.0	7.1	17.4
Upper	0	0.0	41.2	0	0.0	65.1	0	0.0	42.4	0	0.0	68.9	32.2
Unknown	0	0.0	16.2	0	0.0	17.5	0	0.0	11.5	0	0.0	13.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	0.3	0	0.0	0.2	31.5
Moderate	0	0.0	2.1	0	0.0	1.1	0	0.0	0.7	0	0.0	0.4	18.9
Middle	0	0.0	1.8	0	0.0	1.2	0	0.0	0.2	0	0.0	0.2	17.4
Upper	0	0.0	3.6	0	0.0	4.5	0	0.0	2.0	0	0.0	3.1	32.2
Unknown	0	0.0	91.0	0	0.0	92.1	0	0.0	96.7	0	0.0	96.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 2019 and 2018 small business lending is adequate. As illustrated in Table 121, the distribution of 2019 loans to businesses with revenues of \$1MM or less (small businesses) reflects adequate penetration. The bank’s penetration of loans to small businesses was comparable to the aggregate lending data and was below the relative proportion of small businesses in the AA.

The distribution of 2018 loans reflected penetration levels that were below that of 2019 lending performance.

Table 121													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Dallas TX Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	5	27.8	39.0	325	5.4	28.2	10	45.5	44.0	2,566	33.1	29.3	90.1
Over \$1 Million	10	55.6		4,858	81.1		12	54.5		5,195	66.9		8.9
Revenue Unknown	3	16.7		806	13.5		0	0.0		0	0.0		1.1
Total	18	100.0		5,989	100.0		22	100.0		7,761	100.0		100.0
By Loan Size													
\$100,000 or Less	7	38.9	92.5	507	8.5	34.8	6	27.3	93.0	440	5.7	36.5	
\$100,001 - \$250,000	4	22.2	3.6	806	13.5	14.6	4	18.2	3.5	643	8.3	14.9	
\$250,001 - \$1 Million	7	38.9	3.9	4,676	78.1	50.6	12	54.5	3.5	6,678	86.0	48.6	
Total	18	100.0	100.0	5,989	100.0	100.0	22	100.0	100.0	7,761	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	5	100.0		325	100.0		4	40.0		270	10.5		
\$100,001 - \$250,000	0	0.0		0	0.0		2	20.0		320	12.5		
\$250,001 - \$1 Million	0	0.0		0	0.0		4	40.0		1,976	77.0		
Total	5	100.0		325	100.0		10	100.0		2,566	100.0		
<i>Source: 2019 FFIEC Census Data</i>													
<i>2019 Dun & Bradstreet Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

NOTE: The following table is included for informational purposes, as the bank’s small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 122 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Dallas TX Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	#	%	%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	39.3	0	0.0	37.4	0	0.0	57.3	0	0.0	50.2	98.8
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.1
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	92.7	0	0.0	46.0	0	0.0	92.7	0	0.0	46.7	
\$100,001 - \$250,000	0	0.0	4.0	0	0.0	22.3	0	0.0	4.3	0	0.0	19.2	
\$250,001 - \$500,000	0	0.0	3.3	0	0.0	31.7	0	0.0	3.0	0	0.0	34.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		
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.													

Community Development Lending

The bank makes a relatively high level of CD loans in the AA, including three loans totaling \$25.0MM. The composition of CD loans was predominantly responsive to area economic development needs and were comprised of loans to organizations that provide job creation for LMI individuals.

INVESTMENT TEST

The bank’s performance under the investment test in the Dallas Metropolitan AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits adequate

responsiveness to the credit and CD needs of its AA. Consistent with other markets, the bank’s investment vehicles are comprised of MBS that support affordable housing efforts, which totaled \$733,202, as well as philanthropic donations, which totaled \$2,550.

SERVICE TEST

The bank’s performance under the service test in the Dallas Metropolitan AA is adequate.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in the AA. The AA contains one of the bank’s 90 branches and one full-service ATM.

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 has not opened any new branches or closed any existing branches.

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 generally mirror that of other bank wide markets, which is discussed in the overall Retail Banking Services section of this report.

TABLE 123 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES DALLAS 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	0.0	0.0	100.0	0.0	100.0	20.2	35.3	20.8	22.7	0.9	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	0.0	100.0	0.0	100.0	20.2	35.3	20.8	22.7	0.9	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	1		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services	Economic Development			Revitalization & Stabilization		Total Services		Total Organizations	
	0		2	0			0		2		2	
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides an adequate level of CD services, including two service activities during the review period. As illustrated in Table 123, both services were provided to organizations that provide community services benefiting LMI individuals. Specifically, one of the services was particularly responsive to LMI individual needs during the pandemic by purchasing and distributing personal protective equipment.

**OTHER TEXAS METROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE TEXAS METROPOLITAN AREA

AUSTIN METROPOLITAN AA

The bank's AA is comprised of Travis County in its entirety, which is part of the Austin-Round Rock, Texas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 218 total census tracts, including 33 low-, 47 moderate-, 64 middle-, 68 upper-, and 6 unknown-income census tracts.
- Based on 2015 ACS data, the population of the AA is 1,121,645, which represents a 9.5 percent increase based on 2010 U.S. Census Bureau population data.
- The bank operates one full-service branch within the AA, which is located in an upper-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held an 0.08 percent market share of deposits in the AA, ranking 42nd out of 52 FDIC-insured financial institutions with offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE TEXAS METROPOLITAN AREA

The one Texas metropolitan AA listed in the table below was 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 did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Austin Metropolitan AA	Consistent	Consistent	Consistent

**STATE OF UTAH / SALT LAKE CITY COMBINED STATISTICAL AREA AA
METROPOLITAN AREA**

CRA RATING FOR UTAH:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

High Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes limited 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 among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, the bank exhibits adequate responsiveness to the credit and CD needs throughout its Utah AA.

Service Test

- The bank's delivery systems are reasonably 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 its AA, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Utah AA and is responsive to its available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Utah was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Due to the bank operating in only one Utah market, the full-scope review of the Salt Lake City Combined Statistical Area (CSA) AA will also represent the conclusion of the bank's CRA performance for the overall state.

Additionally, only 2019 loan data will be evaluated in this analysis due to the recent expansion of office locations in the bank’s Utah market, which is discussed in the Retail Banking Services section of this AA analysis.

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE SALT LAKE CITY CSA AA

The AA is comprised of Box Elder, Davis, Juab, Morgan, Salt Lake, Tooele, Utah, and Weber Counties in their entirety, which includes both counties that comprise the Salt Lake City, Utah MSA and six additional counties that are part of the Salt Lake City-Provo-Orem CSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 470 total census tracts, including 23 low-, 100 moderate-, 204 middle-, 138 upper-, and 5 unknown-income census tracts.
- The bank operates one limited-service branch in Bountiful, which is located in a middle-income census tract.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held less than a tenth of a percent market share of deposits in the AA, ranking 46th out of 49 FDIC-insured financial institutions with offices in the AA.
- One recent community contact conducted as part of the public evaluation of another financial institution in the area was reviewed for information relevant to the bank’s CRA performance criterion and to gain a perspective on local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact was a representative of an organization that promotes area economic development.

**TABLE 124
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Salt Lake City CSA AA	2,211,842	2,325,531	5.1
Box Elder County, UT	49,975	50,991	2.0
Davis County, UT	306,479	323,374	5.5
Juab County, UT	10,246	10,400	1.5
Morgan County, UT	9,469	10,276	8.5
Salt Lake County, UT	1,029,655	1,078,958	4.8
Tooele County, UT	58,218	60,893	4.6
Utah County, UT	516,564	551,957	6.9
Weber County, UT	231,236	238,682	3.2
Ogden-Clearfield, UT MSA	597,159	623,323	4.4
Provo-Orem, UT MSA	526,810	562,357	6.7
Salt Lake City, UT MSA	1,087,873	1,139,851	4.8
Utah	2,763,885	2,903,379	5.0

Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- As illustrated in Table 124, the AA represents 80.1 percent of the entire population of the State of Utah.
- The AA experienced population growth among all counties that comprise the AA, although the rates of growth varied.

TABLE 125 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Salt Lake City CSA AA	71,750	70,480	(1.8)
Box Elder County, UT	65,901	62,043	(5.9)
Davis County, UT	79,775	78,367	(1.8)
Juab County, UT	60,883	58,389	(4.1)
Morgan County, UT	84,316	90,000	6.7
Salt Lake County, UT	73,451	72,049	(1.9)
Tooele County, UT	71,455	69,299	(3.0)
Utah County, UT	68,536	67,496	(1.5)
Weber County, UT	66,753	65,065	(2.5)
Ogden-Clearfield, UT MSA	72,828	71,742	(1.5)
Provo-Orem, UT MSA	68,319	67,248	(1.6)
Salt Lake City, UT MSA	72,977	71,849	(1.5)
Utah	69,707	68,817	(1.3)

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The MFI varied significantly throughout the expansive AA with Morgan County noted as the most affluent, although least populated, and Box Elder County representing the least affluent of AA counties.

**TABLE 126
HOUSING COST BURDEN**

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Salt Lake City CSA AA	78.0	35.4	43.2	64.9	43.5	21.9
Box Elder County, UT	60.1	16.1	30.1	57.9	35.2	20.2
Davis County, UT	79.9	30.0	40.9	64.7	42.3	19.1
Juab County, UT	55.4	19.0	31.1	53.5	32.3	19.4
Morgan County, UT	66.7	47.4	40.6	60.0	33.3	20.2
Salt Lake County, UT	79.9	36.3	43.9	66.1	44.9	23.3
Tooele County, UT	63.7	36.7	32.6	54.4	42.3	20.2
Utah County, UT	80.6	40.4	45.6	65.4	49.5	21.9
Weber County, UT	69.4	28.2	41.5	64.2	35.4	21.0
Ogden-Clearfield, UT MSA	72.9	28.0	40.4	63.7	38.4	19.9
Provo-Orem, UT MSA	80.2	40.2	45.4	64.9	49.0	21.8
Salt Lake City, UT MSA	79.3	36.3	43.5	65.5	44.7	23.1
Utah	76.4	35.7	42.6	62.3	41.7	21.8

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- As illustrated in Table 126, housing costs were generally higher for both renters and homeowners in the urban, densely populated counties within the AA, such as Salt Lake and Utah Counties, when compared to Box Elder, Tooele, and Juab Counties that contain much more affordable housing, as well as significantly smaller populations.

**TABLE 127
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Salt Lake City CSA AA	3.4	3.1	3.0	2.8	2.5
Box Elder County, UT	3.6	3.4	3.2	2.8	2.6
Davis County, UT	3.3	3.1	3.0	2.7	2.4
Juab County, UT	3.9	3.5	3.3	2.8	2.4
Morgan County, UT	3.1	2.9	2.7	2.6	2.4
Salt Lake County, UT	3.3	3.1	3.0	2.8	2.4
Tooele County, UT	4.1	3.7	3.5	3.2	2.8
Utah County, UT	3.2	3.0	2.8	2.7	2.3
Weber County, UT	4.0	3.7	3.5	3.3	2.9
Ogden-Clearfield, UT MSA	3.6	3.3	3.2	3.0	2.6
Provo-Orem, UT MSA	3.2	3.0	2.8	2.7	2.3
Salt Lake City, UT MSA	3.4	3.1	3.0	2.8	2.5
Utah	3.5	3.3	3.1	2.9	2.5

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA mirrored that of the overall state of Utah and were generally similar throughout the majority of counties that comprise the AA.
- The AA contains a significantly diverse composition of industry due to its size and regional significance in terms of employment, education, and trade. Major employers within the AA include: University Health Care (10,000), University of Utah Health (7,866), Latter Day Saints Church (5,000), Arup Blood Services (4,200), and Brigham Young University Conference Center (4,000).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN UTAH/SALT LAKE CITY CSA AA

LENDING TEST

The bank's performance under the lending test in the state of Utah is low satisfactory. The bank's performance in the Salt Lake City CSA AA is adequate, which is consistent with the overall state rating.

The evaluation of lending performance was weighted heavily on the bank's home mortgage lending, as it contained a significantly larger volume of lending. Small farm loans were not included in the analysis based on a lack of origination volume. Additionally, multifamily, other purpose LOC, other purpose closed/exempt, and purpose not applicable loans were not included in the evaluation of home mortgage loans due to relatively low volumes insufficient to conduct meaningful analyses.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The volume of loans originated in the AA/state include 518 home mortgage and 17 small business loans originated in a one-year period between January 1, 2019 and December 31, 2019.

The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank's flexible lending programs generally mirror that of the overall institution, which is described in the overall Lending Activity section of this report.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. The bank's small business lending reflects good penetration among geographies of different income levels, while home mortgage lending reflects adequate penetration.

Home Mortgage Lending

The geographic distribution of 2019 home mortgage lending is adequate. The distribution of 2019 home mortgage loans among low-income tracts was comparable to the aggregate lending data, as well as the percentage of owner-occupied units in such tracts (demographic figure). The penetration of home mortgage lending in moderate-income tracts was comparable to the aggregate lending data but below

the demographic figure. It is noted that lending in moderate-income tracts had considerably larger volume and, generally, had a positive impact on the overall conclusion for this product, as well as the analysis of each individual sub-product. In addition, weight was given to the bank's home purchase lending, as this sub-product comprised the largest volume of loan originations in 2019.

Additionally, gaps or lapses were identified in the dispersion of loans among geographies of different income levels, including among LMI tracts throughout the expansive AA. For example, home mortgage lending was generally sparse in LMI areas in the communities of Tremonton, Brigham City, Ogden, and the western edges of Salt Lake City. A review of the bank's branch presence reflects the nearest branch location in Bountiful ranges from approximately 10.0 miles to 57.0 miles from the cluster of LMI tracts throughout the CSA. As such, the gaps in lending are noted, but do not significantly impact the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2019 home purchase loans among low-income tracts was comparable to the aggregate lending data and the demographic figure. Similarly, lending in moderate-income tracts also contained penetration levels that were comparable to the aggregate lending data and the demographic figure. The dispersion of home purchase loans is consistent with the performance factors and conclusion detailed in the overall analysis for home mortgage lending.

Home Refinance Loans

The geographic distribution of home refinance lending is poor. The distribution of 2019 home refinance loans among low-income tracts was below the aggregate lending data and below the demographic figure, as the bank did not originate a refinance loan in a low-income tract. Lending in moderate-income tracts also reflected performance that was below the aggregate lending data, as well as the demographic figure. The dispersion of home refinance loans is consistent with the performance factors and conclusion detailed in the overall analysis for home mortgage lending.

Home Improvement Loans

The geographic distribution of home improvement lending is poor. The distribution of home improvement loans among low- and moderate-income tracts was below the aggregate lending data and the demographic figure, as the bank did not originate any home improvement loans in an LMI tract in 2019. The dispersion of home improvement loans is consistent with the performance factors and conclusion detailed in the overall analysis for home mortgage lending.

Table 128 Distribution of 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Home Purchase Loans							
Low	4	1.5	1.5	885	1.1	1.0	1.2
Moderate	37	13.8	16.3	9,291	11.3	12.3	16.1
Middle	140	52.2	53.1	39,006	47.4	50.7	48.7
Upper	86	32.1	28.9	32,839	39.9	35.8	33.7
Unknown	1	0.4	0.3	228	0.3	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	268	100.0	100.0	82,249	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.9	0	0.0	0.6	1.2
Moderate	16	7.2	12.5	3,068	4.4	9.3	16.1
Middle	109	48.9	52.2	30,084	43.5	48.9	48.7
Upper	97	43.5	34.2	35,716	51.6	41.0	33.7
Unknown	1	0.4	0.2	349	0.5	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	223	100.0	100.0	69,217	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.9	0	0.0	0.8	1.2
Moderate	0	0.0	11.5	0	0.0	9.0	16.1
Middle	6	50.0	48.7	484	46.9	43.8	48.7
Upper	6	50.0	38.6	549	53.1	46.2	33.7
Unknown	0	0.0	0.3	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,033	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	11.3	0	0.0	5.9	11.3
Moderate	1	50.0	37.3	10,647	44.8	35.1	40.2
Middle	1	50.0	40.7	13,128	55.2	44.2	36.7
Upper	0	0.0	10.3	0	0.0	14.7	11.2
Unknown	0	0.0	0.5	0	0.0	0.0	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	23,775	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	4	0.8	1.1	885	0.5	1.0	1.2
Moderate	55	10.6	14.0	23,036	13.0	11.6	16.1
Middle	262	50.6	52.2	83,429	47.0	49.3	48.7
Upper	195	37.6	32.4	69,747	39.3	37.9	33.7
Unknown	2	0.4	0.2	577	0.3	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	518	100.0	100.0	177,674	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table 129 Distribution of 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
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	1.2
Moderate	1	10.0	9.6	30	3.5	6.6	16.1
Middle	4	40.0	46.3	277	32.6	37.3	48.7
Upper	5	50.0	43.1	543	63.9	55.4	33.7
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	850	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.6	0	0.0	0.3	1.2
Moderate	0	0.0	14.1	0	0.0	10.4	16.1
Middle	2	66.7	53.3	450	81.8	47.1	48.7
Upper	1	33.3	32.0	100	18.2	42.2	33.7
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	550	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.2	0	0.0	0.7	1.2
Moderate	0	0.0	16.7	0	0.0	12.8	16.1
Middle	0	0.0	52.6	0	0.0	51.7	48.7
Upper	0	0.0	29.2	0	0.0	34.7	33.7
Unknown	0	0.0	0.2	0	0.0	0.1	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: 2019 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 2019 small business lending is good. The distribution of small business loans among low-income tracts was below the aggregate lending data and the demographic figure, as the bank did not originate a small business loan in a low-income tract. However, lending in moderate-income tracts contained a larger volume of lending that was above the aggregate lending data and the demographic figure, and favorably influenced the performance conclusion. The dispersion of small business loans is consistent with the performance factors and conclusion detailed in the overall analysis for home mortgage lending.

Table 130 Distribution of 2019 Small Business Lending By Income Level of Geography Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	3.5	0	0.0	4.7	4.1
Moderate	5	29.4	17.5	1,412	25.4	22.5	19.3
Middle	8	47.1	42.7	2,510	45.1	43.5	43.1
Upper	4	23.5	34.2	1,643	29.5	27.6	33.0
Unknown	0	0.0	0.4	0	0.0	0.5	0.5
Tract-Unk	0	0.0	1.6	0	0.0	1.2	
Total	17	100.0	100.0	5,565	100.0	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.

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 131 Distribution of 2019 Small Farm Lending By Income Level of Geography Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.5	0	0.0	0.1	1.1
Moderate	0	0.0	6.3	0	0.0	7.1	11.6
Middle	0	0.0	60.6	0	0.0	69.8	55.7
Upper	0	0.0	26.2	0	0.0	20.6	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	6.3	0	0.0	2.3	
Total	0	0.0	100.0	0	0.0	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.

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

The bank's lending reflects an adequate penetration among individuals of different income levels and businesses of different sizes. The bank's home mortgage and small business lending reflect adequate penetration levels.

Home Mortgage Lending

The borrower distribution of 2019 home mortgage lending is adequate. The penetration of loans among low-income borrowers was comparable to the aggregate lending data and below the demographic figure. Lending among moderate-income borrowers was also comparable to the aggregate lending data and above the demographic figure.

Home Purchase Loans

The borrower distribution of 2019 home purchase lending is adequate. The penetration of loans among low-income borrowers was comparable to the aggregate lending data, and below the demographic figure. Lending to moderate-income borrowers was also comparable to the aggregate lending data and above the demographic figure.

Home Refinance Loans

The borrower distribution of 2019 home refinance lending is adequate. The penetration of loans to low-income borrowers was comparable to the aggregate lending data and below the demographic figure. Lending to moderate-income borrowers was also comparable to the aggregate lending data, as well as the demographic figure.

Home Improvement Loans

The borrower distribution of 2019 home improvement lending is poor. The penetration of loans to low-income borrowers was below both the aggregate lending data and the demographic figure, as the bank did not originate a loan to a low-income borrower. Similarly, lending to moderate-income borrowers was also below the aggregate lending data, as well as the demographic figure.

Table 132 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	14	5.2	5.0	2,641	3.2	2.9	19.1
Moderate	84	31.3	25.4	20,002	24.3	19.7	18.3
Middle	79	29.5	26.6	25,804	31.4	25.7	22.8
Upper	91	34.0	28.7	33,802	41.1	37.1	39.9
Unknown	0	0.0	14.2	0	0.0	14.6	0.0
Total	268	100.0	100.0	82,249	100.0	100.0	100.0
Refinance Loans							
Low	9	4.0	5.5	1,792	2.6	3.2	19.1
Moderate	31	13.9	19.6	7,355	10.6	15.1	18.3
Middle	80	35.9	26.2	23,098	33.4	24.5	22.8
Upper	99	44.4	33.2	35,763	51.7	40.3	39.9
Unknown	4	1.8	15.5	1,209	1.7	16.9	0.0
Total	223	100.0	100.0	69,217	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.8	0	0.0	3.7	19.1
Moderate	1	8.3	14.9	80	7.7	11.7	18.3
Middle	3	25.0	29.2	219	21.2	24.5	22.8
Upper	8	66.7	49.4	734	71.1	57.9	39.9
Unknown	0	0.0	1.7	0	0.0	2.2	0.0
Total	12	100.0	100.0	1,033	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	24	4.7	5.2	4,562	3.0	2.9	19.1
Moderate	119	23.1	21.4	27,987	18.2	16.4	18.3
Middle	166	32.2	26.5	49,477	32.1	24.0	22.8
Upper	203	39.3	32.8	70,664	45.9	37.9	39.9
Unknown	4	0.8	14.2	1,209	0.8	18.8	0.0
Total	516	100.0	100.0	153,899	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Table 133 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Other Purpose LOC							
Low	1	10.0	4.2	129	15.2	2.5	19.1
Moderate	0	0.0	15.3	0	0.0	9.3	18.3
Middle	4	40.0	28.1	356	41.9	20.1	22.8
Upper	5	50.0	49.1	365	42.9	65.3	39.9
Unknown	0	0.0	3.2	0	0.0	2.8	0.0
Total	10	100.0	100.0	850	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.1	0	0.0	4.4	19.1
Moderate	3	100.0	19.4	550	100.0	12.0	18.3
Middle	0	0.0	31.3	0	0.0	22.8	22.8
Upper	0	0.0	41.0	0	0.0	51.0	39.9
Unknown	0	0.0	3.2	0	0.0	9.8	0.0
Total	3	100.0	100.0	550	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.2	0	0.0	0.5	19.1
Moderate	0	0.0	6.2	0	0.0	2.9	18.3
Middle	0	0.0	11.8	0	0.0	6.4	22.8
Upper	0	0.0	21.0	0	0.0	16.0	39.9
Unknown	0	0.0	59.7	0	0.0	74.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 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 2019 small business lending is adequate. The distribution of loans to businesses with revenues of \$1MM or less (small businesses) was comparable to the aggregate lending data and below the relative proportion of small businesses in the AA.

Table 134 Distribution of 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	8	47.1	44.8	2,914	52.4	28.0	90.6
Over \$1 Million	9	52.9		2,651	47.6		8.0
Revenue Unknown	0	0.0		0	0.0		1.3
Total	17	100.0		5,565	100.0		100.0
By Loan Size							
\$100,000 or Less	5	29.4	94.7	190	3.4	44.7	
\$100,001 - \$250,000	4	23.5	2.6	647	11.6	12.9	
\$250,001 - \$1 Million	8	47.1	2.7	4,728	85.0	42.4	
Total	17	100.0	100.0	5,565	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	2	25.0		50	1.7		
\$100,001 - \$250,000	2	25.0		344	11.8		
\$250,001 - \$1 Million	4	50.0		2,520	86.5		
Total	8	100.0		2,914	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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>							

NOTE: The following table is included for informational purposes, as the bank's small farm lending was not reviewed at this evaluation given the insufficient volume to perform a meaningful analysis.

Table 135 Distribution of 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Salt Lake City-Provo-Orem UT CSA AA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	0	0.0	61.2	0	0.0	57.8	96.6
Over \$1 Million	0	0.0		0	0.0		3.4
Revenue Unknown	0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		100.0
By Loan Size							
\$100,000 or Less	0	0.0	86.4	0	0.0	37.9	
\$100,001 - \$250,000	0	0.0	8.7	0	0.0	26.6	
\$250,001 - \$500,000	0	0.0	5.0	0	0.0	35.5	
Total	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		
Total	0	0.0		0	0.0		
<i>Source: 2019 FFIEC Census Data 2019 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 makes an adequate level of CD loans in the AA, including two CD loans totaling \$3.3MM. Both loans were supportive of area economic development needs, including SBA Program 504 funding for a small business, as well as job creation and retention for a business that employs LMI workers.

TABLE 136 COMMUNITY DEVELOPMENT LOANS STATE OF UTAH / SALT LAKE CITY-PROVO-OREM UT CSA AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	0	0
Economic Development	2	3,258
Revitalization and Stabilization	0	0
TOTAL LOANS	2	3,258

INVESTMENT TEST

The bank's performance under the investment test in the state of Utah is low satisfactory. The bank's performance under the investment test in the Salt Lake City CSA AA is adequate, which is consistent with the overall state rating.

The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. While the bank makes rare use of innovative and/or complex investments, the bank exhibits adequate responsiveness to the credit and CD needs of its AA. Consistent with other markets, the bank's investment instruments are comprised of MBS that support affordable housing efforts. Additionally, the bank made a single donation of \$5,000 to an area organization that provides an array of community services to LMI individuals and families.

It is noted that the AA was established in the latter portion of the bank's evaluation period and, as such, consideration was given to relatively lower volumes of activities when compared to other established AAs when performance conclusions were derived.

TABLE 137 INVESTMENTS, GRANTS, AND DONATIONS STATE OF UTAH / SALT LAKE CITY-PROVO-OREM UT CSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	462	1	480	0	0	2	942
Community Services	0	0	0	0	1	5	1	5
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	1	462	1	480	1	5	3	947

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the state of Utah is high satisfactory. The bank's performance under the service test in the Salt Lake City CSA AA is good, which is consistent with the overall state rating. Weight was given to the level of CD services in determining the overall rating, especially when considering the branch was open for only eight months of the evaluation period.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The AA contains one limited-service branch that is located in a middle-income census tract. The branch is in the northern portion of the Salt Lake City CSA, in suburban Bountiful, and was previously an LPO that was converted to a limited-service branch during the evaluation period. The banking center predominately serves commercial customers as no retail services, such as teller and cash-handling services, are provided.

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's sole branch location in the AA was opened in April 2019 and no other branching activities have occurred since the prior evaluation.

Since the branch offers limited depository services, the bank's products, services, and business hours vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operations are similar to that of other bank wide markets, but the service offerings at the branch are limited and primarily cater to commercial customers.

TABLE 138												
RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES												
STATE OF UTAH / SALT LAKE CITY-PROVO-OREM UT CSA 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	0.0	100.0	0.0	0.0	100.0	4.9	21.3	43.4	29.4	1.1	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	0.0	0.0	0.0	0.0	4.9	21.3	43.4	29.4	1.1	100.0	
Changes in Branch Location	Number of Branches (#)				Net Change in Branch Locations (#)							
	Total Branches		Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total		
	1		1	0	0	0	1	0	0	1		
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
	0	2	1	0		3	2					
¹ Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

Community Development Services

The bank provides a relatively high level of CD services. As illustrated in Table 138, bank representatives performed three services to two area organizations. Two services were provided to an organization that provides an array of services to LMI individuals and families, and the remaining service was performed to an area economic development organization for the purpose of educational resources related to PPP loans during the pandemic.

APPENDIX A

SCOPE OF EXAMINATION			
<u>FINANCIAL INSTITUTION</u>		<u>PRODUCTS/SERVICES REVIEWED</u>	
NBH Bank Greenwood Village, CO		<ul style="list-style-type: none"> • Home Mortgage Loans • Small Business Loans • Small Farm Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 	
<u>TIME PERIODS REVIEWED</u>			
<u>HMDA LAR and CRA SB and SF Loans:</u> January 1, 2018 to December 31, 2019			
<u>Community Development Activities:</u> January 1, 2018 to December 31, 2020			
LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
None	None	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	COMMUNITY CONTACTS
<u>Kansas City Multistate MSA AA</u> MSA 28140 (Kansas City, MO-KS Multistate MSA)	Full Review	None	2 prior
<u>Colorado</u> MSA 19740 (Denver-Aurora-Lakewood MSA AA) MSA 17820 (Colorado Springs MSA AA) MSA 24540 (Greeley MSA AA) MSA 14500 (Boulder MSA AA) MSA 22660 (Fort Collins MSA AA) MSA 39380 (Pueblo MSA AA) MSA 24300 (Grand Junction MSA AA) MSA 99999 (Western Colorado AA)	Full Review Full Review Limited Review Limited Review Limited Review Limited Review Limited Review Limited Review	None None None None None None None None	2 prior 1 prior None None None None None None
<u>Kansas</u> MSA 29940 (Lawrence MSA AA) MSA 99999 (Franklin County AA)	Full Review Limited Review	None None	1 current None
<u>Missouri</u> MSA 41140 (St. Joseph Metropolitan AA) MSA 99999 (Northwest Missouri AA) MSA 99999 (North Central Missouri AA) MSA 99999 (Northeast Missouri AA)	Full Review Full Review Limited Review Limited Review	None None None None	1 prior 1 current None None

<u>New Mexico</u> MSA 99999 (Taos County AA) MSA 10740 (Albuquerque Metropolitan AA)	Full Review Limited Review	None None	1 prior None
<u>Texas</u> MSA 19124 (Dallas Metropolitan AA) MSA 12420 (Austin Metropolitan AA)	Full Review Limited Review	None None	1 prior None
<u>Utah</u> MSA 41620, 36260, 39340 (Salt Lake City CSA AA)	Full Review	None	1 prior

APPENDIX B

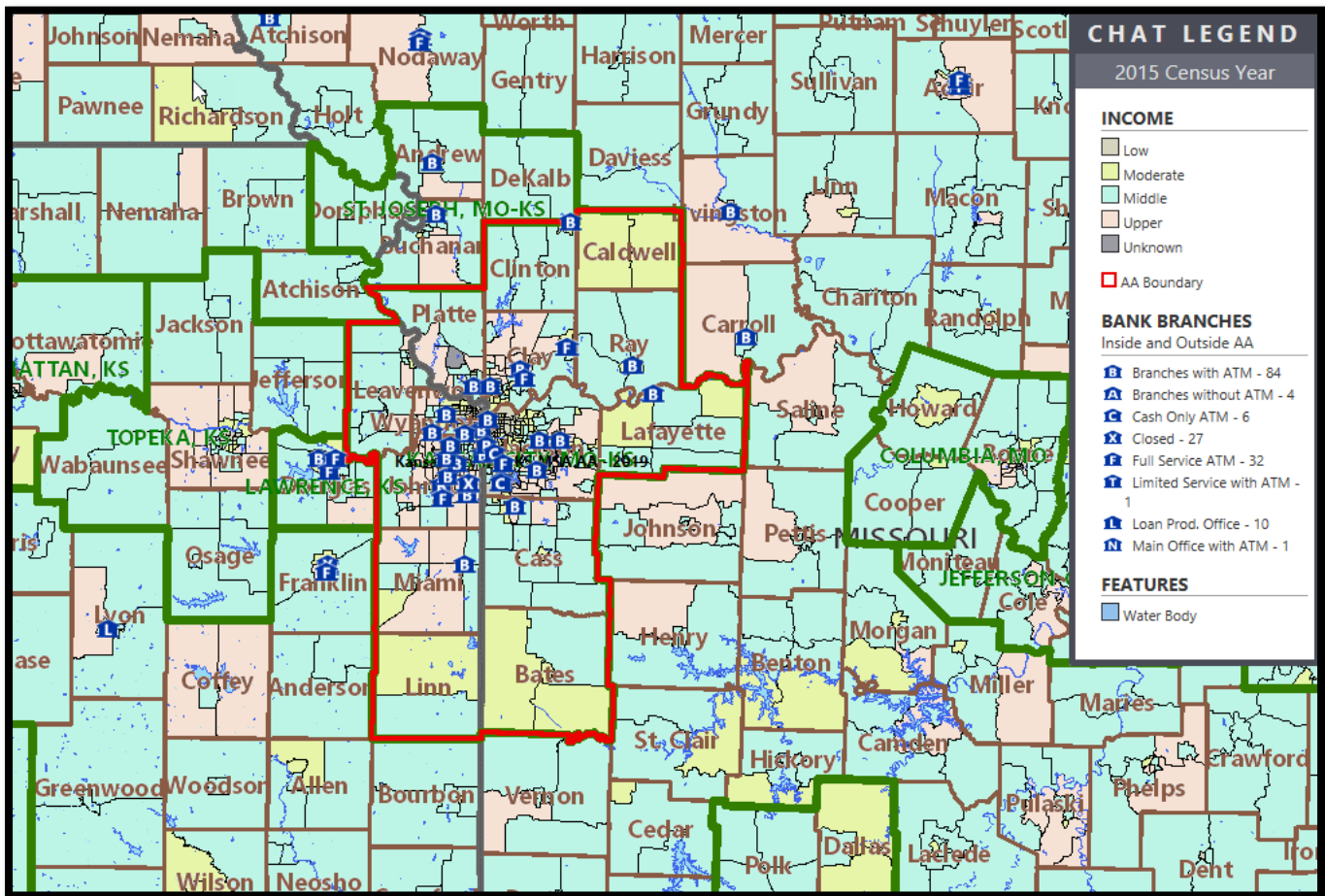
SUMMARY OF STATE AND MULTISTATE MSA RATINGS

STATE OR MULTISTATE AREA NAME	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Kansas City, MO-KS Multistate MSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Colorado	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Kansas	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
State of Missouri	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of New Mexico	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Texas	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Utah	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

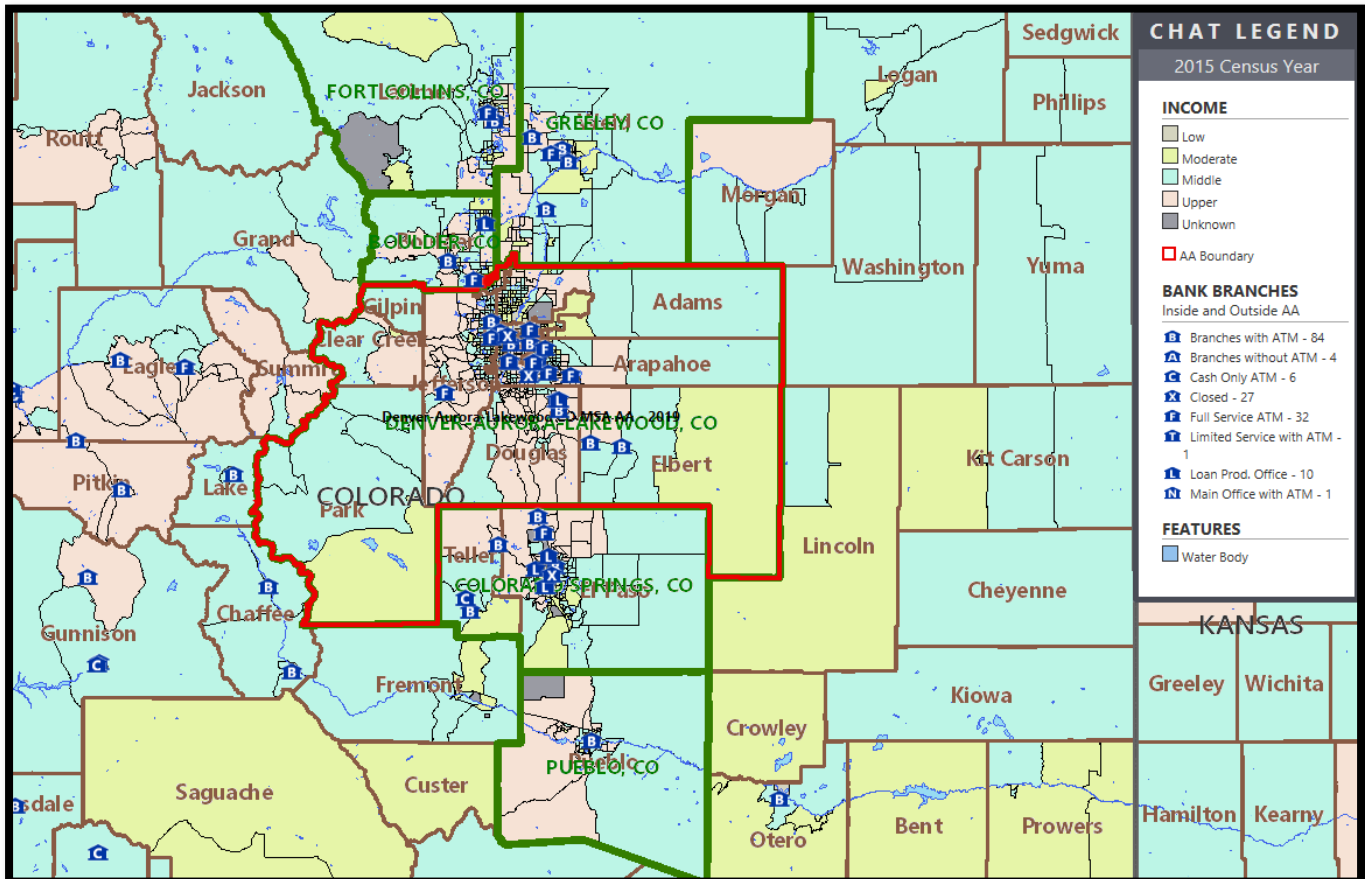
APPENDIX C

MAPS OF THE ASSESSMENT AREAS

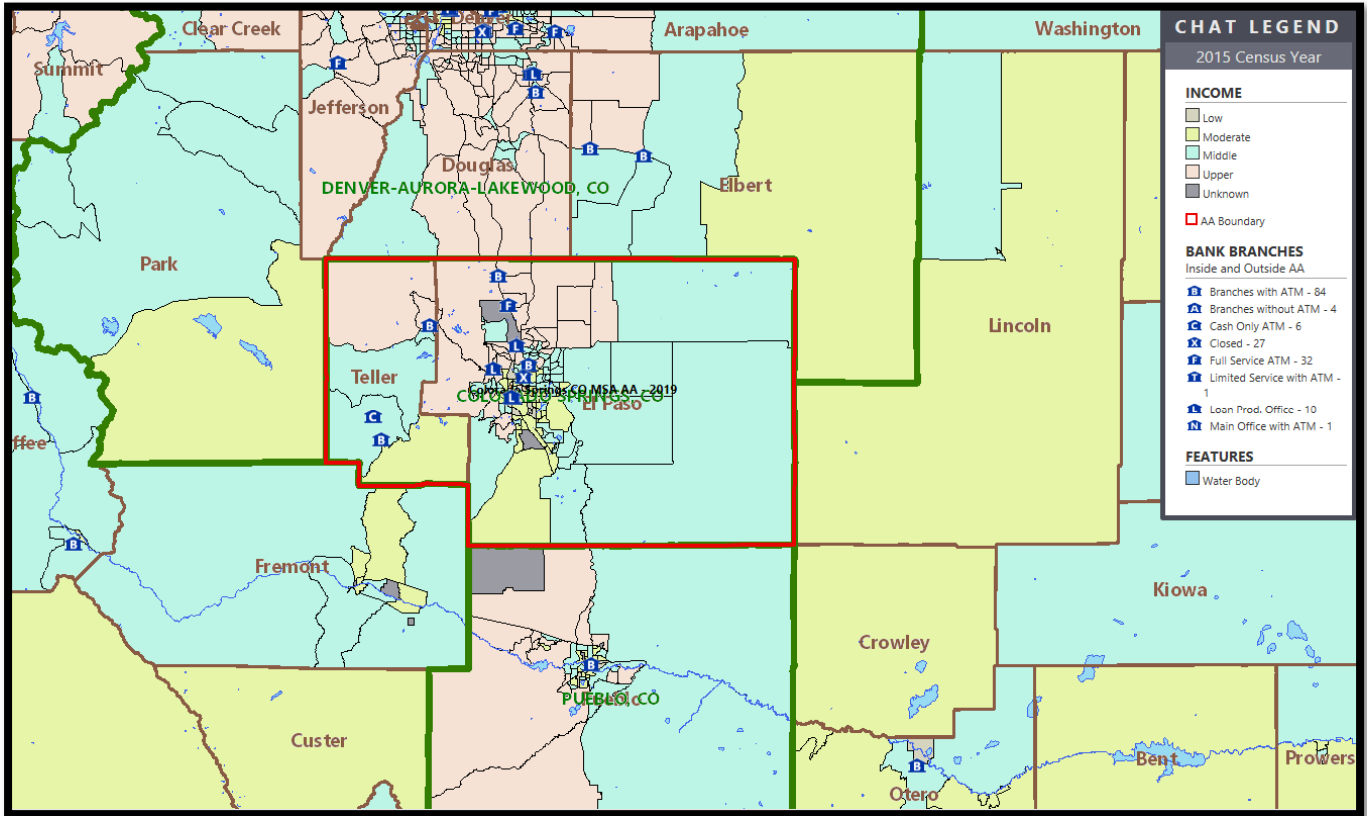
KANSAS CITY, MO-KS MULTISTATE MSA ASSESSMENT AREA



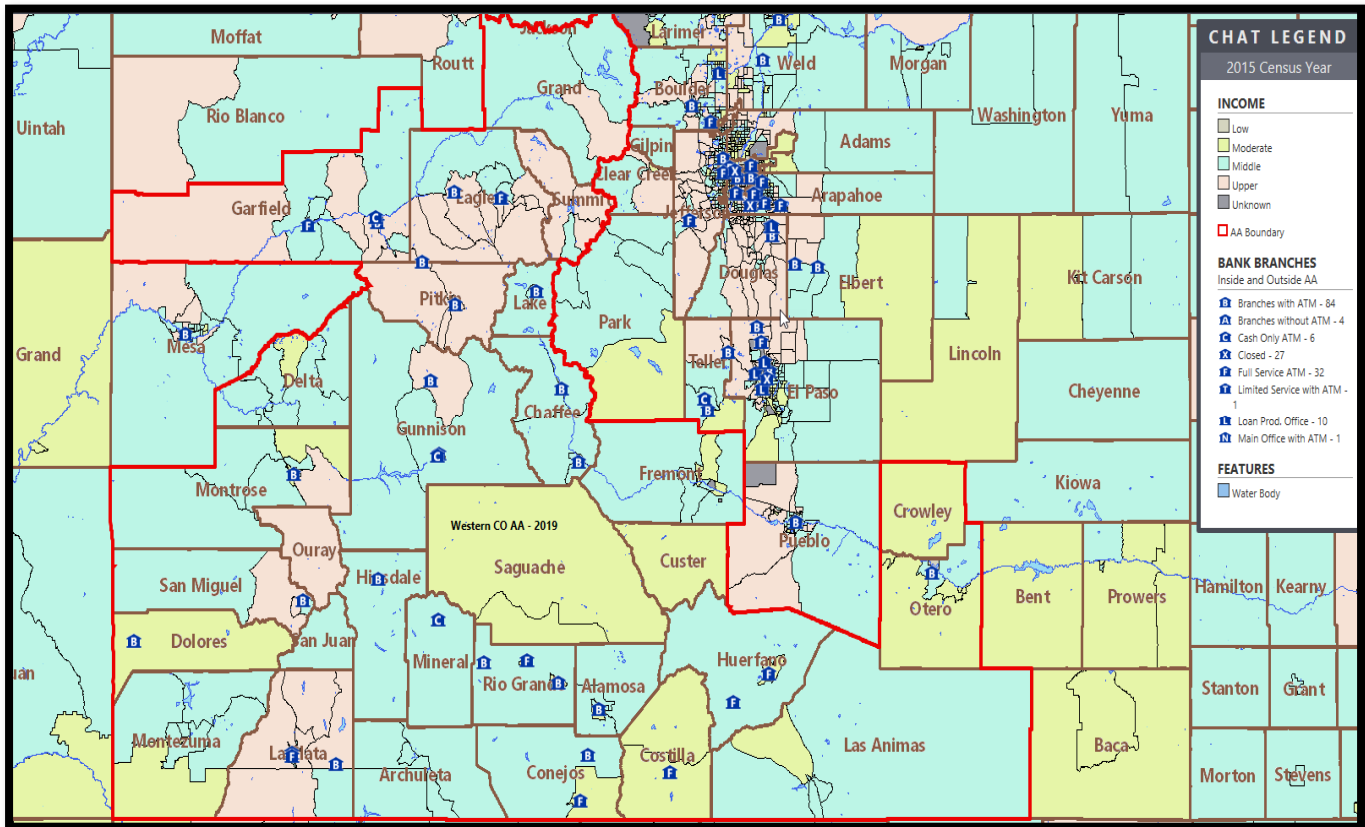
DENVER-AURORA-LAKEWOOD MSA ASSESSMENT AREA



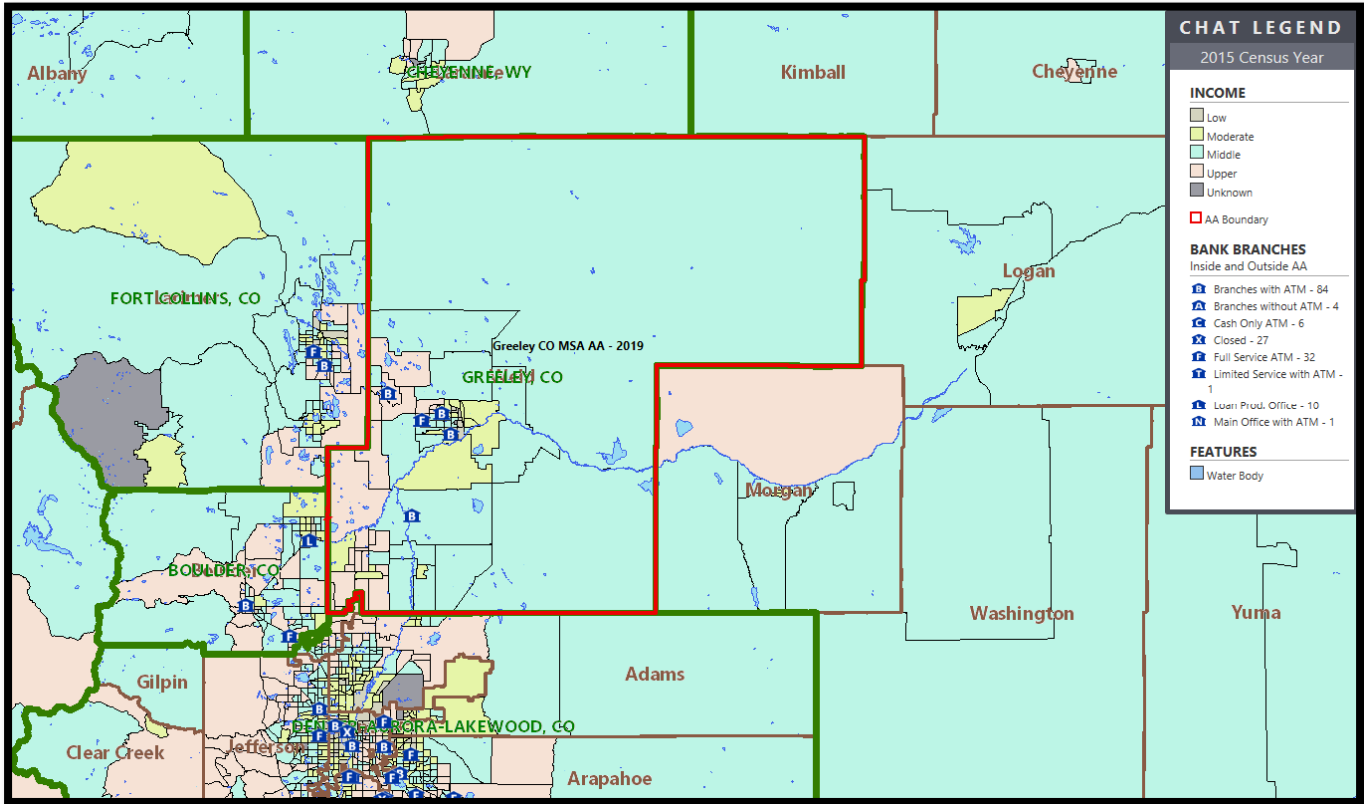
COLORADO SPRINGS MSA ASSESSMENT AREA



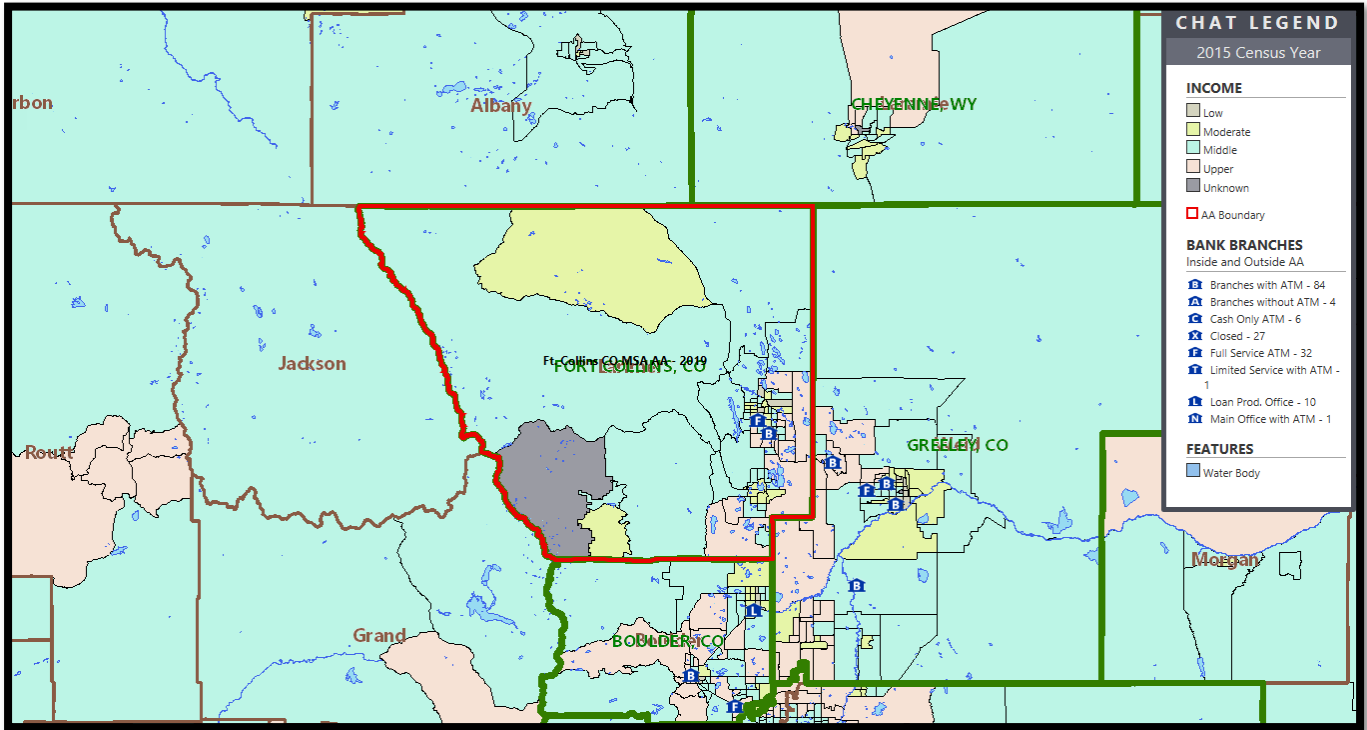
WESTERN COLORADO ASSESSMENT AREA



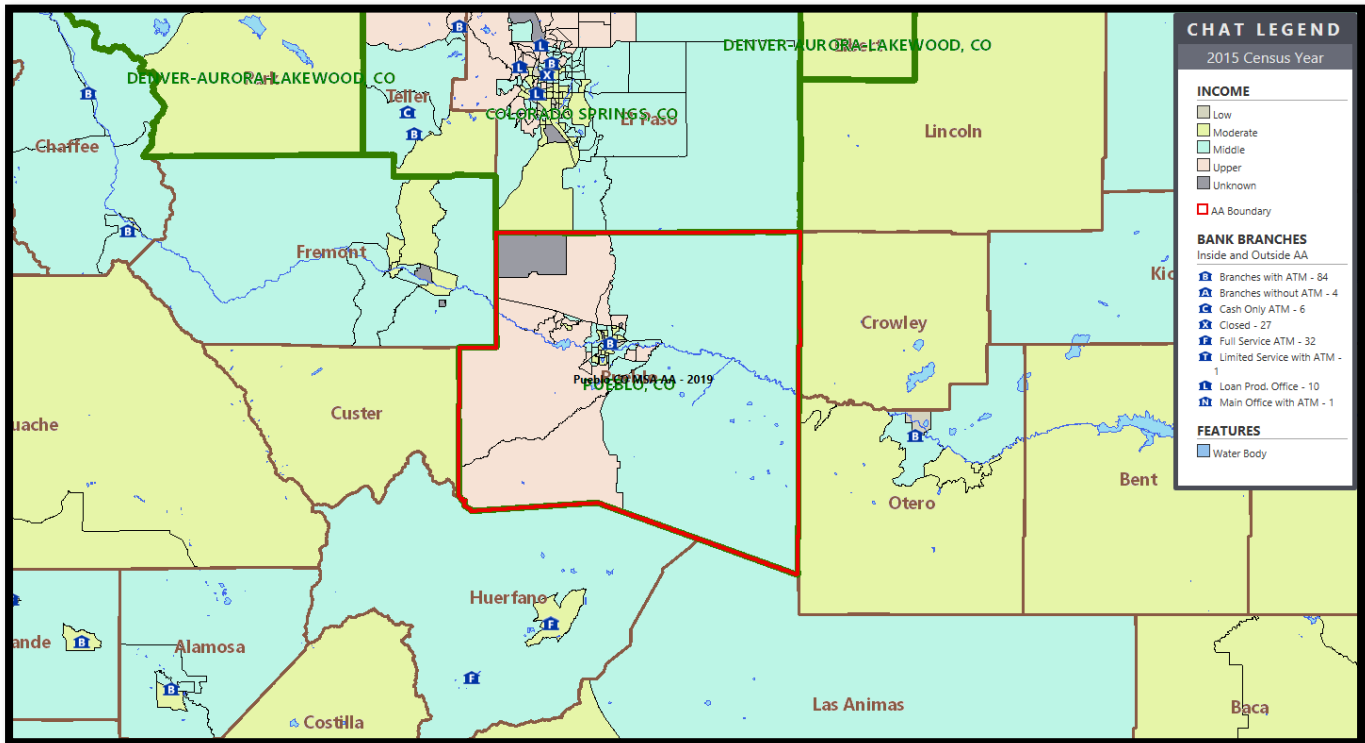
GREELEY MSA ASSESSMENT AREA



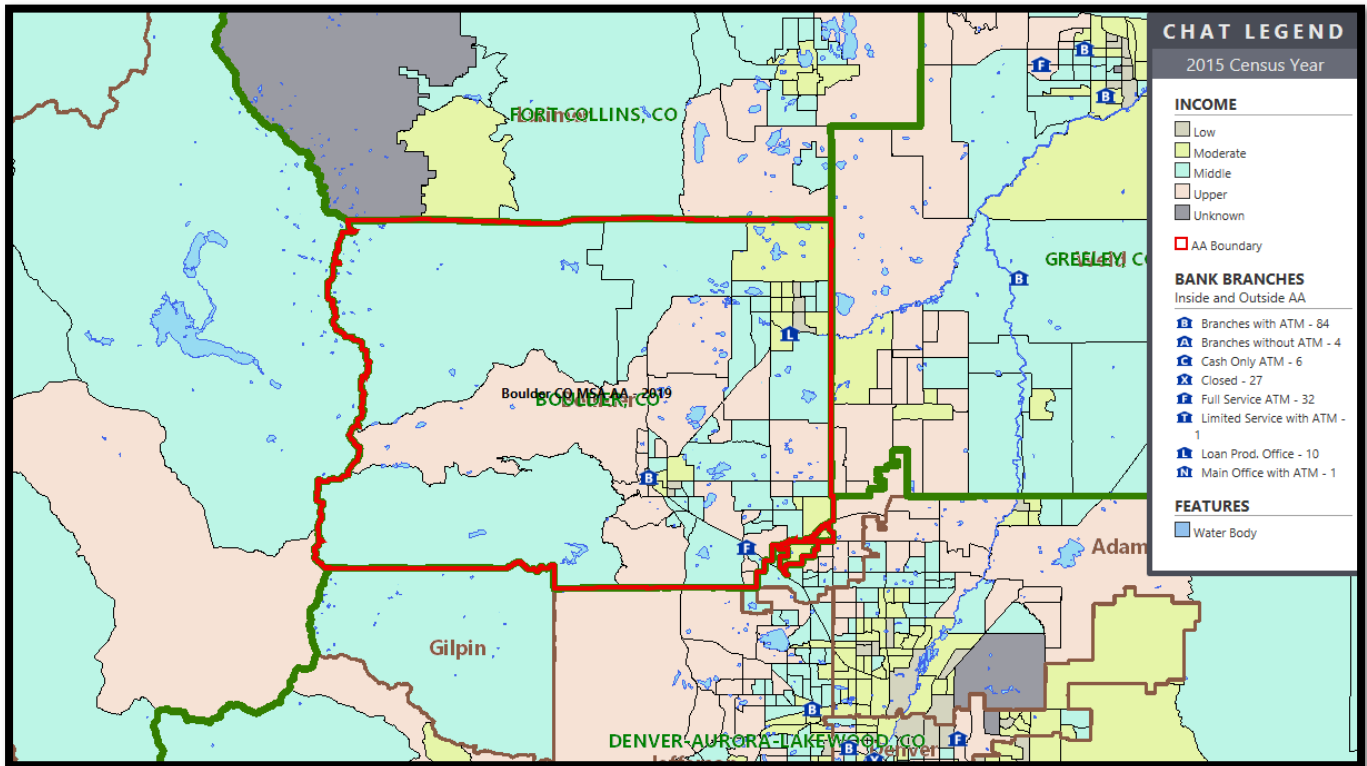
FT. COLLINS MSA ASSESSMENT AREA



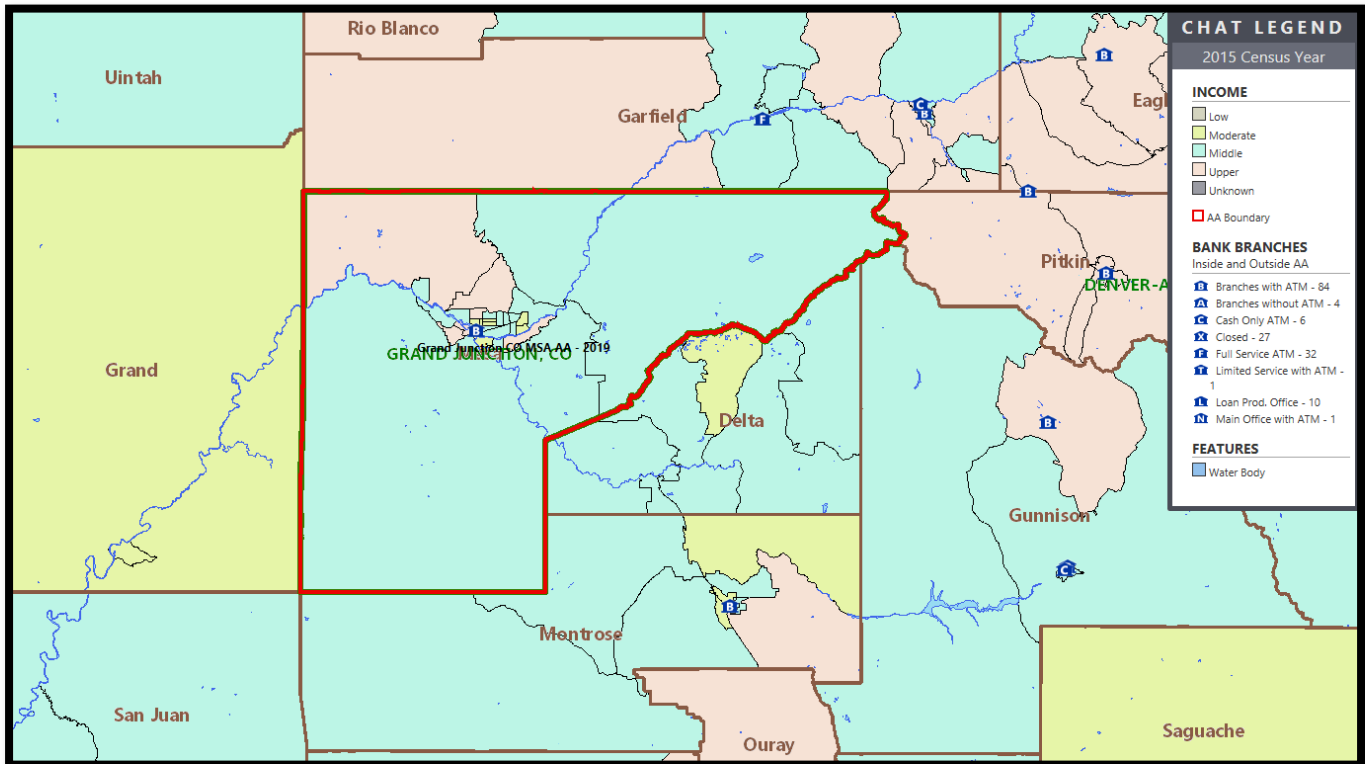
PUEBLO MSA ASSESSMENT AREA



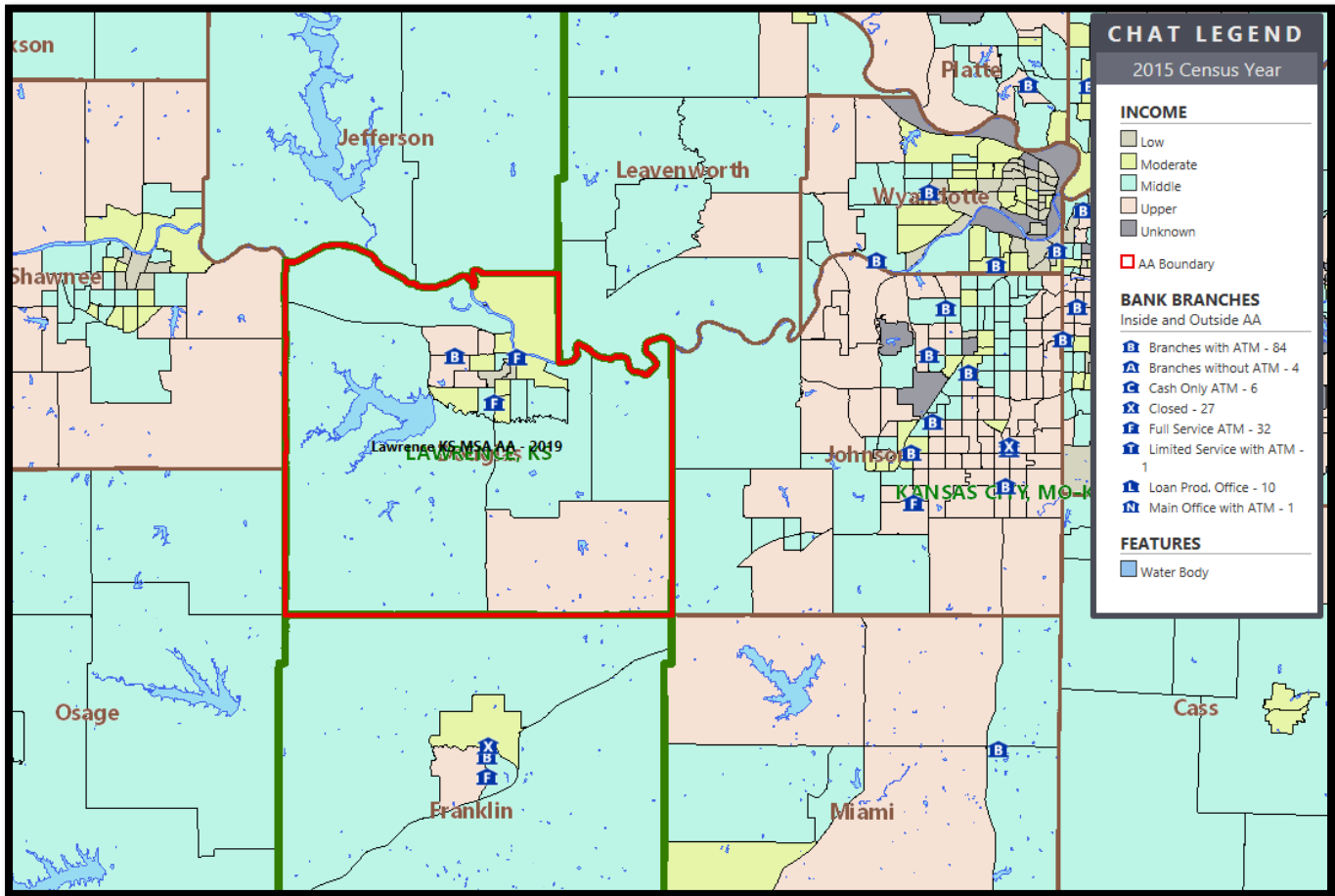
BOULDER MSA ASSESSMENT AREA



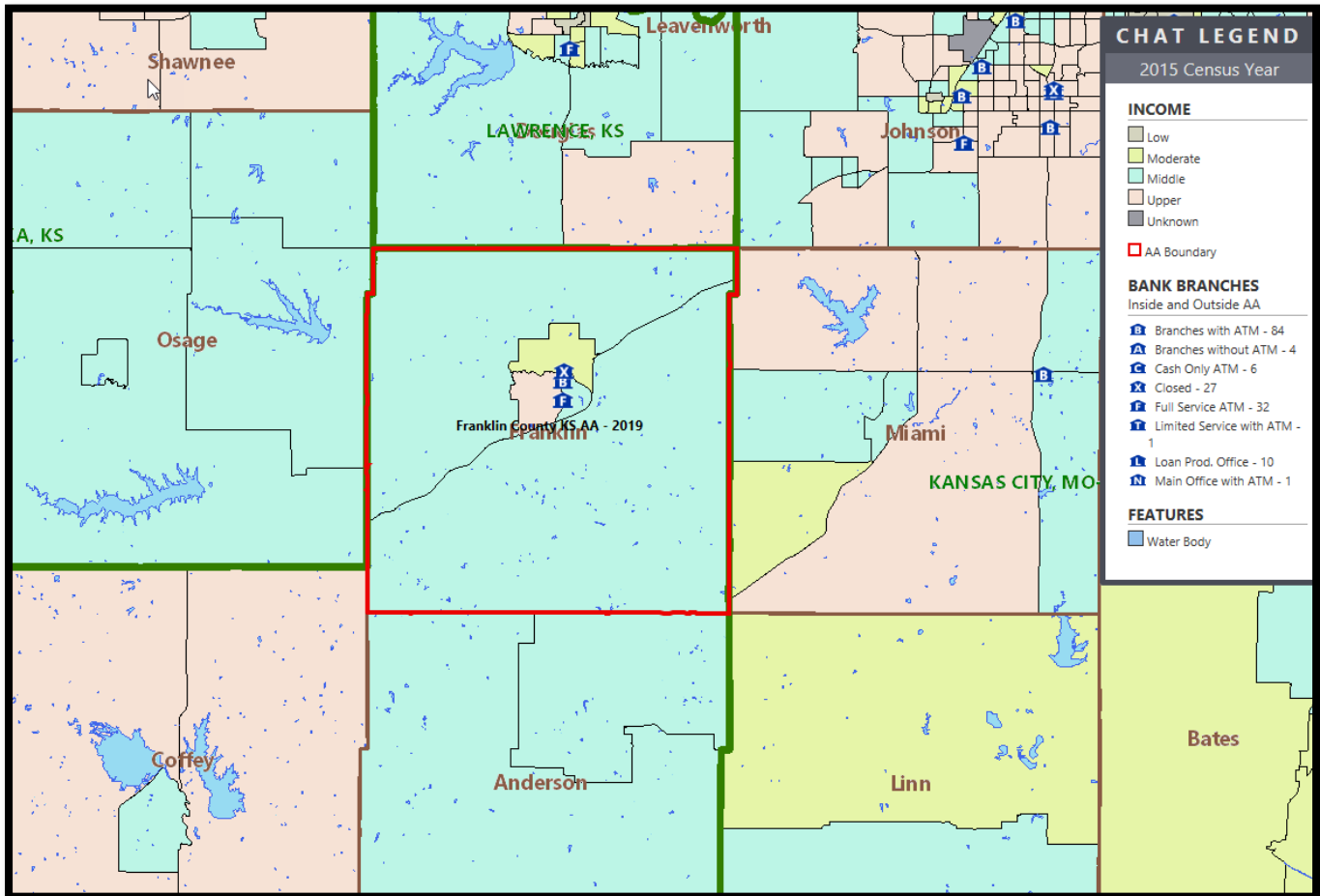
GRAND JUNCTION MSA ASSESSMENT AREA



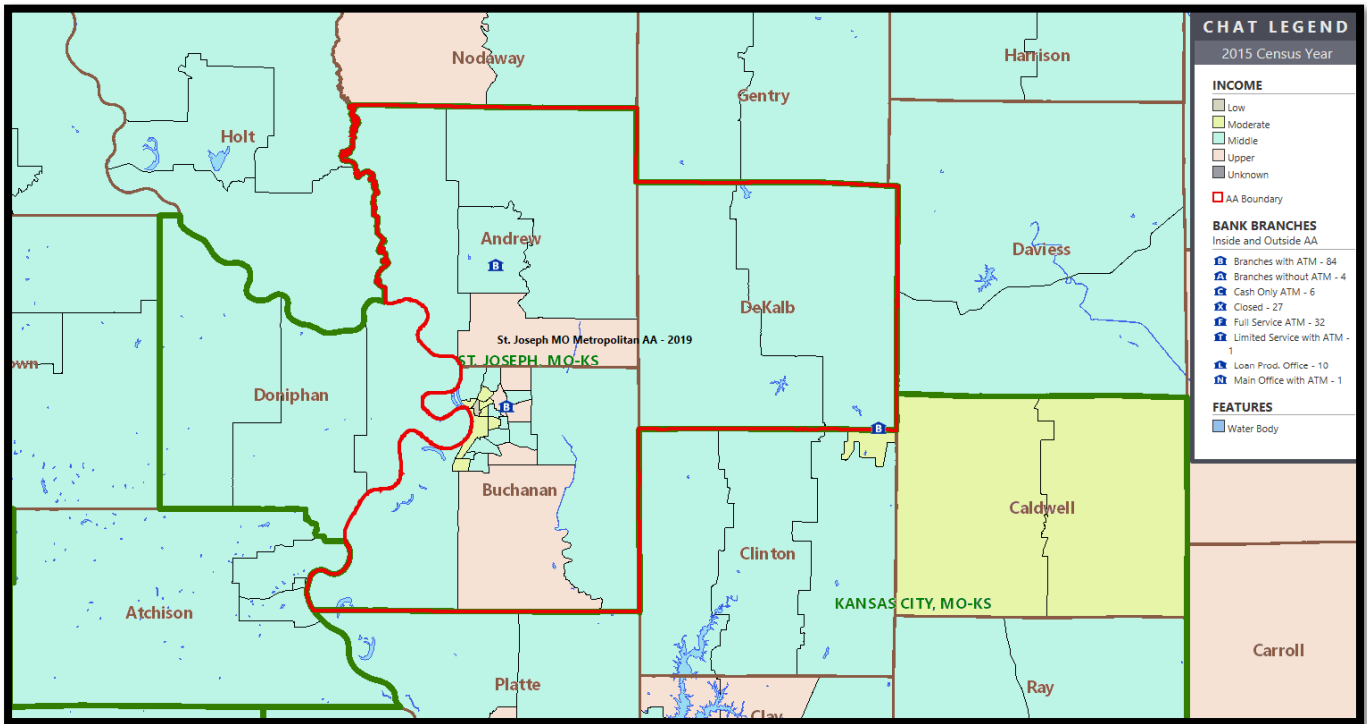
LAWRENCE MSA ASSESSMENT AREA



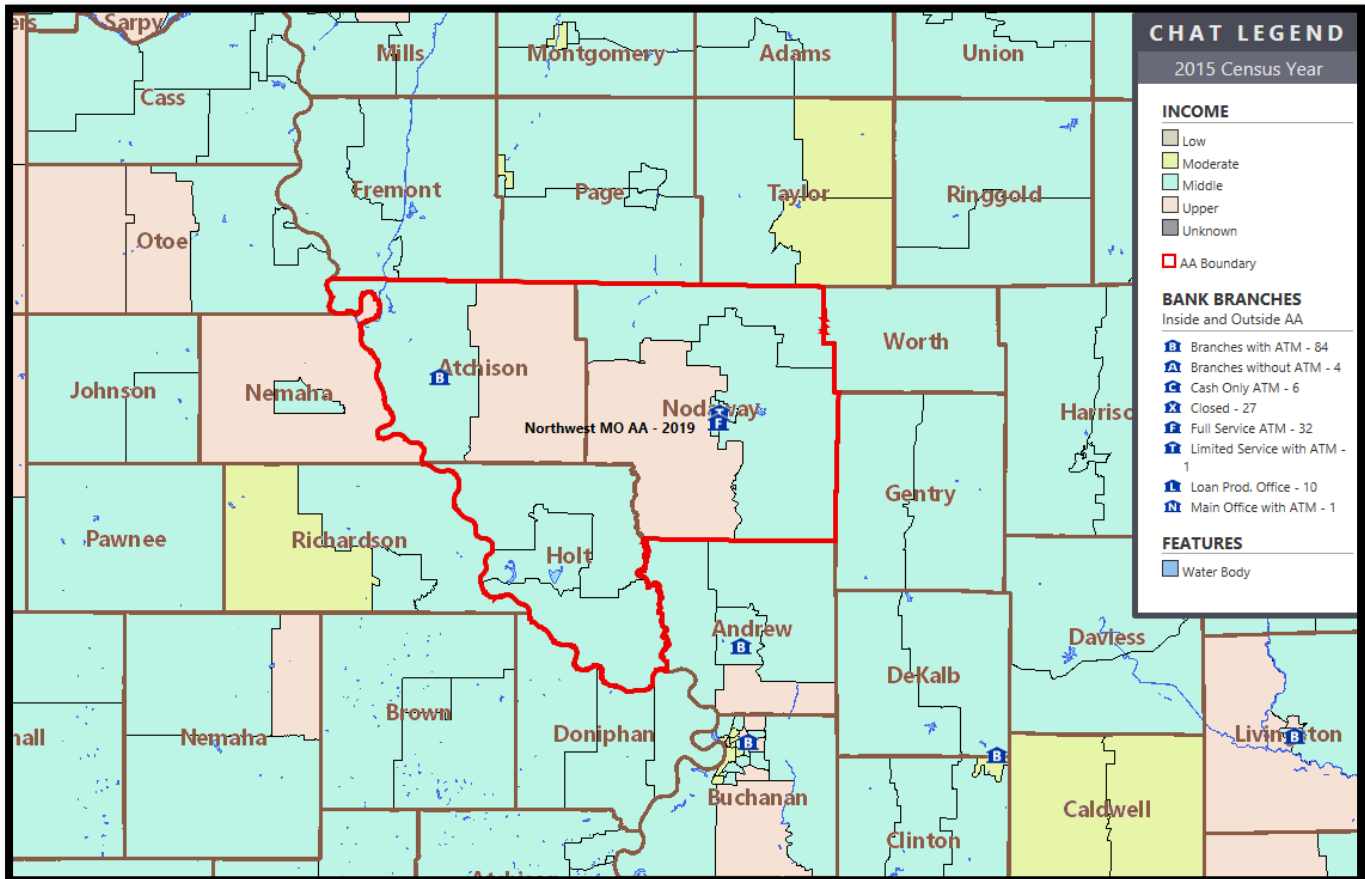
FRANKLIN COUNTY ASSESSMENT AREA



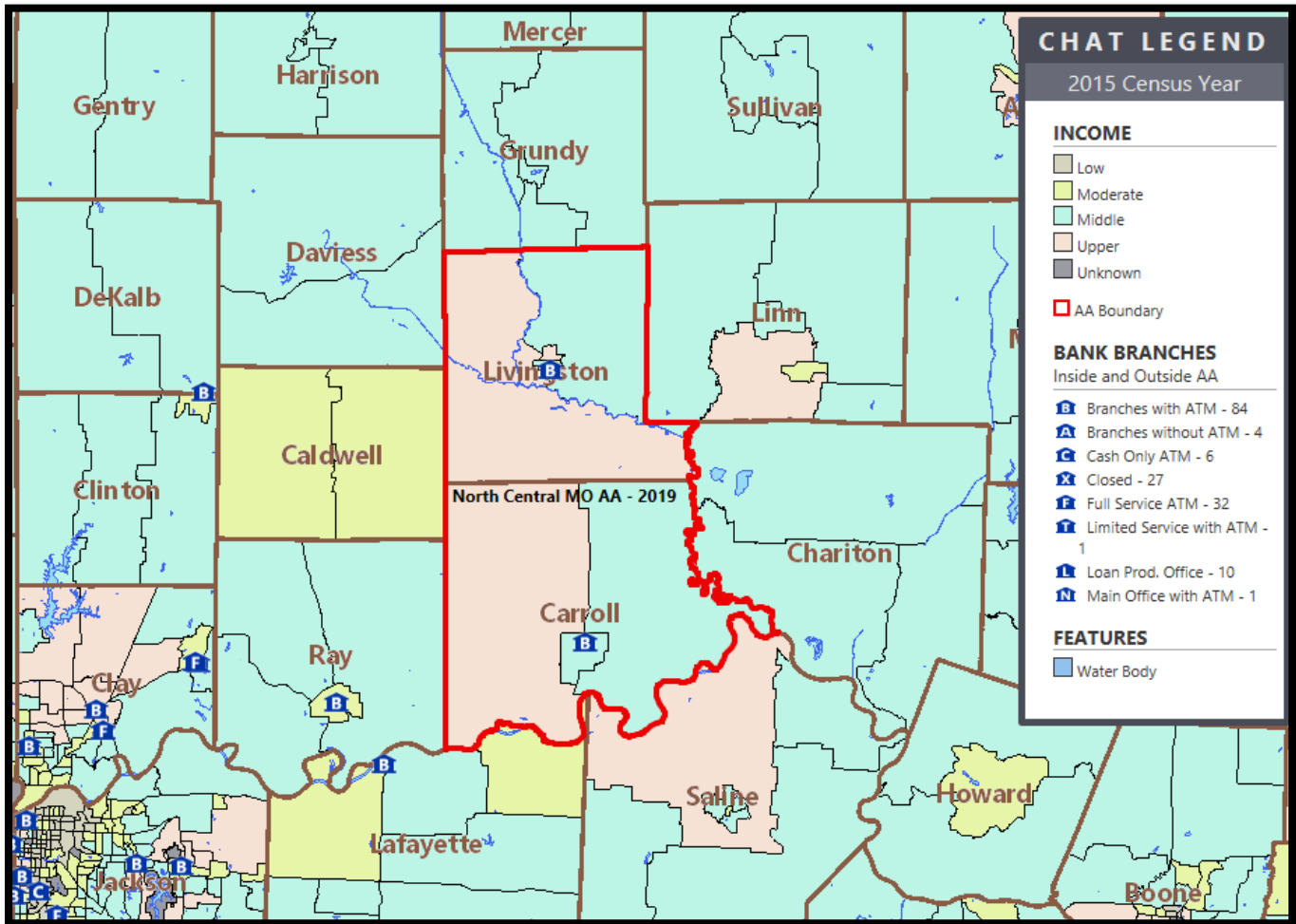
ST. JOSEPH METROPOLITAN ASSESSMENT AREA



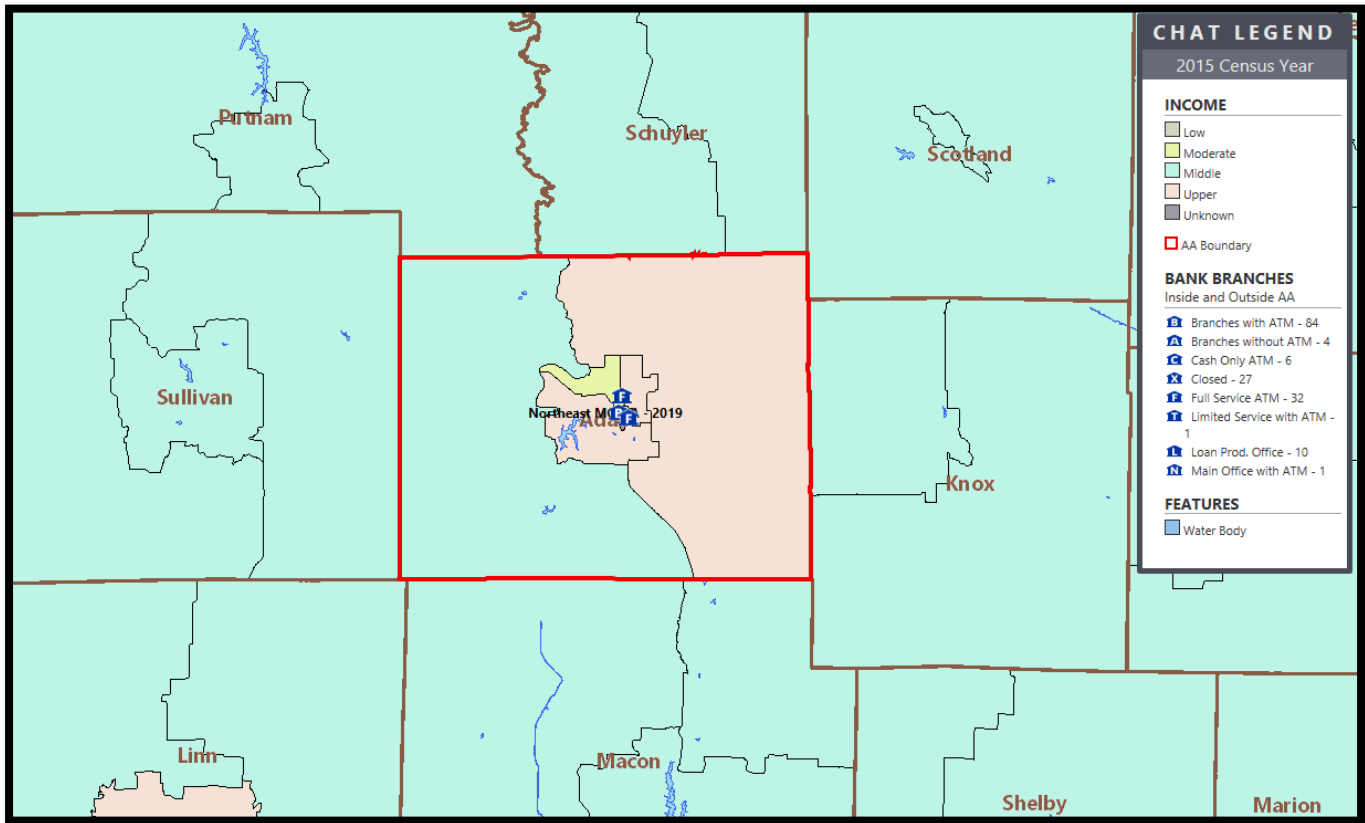
NORTHWEST MISSOURI ASSESSMENT AREA



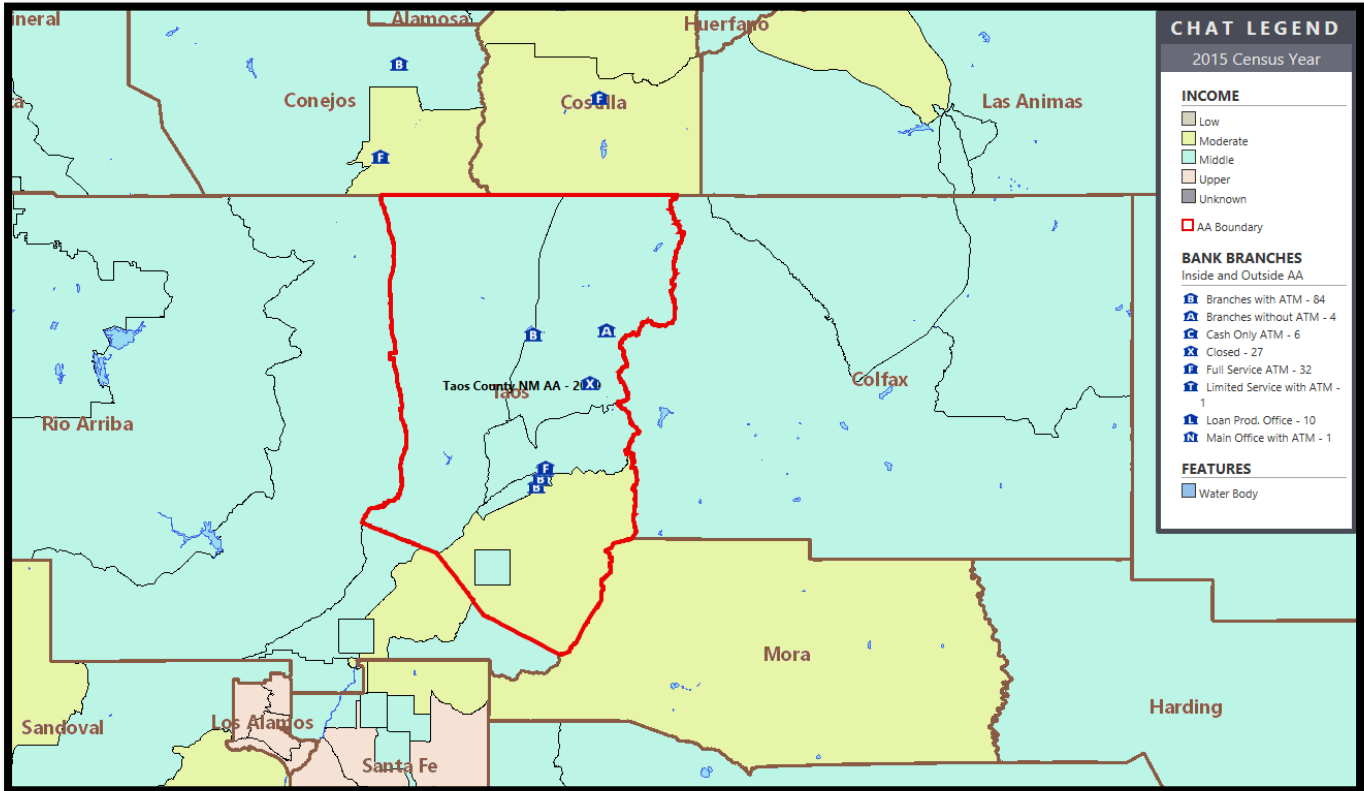
NORTH CENTRAL MISSOURI ASSESSMENT AREA



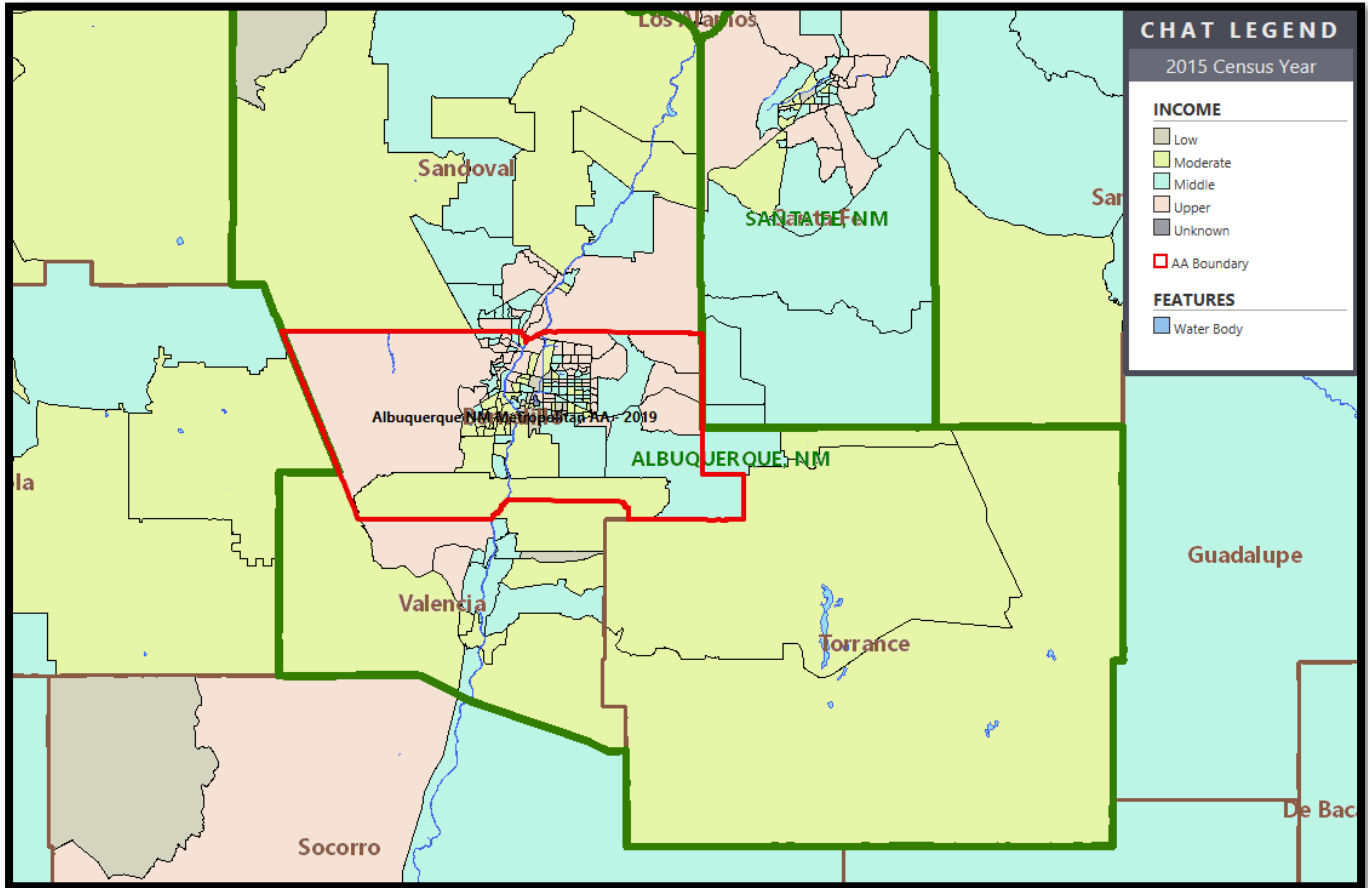
NORTHEAST MISSOURI ASSESSMENT AREA



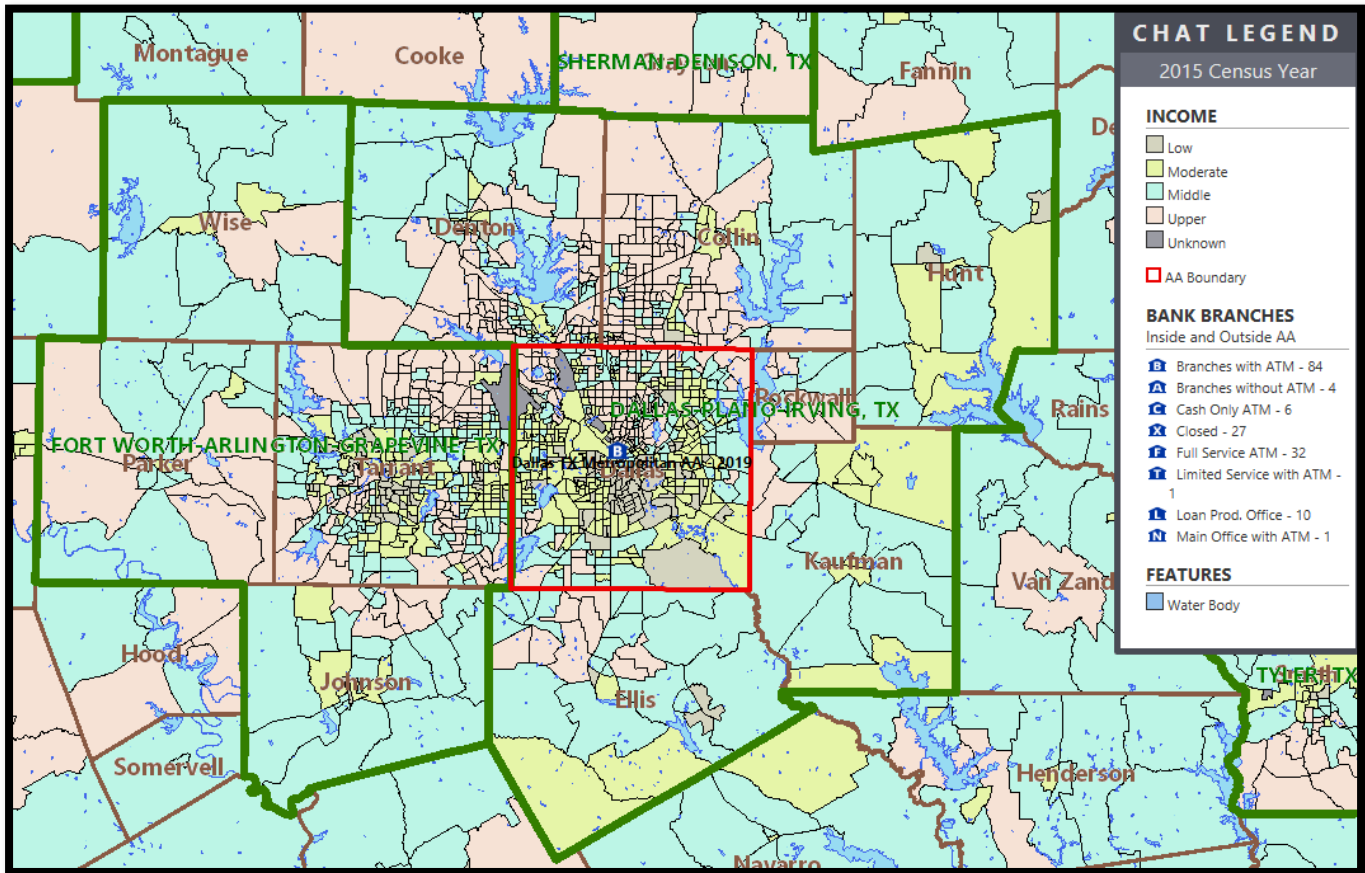
TAOS COUNTY ASSESSMENT AREA



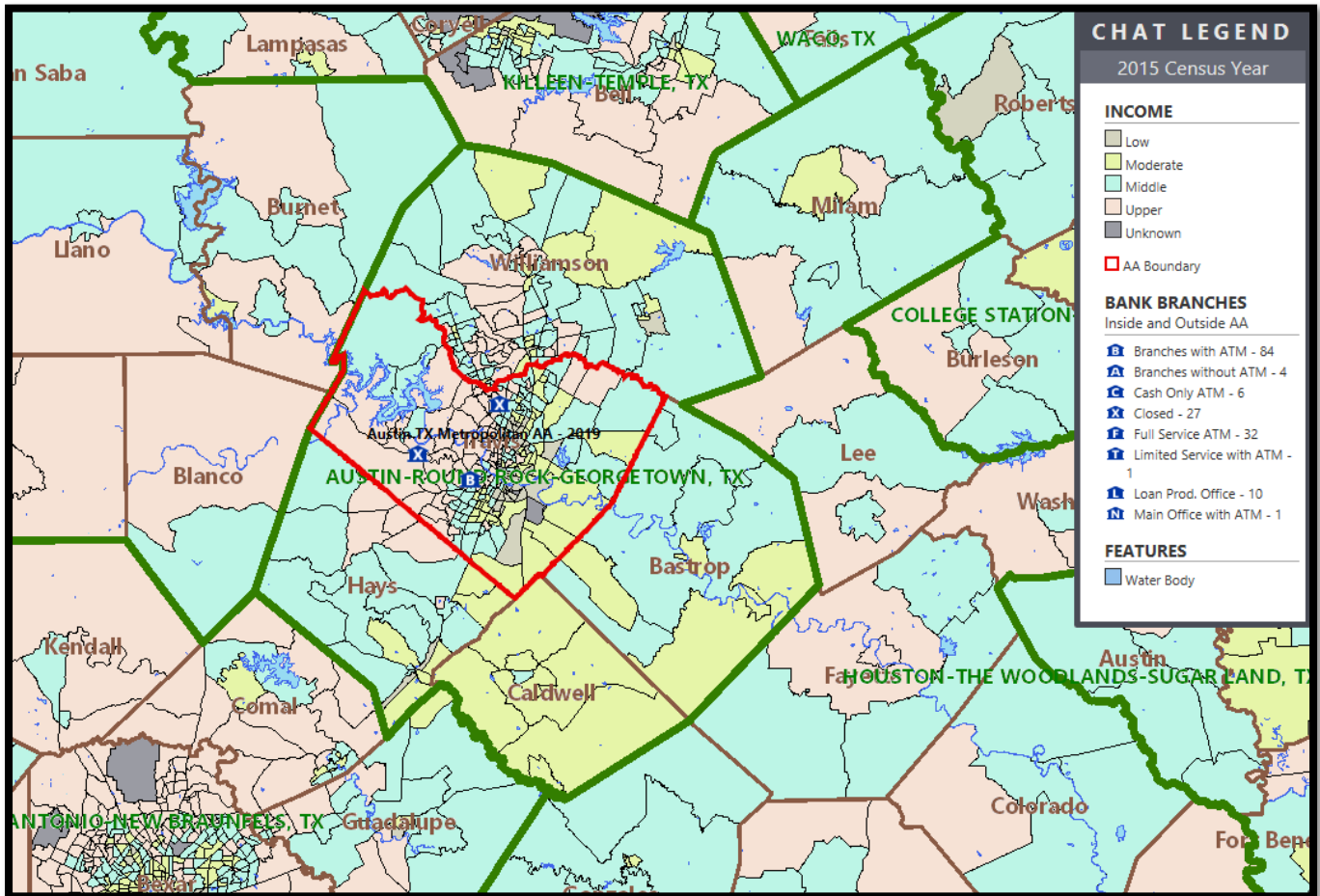
ALBUQUERQUE METROPOLITAN ASSESSMENT AREA



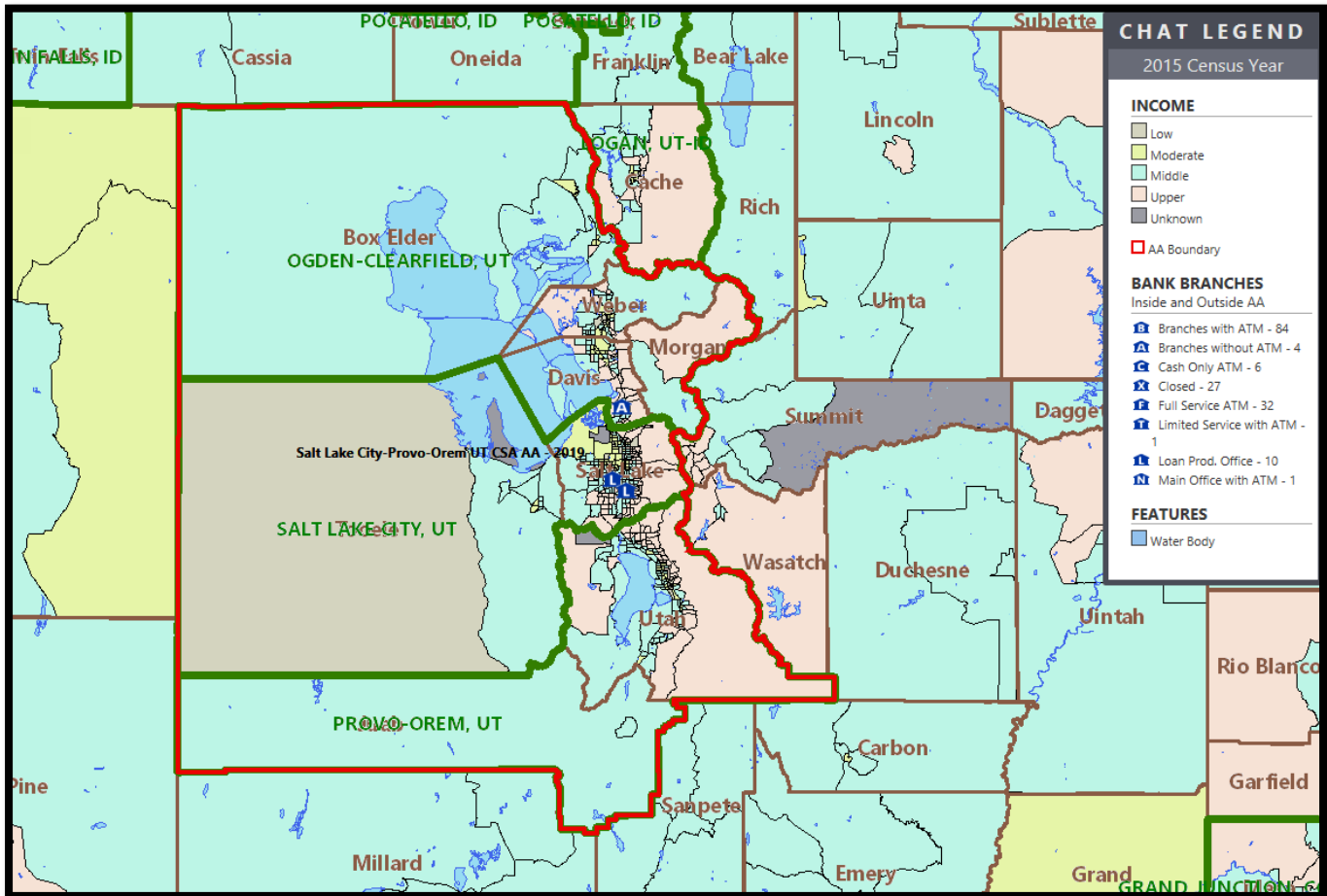
DALLAS METROPOLITAN ASSESSMENT AREA



AUSTIN METROPOLITAN ASSESSMENT AREA



SALT LAKE CITY CSA ASSESSMENT AREA



APPENDIX D

2018 and 2019 DEMOGRAPHIC/ANALYSIS TABLES FOR FULL-SCOPE REVIEW AAs

A. Kansas City, MO-KS Multistate MSA AA – 2018 and 2019 Demographic Tables

Table A-1 2018 Kansas City MO-KS MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	14.9	39,180	7.5	13,683	34.9	111,001	21.3
Moderate	120	22.6	106,172	20.4	16,287	15.3	91,302	17.5
Middle	176	33.2	205,653	39.5	13,179	6.4	107,043	20.6
Upper	136	25.7	168,604	32.4	3,645	2.2	211,251	40.6
Unknown	19	3.6	988	0.2	451	45.6	0	0.0
Total AA	530	100.0	520,597	100.0	47,245	9.1	520,597	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	92,203	28,833	5.5	31.3	43,560	47.2	19,810	21.5
Moderate	204,794	96,833	18.4	47.3	83,537	40.8	24,424	11.9
Middle	340,873	214,636	40.9	63.0	101,350	29.7	24,887	7.3
Upper	238,821	184,102	35.0	77.1	44,577	18.7	10,142	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	880,710	525,267	100.0	59.6	274,804	31.2	80,639	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,439	6.8	5,497	6.4	893	10.3	49	5.0
Moderate	18,705	19.7	16,733	19.6	1,774	20.4	198	20.2
Middle	34,731	36.5	31,464	36.8	2,880	33.1	387	39.4
Upper	33,567	35.3	30,683	35.9	2,553	29.3	331	33.7
Unknown	1,676	1.8	1,054	1.2	605	7.0	17	1.7
Total AA	95,118	100.0	85,431	100.0	8,705	100.0	982	100.0
Percentage of Total Businesses:				89.8		9.2		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	20	1.1	18	1.0	1	2.9	1	9.1
Moderate	315	16.8	310	17.0	2	5.7	3	27.3
Middle	1,030	55.0	1,008	55.2	18	51.4	4	36.4
Upper	505	27.0	490	26.8	12	34.3	3	27.3
Unknown	2	0.1	0	0.0	2	5.7	0	0.0
Total AA	1,872	100.0	1,826	100.0	35	100.0	11	100.0
Percentage of Total Farms:				97.5		1.9		0.6
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table A-2 2019 Kansas City MO-KS MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	14.9	39,180	7.5	13,683	34.9	111,001	21.3
Moderate	120	22.6	106,172	20.4	16,287	15.3	91,302	17.5
Middle	176	33.2	205,653	39.5	13,179	6.4	107,043	20.6
Upper	136	25.7	168,604	32.4	3,645	2.2	211,251	40.6
Unknown	19	3.6	988	0.2	451	45.6	0	0.0
Total AA	530	100.0	520,597	100.0	47,245	9.1	520,597	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	92,203	28,833	5.5	31.3	43,560	47.2	19,810	21.5
Moderate	204,794	96,833	18.4	47.3	83,537	40.8	24,424	11.9
Middle	340,873	214,636	40.9	63.0	101,350	29.7	24,887	7.3
Upper	238,821	184,102	35.0	77.1	44,577	18.7	10,142	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	880,710	525,267	100.0	59.6	274,804	31.2	80,639	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,636	7.0	5,724	6.7	869	10.2	43	5.3
Moderate	18,859	19.8	16,989	19.8	1,718	20.2	152	18.7
Middle	34,623	36.4	31,492	36.7	2,818	33.2	313	38.5
Upper	33,285	35.0	30,511	35.6	2,484	29.3	290	35.7
Unknown	1,686	1.8	1,068	1.2	603	7.1	15	1.8
Total AA	95,089	100.0	85,784	100.0	8,492	100.0	813	100.0
Percentage of Total Businesses:				90.2		8.9		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	22	1.2	20	1.1	1	3.0	1	11.1
Moderate	304	16.9	299	17.0	2	6.1	3	33.3
Middle	989	54.9	969	55.1	17	51.5	3	33.3
Upper	484	26.9	470	26.7	12	36.4	2	22.2
Unknown	1	0.1	0	0.0	1	3.0	0	0.0
Total AA	1,800	100.0	1,758	100.0	33	100.0	9	100.0
Percentage of Total Farms:				97.7		1.8		0.5
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.								

B. Denver-Aurora-Lakewood CO MSA AA – 2018 and 2019 Demographic Tables

Table B-1 2018 Denver-Aurora-Lakewood CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	621	100.0	658,359	100.0	52,836	8.0	658,359	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,105,423	658,882	100.0	59.6	383,221	34.7	63,320	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12,873	6.6	11,293	6.2	1,471	11.8	109	5.0
Moderate	35,872	18.3	32,984	18.2	2,607	20.9	281	12.8
Middle	63,755	32.6	59,271	32.7	3,808	30.6	676	30.9
Upper	82,658	42.2	77,191	42.6	4,359	35.0	1,108	50.7
Unknown	603	0.3	388	0.2	202	1.6	13	0.6
Total AA	195,761	100.0	181,127	100.0	12,447	100.0	2,187	100.0
Percentage of Total Businesses:				92.5		6.4		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	90	4.6	82	4.3	8	24.2	0	0.0
Moderate	256	13.1	252	13.1	4	12.1	0	0.0
Middle	668	34.1	660	34.3	6	18.2	2	66.7
Upper	938	47.9	922	47.9	15	45.5	1	33.3
Unknown	7	0.4	7	0.4	0	0.0	0	0.0
Total AA	1,959	100.0	1,923	100.0	33	100.0	3	100.0
Percentage of Total Farms:				98.2		1.7		0.2

Source: 2018 FFIEC Census Data
2018 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-2 2019 Denver-Aurora-Lakewood CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	621	100.0	658,359	100.0	52,836	8.0	658,359	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,105,423	658,882	100.0	59.6	383,221	34.7	63,320	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12,103	6.9	10,605	6.5	1,409	11.9	89	5.5
Moderate	32,658	18.6	30,013	18.5	2,448	20.7	197	12.1
Middle	57,327	32.6	53,155	32.8	3,658	30.9	514	31.5
Upper	73,029	41.6	68,083	42.0	4,125	34.9	821	50.4
Unknown	584	0.3	388	0.2	187	1.6	9	0.6
Total AA	175,701	100.0	162,244	100.0	11,827	100.0	1,630	100.0
Percentage of Total Businesses:				92.3		6.7		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	114	6.0	104	5.6	10	27.0	0	0.0
Moderate	266	14.0	260	14.0	6	16.2	0	0.0
Middle	640	33.7	631	33.9	7	18.9	2	66.7
Upper	863	45.4	849	45.6	13	35.1	1	33.3
Unknown	17	0.9	16	0.9	1	2.7	0	0.0
Total AA	1,900	100.0	1,860	100.0	37	100.0	3	100.0
Percentage of Total Farms:				97.9		1.9		0.2

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.

C. Colorado Springs MSA AA – 2018 and 2019 Demographic Tables

Table C-1 2018 Colorado Springs CO MSA AA 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	2,874	7.1	2,546	6.7	307	15.5	21	5.7
Moderate	9,143	22.6	8,508	22.4	561	28.3	74	20.1
Middle	13,595	33.7	13,006	34.2	477	24.1	112	30.4
Upper	14,721	36.4	13,936	36.6	626	31.6	159	43.2
Unknown	58	0.1	47	0.1	9	0.5	2	0.5
Total AA	40,391	100.0	38,043	100.0	1,980	100.0	368	100.0
Percentage of Total Businesses:				94.2		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	13	2.7	13	2.7	0	0.0	0	0.0
Moderate	64	13.1	63	13.0	1	16.7	0	0.0
Middle	233	47.6	230	47.5	3	50.0	0	0.0
Upper	180	36.7	178	36.8	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	490	100.0	484	100.0	6	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0

Source: 2018 FFIEC Census Data
2018 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 2019 Colorado Springs CO MSA AA 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	2,742	7.4	2,432	7.0	295	15.8	15	5.8
Moderate	8,527	23.0	7,945	22.8	535	28.6	47	18.1
Middle	12,414	33.5	11,879	34.1	446	23.8	89	34.2
Upper	13,271	35.9	12,574	36.1	588	31.4	109	41.9
Unknown	55	0.1	48	0.1	7	0.4	0	0.0
Total AA	37,009	100.0	34,878	100.0	1,871	100.0	260	100.0
Percentage of Total Businesses:				94.2		5.1		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	22	4.5	22	4.6	0	0.0	0	0.0
Moderate	75	15.4	74	15.4	1	14.3	0	0.0
Middle	220	45.3	216	45.1	4	57.1	0	0.0
Upper	169	34.8	167	34.9	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	486	100.0	479	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

D. Lawrence MSA AA – 2018 and 2019 Demographic Tables

Table D-1 2018 Lawrence KS MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	9.1	441	1.9	160	36.3	4,537	19.1
Moderate	7	31.8	6,694	28.1	760	11.4	4,666	19.6
Middle	8	36.4	8,410	35.3	604	7.2	4,904	20.6
Upper	5	22.7	8,249	34.7	398	4.8	9,687	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	22	100.0	23,794	100.0	1,922	8.1	23,794	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,024	306	1.3	10.1	2,350	77.7	368	12.2
Moderate	16,053	5,804	25.4	36.2	8,581	53.5	1,668	10.4
Middle	15,114	8,413	36.9	55.7	5,397	35.7	1,304	8.6
Upper	13,621	8,283	36.3	60.8	4,595	33.7	743	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	47,812	22,806	100.0	47.7	20,923	43.8	4,083	8.5
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	271	5.9	244	5.8	26	7.0	1	2.5
Moderate	1,462	31.9	1,299	31.1	152	40.8	11	27.5
Middle	1,537	33.5	1,407	33.7	111	29.8	19	47.5
Upper	1,317	28.7	1,224	29.3	84	22.5	9	22.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,587	100.0	4,174	100.0	373	100.0	40	100.0
Percentage of Total Businesses:				91.0	8.1	0.9		
	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
Moderate	22	15.3	21	14.7	1	100.0	0	0.0
Middle	86	59.7	86	60.1	0	0.0	0	0.0
Upper	36	25.0	36	25.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	144	100.0	143	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.3	0.7	0.0		
Source: 2018 FFIEC Census Data 2018 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-2
2019 Lawrence KS MSA AA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	9.1	441	1.9	160	36.3	4,537	19.1
Moderate	7	31.8	6,694	28.1	760	11.4	4,666	19.6
Middle	8	36.4	8,410	35.3	604	7.2	4,904	20.6
Upper	5	22.7	8,249	34.7	398	4.8	9,687	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	22	100.0	23,794	100.0	1,922	8.1	23,794	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,024	306	1.3	10.1	2,350	77.7	368	12.2
Moderate	16,053	5,804	25.4	36.2	8,581	53.5	1,668	10.4
Middle	15,114	8,413	36.9	55.7	5,397	35.7	1,304	8.6
Upper	13,621	8,283	36.3	60.8	4,595	33.7	743	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	47,812	22,806	100.0	47.7	20,923	43.8	4,083	8.5
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	271	5.9	244	5.9	27	7.4	0	0.0
Moderate	1,484	32.5	1,328	31.9	146	40.2	10	26.3
Middle	1,511	33.1	1,383	33.3	108	29.8	20	52.6
Upper	1,294	28.4	1,204	28.9	82	22.6	8	21.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,560	100.0	4,159	100.0	363	100.0	38	100.0
Percentage of Total Businesses:				91.2	8.0	0.8		
	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
Moderate	25	18.1	24	17.5	1	100.0	0	0.0
Middle	80	58.0	80	58.4	0	0.0	0	0.0
Upper	33	23.9	33	24.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	138	100.0	137	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.3	0.7	0.0		

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.

E. St. Joseph Metropolitan AA – 2018 and 2019 Demographic Tables

Table E-1 2018 St. Joseph MO Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.2	307	1.1	141	45.9	5,969	21.2
Moderate	7	22.6	5,379	19.1	1,161	21.6	5,040	17.9
Middle	17	54.8	15,639	55.4	1,873	12.0	6,400	22.7
Upper	6	19.4	6,896	24.4	332	4.8	10,812	38.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	31	100.0	28,221	100.0	3,507	12.4	28,221	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,080	183	0.6	16.9	645	59.7	252	23.3
Moderate	10,903	4,807	16.7	44.1	3,694	33.9	2,402	22.0
Middle	27,617	16,277	56.6	58.9	8,247	29.9	3,093	11.2
Upper	10,494	7,511	26.1	71.6	2,376	22.6	607	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	50,094	28,778	100.0	57.4	14,962	29.9	6,354	12.7
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	208	5.3	170	4.9	32	7.7	6	13.0
Moderate	551	14.1	463	13.4	84	20.1	4	8.7
Middle	2,058	52.6	1,851	53.6	177	42.4	30	65.2
Upper	1,099	28.1	969	28.1	124	29.7	6	13.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,916	100.0	3,453	100.0	417	100.0	46	100.0
Percentage of Total Businesses:				88.2	10.6	1.2		
	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
Moderate	4	1.6	4	1.7	0	0.0	0	0.0
Middle	196	80.3	195	80.6	1	50.0	0	0.0
Upper	44	18.0	43	17.8	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	244	100.0	242	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.2	0.8	0.0		
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-2
2019 St. Joseph MO Metropolitan AA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.2	307	1.1	141	45.9	5,969	21.2
Moderate	7	22.6	5,379	19.1	1,161	21.6	5,040	17.9
Middle	17	54.8	15,639	55.4	1,873	12.0	6,400	22.7
Upper	6	19.4	6,896	24.4	332	4.8	10,812	38.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	31	100.0	28,221	100.0	3,507	12.4	28,221	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,080	183	0.6	16.9	645	59.7	252	23.3
Moderate	10,903	4,807	16.7	44.1	3,694	33.9	2,402	22.0
Middle	27,617	16,277	56.6	58.9	8,247	29.9	3,093	11.2
Upper	10,494	7,511	26.1	71.6	2,376	22.6	607	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	50,094	28,778	100.0	57.4	14,962	29.9	6,354	12.7
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	214	5.4	178	5.1	33	8.3	3	8.8
Moderate	561	14.3	477	13.6	81	20.3	3	8.8
Middle	2,029	51.6	1,840	52.5	167	41.9	22	64.7
Upper	1,131	28.7	1,007	28.8	118	29.6	6	17.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,935	100.0	3,502	100.0	399	100.0	34	100.0
Percentage of Total Businesses:				89.0		10.1		0.9
	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
Moderate	5	2.2	5	2.2	0	0.0	0	0.0
Middle	183	78.9	182	79.1	1	50.0	0	0.0
Upper	44	19.0	43	18.7	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	232	100.0	230	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		0.0

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.

F. Northwest Missouri AA – 2018 and 2019 Demographic Tables

Table F-1 2018 Northwest MO AA 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	1,306	16.8
Moderate	0	0.0	0	0.0	0	0.0	1,286	16.6
Middle	9	90.0	6,981	89.9	894	12.8	1,697	21.9
Upper	1	10.0	785	10.1	68	8.7	3,477	44.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	7,766	100.0	962	12.4	7,766	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	14,164	7,056	89.4	49.8	5,207	36.8	1,901	13.4
Upper	1,198	836	10.6	69.8	191	15.9	171	14.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	15,362	7,892	100.0	51.4	5,398	35.1	2,072	13.5
	Total Businesses by Tract	0						
		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	1,238	90.4	1,085	90.0	87	92.6	66	94.3
Upper	131	9.6	120	10.0	7	7.4	4	5.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,369	100.0	1,205	100.0	94	100.0	70	100.0
Percentage of Total Businesses:				88.0	6.9	5.1		
	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
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	353	81.1	348	80.9	3	100.0	2	100.0
Upper	82	18.9	82	19.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	435	100.0	430	100.0	3	100.0	2	100.0
Percentage of Total Farms:				98.9	0.7	0.5		
Source: 2018 FFIEC Census Data 2018 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-2
2019 Northwest MO AA 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	1,300	16.7
Moderate	0	0.0	0	0.0	0	0.0	1,277	16.4
Middle	8	80.0	6,167	79.4	803	13.0	1,689	21.7
Upper	2	20.0	1,599	20.6	159	9.9	3,500	45.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	7,766	100.0	962	12.4	7,766	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	12,424	6,085	77.1	49.0	4,753	38.3	1,586	12.8
Upper	2,938	1,807	22.9	61.5	645	22.0	486	16.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	15,362	7,892	100.0	51.4	5,398	35.1	2,072	13.5
	Total Businesses by Tract	0						
		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	1,116	80.8	989	80.3	82	85.4	45	84.9
Upper	265	19.2	243	19.7	14	14.6	8	15.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,381	100.0	1,232	100.0	96	100.0	53	100.0
Percentage of Total Businesses:				89.2		7.0		3.8
	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
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	280	66.2	277	66.0	3	100.0	0	0.0
Upper	143	33.8	143	34.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	423	100.0	420	100.0	3	100.0	0	0.0
Percentage of Total Farms:				99.3		0.7		0.0

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.

G. Taos County AA – 2018 and 2019 Demographic Tables

Table G-1 2018 Taos County NM AA 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	2,057	26.0
Moderate	1	16.7	1,486	18.8	277	18.6	1,225	15.5
Middle	5	83.3	6,411	81.2	1,070	16.7	1,775	22.5
Upper	0	0.0	0	0.0	0	0.0	2,840	36.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,897	100.0	1,347	17.1	7,897	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	3,704	1,956	20.5	52.8	543	14.7	1,205	32.5
Middle	16,612	7,578	79.5	45.6	3,147	18.9	5,887	35.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	20,316	9,534	100.0	46.9	3,690	18.2	7,092	34.9
	Total Businesses by Tract	0						
		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	267	17.8	245	17.9	17	17.5	5	17.2
Middle	1,229	82.2	1,125	82.1	80	82.5	24	82.8
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,496	100.0	1,370	100.0	97	100.0	29	100.0
Percentage of Total Businesses:				91.6		6.5		1.9
	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
Moderate	7	15.6	7	15.9	0	0.0	0	0.0
Middle	38	84.4	37	84.1	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	45	100.0	44	100.0	1	100.0	0	0.0
Percentage of Total Farms:				97.8		2.2		0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table G-2
2019 Taos County NM AA 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	2,057	26.0
Moderate	1	16.7	1,486	18.8	277	18.6	1,225	15.5
Middle	5	83.3	6,411	81.2	1,070	16.7	1,775	22.5
Upper	0	0.0	0	0.0	0	0.0	2,840	36.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,897	100.0	1,347	17.1	7,897	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	3,704	1,956	20.5	52.8	543	14.7	1,205	32.5
Middle	16,612	7,578	79.5	45.6	3,147	18.9	5,887	35.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	20,316	9,534	100.0	46.9	3,690	18.2	7,092	34.9
	Total Businesses by Tract	0						
		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	266	17.9	247	18.0	15	15.8	4	17.4
Middle	1,222	82.1	1,123	82.0	80	84.2	19	82.6
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,488	100.0	1,370	100.0	95	100.0	23	100.0
Percentage of Total Businesses:				92.1		6.4		1.5
	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
Moderate	6	14.3	6	14.6	0	0.0	0	0.0
Middle	36	85.7	35	85.4	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	42	100.0	41	100.0	1	100.0	0	0.0
Percentage of Total Farms:				97.6		2.4		0.0

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.

H. Dallas Metropolitan AA – 2018 and 2019 Demographic Tables

Table H-1 2018 Dallas TX Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	107	20.2	100,867	17.5	33,928	33.6	181,784	31.5
Moderate	187	35.3	207,878	36.0	39,954	19.2	109,266	18.9
Middle	110	20.8	135,657	23.5	12,627	9.3	100,167	17.4
Upper	120	22.7	131,707	22.8	5,205	4.0	185,509	32.2
Unknown	5	0.9	617	0.1	79	12.8	0	0.0
Total AA	529	100.0	576,726	100.0	91,793	15.9	576,726	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	188,536	45,102	10.0	23.9	118,338	62.8	25,096	13.3
Moderate	327,960	150,754	33.4	46.0	150,466	45.9	26,740	8.2
Middle	220,794	115,592	25.6	52.4	90,447	41.0	14,755	6.7
Upper	225,058	139,114	30.8	61.8	69,362	30.8	16,582	7.4
Unknown	2,365	918	0.2	38.8	1,186	50.1	261	11.0
Total AA	964,713	451,480	100.0	46.8	429,799	44.6	83,434	8.6
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	16,608	11.2	14,733	11.1	1,758	13.0	117	6.4
Moderate	40,948	27.6	36,662	27.6	3,930	29.1	356	19.5
Middle	38,659	26.1	34,775	26.1	3,467	25.6	417	22.8
Upper	50,348	33.9	45,619	34.3	3,824	28.3	905	49.6
Unknown	1,778	1.2	1,209	0.9	539	4.0	30	1.6
Total AA	148,341	100.0	132,998	100.0	13,518	100.0	1,825	100.0
Percentage of Total Businesses:				89.7		9.1		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	68	7.5	63	7.0	5	41.7	0	0.0
Moderate	171	18.9	168	18.8	3	25.0	0	0.0
Middle	216	23.8	215	24.0	1	8.3	0	0.0
Upper	443	48.8	440	49.2	2	16.7	1	100.0
Unknown	9	1.0	8	0.9	1	8.3	0	0.0
Total AA	907	100.0	894	100.0	12	100.0	1	100.0
Percentage of Total Farms:				98.6		1.3		0.1
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table H-2
2019 Dallas TX Metropolitan AA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	107	20.2	100,867	17.5	33,928	33.6	181,784	31.5
Moderate	187	35.3	207,878	36.0	39,954	19.2	109,266	18.9
Middle	110	20.8	135,657	23.5	12,627	9.3	100,167	17.4
Upper	120	22.7	131,707	22.8	5,205	4.0	185,509	32.2
Unknown	5	0.9	617	0.1	79	12.8	0	0.0
Total AA	529	100.0	576,726	100.0	91,793	15.9	576,726	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	188,536	45,102	10.0	23.9	118,338	62.8	25,096	13.3
Moderate	327,960	150,754	33.4	46.0	150,466	45.9	26,740	8.2
Middle	220,794	115,592	25.6	52.4	90,447	41.0	14,755	6.7
Upper	225,058	139,114	30.8	61.8	69,362	30.8	16,582	7.4
Unknown	2,365	918	0.2	38.8	1,186	50.1	261	11.0
Total AA	964,713	451,480	100.0	46.8	429,799	44.6	83,434	8.6
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	17,004	11.3	15,191	11.2	1,715	12.9	98	6.1
Moderate	41,529	27.7	37,426	27.7	3,823	28.7	280	17.3
Middle	39,076	26.0	35,289	26.1	3,432	25.8	355	22.0
Upper	50,573	33.7	45,913	34.0	3,808	28.6	852	52.7
Unknown	1,833	1.2	1,273	0.9	528	4.0	32	2.0
Total AA	150,015	100.0	135,092	100.0	13,306	100.0	1,617	100.0
Percentage of Total Businesses:				90.1		8.9		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	76	8.2	73	8.0	3	30.0	0	0.0
Moderate	177	19.1	174	19.0	3	30.0	0	0.0
Middle	222	23.9	221	24.1	1	10.0	0	0.0
Upper	442	47.7	439	47.9	2	20.0	1	100.0
Unknown	10	1.1	9	1.0	1	10.0	0	0.0
Total AA	927	100.0	916	100.0	10	100.0	1	100.0
Percentage of Total Farms:				98.8		1.1		0.1
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.								

I. Salt Lake City-Provo-Orem UT CSA AA – 2019 Demographic Tables

Table I-1 2019 Salt Lake City-Provo-Orem UT CSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	23	4.9	16,553	3.1	5,628	34.0	103,155	19.1
Moderate	100	21.3	104,502	19.3	17,870	17.1	98,807	18.3
Middle	204	43.4	253,142	46.8	17,841	7.0	123,315	22.8
Upper	138	29.4	165,819	30.6	5,968	3.6	216,081	39.9
Unknown	5	1.1	1,342	0.2	525	39.1	0	0.0
Total AA	470	100.0	541,358	100.0	47,832	8.8	541,358	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	28,891	6,175	1.2	21.4	20,696	71.6	2,020	7.0
Moderate	170,248	79,919	16.1	46.9	78,674	46.2	11,655	6.8
Middle	348,428	242,362	48.7	69.6	88,604	25.4	17,462	5.0
Upper	212,247	167,700	33.7	79.0	32,818	15.5	11,729	5.5
Unknown	2,668	1,186	0.2	44.5	1,434	53.7	48	1.8
Total AA	762,482	497,342	100.0	65.2	222,226	29.1	42,914	5.6
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,200	4.1	3,523	3.8	634	7.6	43	3.1
Moderate	19,993	19.3	17,178	18.3	2,610	31.3	205	14.8
Middle	44,628	43.1	40,815	43.5	3,308	39.7	505	36.5
Upper	34,203	33.0	31,914	34.0	1,667	20.0	622	45.0
Unknown	473	0.5	355	0.4	110	1.3	8	0.6
Total AA	103,497	100.0	93,785	100.0	8,329	100.0	1,383	100.0
Percentage of Total Businesses:				90.6	8.0	1.3		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	1.1	13	1.2	0	0.0	0	0.0
Moderate	135	11.6	130	11.6	5	12.5	0	0.0
Middle	648	55.7	619	55.1	29	72.5	0	0.0
Upper	366	31.5	360	32.1	6	15.0	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	1,163	100.0	1,123	100.0	40	100.0	0	0.0
Percentage of Total Farms:				96.6	3.4	0.0		
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.								

APPENDIX E

2018 and 2019 DEMOGRAPHIC/ANALYSIS TABLES FOR LIMITED-SCOPE REVIEW AAs

J. Western Colorado AA – 2018 and 2019 Demographic and Lending Tables

Table J-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Western CO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.5
Moderate	12	8.5	12.8	1,872	4.6	6.0	19	12.4	13.2	2,865	5.8	6.1	19.0
Middle	81	57.0	42.8	23,779	58.7	34.4	66	43.1	42.3	21,214	42.6	34.7	48.8
Upper	49	34.5	43.7	14,851	36.7	59.0	68	44.4	44.4	25,699	51.6	59.1	31.7
Unknown	0	0.0	0.6	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	142	100.0	100.0	40,502	100.0	100.0	153	100.0	100.0	49,778	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.0	1	0.9	0.1	79	0.3	0.0	0.5
Moderate	9	10.7	13.1	641	3.4	5.9	13	11.7	10.9	1,746	5.8	4.8	19.0
Middle	30	35.7	43.7	4,340	23.2	31.2	43	38.7	43.4	11,629	38.8	31.0	48.8
Upper	45	53.6	42.9	13,744	73.4	62.6	54	48.6	45.5	16,513	55.1	64.1	31.7
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	84	100.0	100.0	18,725	100.0	100.0	111	100.0	100.0	29,967	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.2	0.2	35	1.5	0.1	0	0.0	0.4	0	0.0	0.2	0.5
Moderate	3	9.7	9.2	100	4.3	4.7	0	0.0	10.5	0	0.0	4.7	19.0
Middle	17	54.8	41.7	1,147	48.8	34.8	15	51.7	38.8	1,132	38.4	29.1	48.8
Upper	10	32.3	48.9	1,068	45.4	60.4	14	48.3	50.4	1,818	61.6	66.1	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	2,350	100.0	100.0	29	100.0	100.0	2,950	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	1.9	0	0.0	0.0	0	0.0	2.0	0	0.0	0.4	0.4
Moderate	0	0.0	18.9	0	0.0	4.6	0	0.0	14.0	0	0.0	11.5	6.6
Middle	1	100.0	39.6	108	100.0	26.9	0	0.0	48.0	0	0.0	30.4	30.4
Upper	0	0.0	37.7	0	0.0	67.5	1	100.0	36.0	1,300	100.0	57.6	62.7
Unknown	0	0.0	1.9	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	108	100.0	100.0	1	100.0	100.0	1,300	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	0.3	0.1	35	0.1	0.0	1	0.3	0.1	79	0.1	0.0	0.5
Moderate	28	9.2	12.6	2,789	4.2	5.8	38	11.9	12.0	4,786	5.6	5.4	19.0
Middle	152	49.7	42.9	32,299	48.1	32.8	134	42.0	42.6	34,543	40.3	32.4	48.8
Upper	125	40.8	43.9	32,020	47.7	61.0	146	45.8	45.3	46,350	54.0	62.1	31.7
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	306	100.0	100.0	67,143	100.0	100.0	319	100.0	100.0	85,758	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table J-2													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Western CO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	2	5.3	6.9	129	2.9	2.4	1	7.1	7.0	10	0.7	2.7	19.0
Middle	17	44.7	39.4	2,006	45.3	25.6	7	50.0	41.1	436	32.4	27.3	48.8
Upper	19	50.0	53.7	2,297	51.8	72.0	6	42.9	51.9	900	66.9	70.1	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	4,432	100.0	100.0	14	100.0	100.0	1,346	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.3	0	0.0	0.0	0	0.0	0.2	0	0.0	0.0	0.5
Moderate	2	20.0	12.5	47	4.6	1.7	5	45.5	13.5	165	39.6	1.5	19.0
Middle	6	60.0	38.8	919	89.6	19.5	3	27.3	38.7	132	31.7	18.6	48.8
Upper	2	20.0	48.2	60	5.8	78.8	3	27.3	47.4	120	28.8	79.9	31.7
Unknown	0	0.0	0.3	0	0.0	0.0	0	0.0	0.2	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,026	100.0	100.0	11	100.0	100.0	417	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	21.2	0	0.0	12.3	0	0.0	13.2	0	0.0	6.3	19.0
Middle	0	0.0	53.9	0	0.0	45.6	0	0.0	46.2	0	0.0	34.8	48.8
Upper	0	0.0	24.9	0	0.0	42.1	0	0.0	40.6	0	0.0	58.9	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table J-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Western CO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.3
Moderate	8	6.3	9.5	408	2.4	7.9	13	9.1	9.3	1,509	8.7	8.0	15.2
Middle	68	54.0	40.6	9,860	57.3	41.5	77	53.8	39.6	8,216	47.5	40.7	48.2
Upper	50	39.7	39.7	6,933	40.3	45.0	53	37.1	39.2	7,561	43.7	45.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	10.1	0	0.0	5.6	0	0.0	11.8	0	0.0	6.2	
Total	126	100.0	100.0	17,201	100.0	100.0	143	100.0	100.0	17,286	100.0	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 J-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Western CO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	2	4.9	0.4	290	8.7	0.9	0.1
Moderate	7	14.0	15.2	610	11.2	12.0	14	34.1	16.4	689	20.6	12.5	18.3
Middle	43	86.0	67.5	4,822	88.8	76.9	25	61.0	61.8	2,369	70.8	72.9	63.4
Upper	0	0.0	11.7	0	0.0	9.7	0	0.0	15.0	0	0.0	11.5	18.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	5.6	0	0.0	1.4	0	0.0	6.3	0	0.0	2.1	
Total	50	100.0	100.0	5,432	100.0	100.0	41	100.0	100.0	3,348	100.0	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 J-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Western CO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	\$ %	\$ %	#	%	#	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	5	3.5	4.0	397	1.0	1.4	4	2.6	3.6	461	0.9	1.3	20.4
Moderate	17	12.0	12.5	2,696	6.7	6.0	24	15.7	12.9	4,069	8.2	6.0	18.4
Middle	16	11.3	18.4	2,872	7.1	11.8	27	17.6	17.6	6,040	12.1	10.8	20.4
Upper	100	70.4	51.5	32,024	79.1	63.5	95	62.1	54.0	38,154	76.6	65.6	40.8
Unknown	4	2.8	13.5	2,513	6.2	17.2	3	2.0	11.9	1,054	2.1	16.3	0.0
Total	142	100.0	100.0	40,502	100.0	100.0	153	100.0	100.0	49,778	100.0	100.0	100.0
Refinance Loans													
Low	10	11.9	7.1	875	4.7	2.9	15	13.5	4.6	948	3.2	1.6	20.4
Moderate	14	16.7	13.8	1,002	5.4	6.8	12	10.8	10.7	1,535	5.1	4.8	18.4
Middle	11	13.1	19.6	1,778	9.5	13.0	13	11.7	17.2	2,643	8.8	10.5	20.4
Upper	40	47.6	45.7	9,810	52.4	56.4	54	48.6	50.7	19,354	64.6	60.8	40.8
Unknown	9	10.7	13.9	5,260	28.1	21.0	17	15.3	16.9	5,487	18.3	22.3	0.0
Total	84	100.0	100.0	18,725	100.0	100.0	111	100.0	100.0	29,967	100.0	100.0	100.0
Home Improvement Loans													
Low	1	3.2	4.5	40	1.7	2.9	1	3.4	4.4	33	1.1	1.9	20.4
Moderate	4	12.9	8.3	205	8.7	4.6	5	17.2	9.9	122	4.1	5.5	18.4
Middle	6	19.4	17.6	387	16.5	10.2	4	13.8	17.2	187	6.3	10.8	20.4
Upper	19	61.3	61.7	1,643	69.9	71.0	18	62.1	62.7	2,465	83.6	66.9	40.8
Unknown	1	3.2	7.8	75	3.2	11.4	1	3.4	5.8	143	4.8	14.9	0.0
Total	31	100.0	100.0	2,350	100.0	100.0	29	100.0	100.0	2,950	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	19	6.2	4.9	1,432	2.1	1.8	24	7.5	4.1	1,592	1.9	1.5	20.4
Moderate	42	13.7	12.4	4,465	6.6	5.8	43	13.5	11.7	5,783	6.8	5.3	18.4
Middle	41	13.4	18.3	5,435	8.1	11.4	50	15.7	17.2	9,184	10.9	10.2	20.4
Upper	187	61.1	50.4	47,793	71.2	59.8	179	56.3	52.9	61,165	72.4	62.6	40.8
Unknown	17	5.6	13.9	8,018	11.9	21.2	22	6.9	14.1	6,734	8.0	20.5	0.0
Total	306	100.0	100.0	67,143	100.0	100.0	318	100.0	100.0	84,458	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table J-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Western CO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	2	5.3	4.1	90	2.0	1.8	2	14.3	4.7	85	6.3	3.1	20.4
Moderate	6	15.8	8.3	312	7.0	2.3	0	0.0	11.2	0	0.0	4.5	18.4
Middle	4	10.5	14.9	233	5.3	6.5	3	21.4	16.2	234	17.4	8.3	20.4
Upper	23	60.5	68.3	3,627	81.8	80.0	8	57.1	64.0	977	72.6	78.8	40.8
Unknown	3	7.9	4.5	170	3.8	9.4	1	7.1	3.8	50	3.7	5.3	0.0
Total	38	100.0	100.0	4,432	100.0	100.0	14	100.0	100.0	1,346	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	10.0	5.4	30	2.9	0.6	2	18.2	6.6	65	15.6	1.8	20.4
Moderate	1	10.0	13.0	250	24.4	2.3	2	18.2	12.8	57	13.7	2.2	18.4
Middle	4	40.0	12.0	165	16.1	2.2	3	27.3	13.7	80	19.2	2.7	20.4
Upper	4	40.0	60.2	581	56.6	59.8	4	36.4	57.8	215	51.6	66.5	40.8
Unknown	0	0.0	9.4	0	0.0	35.1	0	0.0	9.1	0	0.0	26.8	0.0
Total	10	100.0	100.0	1,026	100.0	100.0	11	100.0	100.0	417	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.9	0	0.0	1.8	0	0.0	0.5	0	0.0	0.0	20.4
Moderate	0	0.0	1.9	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	18.4
Middle	0	0.0	2.6	0	0.0	1.0	0	0.0	0.5	0	0.0	0.5	20.4
Upper	0	0.0	4.1	0	0.0	3.6	0	0.0	4.2	0	0.0	7.5	40.8
Unknown	0	0.0	89.6	0	0.0	93.0	0	0.0	94.8	0	0.0	92.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table J-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Western CO AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	83	65.9	49.1	9,192	53.4	41.5	101	70.6	51.9	7,639	44.2	44.5	92.1
Over \$1 Million	40	31.7		7,944	46.2		37	25.9		8,947	51.8		6.7
Revenue Unknown	3	2.4		65	0.4		5	3.5		700	4.0		1.2
Total	126	100.0		17,201	100.0		143	100.0		17,286	100.0		100.0
By Loan Size													
\$100,000 or Less	81	64.3	93.8	3,263	19.0	41.3	99	69.2	94.4	3,848	22.3	44.1	
\$100,001 - \$250,000	25	19.8	3.2	4,738	27.5	15.6	29	20.3	3.1	5,049	29.2	15.9	
\$250,001 - \$1 Million	20	15.9	3.0	9,200	53.5	43.1	15	10.5	2.5	8,389	48.5	40.0	
Total	126	100.0	100.0	17,201	100.0	100.0	143	100.0	100.0	17,286	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	60	72.3		2,354	25.6		79	78.2		2,858	37.4		
\$100,001 - \$250,000	13	15.7		2,472	26.9		18	17.8		3,099	40.6		
\$250,001 - \$1 Million	10	12.0		4,366	47.5		4	4.0		1,682	22.0		
Total	83	100.0		9,192	100.0		101	100.0		7,639	100.0		
<i>Source: 2019 FFIEC Census Data</i>													
<i>2019 Dun & Bradstreet Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table J-8													
Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Western CO AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	47	94.0	65.0	5,055	93.1	79.6	37	90.2	66.5	2,931	87.5	79.4	97.7
Over \$1 Million	1	2.0		300	5.5		4	9.8		417	12.5		2.2
Revenue Unknown	2	4.0		77	1.4		0	0.0		0	0.0		0.1
Total	50	100.0		5,432	100.0		41	100.0		3,348	100.0		100.0
By Loan Size													
\$100,000 or Less	35	70.0	79.9	1,928	35.5	29.2	32	78.0	86.6	1,322	39.5	41.1	
\$100,001 - \$250,000	9	18.0	12.2	1,659	30.5	30.1	7	17.1	9.9	1,471	43.9	32.9	
\$250,001 - \$500,000	6	12.0	7.9	1,845	34.0	40.7	2	4.9	3.5	555	16.6	26.0	
Total	50	100.0	100.0	5,432	100.0	100.0	41	100.0	100.0	3,348	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	33	70.2		1,851	36.6		29	78.4		1,155	39.4		
\$100,001 - \$250,000	9	19.1		1,659	32.8		6	16.2		1,221	41.7		
\$250,001 - \$500,000	5	10.6		1,545	30.6		2	5.4		555	18.9		
Total	47	100.0		5,055	100.0		37	100.0		2,931	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 J-9 2018 Western CO AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	0.7	692	0.5	219	31.6	26,753	20.4
Moderate	29	20.9	25,570	19.5	4,703	18.4	24,102	18.4
Middle	69	49.6	64,817	49.5	6,346	9.8	26,648	20.4
Upper	37	26.6	39,842	30.4	1,933	4.9	53,418	40.8
Unknown	3	2.2	0	0.0	0	0.0	0	0.0
Total AA	139	100.0	130,921	100.0	13,201	10.1	130,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,358	652	0.5	48.0	431	31.7	275	20.3
Moderate	52,786	26,585	19.0	50.4	14,018	26.6	12,183	23.1
Middle	140,223	68,097	48.8	48.6	31,507	22.5	40,619	29.0
Upper	112,320	44,242	31.7	39.4	19,457	17.3	48,621	43.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	306,687	139,576	100.0	45.5	65,413	21.3	101,698	33.2
	Total Businesses by Tract		0					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	97	0.3	87	0.3	7	0.3	3	0.5
Moderate	5,447	15.1	4,993	15.0	333	14.3	121	20.3
Middle	17,343	48.0	15,981	48.1	1,095	47.1	267	44.8
Upper	13,255	36.7	12,159	36.6	891	38.3	205	34.4
Unknown	5	0.0	5	0.0	0	0.0	0	0.0
Total AA	36,147	100.0	33,225	100.0	2,326	100.0	596	100.0
Percentage of Total Businesses:			91.9		6.4		1.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	0.1	2	0.1	0	0.0	0	0.0
Moderate	298	17.1	290	17.0	8	23.5	0	0.0
Middle	1,118	64.2	1,094	64.1	23	67.6	1	50.0
Upper	324	18.6	320	18.8	3	8.8	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,742	100.0	1,706	100.0	34	100.0	2	100.0
Percentage of Total Farms:			97.9		2.0		0.1	
<p>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Table J-10 2019 Western CO AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	0.7	692	0.5	219	31.6	26,753	20.4
Moderate	29	20.9	25,570	19.5	4,703	18.4	24,102	18.4
Middle	69	49.6	64,817	49.5	6,346	9.8	26,648	20.4
Upper	37	26.6	39,842	30.4	1,933	4.9	53,418	40.8
Unknown	3	2.2	0	0.0	0	0.0	0	0.0
Total AA	139	100.0	130,921	100.0	13,201	10.1	130,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,358	652	0.5	48.0	431	31.7	275	20.3
Moderate	52,786	26,585	19.0	50.4	14,018	26.6	12,183	23.1
Middle	140,223	68,097	48.8	48.6	31,507	22.5	40,619	29.0
Upper	112,320	44,242	31.7	39.4	19,457	17.3	48,621	43.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	306,687	139,576	100.0	45.5	65,413	21.3	101,698	33.2
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	90	0.3	81	0.3	6	0.3	3	0.7
Moderate	4,977	15.2	4,567	15.1	318	14.5	92	22.5
Middle	15,809	48.2	14,614	48.4	1,035	47.2	160	39.1
Upper	11,916	36.3	10,930	36.2	832	38.0	154	37.7
Unknown	5	0.0	5	0.0	0	0.0	0	0.0
Total AA	32,797	100.0	30,197	100.0	2,191	100.0	409	100.0
Percentage of Total Businesses:				92.1		6.7		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2	0.1	2	0.1	0	0.0	0	0.0
Moderate	303	18.3	293	18.1	10	27.8	0	0.0
Middle	1,050	63.4	1,029	63.6	20	55.6	1	50.0
Upper	300	18.1	293	18.1	6	16.7	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,655	100.0	1,617	100.0	36	100.0	2	100.0
Percentage of Total Farms:				97.7		2.2		0.1
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

K. Greeley MSA AA – 2018 and 2019 Demographic and Lending Tables

Table K-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Greeley CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	1.5	2.7	185	1.0	1.6	1	1.9	2.5	236	1.5	1.6	3.5
Moderate	13	20.0	16.3	3,425	17.9	12.8	13	25.0	15.8	3,135	20.2	12.4	19.9
Middle	18	27.7	37.3	5,010	26.2	35.2	22	42.3	36.5	6,408	41.2	34.2	40.5
Upper	33	50.8	43.7	10,516	55.0	50.4	16	30.8	45.2	5,757	37.1	51.7	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	65	100.0	100.0	19,136	100.0	100.0	52	100.0	100.0	15,536	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.2	0	0.0	2.1	0	0.0	2.4	0	0.0	1.5	3.5
Moderate	12	23.5	19.1	1,268	14.4	15.5	5	8.3	16.7	844	5.4	13.7	19.9
Middle	18	35.3	41.5	3,204	36.4	40.1	26	43.3	37.6	6,280	40.1	35.5	40.5
Upper	21	41.2	36.2	4,339	49.2	42.3	29	48.3	43.4	8,528	54.5	49.3	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	8,811	100.0	100.0	60	100.0	100.0	15,652	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.9	0	0.0	2.0	1	4.8	2.2	120	8.6	2.3	3.5
Moderate	4	25.0	14.7	340	27.0	13.5	4	19.0	11.6	140	10.1	9.2	19.9
Middle	5	31.3	36.6	388	30.9	38.0	9	42.9	30.8	538	38.7	31.8	40.5
Upper	7	43.8	46.8	529	42.1	46.4	7	33.3	55.4	591	42.5	56.8	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,257	100.0	100.0	21	100.0	100.0	1,389	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	41.2	0	0.0	60.8	0	0.0	33.3	0	0.0	15.5	33.1
Moderate	0	0.0	23.5	0	0.0	18.2	0	0.0	33.3	0	0.0	9.1	23.0
Middle	0	0.0	32.4	0	0.0	11.6	0	0.0	25.0	0	0.0	55.6	31.7
Upper	0	0.0	2.9	0	0.0	9.4	0	0.0	8.3	0	0.0	19.7	12.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	1.2	2.8	385	1.2	2.8	2	1.4	2.4	356	1.1	1.8	3.5
Moderate	34	20.2	17.1	5,459	16.6	13.8	23	16.1	16.0	4,219	12.7	13.0	19.9
Middle	57	33.9	38.6	10,238	31.1	36.4	64	44.8	36.7	13,804	41.4	35.1	40.5
Upper	75	44.6	41.5	16,876	51.2	47.1	54	37.8	44.8	14,932	44.8	50.1	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	168	100.0	100.0	32,958	100.0	100.0	143	100.0	100.0	33,311	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table K-2													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Greeley CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	1	3.2	0.7	200	6.2	1.0	0	0.0	1.3	0	0.0	1.1	3.5
Moderate	5	16.1	13.9	426	13.2	12.0	0	0.0	12.9	0	0.0	12.1	19.9
Middle	15	48.4	36.7	1,581	48.9	35.4	5	71.4	34.0	410	88.0	31.5	40.5
Upper	10	32.3	48.6	1,028	31.8	51.7	2	28.6	51.8	56	12.0	55.3	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	3,235	100.0	100.0	7	100.0	100.0	466	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.2	0	0.0	1.4	0	0.0	1.6	0	0.0	2.0	3.5
Moderate	0	0.0	14.1	0	0.0	12.3	1	33.3	18.0	100	37.3	15.6	19.9
Middle	1	20.0	32.7	55	10.6	31.7	2	66.7	33.2	168	62.7	36.0	40.5
Upper	4	80.0	52.0	464	89.4	54.7	0	0.0	47.1	0	0.0	46.5	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	519	100.0	100.0	3	100.0	100.0	268	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.8	0	0.0	2.8	0	0.0	7.0	0	0.0	3.7	3.5
Moderate	0	0.0	23.6	0	0.0	16.1	0	0.0	20.4	0	0.0	15.2	19.9
Middle	0	0.0	39.3	0	0.0	34.4	0	0.0	38.7	0	0.0	37.7	40.5
Upper	0	0.0	32.3	0	0.0	46.6	0	0.0	33.8	0	0.0	43.4	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table K-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Greeley CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	4.5	0	0.0	3.6	4	10.0	4.7	846	14.4	5.9	6.7
Moderate	7	46.7	16.2	2,621	56.0	20.4	10	25.0	16.5	552	9.4	17.9	16.3
Middle	5	33.3	36.8	1,165	24.9	34.1	17	42.5	35.0	2,996	51.0	32.7	37.9
Upper	3	20.0	40.6	898	19.2	41.0	9	22.5	41.9	1,478	25.2	42.6	39.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.8	0	0.0	0.9	0	0.0	1.9	0	0.0	0.8	
Total	15	100.0	100.0	4,684	100.0	100.0	40	100.0	100.0	5,872	100.0	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 K-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Greeley CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.4	0	0.0	0.1	0	0.0	1.4	0	0.0	0.3	2.2
Moderate	0	0.0	10.4	0	0.0	6.6	0	0.0	9.5	0	0.0	7.7	10.2
Middle	2	66.7	67.8	220	91.7	73.4	1	25.0	64.8	60	29.9	68.7	64.3
Upper	1	33.3	19.8	20	8.3	19.3	3	75.0	21.9	141	70.1	22.8	23.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	0.5	0	0.0	2.4	0	0.0	0.6	
Total	3	100.0	100.0	240	100.0	100.0	4	100.0	100.0	201	100.0	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 K-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Greeley CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	4	6.2	4.2	779	4.1	2.5	2	3.8	2.8	243	1.6	1.7	20.6
Moderate	16	24.6	19.2	3,880	20.3	15.2	13	25.0	16.3	3,188	20.5	12.4	18.4
Middle	18	27.7	28.9	5,331	27.9	27.9	19	36.5	30.1	5,434	35.0	28.0	21.0
Upper	26	40.0	30.4	8,897	46.5	36.6	18	34.6	35.1	6,671	42.9	41.6	39.9
Unknown	1	1.5	17.2	249	1.3	17.8	0	0.0	15.7	0	0.0	16.3	0.0
Total	65	100.0	100.0	19,136	100.0	100.0	52	100.0	100.0	15,536	100.0	100.0	100.0
Refinance Loans													
Low	3	5.9	9.4	382	4.3	5.9	4	6.7	4.7	402	2.6	2.8	20.6
Moderate	8	15.7	19.8	1,086	12.3	16.9	7	11.7	15.0	1,394	8.9	11.6	18.4
Middle	14	27.5	26.9	2,970	33.7	27.2	18	30.0	22.8	4,777	30.5	21.6	21.0
Upper	22	43.1	27.0	3,823	43.4	32.7	27	45.0	34.1	8,164	52.2	38.8	39.9
Unknown	4	7.8	16.9	550	6.2	17.3	4	6.7	23.4	915	5.8	25.3	0.0
Total	51	100.0	100.0	8,811	100.0	100.0	60	100.0	100.0	15,652	100.0	100.0	100.0
Home Improvement Loans													
Low	2	12.5	5.2	70	5.6	4.2	0	0.0	4.0	0	0.0	3.1	20.6
Moderate	3	18.8	14.8	325	25.9	13.2	5	23.8	14.0	370	26.6	11.5	18.4
Middle	5	31.3	28.6	465	37.0	25.2	1	4.8	24.0	20	14	22.2	21.0
Upper	5	31.3	43.0	367	29.2	41.6	15	71.4	56.0	999	71.9	59.8	39.9
Unknown	1	6.3	8.3	30	2.4	15.6	0	0.0	2.0	0	0.0	3.4	0.0
Total	16	100.0	100.0	1,257	100.0	100.0	21	100.0	100.0	1,389	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	10	6.0	6.0	1,361	4.1	3.5	7	4.9	3.8	663	2.0	2.2	20.6
Moderate	31	18.5	18.8	5,586	16.9	15.3	27	18.9	15.4	5,202	15.6	11.8	18.4
Middle	49	29.2	28.1	9,670	29.3	26.9	41	28.7	26.1	10,402	31.2	24.3	21.0
Upper	70	41.7	30.4	15,372	46.6	35.0	64	44.8	35.7	16,129	48.4	39.9	39.9
Unknown	8	4.8	16.7	969	2.9	19.3	4	2.8	18.8	915	2.7	21.8	0.0
Total	168	100.0	100.0	32,958	100.0	100.0	143	100.0	100.0	33,311	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table K-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Greeley CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	1	3.2	5.8	130	4.0	4.3	0	0.0	5.9	0	0.0	4.4	20.6
Moderate	4	12.9	16.1	295	9.1	13.8	2	28.6	15.4	250	53.6	12.6	18.4
Middle	10	32.3	32.9	554	17.1	28.5	2	28.6	26.6	71	15.2	23.1	21.0
Upper	14	45.2	44.0	2,116	65.4	52.2	3	42.9	50.7	145	31.1	58.4	39.9
Unknown	2	6.5	1.2	140	4.3	1.2	0	0.0	1.3	0	0.0	1.5	0.0
Total	31	100.0	100.0	3,235	100.0	100.0	7	100.0	100.0	466	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.8	0	0.0	4.7	1	33.3	6.6	18	6.7	4.5	20.6
Moderate	0	0.0	16.1	0	0.0	14.4	0	0.0	14.8	0	0.0	11.1	18.4
Middle	2	40.0	33.1	350	67.4	23.6	1	33.3	29.9	100	37.3	26.7	21.0
Upper	3	60.0	40.3	169	32.6	47.4	1	33.3	40.2	150	56.0	46.3	39.9
Unknown	0	0.0	5.6	0	0.0	9.8	0	0.0	8.6	0	0.0	11.3	0.0
Total	5	100.0	100.0	519	100.0	100.0	3	100.0	100.0	268	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.3	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	20.6
Moderate	0	0.0	1.7	0	0.0	1.3	0	0.0	0.7	0	0.0	1.0	18.4
Middle	0	0.0	1.7	0	0.0	1.9	0	0.0	1.4	0	0.0	2.1	21.0
Upper	0	0.0	2.6	0	0.0	2.8	0	0.0	0.7	0	0.0	0.1	39.9
Unknown	0	0.0	92.6	0	0.0	93.5	0	0.0	97.2	0	0.0	96.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table K-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Greeley CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	6	40.0	45.9	1,035	22.1	29.8	18	45.0	47.7	1,317	22.4	29.6	92.8
Over \$1 Million	8	53.3		3,584	76.5		21	52.5		4,315	73.5		6.3
Revenue Unknown	1	6.7		65	1.4		1	2.5		240	4.1		0.9
Total	15	100.0		4,684	100.0		40	100.0		5,872	100.0		100.0
By Loan Size													
\$100,000 or Less	7	46.7	92.9	364	7.8	37.4	26	65.0	92.9	1,403	23.9	37.4	
\$100,001 - \$250,000	2	13.3	3.4	400	8.5	14.3	7	17.5	3.1	1,483	25.3	12.6	
\$250,001 - \$1 Million	6	40.0	3.7	3,920	83.7	48.3	7	17.5	4.0	2,986	50.9	50.0	
Total	15	100.0	100.0	4,684	100.0	100.0	40	100.0	100.0	5,872	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	66.7		165	15.9		16	88.9		658	50.0		
\$100,001 - \$250,000	0	0.0		0	0.0		1	5.6		249	18.9		
\$250,001 - \$1 Million	2	33.3		870	84.1		1	5.6		410	31.1		
Total	6	100.0		1,035	100.0		18	100.0		1,317	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 K-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Greeley CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	3	100.0	56.2	240	100.0	64.4	4	100.0	59.1	201	100.0	72.4	93.9
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		6.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	3	100.0		240	100.0		4	100.0		201	100.0		100.0
By Loan Size													
\$100,000 or Less	2	66.7	76.4	80	33.3	25.2	4	100.0	78.7	201	100.0	27.8	
\$100,001 - \$250,000	1	33.3	13.2	160	66.7	25.7	0	0.0	14.0	0	0.0	33.9	
\$250,001 - \$500,000	0	0.0	10.4	0	0.0	49.1	0	0.0	7.3	0	0.0	38.3	
Total	3	100.0	100.0	240	100.0	100.0	4	100.0	100.0	201	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	2	66.7		80	33.3		4	100.0		201	100.0		
\$100,001 - \$250,000	1	33.3		160	66.7		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		240	100.0		4	100.0		201	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 K-9 2018 Greeley CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	9.1	4,650	6.8	1,569	33.7	14,101	20.6
Moderate	16	20.8	14,956	21.9	1,952	13.1	12,582	18.4
Middle	26	33.8	27,065	39.6	2,066	7.6	14,359	21.0
Upper	27	35.1	21,634	31.7	450	2.1	27,263	39.9
Unknown	1	1.3	0	0.0	0	0.0	0	0.0
Total AA	77	100.0	68,305	100.0	6,037	8.8	68,305	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,804	2,304	3.5	23.5	6,685	68.2	815	8.3
Moderate	22,105	13,036	19.9	59.0	7,994	36.2	1,075	4.9
Middle	39,347	26,524	40.5	67.4	10,537	26.8	2,286	5.8
Upper	27,970	23,560	36.0	84.2	3,654	13.1	756	2.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	99,226	65,424	100.0	65.9	28,870	29.1	4,932	5.0
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	926	6.5	842	6.4	72	8.3	12	7.2
Moderate	2,320	16.4	2,105	16.0	188	21.8	27	16.3
Middle	5,347	37.8	4,992	38.1	286	33.1	69	41.6
Upper	5,551	39.2	5,177	39.5	316	36.6	58	34.9
Unknown	2	0.0	1	0.0	1	0.1	0	0.0
Total AA	14,146	100.0	13,117	100.0	863	100.0	166	100.0
Percentage of Total Businesses:				92.7		6.1		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12	1.6	12	1.7	0	0.0	0	0.0
Moderate	84	11.1	80	11.2	4	8.7	0	0.0
Middle	486	64.0	450	63.1	36	78.3	0	0.0
Upper	177	23.3	171	24.0	6	13.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	759	100.0	713	100.0	46	100.0	0	0.0
Percentage of Total Farms:				93.9		6.1		0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table K-10 2019 Greeley CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	9.1	4,650	6.8	1,569	33.7	14,101	20.6
Moderate	16	20.8	14,956	21.9	1,952	13.1	12,582	18.4
Middle	26	33.8	27,065	39.6	2,066	7.6	14,359	21.0
Upper	27	35.1	21,634	31.7	450	2.1	27,263	39.9
Unknown	1	1.3	0	0.0	0	0.0	0	0.0
Total AA	77	100.0	68,305	100.0	6,037	8.8	68,305	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,804	2,304	3.5	23.5	6,685	68.2	815	8.3
Moderate	22,105	13,036	19.9	59.0	7,994	36.2	1,075	4.9
Middle	39,347	26,524	40.5	67.4	10,537	26.8	2,286	5.8
Upper	27,970	23,560	36.0	84.2	3,654	13.1	756	2.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	99,226	65,424	100.0	65.9	28,870	29.1	4,932	5.0
	Total Businesses by Tract		0					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	874	6.7	799	6.6	66	8.1	9	7.4
Moderate	2,114	16.3	1,924	16.0	169	20.8	21	17.4
Middle	4,919	37.9	4,593	38.2	274	33.7	52	43.0
Upper	5,053	39.0	4,710	39.2	304	37.3	39	32.2
Unknown	2	0.0	1	0.0	1	0.1	0	0.0
Total AA	12,962	100.0	12,027	100.0	814	100.0	121	100.0
Percentage of Total Businesses:				92.8		6.3		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	16	2.2	15	2.2	1	2.2	0	0.0
Moderate	75	10.2	71	10.3	4	8.9	0	0.0
Middle	474	64.3	440	63.6	34	75.6	0	0.0
Upper	172	23.3	166	24.0	6	13.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	737	100.0	692	100.0	45	100.0	0	0.0
Percentage of Total Farms:				93.9		6.1		0.0

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.

L. Ft. Collins MSA AA – 2018 and 2019 Demographic and Lending Tables

Table L-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Ft. Collins CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	2.3	1.8	287	2.2	1.6	0	0.0	2.5	0	0.0	2.3	15
Moderate	11	25.6	21.0	3,184	24.2	18.5	7	23.3	19.4	1,489	16.2	17.3	20.5
Middle	24	55.8	43.6	7,160	54.4	41.4	18	60.0	46.0	5,924	64.6	43.4	52.7
Upper	7	16.3	33.6	2,530	19.2	38.5	5	16.7	32.1	1,761	19.2	37.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	13,161	100.0	100.0	30	100.0	100.0	9,174	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.7	0	0.0	0.6	1	2.7	10	350	3.4	1.0	15
Moderate	4	33.3	22.9	759	25.1	20.2	6	16.2	19.8	1,829	18.0	17.3	20.5
Middle	4	33.3	51.7	875	28.9	50.2	20	54.1	48.6	4,940	48.5	45.7	52.7
Upper	4	33.3	24.7	1,391	46.0	28.9	10	27.0	30.6	3,058	30.0	36.1	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	3,025	100.0	100.0	37	100.0	100.0	10,177	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.8	0	0.0	0.6	0	0.0	0.5	0	0.0	0.3	15
Moderate	0	0.0	19.4	0	0.0	19.0	0	0.0	17.3	0	0.0	18.0	20.5
Middle	2	33.3	50.5	80	26.2	51.0	2	100.0	51.4	150	100.0	48.7	52.7
Upper	4	66.7	29.3	225	73.8	29.5	0	0.0	30.7	0	0.0	33.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	305	100.0	100.0	2	100.0	100.0	150	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	0	0.0	38.7	0	0.0	21.4	0	0.0	50.0	0	0.0	27.2	46.2
Middle	0	0.0	51.6	0	0.0	59.3	0	0.0	42.1	0	0.0	52.2	34.4
Upper	0	0.0	9.7	0	0.0	19.3	0	0.0	7.9	0	0.0	20.6	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.4	1.3	287	1.7	1.2	1	1.4	1.5	350	1.8	1.5	15
Moderate	17	24.6	21.4	4,039	23.3	19.3	13	18.3	19.6	3,318	16.9	17.8	20.5
Middle	34	49.3	47.4	8,695	50.1	45.2	42	59.2	47.8	11,156	56.8	45.0	52.7
Upper	17	24.6	29.9	4,341	25.0	34.3	15	21.1	31.1	4,819	24.5	35.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	69	100.0	100.0	17,362	100.0	100.0	71	100.0	100.0	19,643	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table L-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Ft. Collins CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	%	%	#	%	%	\$ (000)	%	%	
Other Purpose LOC													
Low	0	0.0	1.1	0	0.0	0.9	0	0.0	0.2	0	0.0	0.3	1.5
Moderate	2	33.3	19.1	96	23.9	16.4	0	0.0	19.7	0	0.0	19.8	20.5
Middle	2	33.3	51.2	110	27.4	46.4	1	100.0	49.6	62	100.0	46.7	52.7
Upper	2	33.3	28.6	195	48.6	36.4	0	0.0	30.4	0	0.0	33.2	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	401	100.0	100.0	1	100.0	100.0	62	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.2	0	0.0	1.7	0	0.0	0.4	0	0.0	0.5	1.5
Moderate	0	0.0	22.7	0	0.0	22.0	0	0.0	23.7	0	0.0	19.6	20.5
Middle	2	100.0	51.9	470	100.0	53.2	1	100.0	49.8	80	100.0	49.7	52.7
Upper	0	0.0	24.2	0	0.0	23.1	0	0.0	26.1	0	0.0	30.1	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	470	100.0	100.0	1	100.0	100.0	80	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.7	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	1.5
Moderate	0	0.0	18.7	0	0.0	38.8	0	0.0	22.0	0	0.0	20.7	20.5
Middle	0	0.0	49.3	0	0.0	33.6	0	0.0	56.9	0	0.0	50.4	52.7
Upper	0	0.0	29.3	0	0.0	25.7	0	0.0	21.1	0	0.0	28.9	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table L-3 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Ft. Collins CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	1	4.8	4.6	35	0.9	7.5	2	5.0	5.0	1,035	16.9	7.9	3.5
Moderate	9	42.9	26.8	1,626	41.6	29.2	10	25.0	26.2	1,687	27.6	28.6	29.2
Middle	9	42.9	39.7	1,970	50.4	31.0	24	60.0	39.1	2,991	48.9	31.7	42.6
Upper	2	9.5	26.8	280	7.2	31.2	4	10.0	27.5	402	6.6	30.3	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.2	0	0.0	1.2	0	0.0	2.2	0	0.0	1.4	
Total	21	100.0	100.0	3,911	100.0	100.0	40	100.0	100.0	6,115	100.0	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 L-4 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Ft. Collins CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	1.3	0	0.0	0.3	0	0.0	3.0	0	0.0	1.0	1.5
Moderate	0	0.0	7.1	0	0.0	6.4	0	0.0	12.5	0	0.0	8.3	14.0
Middle	1	100.0	51.6	200	100.0	48.0	1	100.0	42.3	400	100.0	48.5	50.9
Upper	0	0.0	39.4	0	0.0	45.0	0	0.0	41.1	0	0.0	41.9	33.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.6	0	0.0	0.4	0	0.0	1.2	0	0.0	0.4	
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	400	100.0	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 L-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Ft. Collins CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	3.3	0	0.0	1.7	1	3.3	3.6	184	2.0	1.9	20.5
Moderate	11	25.6	16.1	2,822	21.4	12.5	10	33.3	16.4	2,121	23.1	12.8	17.2
Middle	15	34.9	22.5	4,607	35.0	21.4	6	20.0	23.9	1,854	20.2	22.2	22.6
Upper	17	39.5	40.6	5,732	43.6	47.4	13	43.3	40.2	5,015	54.7	47.4	39.6
Unknown	0	0.0	17.5	0	0.0	17.0	0	0.0	15.9	0	0.0	15.8	0.0
Total	43	100.0	100.0	13,161	100.0	100.0	30	100.0	100.0	9,174	100.0	100.0	100.0
Refinance Loans													
Low	1	8.3	9.5	100	3.3	6.1	1	2.7	6.0	86	0.8	3.4	20.5
Moderate	5	41.7	19.4	963	31.8	16.4	8	21.6	16.7	1,745	17.1	13.1	17.2
Middle	2	16.7	24.7	718	23.7	24.0	8	21.6	23.5	2,105	20.7	22.3	22.6
Upper	3	25.0	33.9	1,059	35.0	40.0	12	32.4	35.9	4,101	40.3	41.7	39.6
Unknown	1	8.3	12.6	185	6.1	13.4	8	21.6	17.9	2,140	21.0	19.5	0.0
Total	12	100.0	100.0	3,025	100.0	100.0	37	100.0	100.0	10,177	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.2	0	0.0	3.4	0	0.0	5.1	0	0.0	3.4	20.5
Moderate	0	0.0	14.4	0	0.0	12.3	0	0.0	14.0	0	0.0	11.0	17.2
Middle	2	33.3	27.8	50	16.4	23.8	1	50.0	26.9	125	83.3	25.8	22.6
Upper	3	50.0	47.3	200	65.6	50.0	1	50.0	51.4	25	16.7	55.5	39.6
Unknown	1	16.7	5.2	55	18.0	10.6	0	0.0	2.6	0	0.0	4.3	0.0
Total	6	100.0	100.0	305	100.0	100.0	2	100.0	100.0	150	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	1.4	5.8	100	0.6	3.1	2	2.8	5.0	270	1.4	2.6	20.5
Moderate	16	23.2	17.1	3,785	21.8	13.0	18	25.4	16.3	3,866	19.7	12.3	17.2
Middle	21	30.4	23.7	5,485	31.6	21.0	16	22.5	23.9	4,146	21.1	21.3	22.6
Upper	27	39.1	39.0	7,677	44.2	42.9	27	38.0	38.9	9,221	46.9	42.8	39.6
Unknown	4	5.8	14.4	315	1.8	20.0	8	11.3	15.8	2,140	10.9	21.0	0.0
Total	69	100.0	100.0	17,362	100.0	100.0	71	100.0	100.0	19,643	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table L-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Ft. Collins CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	6.9	0	0.0	5.5	0	0.0	6.9	0	0.0	4.8	20.5
Moderate	0	0.0	18.3	0	0.0	11.7	0	0.0	14.7	0	0.0	10.0	17.2
Middle	2	33.3	26.7	110	27.4	22.0	1	100.0	27.5	62	100.0	22.5	22.6
Upper	3	50.0	46.2	266	66.3	58.8	0	0.0	49.6	0	0.0	61.3	39.6
Unknown	1	16.7	1.8	25	6.2	2.0	0	0.0	1.4	0	0.0	1.4	0.0
Total	6	100.0	100.0	401	100.0	100.0	1	100.0	100.0	62	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.1	0	0.0	4.6	0	0.0	11.0	0	0.0	7.3	20.5
Moderate	0	0.0	21.5	0	0.0	20.4	0	0.0	19.1	0	0.0	15.8	17.2
Middle	0	0.0	23.5	0	0.0	16.3	0	0.0	25.8	0	0.0	21.0	22.6
Upper	1	50.0	40.4	420	89.4	45.5	1	100.0	37.8	80	100.0	45.4	39.6
Unknown	1	50.0	6.5	50	10.6	13.2	0	0.0	6.4	0	0.0	10.5	0.0
Total	2	100.0	100.0	470	100.0	100.0	1	100.0	100.0	80	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.0	0	0.0	2.3	0	0.0	0.0	0	0.0	0.0	20.5
Moderate	0	0.0	4.7	0	0.0	0.4	0	0.0	0.9	0	0.0	1.5	17.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	4.6	0	0.0	3.2	22.6
Upper	0	0.0	4.0	0	0.0	3.7	0	0.0	8.3	0	0.0	9.3	39.6
Unknown	0	0.0	87.3	0	0.0	93.6	0	0.0	86.2	0	0.0	86.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table L-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Ft. Collins CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	9	42.9	46.9	519	13.3	34.4	18	45.0	51.2	1,660	27.1	33.4	93.7
Over \$1 Million	12	57.1		3,392	86.7		22	55.0		4,455	72.9		5.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Total	21	100.0		3,911	100.0		40	100.0		6,115	100.0		100.0
By Loan Size													
\$100,000 or Less	12	57.1	93.5	376	9.6	38.0	28	70.0	93.8	722	11.8	38.9	
\$100,001 - \$250,000	5	23.8	3.3	975	24.9	15.6	3	7.5	3.0	662	10.8	14.3	
\$250,001 - \$1 Million	4	19.0	3.1	2,560	65.5	46.4	9	22.5	3.2	4,731	77.4	46.8	
Total	21	100.0	100.0	3,911	100.0	100.0	40	100.0	100.0	6,115	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	8	88.9		269	51.8		14	77.8		406	24.5		
\$100,001 - \$250,000	1	11.1		250	48.2		2	11.1		412	24.8		
\$250,001 - \$1 Million	0	0.0		0	0.0		2	11.1		842	50.7		
Total	9	100.0		519	100.0		18	100.0		1,660	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 L-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Ft. Collins CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	1	100.0	58.1	200	100.0	51.7	0	0.0	63.7	0	0.0	61.8	98.3
Over \$1 Million	0	0.0		0	0.0		1	100.0		400	100.0		1.5
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.2
Total	1	100.0		200	100.0		1	100.0		400	100.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	84.5	0	0.0	34.2	0	0.0	83.9	0	0.0	27.7	
\$100,001 - \$250,000	1	100.0	11.0	200	100.0	35.4	0	0.0	8.3	0	0.0	22.4	
\$250,001 - \$500,000	0	0.0	4.5	0	0.0	30.3	1	100.0	7.7	400	100.0	49.9	
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	400	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	1	100.0		200	100.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		200	100.0		0	0.0		0	0.0		

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.

L-9 2018 Ft. Collins CO MSA AA 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	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	794	3.4	669	3.0	116	9.4	9	3.5
Moderate	6,829	29.0	6,386	28.9	381	30.7	62	24.2
Middle	10,162	43.1	9,634	43.7	411	33.1	117	45.7
Upper	5,775	24.5	5,375	24.4	332	26.8	68	26.6
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	23,562	100.0	22,066	100.0	1,240	100.0	256	100.0
Percentage of Total Businesses:				93.7		5.3		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.6	7	1.4	1	12.5	0	0.0
Moderate	72	14.2	71	14.2	0	0.0	1	100.0
Middle	255	50.2	252	50.5	3	37.5	0	0.0
Upper	172	33.9	168	33.7	4	50.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	508	100.0	499	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.2		1.6		0.2
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

L-10 2019 Ft. Collins CO MSA AA 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	0						
		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
Total AA	21,766	100.0	20,395	100.0	1,181	100.0	190	100.0
Percentage of Total Businesses:				93.7	5.4	0.9		
	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
Total AA	464	100.0	456	100.0	7	100.0	1	100.0
Percentage of Total Farms:				98.3	1.5	0.2		
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.								

M. Pueblo MSA AA – 2018 and 2019 Demographic and Lending Tables

Table M-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Pueblo CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$ %	\$ %	#	%	%	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	3	6.5	2.7	334	3.8	1.6	0	0.0	2.6	0	0.0	1.3	3.5
Moderate	5	10.9	23.8	545	6.1	15.9	7	24.1	23.0	962	15.9	15.5	23.6
Middle	12	26.1	25.5	1,753	19.8	21.3	2	6.9	26.3	379	6.3	22.5	30.7
Upper	26	56.5	48.1	6,240	70.3	61.2	20	69.0	48.0	4,704	77.8	60.6	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	8,872	100.0	100.0	29	100.0	100.0	6,045	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.7	0	0.0	0.9	0	0.0	1.8	0	0.0	0.9	3.5
Moderate	1	20.0	19.7	251	39.5	13.9	1	6.7	18.6	64	2.2	12.6	23.6
Middle	3	60.0	25.6	160	25.2	21.5	4	26.7	23.9	493	16.9	19.7	30.7
Upper	1	20.0	53.0	225	35.4	63.7	10	66.7	55.7	2,359	80.9	66.8	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	636	100.0	100.0	15	100.0	100.0	2,916	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.1	0	0.0	1.1	0	0.0	3.0	0	0.0	2.5	3.5
Moderate	0	0.0	15.2	0	0.0	17.3	0	0.0	15.6	0	0.0	14.1	23.6
Middle	0	0.0	26.2	0	0.0	22.0	0	0.0	22.4	0	0.0	21.4	30.7
Upper	0	0.0	56.5	0	0.0	59.5	0	0.0	58.6	0	0.0	61.2	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.4	0	0.0	0.9	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	4.3	0	0.0	1.5	0	0.0	4.0	0	0.0	10.2	10.9
Moderate	0	0.0	52.2	0	0.0	49.7	0	0.0	44.0	0	0.0	51.5	52.7
Middle	0	0.0	30.4	0	0.0	18.9	0	0.0	44.0	0	0.0	34.1	26.8
Upper	0	0.0	13.0	0	0.0	29.9	0	0.0	8.0	0	0.0	4.3	9.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	3	5.7	2.3	334	3.5	1.4	0	0.0	2.2	0	0.0	1.3	3.5
Moderate	6	11.3	21.9	796	8.3	15.8	8	17.0	20.8	1,026	11.3	14.9	23.6
Middle	15	28.3	25.5	1,913	20.0	21.4	7	14.9	25.2	892	9.9	21.4	30.7
Upper	29	54.7	50.3	6,540	68.2	61.5	32	68.1	51.7	7,137	78.8	62.3	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	53	100.0	100.0	9,583	100.0	100.0	47	100.0	100.0	9,055	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table M-2													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Pueblo CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.3	0	0.0	0.9	0	0.0	1.5	0	0.0	0.8	3.5
Moderate	0	0.0	13.0	0	0.0	10.3	0	0.0	18.6	0	0.0	13.6	23.6
Middle	0	0.0	21.6	0	0.0	20.3	1	100.0	24.1	20	100.0	21.2	30.7
Upper	1	100.0	64.1	30	100.0	68.6	0	0.0	55.0	0	0.0	62.3	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	2.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	30	100.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.5	0	0.0	3.7	0	0.0	3.0	0	0.0	1.1	3.5
Moderate	0	0.0	33.9	0	0.0	29.6	0	0.0	24.8	0	0.0	19.8	23.6
Middle	0	0.0	32.2	0	0.0	28.1	0	0.0	30.3	0	0.0	21.7	30.7
Upper	1	100.0	30.4	45	100.0	38.6	2	100.0	41.8	74	100.0	57.5	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	45	100.0	100.0	2	100.0	100.0	74	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.9	0	0.0	3.2	0	0.0	3.4	0	0.0	2.4	3.5
Moderate	0	0.0	28.1	0	0.0	19.2	0	0.0	30.7	0	0.0	20.7	23.6
Middle	0	0.0	27.4	0	0.0	22.6	0	0.0	23.9	0	0.0	20.4	30.7
Upper	0	0.0	38.5	0	0.0	55.0	0	0.0	42.0	0	0.0	56.5	42.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table M-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Pueblo CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	2.4	0	0.0	3.4	0	0.0	2.8	0	0.0	3.1	3.2
Moderate	4	57.1	20.4	357	58.2	19.0	2	66.7	22.8	866	92.2	21.2	28.3
Middle	0	0.0	29.1	0	0.0	32.1	0	0.0	28.5	0	0.0	29.8	30.0
Upper	3	42.9	46.4	256	41.8	44.0	1	33.3	44.4	73	7.8	44.2	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	1.7	0	0.0	1.4	0	0.0	1.5	0	0.0	1.6	
Total	7	100.0	100.0	613	100.0	100.0	3	100.0	100.0	939	100.0	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 M-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Pueblo CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	5.1
Middle	0	0.0	58.1	0	0.0	51.4	0	0.0	50.0	0	0.0	66.4	45.4
Upper	0	0.0	37.2	0	0.0	47.2	0	0.0	39.1	0	0.0	9.2	48.5
Unknown	0	0.0	2.3	0	0.0	0.4	0	0.0	6.5	0	0.0	23.4	0.5
Tract-Unk	0	0.0	2.3	0	0.0	1.0	0	0.0	4.3	0	0.0	1.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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 M-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Pueblo CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	2	4.3	5.8	222	2.5	3.1	4	13.8	9.2	500	8.3	4.9	22.6
Moderate	5	10.9	18.8	685	7.7	13.4	5	17.2	25.3	875	14.5	20.5	17.6
Middle	15	32.6	25.7	2,509	28.3	24.4	8	27.6	24.1	1,701	28.1	24.6	18.7
Upper	24	52.2	36.6	5,456	61.5	46.4	12	41.4	29.9	2,969	49.1	38.4	41.1
Unknown	0	0.0	13.2	0	0.0	12.7	0	0.0	11.4	0	0.0	11.6	0.0
Total	46	100.0	100.0	8,872	100.0	100.0	29	100.0	100.0	6,045	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.1	0	0.0	4.4	1	6.7	7.5	95	3.3	4.2	22.6
Moderate	1	20.0	13.9	45	7.1	11.0	2	13.3	17.4	320	11.0	13.2	17.6
Middle	1	20.0	22.8	225	35.4	21.6	2	13.3	20.5	541	18.6	19.9	18.7
Upper	1	20.0	42.1	251	39.5	48.6	5	33.3	28.3	895	30.7	32.7	41.1
Unknown	2	40.0	14.1	115	18.1	14.6	5	33.3	26.4	1,065	36.5	30.0	0.0
Total	5	100.0	100.0	636	100.0	100.0	15	100.0	100.0	2,916	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.8	0	0.0	4.7	0	0.0	9.7	0	0.0	6.8	22.6
Moderate	0	0.0	13.1	0	0.0	9.7	0	0.0	17.7	0	0.0	12.0	17.6
Middle	0	0.0	22.0	0	0.0	21.9	0	0.0	24.1	0	0.0	25.7	18.7
Upper	0	0.0	51.8	0	0.0	48.4	0	0.0	44.7	0	0.0	47.0	41.1
Unknown	0	0.0	7.3	0	0.0	15.3	0	0.0	3.8	0	0.0	8.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	3.8	6.1	222	2.3	3.5	5	10.6	8.3	595	6.6	4.5	22.6
Moderate	6	11.3	16.5	730	7.6	12.3	8	17.0	21.2	1,215	13.4	16.6	17.6
Middle	17	32.1	23.7	2,779	29.0	22.5	11	23.4	22.1	2,262	25.0	21.7	18.7
Upper	26	49.1	39.4	5,737	59.9	46.3	18	38.3	30.2	3,918	43.3	35.2	41.1
Unknown	2	3.8	14.3	115	1.2	15.4	5	10.6	18.1	1,065	11.8	21.9	0.0
Total	53	100.0	100.0	9,583	100.0	100.0	47	100.0	100.0	9,055	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table M-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Pueblo CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	4.8	0	0.0	3.8	0	0.0	7.3	0	0.0	5.2	22.6
Moderate	0	0.0	13.5	0	0.0	11.8	1	100.0	18.3	20	100.0	14.5	17.6
Middle	0	0.0	18.8	0	0.0	14.1	0	0.0	22.6	0	0.0	18.6	18.7
Upper	1	100.0	62.6	30	100.0	70.2	0	0.0	51.3	0	0.0	61.5	41.1
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.5	0	0.0	0.3	0.0
Total	1	100.0	100.0	30	100.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.7	0	0.0	6.3	0	0.0	12.7	0	0.0	8.7	22.6
Moderate	0	0.0	28.7	0	0.0	22.5	0	0.0	37.0	0	0.0	27.7	17.6
Middle	1	100.0	28.7	45	100.0	21.8	1	50.0	24.2	20	27.0	21.5	18.7
Upper	0	0.0	28.7	0	0.0	40.3	1	50.0	24.8	54	73.0	37.7	41.1
Unknown	0	0.0	5.2	0	0.0	9.1	0	0.0	1.2	0	0.0	4.4	0.0
Total	1	100.0	100.0	45	100.0	100.0	2	100.0	100.0	74	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.7	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	22.6
Moderate	0	0.0	5.2	0	0.0	3.7	0	0.0	2.3	0	0.0	2.8	17.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	2.3	0	0.0	1.9	18.7
Upper	0	0.0	3.0	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	41.1
Unknown	0	0.0	91.1	0	0.0	94.0	0	0.0	95.5	0	0.0	95.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table M-7 Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Pueblo CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	3	42.9	45.2	123	20.1	38.5	1	33.3	47.7	73	7.8	40.7	93.6
Over \$1 Million	2	28.6		275	44.9		2	66.7		866	92.2		5.9
Revenue Unknown	2	28.6		215	35.1		0	0.0		0	0.0		0.5
Total	7	100.0		613	100.0		3	100.0		939	100.0		100.0
By Loan Size													
\$100,000 or Less	4	57.1	94.5	194	31.6	42.0	2	66.7	95.6	118	12.6	48.5	
\$100,001 - \$250,000	3	42.9	3.2	419	68.4	18.4	0	0.0	2.8	0	0.0	18.3	
\$250,001 - \$1 Million	0	0.0	2.3	0	0.0	39.6	1	33.3	1.6	821	87.4	33.2	
Total	7	100.0	100.0	613	100.0	100.0	3	100.0	100.0	939	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	3	100.0		123	100.0		1	100.0		73	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		123	100.0		1	100.0		73	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 M-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Pueblo CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	0	0.0	69.8	0	0.0	93.5	0	0.0	58.7	0	0.0	61.7	98.0
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	86.0	0	0.0	38.4	0	0.0	84.8	0	0.0	29.2	
\$100,001 - \$250,000	0	0.0	11.6	0	0.0	40.5	0	0.0	8.7	0	0.0	28.2	
\$250,001 - \$500,000	0	0.0	2.3	0	0.0	21.1	0	0.0	6.5	0	0.0	42.7	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		
<i>Source: 2019 FFIEC Census Data 2019 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>													

M-9 2018 Pueblo CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	5.5	1,876	4.6	858	45.7	9,187	22.6
Moderate	16	29.1	10,789	26.5	2,493	23.1	7,160	17.6
Middle	18	32.7	12,183	30.0	1,755	14.4	7,616	18.7
Upper	15	27.3	15,808	38.9	1,025	6.5	16,697	41.1
Unknown	3	5.5	4	0.0	4	100.0	0	0.0
Total AA	55	100.0	40,660	100.0	6,135	15.1	40,660	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,961	1,418	3.5	35.8	2,084	52.6	459	11.6
Moderate	21,983	9,541	23.6	43.4	9,908	45.1	2,534	11.5
Middle	21,420	12,377	30.7	57.8	7,032	32.8	2,011	9.4
Upper	22,585	17,033	42.2	75.4	3,485	15.4	2,067	9.2
Unknown	10	0	0.0	0.0	10	100.0	0	0.0
Total AA	69,959	40,369	100.0	57.7	22,519	32.2	7,071	10.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	228	3.2	218	3.3	10	2.5	0	0.0
Moderate	1,900	27.0	1,763	26.8	124	30.7	13	24.1
Middle	2,063	29.4	1,910	29.1	137	33.9	16	29.6
Upper	2,807	40.0	2,654	40.4	128	31.7	25	46.3
Unknown	28	0.4	23	0.4	5	1.2	0	0.0
Total AA	7,026	100.0	6,568	100.0	404	100.0	54	100.0
Percentage of Total Businesses:				93.5			5.8	0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	12	6.3	12	6.4	0	0.0	0	0.0
Middle	90	47.4	87	46.5	3	100.0	0	0.0
Upper	86	45.3	86	46.0	0	0.0	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
Total AA	190	100.0	187	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.4			1.6	0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

M-10 2019 Pueblo CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	5.5	1,876	4.6	858	45.7	9,187	22.6
Moderate	16	29.1	10,789	26.5	2,493	23.1	7,160	17.6
Middle	18	32.7	12,183	30.0	1,755	14.4	7,616	18.7
Upper	15	27.3	15,808	38.9	1,025	6.5	16,697	41.1
Unknown	3	5.5	4	0.0	4	100.0	0	0.0
Total AA	55	100.0	40,660	100.0	6,135	15.1	40,660	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,961	1,418	3.5	35.8	2,084	52.6	459	11.6
Moderate	21,983	9,541	23.6	43.4	9,908	45.1	2,534	11.5
Middle	21,420	12,377	30.7	57.8	7,032	32.8	2,011	9.4
Upper	22,585	17,033	42.2	75.4	3,485	15.4	2,067	9.2
Unknown	10	0	0.0	0.0	10	100.0	0	0.0
Total AA	69,959	40,369	100.0	57.7	22,519	32.2	7,071	10.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	206	3.2	196	3.2	10	2.6	0	0.0
Moderate	1,824	28.3	1,688	27.9	125	32.6	11	33.3
Middle	1,935	30.0	1,800	29.8	125	32.6	10	30.3
Upper	2,464	38.2	2,333	38.6	119	31.1	12	36.4
Unknown	27	0.4	23	0.4	4	1.0	0	0.0
Total AA	6,456	100.0	6,040	100.0	383	100.0	33	100.0
Percentage of Total Businesses:				93.6		5.9		0.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	10	5.1	10	5.2	0	0.0	0	0.0
Middle	89	45.4	86	44.8	3	75.0	0	0.0
Upper	95	48.5	94	49.0	1	25.0	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
Total AA	196	100.0	192	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.0		2.0		0.0
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

N. Boulder MSA AA – 2018 and 2019 Demographic and Lending Tables

Table N-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Boulder CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	4	12.9	3.5	1,109	9.4	2.1	1	6.3	3.6	245	3.9	2.2	3.0
Mo d e r a t e	7	22.6	19.3	2,258	19.1	14.6	5	31.3	17.9	1,997	31.4	14.1	18.0
M i d d l e	16	51.6	47.2	6,325	53.6	45.5	5	31.3	49.8	2,112	33.2	47.9	45.6
U p p e r	4	12.9	30.0	2,102	17.8	37.7	5	31.3	28.6	1,998	31.5	35.8	33.3
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	31	100.0	100.0	11,794	100.0	100.0	16	100.0	100.0	6,352	100.0	100.0	100.0
Refinance Loans													
Lo w	2	9.5	5.6	200	3.8	3.6	0	0.0	3.8	0	0.0	2.2	3.0
Mo d e r a t e	8	38.1	19.6	2,090	40.1	15.3	4	15.4	18.0	1,136	12.2	13.7	18.0
M i d d l e	8	38.1	44.1	1,919	36.8	41.9	17	65.4	45.4	6,268	67.1	43.2	45.6
U p p e r	3	14.3	30.7	1,007	19.3	39.2	5	19.2	32.9	1,940	20.8	40.9	33.3
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	21	100.0	100.0	5,216	100.0	100.0	26	100.0	100.0	9,344	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	2.6	0	0.0	1.8	0	0.0	2.7	0	0.0	1.7	3.0
Mo d e r a t e	1	50.0	17.3	125	75.8	12.7	0	0.0	17.0	0	0.0	14.0	18.0
M i d d l e	1	50.0	47.5	40	24.2	44.5	2	66.7	48.6	225	60.0	43.4	45.6
U p p e r	0	0.0	32.6	0	0.0	40.9	1	33.3	31.8	150	40.0	40.9	33.3
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	2	100.0	100.0	165	100.0	100.0	3	100.0	100.0	375	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	20.8	0	0.0	74.0	0	0.0	22.2	0	0.0	4.9	15.1
Mo d e r a t e	1	100.0	45.8	15,750	100.0	12.4	0	0.0	41.3	0	0.0	36.0	33.1
M i d d l e	0	0.0	18.8	0	0.0	5.9	0	0.0	25.4	0	0.0	44.0	38.9
U p p e r	0	0.0	14.6	0	0.0	7.7	0	0.0	11.1	0	0.0	15.0	12.8
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	1	100.0	100.0	15,750	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	6	10.0	4.1	1,309	3.9	17.3	1	2.1	3.6	245	1.5	2.4	3.0
Mo d e r a t e	19	31.7	19.0	20,568	60.6	14.1	9	19.1	17.8	3,133	18.8	15.5	18.0
M i d d l e	26	43.3	45.9	8,651	25.5	36.2	26	55.3	47.3	9,231	55.3	45.0	45.6
U p p e r	9	15.0	31.0	3,389	10.0	32.4	11	23.4	31.3	4,088	24.5	37.1	33.3
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	60	100.0	100.0	33,917	100.0	100.0	47	100.0	100.0	16,697	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table N-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Boulder CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.5	0	0.0	1.2	0	0.0	1.9	0	0.0	0.9	3.0
Moderate	0	0.0	16.6	0	0.0	11.0	0	0.0	14.6	0	0.0	10.9	18.0
Middle	0	0.0	45.4	0	0.0	44.5	1	100.0	47.8	41	100.0	44.5	45.6
Upper	1	100.0	36.6	200	100.0	43.4	0	0.0	35.7	0	0.0	43.8	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	41	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.4	0	0.0	1.4	0	0.0	5.3	0	0.0	1.5	3.0
Moderate	2	50.0	14.2	345	43.6	10.5	0	0.0	18.7	0	0.0	15.0	18.0
Middle	1	25.0	46.7	367	46.3	34.9	1	100.0	41.5	585	100.0	26.2	45.6
Upper	1	25.0	36.7	80	10.1	53.2	0	0.0	34.5	0	0.0	57.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	792	100.0	100.0	1	100.0	100.0	585	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.4	0	0.0	1.2	0	0.0	7.6	0	0.0	3.6	3.0
Moderate	0	0.0	11.8	0	0.0	8.0	0	0.0	15.2	0	0.0	15.2	18.0
Middle	0	0.0	47.2	0	0.0	44.3	0	0.0	45.7	0	0.0	34.0	45.6
Upper	0	0.0	38.6	0	0.0	46.5	0	0.0	31.5	0	0.0	47.2	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table N-3 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Boulder CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	1	33.3	3.7	50	7.1	3.9	0	0.0	3.6	0	0.0	3.8	4.1
Moderate	1	33.3	29.5	150	21.4	38.3	2	50.0	27.7	868	69.4	34.0	30.4
Middle	1	33.3	37.4	500	71.4	32.6	2	50.0	37.9	382	30.6	32.9	37.5
Upper	0	0.0	27.3	0	0.0	24.2	0	0.0	28.7	0	0.0	28.0	28.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.1	0	0.0	1.1	0	0.0	2.1	0	0.0	1.3	
Total	3	100.0	100.0	700	100.0	100.0	4	100.0	100.0	1,250	100.0	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 N-4 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Boulder CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	1.3	0	0.0	1.2	0	0.0	1.1	0	0.0	6.9	3.2
Moderate	0	0.0	19.5	0	0.0	23.9	0	0.0	21.6	0	0.0	17.3	19.2
Middle	0	0.0	51.9	0	0.0	46.0	0	0.0	50.0	0	0.0	54.0	42.6
Upper	0	0.0	24.7	0	0.0	28.6	0	0.0	25.0	0	0.0	21.3	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.6	0	0.0	0.3	0	0.0	2.3	0	0.0	0.5	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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 N-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Boulder CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	2	6.5	5.1	478	4.1	2.5	1	6.3	6.0	195	3.1	3.0	22.3
Moderate	9	29.0	15.7	2,279	19.3	10.8	4	25.0	17.8	1,434	22.6	12.4	17.0
Middle	5	16.1	2.12	1,549	13.1	17.7	4	25.0	22.9	1,724	27.1	19.9	19.9
Upper	15	48.4	44.4	7,488	63.5	55.5	7	43.8	41.4	2,999	47.2	52.4	40.8
Unknown	0	0.0	13.5	0	0.0	13.5	0	0.0	11.9	0	0.0	12.4	0.0
Total	31	100.0	100.0	11,794	100.0	100.0	16	100.0	100.0	6,352	100.0	100.0	100.0
Refinance Loans													
Low	2	9.5	13.1	272	5.2	7.4	0	0.0	9.4	0	0.0	5.0	22.3
Moderate	9	42.9	19.5	2,210	42.4	14.6	4	15.4	17.7	1,097	11.7	12.7	17.0
Middle	7	33.3	21.1	2,171	41.6	19.0	5	19.2	21.8	1,359	14.5	19.2	19.9
Upper	3	14.3	35.1	563	10.8	47.3	15	57.7	39.2	6,178	66.1	50.7	40.8
Unknown	0	0.0	11.3	0	0.0	11.7	2	7.7	11.8	710	7.6	12.4	0.0
Total	21	100.0	100.0	5,216	100.0	100.0	26	100.0	100.0	9,344	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.6	0	0.0	4.9	0	0.0	8.1	0	0.0	4.7	22.3
Moderate	0	0.0	16.1	0	0.0	9.3	0	0.0	18.1	0	0.0	12.0	17.0
Middle	1	50.0	23.6	125	75.8	18.5	1	33.3	24.1	75	20.0	19.5	19.9
Upper	1	50.0	48.2	40	24.2	59.1	2	66.7	47.5	300	80.0	60.4	40.8
Unknown	0	0.0	4.5	0	0.0	8.2	0	0.0	2.2	0	0.0	3.3	0.0
Total	2	100.0	100.0	165	100.0	100.0	3	100.0	100.0	375	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	8.5	8.3	790	4.3	3.4	1	2.1	7.9	195	1.2	3.8	22.3
Moderate	18	30.5	17.0	4,489	24.7	9.4	8	17.0	17.6	2,531	15.2	11.4	17.0
Middle	14	23.7	2.13	4,150	22.8	14.3	10	21.3	22.4	3,158	18.9	17.9	19.9
Upper	22	37.3	41.3	8,738	48.1	41.9	26	55.3	41.1	10,103	60.5	48.0	40.8
Unknown	0	0.0	12.0	0	0.0	31.1	2	4.3	10.9	710	4.3	19.0	0.0
Total	59	100.0	100.0	18,167	100.0	100.0	47	100.0	100.0	16,697	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table N-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Boulder CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	9.5	0	0.0	6.4	0	0.0	7.8	0	0.0	4.6	22.3
Moderate	0	0.0	17.0	0	0.0	10.4	0	0.0	17.0	0	0.0	11.5	17.0
Middle	0	0.0	23.6	0	0.0	19.7	0	0.0	23.6	0	0.0	18.0	19.9
Upper	1	100.0	47.3	200	100.0	59.9	1	100.0	49.5	41	100.0	64.2	40.8
Unknown	0	0.0	2.6	0	0.0	3.5	0	0.0	2.1	0	0.0	1.8	0.0
Total	1	100.0	100.0	200	100.0	100.0	1	100.0	100.0	41	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	25.0	5.9	40	5.1	5.1	0	0.0	10.9	0	0.0	3.0	22.3
Moderate	0	0.0	15.4	0	0.0	4.9	0	0.0	18.7	0	0.0	7.1	17.0
Middle	1	25.0	20.7	305	38.5	12.4	0	0.0	23.9	0	0.0	10.8	19.9
Upper	2	50.0	52.1	447	56.4	61.7	1	100.0	43.0	585	100.0	66.5	40.8
Unknown	0	0.0	5.9	0	0.0	15.9	0	0.0	3.5	0	0.0	12.6	0.0
Total	4	100.0	100.0	792	100.0	100.0	1	100.0	100.0	585	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.6	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	22.3
Moderate	0	0.0	3.1	0	0.0	2.5	0	0.0	2.2	0	0.0	0.9	17.0
Middle	0	0.0	3.9	0	0.0	1.1	0	0.0	3.3	0	0.0	4.8	19.9
Upper	0	0.0	2.4	0	0.0	2.5	0	0.0	2.2	0	0.0	3.7	40.8
Unknown	0	0.0	89.0	0	0.0	93.1	0	0.0	92.4	0	0.0	90.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table N-7 Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Boulder CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	1	33.3	46.9	150	21.4	35.8	3	75.0	54.4	1,168	93.4	38.4	92.9
Over \$1 Million	2	66.7		550	78.6		1	25.0		82	6.6		6.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.8
Total	3	100.0		700	100.0		4	100.0		1,250	100.0		100.0
By Loan Size													
\$100,000 or Less	1	33.3	94.4	50	7.1	38.3	1	25.0	95.3	82	6.6	42.8	
\$100,001 - \$250,000	1	33.3	2.6	150	21.4	12.8	0	0.0	2.1	0	0.0	11.4	
\$250,001 - \$1 Million	1	33.3	3.1	500	71.4	48.9	3	75.0	2.6	1,168	93.4	45.9	
Total	3	100.0	100.0	700	100.0	100.0	4	100.0	100.0	1,250	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	1	100.0		150	100.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		3	100.0		1,168	100.0		
Total	1	100.0		150	100.0		3	100.0		1,168	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 N-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Boulder CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	0	0.0	64.9	0	0.0	75.0	0	0.0	65.9	0	0.0	44.9	98.5
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.2
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	85.7	0	0.0	36.7	0	0.0	94.3	0	0.0	49.3	
\$100,001 - \$250,000	0	0.0	13.0	0	0.0	52.0	0	0.0	3.4	0	0.0	20.8	
\$250,001 - \$500,000	0	0.0	1.3	0	0.0	11.3	0	0.0	2.3	0	0.0	29.8	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		
<i>Source: 2019 FFIEC Census Data 2019 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 N-9 2018 Boulder CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.4	3,847	5.3	958	24.9	16,135	22.3
Moderate	14	20.6	13,721	18.9	1,392	10.1	12,332	17.0
Middle	30	44.1	32,808	45.3	1,705	5.2	14,393	19.9
Upper	19	27.9	22,042	30.4	566	2.6	29,558	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	68	100.0	72,418	100.0	4,621	6.4	72,418	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,149	2,293	3.0	25.1	6,432	70.3	424	4.6
Moderate	29,026	13,742	18.0	47.3	13,853	47.7	1,431	4.9
Middle	56,892	34,740	45.6	61.1	18,405	32.4	3,747	6.6
Upper	34,672	25,388	33.3	73.2	7,663	22.1	1,621	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	129,739	76,163	100.0	58.7	46,353	35.7	7,223	5.6
	Total Businesses by Tract	0						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,123	4.0	1,053	4.1	63	3.7	7	2.5
Moderate	8,110	29.1	7,308	28.2	739	43.9	63	22.6
Middle	10,601	38.1	9,981	38.6	515	30.6	105	37.6
Upper	8,009	28.8	7,538	29.1	367	21.8	104	37.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	27,843	100.0	25,880	100.0	1,684	100.0	279	100.0
Percentage of Total Businesses:				92.9		6.0		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	3.1	13	3.2	0	0.0	0	0.0
Moderate	82	19.8	79	19.3	3	75.0	0	0.0
Middle	172	41.4	170	41.5	1	25.0	1	100.0
Upper	148	35.7	148	36.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	415	100.0	410	100.0	4	100.0	1	100.0
Percentage of Total Farms:				98.8		1.0		0.2
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table N-10 2019 Boulder CO MSA AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.4	3,847	5.3	958	24.9	16,135	22.3
Moderate	14	20.6	13,721	18.9	1,392	10.1	12,332	17.0
Middle	30	44.1	32,808	45.3	1,705	5.2	14,393	19.9
Upper	19	27.9	22,042	30.4	566	2.6	29,558	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	68	100.0	72,418	100.0	4,621	6.4	72,418	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,149	2,293	3.0	25.1	6,432	70.3	424	4.6
Moderate	29,026	13,742	18.0	47.3	13,853	47.7	1,431	4.9
Middle	56,892	34,740	45.6	61.1	18,405	32.4	3,747	6.6
Upper	34,672	25,388	33.3	73.2	7,663	22.1	1,621	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	129,739	76,163	100.0	58.7	46,353	35.7	7,223	5.6
	Total Businesses by Tract		0					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,051	4.1	986	4.2	61	3.8	4	1.9
Moderate	7,701	30.4	6,942	29.5	705	44.2	54	25.7
Middle	9,506	37.5	8,949	38.0	482	30.2	75	35.7
Upper	7,104	28.0	6,681	28.4	346	21.7	77	36.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25,362	100.0	23,558	100.0	1,594	100.0	210	100.0
Percentage of Total Businesses:			92.9		6.3		0.8	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	13	3.2	13	3.2	0	0.0	0	0.0
Moderate	79	19.2	76	18.8	3	60.0	0	0.0
Middle	175	42.6	172	42.5	2	40.0	1	100.0
Upper	144	35.0	144	35.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	411	100.0	405	100.0	5	100.0	1	100.0
Percentage of Total Farms:			98.5		1.2		0.2	
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.								

O. Grand Junction MSA AA – 2018 and 2019 Demographic and Lending Tables

Table O-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Grand Junction CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	3	33.3	20.3	486	23.4	15.4	1	20.0	21.5	169	15.0	16.3	19.1
M i d d l e	4	44.4	61.0	767	37.0	59.5	3	60.0	60.9	472	42.0	60.0	58.3
U p p e r	2	22.2	18.7	821	39.6	25.2	1	20.0	17.6	484	43.0	23.6	22.7
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	9	100.0	100.0	2,074	100.0	100.0	5	100.0	100.0	1,125	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	17.7	0	0.0	13.6	0	0.0	16.0	0	0.0	12.1	19.1
M i d d l e	2	100.0	61.8	375	100.0	59.3	2	100.0	62.4	431	100.0	59.6	58.3
U p p e r	0	0.0	20.4	0	0.0	27.2	0	0.0	21.6	0	0.0	28.3	22.7
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	2	100.0	100.0	375	100.0	100.0	2	100.0	100.0	431	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	13.0	0	0.0	9.5	0	0.0	16.4	0	0.0	12.4	19.1
M i d d l e	0	0.0	60.4	0	0.0	62.9	1	100.0	58.8	20	100.0	56.1	58.3
U p p e r	0	0.0	26.6	0	0.0	27.6	0	0.0	24.8	0	0.0	31.5	22.7
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	63.2	0	0.0	38.3	0	0.0	52.6	0	0.0	46.8	39.5
M i d d l e	0	0.0	36.8	0	0.0	61.7	0	0.0	42.1	0	0.0	51.9	42.0
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	1.2	18.5
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	3	20.0	19.3	486	17.5	15.1	1	11.1	18.9	169	10.1	14.7	19.1
M i d d l e	10	66.7	61.0	1,466	52.9	59.4	6	66.7	61.3	923	55.1	59.7	58.3
U p p e r	2	13.3	19.8	821	29.6	25.5	2	22.2	19.8	584	34.8	25.6	22.7
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	15	100.0	100.0	2,773	100.0	100.0	9	100.0	100.0	1,676	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Table O-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Grand Junction CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	%	\$%	#	%	#	\$ (000)	%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.6	0	0.0	8.3	0	0.0	13.2	0	0.0	9.0	19.1
Middle	4	100.0	55.4	324	100.0	47.6	0	0.0	58.9	0	0.0	57.5	58.3
Upper	0	0.0	33.0	0	0.0	44.0	1	100.0	27.9	100	100.0	33.6	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	324	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	22.2	0	0.0	12.3	0	0.0	21.3	0	0.0	14.1	19.1
Middle	0	0.0	59.3	0	0.0	54.8	0	0.0	66.3	0	0.0	69.3	58.3
Upper	0	0.0	18.5	0	0.0	33.0	0	0.0	12.5	0	0.0	16.6	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	23.5	0	0.0	16.0	0	0.0	25.2	0	0.0	21.0	19.1
Middle	0	0.0	61.1	0	0.0	64.3	0	0.0	54.2	0	0.0	52.9	58.3
Upper	0	0.0	15.4	0	0.0	19.7	0	0.0	20.6	0	0.0	26.1	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table O-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Grand Junction CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.0	0	0.0	20.8	1	16.7	16.9	350	33.2	18.5	19.7
Middle	2	50.0	54.0	330	55.9	53.5	4	66.7	54.6	650	61.6	52.0	57.0
Upper	2	50.0	27.5	260	44.1	24.0	1	16.7	26.1	55	5.2	27.6	23.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.5	0	0.0	1.6	0	0.0	2.5	0	0.0	1.9	
Total	4	100.0	100.0	590	100.0	100.0	6	100.0	100.0	1,055	100.0	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 O-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Grand Junction CO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.3	0	0.0	0.8	0	0.0	3.0	0	0.0	0.8	6.8
Middle	0	0.0	43.5	0	0.0	40.0	1	50.0	47.2	374	78.9	50.7	43.6
Upper	1	100.0	50.5	100	100.0	57.6	1	50.0	47.2	100	21.1	46.8	49.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.7	0	0.0	1.6	0	0.0	2.5	0	0.0	1.7	
Total	1	100.0	100.0	100	100.0	100.0	2	100.0	100.0	474	100.0	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 O-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Junction CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	11.1	6.2	128	6.2	3.4	0	0.0	7.1	0	0.0	4.1	21.6
Moderate	1	11.1	21.7	130	6.3	16.1	1	20.0	23.9	169	15.0	18.1	18.0
Middle	1	11.1	24.3	186	9.0	22.5	0	0.0	24.0	0	0.0	22.4	19.9
Upper	5	55.6	34.5	1,269	61.2	43.1	4	80.0	34.3	956	85.0	43.5	40.5
Unknown	1	11.1	13.3	361	17.4	14.9	0	0.0	10.8	0	0.0	12.0	0.0
Total	9	100.0	100.0	2,074	100.0	100.0	5	100.0	100.0	1,125	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	9.3	0	0.0	5.5	0	0.0	6.6	0	0.0	4.0	21.6
Moderate	0	0.0	18.0	0	0.0	13.7	0	0.0	18.9	0	0.0	13.9	18.0
Middle	1	50.0	24.1	198	52.8	22.6	0	0.0	21.4	0	0.0	19.8	19.9
Upper	1	50.0	33.4	177	47.2	42.7	0	0.0	31.9	0	0.0	39.5	40.5
Unknown	0	0.0	15.3	0	0.0	15.5	2	100.0	2.11	431	100.0	22.9	0.0
Total	2	100.0	100.0	375	100.0	100.0	2	100.0	100.0	431	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.8	0	0.0	4.0	0	0.0	5.5	0	0.0	3.7	21.6
Moderate	0	0.0	13.3	0	0.0	12.4	0	0.0	16.7	0	0.0	11.0	18.0
Middle	0	0.0	19.8	0	0.0	18.6	1	100.0	24.8	20	100.0	24.2	19.9
Upper	0	0.0	51.9	0	0.0	52.8	0	0.0	49.2	0	0.0	57.4	40.5
Unknown	0	0.0	8.2	0	0.0	12.1	0	0.0	3.9	0	0.0	3.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	6.7	6.9	128	4.6	3.9	0	0.0	6.8	0	0.0	4.0	21.6
Moderate	3	20.0	19.8	299	10.8	14.9	1	11.1	2.11	169	10.1	15.8	18.0
Middle	4	26.7	23.4	539	19.4	21.6	1	11.1	22.6	20	12	20.8	19.9
Upper	6	40.0	35.1	1,446	52.1	42.1	5	55.6	33.9	1,056	63.0	41.2	40.5
Unknown	1	6.7	14.9	361	13.0	17.5	2	22.2	15.6	431	25.7	18.2	0.0
Total	15	100.0	100.0	2,773	100.0	100.0	9	100.0	100.0	1,676	100.0	100.0	100.0

Source: 2019 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 O-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Junction CO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	6.0	0	0.0	6.9	0	0.0	7.5	0	0.0	4.6	21.6
Moderate	2	50.0	15.0	169	52.2	15.3	0	0.0	16.8	0	0.0	11.9	18.0
Middle	2	50.0	18.0	155	47.8	14.6	0	0.0	21.4	0	0.0	22.7	19.9
Upper	0	0.0	58.4	0	0.0	60.4	1	100.0	52.9	100	100.0	60.4	40.5
Unknown	0	0.0	2.6	0	0.0	2.8	0	0.0	1.4	0	0.0	0.4	0.0
Total	4	100.0	100.0	324	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.9	0	0.0	3.6	0	0.0	13.8	0	0.0	8.3	21.6
Moderate	0	0.0	19.8	0	0.0	10.8	0	0.0	22.5	0	0.0	17.5	18.0
Middle	0	0.0	18.5	0	0.0	9.9	0	0.0	26.3	0	0.0	25.1	19.9
Upper	0	0.0	40.7	0	0.0	49.5	0	0.0	30.0	0	0.0	35.6	40.5
Unknown	0	0.0	11.1	0	0.0	26.1	0	0.0	7.5	0	0.0	13.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.3	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	21.6
Moderate	0	0.0	1.3	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	18.0
Middle	0	0.0	0.7	0	0.0	0.9	0	0.0	0.9	0	0.0	1.0	19.9
Upper	0	0.0	2.0	0	0.0	2.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	94.6	0	0.0	95.7	0	0.0	99.1	0	0.0	99.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table O-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Grand Junction CO MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	2	50.0	48.7	180	30.5	38.3	5	83.3	49.0	1,037	98.3	40.9	92.6
Over \$1 Million	2	50.0		410	69.5		0	0.0		0	0.0		6.5
Revenue Unknown	0	0.0		0	0.0		1	16.7		18	1.7		0.8
Total	4	100.0		590	100.0		6	100.0		1,055	100.0		100.0
By Loan Size													
\$100,000 or Less	1	25.0	92.5	30	5.1	37.4	3	50.0	93.0	103	9.8	38.0	
\$100,001 - \$250,000	2	50.0	3.9	260	44.1	17.0	0	0.0	3.7	0	0.0	16.2	
\$250,001 - \$1 Million	1	25.0	3.7	300	50.8	45.6	3	50.0	3.4	952	90.2	45.8	
Total	4	100.0	100.0	590	100.0	100.0	6	100.0	100.0	1,055	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1	50.0		30	16.7		2	40.0		85	8.2		
\$100,001 - \$250,000	1	50.0		150	83.3		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		3	60.0		952	91.8		
Total	2	100.0		180	100.0		5	100.0		1,037	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 O-8													
Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Grand Junction CO MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	1	100.0	79.9	100	100.0	88.4	2	100.0	75.4	474	100.0	90.7	98.6
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	1	100.0		100	100.0		2	100.0		474	100.0		100.0
By Loan Size													
\$100,000 or Less	1	100.0	77.7	100	100.0	34.5	1	50.0	82.9	100	21.1	38.9	
\$100,001 - \$250,000	0	0.0	17.4	0	0.0	41.4	0	0.0	12.1	0	0.0	34.0	
\$250,001 - \$500,000	0	0.0	4.9	0	0.0	24.1	1	50.0	5.0	374	78.9	27.1	
Total	1	100.0	100.0	100	100.0	100.0	2	100.0	100.0	474	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1	100.0		100	100.0		1	50.0		100	21.1		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		1	50.0		374	78.9		
Total	1	100.0		100	100.0		2	100.0		474	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 O-9 2018 Grand Junction CO MSA AA 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	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	38,714	100.0	4,432	11.4	38,714	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	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,472	40,908	100.0	64.5	18,307	28.8	4,257	6.7
	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	1,664	18.7	1,558	18.9	96	17.1	10	9.9
Middle	5,147	57.7	4,721	57.2	363	64.5	63	62.4
Upper	2,104	23.6	1,972	23.9	104	18.5	28	27.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,915	100.0	8,251	100.0	563	100.0	101	100.0
Percentage of Total Businesses:				92.6		6.3		1.1
	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
Moderate	16	5.6	16	5.7	0	0.0	0	0.0
Middle	124	43.5	120	42.9	4	80.0	0	0.0
Upper	145	50.9	144	51.4	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	285	100.0	280	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table O-10 2019 Grand Junction CO MSA AA 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	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	38,714	100.0	4,432	11.4	38,714	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	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,472	40,908	100.0	64.5	18,307	28.8	4,257	6.7
	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	1,596	19.7	1,498	19.9	90	17.0	8	11.9
Middle	4,625	57.0	4,253	56.6	333	62.8	39	58.2
Upper	1,895	23.3	1,768	23.5	107	20.2	20	29.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,116	100.0	7,519	100.0	530	100.0	67	100.0
Percentage of Total Businesses:				92.6		6.5		0.8
	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
Moderate	19	6.8	19	6.9	0	0.0	0	0.0
Middle	122	43.6	119	43.1	3	75.0	0	0.0
Upper	139	49.6	138	50.0	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	280	100.0	276	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0

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.

P. Franklin County AA – 2018 and 2019 Demographic and Lending Tables

Table P-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Franklin County KS AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	4	14.3	13.1	407	11.0	10.2	2	11.1	13.9	241	8.9	11.7	9.8
Middle	9	32.1	34.1	1,112	30.1	34.9	8	44.4	60.4	1,311	48.2	64.0	71.4
Uppe r	15	53.6	52.5	2,170	58.8	54.8	8	44.4	25.5	1,166	42.9	24.2	18.8
Unkno wn	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	28	100.0	100.0	3,689	100.0	100.0	18	100.0	100.0	2,718	100.0	100.0	100.0
Re finance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	4	22.2	9.3	277	25.8	6.7	2	10.0	7.8	345	15.0	8.2	9.8
Middle	5	27.8	35.2	289	26.9	38.5	12	60.0	76.9	985	42.8	77.1	71.4
Uppe r	9	50.0	55.1	508	47.3	54.5	6	30.0	15.3	971	42.2	14.7	18.8
Unkno wn	0	0.0	0.5	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	18	100.0	100.0	1,074	100.0	100.0	20	100.0	100.0	2,301	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	3.1	0	0.0	2.1	0	0.0	17.9	0	0.0	19.8	9.8
Middle	1	50.0	31.3	75	78.9	27.0	1	50.0	64.1	13	24.5	63.1	71.4
Uppe r	1	50.0	65.6	20	21.1	70.8	1	50.0	17.9	40	75.5	17.1	18.8
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	2	100.0	100.0	95	100.0	100.0	2	100.0	100.0	53	100.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	2	100.0	50.0	180	100.0	25.4	0	0.0	33.3	0	0.0	52.1	0.0
Middle	0	0.0	0.0	0	0.0	0.0	1	100.0	66.7	273	100.0	47.9	56.1
Uppe r	0	0.0	50.0	0	0.0	74.6	0	0.0	0.0	0	0.0	0.0	43.9
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	2	100.0	100.0	180	100.0	100.0	1	100.0	100.0	273	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	13	22.8	11.6	959	18.3	9.0	4	9.5	11.8	586	10.8	10.9	9.8
Middle	16	28.1	35.0	1,496	28.6	36.0	23	54.8	66.9	2,650	49.0	68.9	71.4
Uppe r	28	49.1	53.1	2,773	53.0	54.7	15	35.7	21.2	2,177	40.2	20.1	18.8
Unkno wn	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	57	100.0	100.0	5,228	100.0	100.0	42	100.0	100.0	5,413	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table P-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Franklin County KS AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	33.3	10.7	45	32.1	6.0	0	0.0	11.1	0	0.0	9.1	9.8
Middle	1	16.7	42.9	20	14.3	45.6	0	0.0	66.7	0	0.0	70.3	71.4
Upper	3	50.0	46.4	75	53.6	48.4	0	0.0	22.2	0	0.0	20.5	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	140	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	5.9	50	100.0	4.1	0	0.0	5.6	0	0.0	8.8	9.8
Middle	0	0.0	52.9	0	0.0	67.0	1	100.0	72.2	68	100.0	76.2	71.4
Upper	0	0.0	41.2	0	0.0	29.0	0	0.0	22.2	0	0.0	15.0	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	50	100.0	100.0	1	100.0	100.0	68	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.6	0	0.0	0.3	0	0.0	10.5	0	0.0	9.4	9.8
Middle	0	0.0	41.2	0	0.0	35.1	0	0.0	73.7	0	0.0	77.5	71.4
Upper	0	0.0	41.2	0	0.0	64.6	0	0.0	15.8	0	0.0	13.1	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table P-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Franklin County KS AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	15.4	11.7	250	18.7	25.0	2	13.3	8.1	223	13.4	18.6	12.6
Middle	8	61.5	44.7	663	49.7	51.4	9	60.0	78.0	892	53.6	70.5	72.7
Upper	3	23.1	40.8	421	31.6	23.2	4	26.7	11.8	550	33.0	10.4	14.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.8	0	0.0	0.4	0	0.0	2.0	0	0.0	0.5	
Total	13	100.0	100.0	1,334	100.0	100.0	15	100.0	100.0	1,665	100.0	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 P-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Franklin County KS AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.9	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	6.5
Middle	3	33.3	55.9	242	50.2	37.3	4	100.0	89.2	235	100.0	98.2	89.2
Upper	6	66.7	41.2	240	49.8	62.4	0	0.0	8.1	0	0.0	1.3	4.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	2.7	0	0.0	0.5	
Total	9	100.0	100.0	482	100.0	100.0	4	100.0	100.0	235	100.0	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 P-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Franklin County KS AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	3.6	5.5	68	1.8	3.2	0	0.0	6.9	0	0.0	4.2	16.0
Moderate	6	21.4	19.1	556	15.1	13.6	7	38.9	20.1	708	26.0	14.5	18.2
Middle	14	50.0	21.7	2,016	54.6	21.0	5	27.8	27.5	844	31.1	27.6	22.8
Upper	6	21.4	33.9	928	25.2	45.8	6	33.3	33.3	1,166	42.9	42.5	43.0
Unknown	1	3.6	19.8	121	3.3	16.5	0	0.0	12.0	0	0.0	11.2	0.0
Total	28	100.0	100.0	3,689	100.0	100.0	18	100.0	100.0	2,718	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.9	0	0.0	5.8	2	10.0	4.5	139	6.0	2.1	16.0
Moderate	4	22.2	12.0	129	12.0	7.6	3	15.0	12.3	192	8.3	7.6	18.2
Middle	5	27.8	19.9	385	35.8	19.1	6	30.0	21.6	501	21.8	16.8	22.8
Upper	9	50.0	45.4	560	52.1	48.5	7	35.0	42.9	1,116	48.5	50.5	43.0
Unknown	0	0.0	15.7	0	0.0	19.0	2	10.0	18.7	353	15.3	23.0	0.0
Total	18	100.0	100.0	1,074	100.0	100.0	20	100.0	100.0	2,301	100.0	100.0	100.0
Home Improvement Loans													
Low	1	50.0	6.3	20	21.1	2.4	0	0.0	5.1	0	0.0	3.4	16.0
Moderate	1	50.0	9.4	75	78.9	9.7	0	0.0	7.7	0	0.0	4.1	18.2
Middle	0	0.0	25.0	0	0.0	17.7	0	0.0	17.9	0	0.0	13.1	22.8
Upper	0	0.0	53.1	0	0.0	61.2	2	100.0	66.7	53	100.0	74.6	43.0
Unknown	0	0.0	6.3	0	0.0	9.0	0	0.0	2.6	0	0.0	4.8	0.0
Total	2	100.0	100.0	95	100.0	100.0	2	100.0	100.0	53	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	5.5	5.9	108	2.1	3.9	2	4.9	5.7	139	2.7	3.4	16.0
Moderate	13	23.6	16.0	795	15.7	11.6	10	24.4	15.9	900	17.5	11.3	18.2
Middle	19	34.5	20.8	2,401	47.6	20.1	11	26.8	24.7	1,345	26.2	22.7	22.8
Upper	18	32.7	37.9	1,573	31.2	46.0	16	39.0	38.2	2,403	46.8	45.4	43.0
Unknown	2	3.6	19.4	171	3.4	18.4	2	4.9	15.4	353	6.9	17.2	0.0
Total	55	100.0	100.0	5,048	100.0	100.0	41	100.0	100.0	5,140	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table P-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Franklin County KS AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	1	16.7	10.7	20	14.3	9.3	0	0.0	0.0	0	0.0	0.0	16.0
Moderate	2	33.3	17.9	35	25.0	12.6	0	0.0	11.1	0	0.0	5.7	18.2
Middle	0	0.0	21.4	0	0.0	15.8	0	0.0	33.3	0	0.0	19.9	22.8
Upper	3	50.0	46.4	85	60.7	58.4	0	0.0	55.6	0	0.0	74.4	43.0
Unknown	0	0.0	3.6	0	0.0	3.8	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	140	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.0
Moderate	0	0.0	11.8	0	0.0	9.0	0	0.0	5.6	0	0.0	3.2	18.2
Middle	0	0.0	23.5	0	0.0	34.2	0	0.0	38.9	0	0.0	25.4	22.8
Upper	0	0.0	41.2	0	0.0	35.6	1	100.0	55.6	68	100.0	71.4	43.0
Unknown	1	100.0	23.5	50	100.0	21.2	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	50	100.0	100.0	1	100.0	100.0	68	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	4.7	16.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	43.0
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	94.7	0	0.0	95.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table P-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Franklin County KS AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	5	38.5	45.4	523	39.2	26.9	11	73.3	48.3	1,202	72.2	41.9	89.6
Over \$1 Million	8	61.5		811	60.8		4	26.7		463	27.8		8.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		2.2
Total	13	100.0		1,334	100.0		15	100.0		1,665	100.0		100.0
By Loan Size													
\$100,000 or Less	10	76.9	92.2	559	41.9	36.5	9	60.0	90.5	378	22.7	34.7	
\$100,001 - \$250,000	1	7.7	4.3	150	11.2	18.3	3	20.0	4.7	398	23.9	19.3	
\$250,001 - \$1 Million	2	15.4	3.5	625	46.9	45.1	3	20.0	4.7	889	53.4	46.0	
Total	13	100.0	100.0	1,334	100.0	100.0	15	100.0	100.0	1,665	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	80.0		223	42.6		6	54.5		240	20.0		
\$100,001 - \$250,000	0	0.0		0	0.0		3	27.3		398	33.1		
\$250,001 - \$1 Million	1	20.0		300	57.4		2	18.2		564	46.9		
Total	5	100.0		523	100.0		11	100.0		1,202	100.0		
<i>Source: 2019 FFIEC Census Data</i>													
<i>2019 Dun & Bradstreet Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table P-8													
Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Franklin County KS AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	9	100.0	50.0	482	100.0	85.6	4	100.0	40.5	235	100.0	42.9	96.8
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		3.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	9	100.0		482	100.0		4	100.0		235	100.0		100.0
By Loan Size													
\$100,000 or Less	8	88.9	91.2	332	68.9	50.5	3	75.0	89.2	106	45.1	32.3	
\$100,001 - \$250,000	1	11.1	5.9	150	31.1	26.0	1	25.0	2.7	129	54.9	6.8	
\$250,001 - \$500,000	0	0.0	2.9	0	0.0	23.4	0	0.0	8.1	0	0.0	60.9	
Total	9	100.0	100.0	482	100.0	100.0	4	100.0	100.0	235	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	8	88.9		332	68.9		3	75.0		106	45.1		
\$100,001 - \$250,000	1	11.1		150	31.1		1	25.0		129	54.9		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	9	100.0		482	100.0		4	100.0		235	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 P-9 2018 Franklin County KS AA 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	1,098	15.8
Moderate	1	20.0	759	11.0	143	18.8	1,244	18.0
Middle	2	40.0	2,791	40.3	224	8.0	1,580	22.8
Upper	2	40.0	3,379	48.8	226	6.7	3,007	43.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	6,929	100.0	593	8.6	6,929	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	1,308	692	9.8	52.9	442	33.8	174	13.3
Middle	4,615	2,971	42.1	64.4	1,112	24.1	532	11.5
Upper	5,191	3,395	48.1	65.4	1,218	23.5	578	11.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	11,114	7,058	100.0	63.5	2,772	24.9	1,284	11.6
	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	110	12.1	81	10.1	29	36.7	0	0.0
Middle	455	50.2	409	50.8	30	38.0	16	72.7
Upper	341	37.6	315	39.1	20	25.3	6	27.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	906	100.0	805	100.0	79	100.0	22	100.0
Percentage of Total Businesses:				88.9		8.7		2.4
	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
Moderate	5	5.2	4	4.3	1	33.3	0	0.0
Middle	41	42.7	40	43.0	1	33.3	0	0.0
Upper	50	52.1	49	52.7	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	96	100.0	93	100.0	3	100.0	0	0.0
Percentage of Total Farms:				96.9		3.1		0.0
<p>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Table P-10 2019 Franklin County KS AA 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	1,110	16.0
Moderate	1	20.0	759	11.0	143	18.8	1,260	18.2
Middle	3	60.0	4,731	68.3	357	7.5	1,580	22.8
Upper	1	20.0	1,439	20.8	93	6.5	2,979	43.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	6,929	100.0	593	8.6	6,929	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	1,308	692	9.8	52.9	442	33.8	174	13.3
Middle	7,399	5,042	71.4	68.1	1,492	20.2	865	11.7
Upper	2,407	1,324	18.8	55.0	838	34.8	245	10.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	11,114	7,058	100.0	63.5	2,772	24.9	1,284	11.6
	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	109	12.6	84	10.8	25	35.2	0	0.0
Middle	630	72.7	573	73.8	38	53.5	19	100.0
Upper	127	14.7	119	15.3	8	11.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	866	100.0	776	100.0	71	100.0	19	100.0
Percentage of Total Businesses:				89.6		8.2		2.2
	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
Moderate	6	6.5	5	5.6	1	33.3	0	0.0
Middle	83	89.2	81	90.0	2	66.7	0	0.0
Upper	4	4.3	4	4.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	93	100.0	90	100.0	3	100.0	0	0.0
Percentage of Total Farms:				96.8		3.2		0.0
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.								

Q. North Central Missouri AA – 2018 and 2019 Demographic and Lending Tables

Table Q-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: North Central MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$ %	\$ %	#	%	%	\$(000)	\$ %		\$ %
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	12.5	4.7	83	13.8	2.3	1	8.3	5.6	93	6.3	3.7	4.4
Middle	3	37.5	59.5	183	30.4	54.6	7	58.3	54.0	998	67.4	51.1	50.5
Upper	4	50.0	34.2	335	55.7	41.1	4	33.3	40.0	390	26.3	43.8	45.1
Unknown	0	0.0	1.6	0	0.0	2.0	0	0.0	0.4	0	0.0	1.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	601	100.0	100.0	12	100.0	100.0	1,481	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.4	0	0.0	3.7	0	0.0	0.0	0	0.0	0.0	4.4
Middle	4	50.0	47.1	155	50.7	46.2	6	50.0	57.0	333	51.4	49.0	50.5
Upper	4	50.0	48.5	151	49.3	50.1	6	50.0	43.0	315	48.6	51.0	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	306	100.0	100.0	12	100.0	100.0	648	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.4
Middle	3	75.0	61.5	135	77.1	60.4	3	60.0	62.5	145	74.4	59.1	50.5
Upper	1	25.0	38.5	40	22.9	39.6	2	40.0	37.5	50	25.6	40.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	175	100.0	100.0	5	100.0	100.0	195	100.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	67.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	4.2	4.5	83	7.1	2.9	1	3.3	3.6	93	4.0	2.4	4.4
Middle	12	50.0	55.6	513	44.0	52.0	16	53.3	53.9	1,476	63.0	49.9	50.5
Upper	11	45.8	38.9	571	48.9	43.7	13	43.3	42.2	773	33.0	46.9	45.1
Unknown	0	0.0	1.0	0	0.0	1.4	0	0.0	0.3	0	0.0	0.9	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	1,167	100.0	100.0	30	100.0	100.0	2,342	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table Q-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: North Central MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.4
Middle	1	33.3	42.9	25	35.7	48.7	0	0.0	25.0	0	0.0	6.1	50.5
Upper	2	66.7	57.1	45	64.3	51.3	0	0.0	75.0	0	0.0	93.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	70	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.4
Middle	1	100.0	100.0	15	100.0	100.0	0	0.0	42.9	0	0.0	63.0	50.5
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	57.1	18	100.0	37.0	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	15	100.0	100.0	1	100.0	100.0	18	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.5	0	0.0	21.0	0	0.0	0.0	0	0.0	0.0	4.4
Middle	0	0.0	25.0	0	0.0	20.8	0	0.0	22.2	0	0.0	12.1	50.5
Upper	0	0.0	62.5	0	0.0	58.3	0	0.0	77.8	0	0.0	87.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table Q-3 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: North Central MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	17.1	40	15.2	29.3	0	0.0	16.8	0	0.0	25.9	17.7
Middle	2	40.0	48.6	99	37.5	37.0	5	83.3	45.3	96	79.3	55.5	51.6
Upper	2	40.0	32.3	125	47.3	32.7	1	16.7	37.2	25	20.7	17.9	30.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.0	0	0.0	0.9	0	0.0	0.7	0	0.0	0.7	
Total	5	100.0	100.0	264	100.0	100.0	6	100.0	100.0	121	100.0	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 Q-4 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: North Central MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.6	0	0.0	0.6	0	0.0	1.3	0	0.0	0.7	1.2
Middle	2	25.0	47.0	109	32.2	31.1	5	41.7	48.8	260	48.2	46.2	50.6
Upper	6	75.0	49.4	230	67.8	68.3	7	58.3	50.0	279	51.8	53.1	48.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	339	100.0	100.0	12	100.0	100.0	539	100.0	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 Q-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: North Central MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	\$ %	\$ %	#	%	#	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	8.4	0	0.0	5.0	0	0.0	7.2	0	0.0	3.7	17.9
Moderate	3	37.5	21.6	183	30.4	14.9	4	33.3	22.8	419	28.3	18.3	14.1
Middle	2	25.0	23.7	208	34.6	22.4	4	33.3	23.2	475	32.1	19.0	19.6
Upper	3	37.5	35.3	210	34.9	48.1	4	33.3	35.2	587	39.6	48.4	48.4
Unknown	0	0.0	11.1	0	0.0	9.6	0	0.0	11.6	0	0.0	10.5	0.0
Total	8	100.0	100.0	601	100.0	100.0	12	100.0	100.0	1,481	100.0	100.0	100.0
Refinance Loans													
Low	1	12.5	11.8	45	14.7	6.6	1	8.3	3.7	12	19	1.7	17.9
Moderate	3	37.5	17.6	170	55.6	11.2	2	16.7	12.1	135	20.8	8.2	14.1
Middle	1	12.5	22.1	25	8.2	23.5	1	8.3	26.2	45	6.9	25.0	19.6
Upper	2	25.0	35.3	50	16.3	48.9	8	66.7	42.1	456	70.4	45.9	48.4
Unknown	1	12.5	13.2	16	5.2	9.8	0	0.0	15.9	0	0.0	19.2	0.0
Total	8	100.0	100.0	306	100.0	100.0	12	100.0	100.0	648	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.3	0	0.0	4.7	17.9
Moderate	1	25.0	7.7	40	22.9	4.4	0	0.0	0.0	0	0.0	0.0	14.1
Middle	1	25.0	15.4	10	5.7	3.9	3	60.0	37.5	105	53.8	32.9	19.6
Upper	2	50.0	61.5	125	71.4	70.3	2	40.0	56.3	90	46.2	62.3	48.4
Unknown	0	0.0	15.4	0	0.0	21.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	175	100.0	100.0	5	100.0	100.0	195	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	4.2	8.3	45	3.9	5.1	1	3.3	6.4	12	0.5	3.2	17.9
Moderate	7	29.2	19.1	393	33.7	13.4	6	20.0	18.1	554	23.7	14.4	14.1
Middle	8	33.3	23.6	328	28.1	22.1	9	30.0	24.2	643	27.5	20.8	19.6
Upper	7	29.2	34.7	385	33.0	47.8	14	46.7	37.4	1,133	48.4	47.2	48.4
Unknown	1	4.2	14.2	16	1.4	11.6	0	0.0	14.0	0	0.0	14.3	0.0
Total	24	100.0	100.0	1,167	100.0	100.0	30	100.0	100.0	2,342	100.0	100.0	100.0

Source: 2019 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 Q-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: North Central MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.9
Moderate	0	0.0	14.3	0	0.0	16.9	0	0.0	0.0	0	0.0	0.0	14.1
Middle	3	100.0	71.4	70	100.0	71.8	0	0.0	25.0	0	0.0	11.9	19.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	75.0	0	0.0	88.1	48.4
Unknown	0	0.0	14.3	0	0.0	11.3	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	70	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	28.6	0	0.0	30.4	17.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	30.1	14.1
Middle	1	100.0	50.0	15	100.0	42.9	1	100.0	28.6	18	100.0	15.7	19.6
Upper	0	0.0	50.0	0	0.0	57.1	0	0.0	28.6	0	0.0	23.8	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	15	100.0	100.0	1	100.0	100.0	18	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	48.4
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table Q-7 Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: North Central MO AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	5	100.0	36.7	264	100.0	24.1	5	83.3	37.2	89	73.6	35.8	88.6
Over \$1 Million	0	0.0		0	0.0		1	16.7		32	26.4		8.5
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		2.9
Total	5	100.0		264	100.0		6	100.0		121	100.0		100.0
By Loan Size													
\$100,000 or Less	5	100.0	96.8	264	100.0	43.1	6	100.0	96.8	121	100.0	52.6	
\$100,001 - \$250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	2.1	0	0.0	16.5	
\$250,001 - \$1 Million	0	0.0	3.2	0	0.0	56.9	0	0.0	1.1	0	0.0	31.0	
Total	5	100.0	100.0	264	100.0	100.0	6	100.0	100.0	121	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	5	100.0		264	100.0		5	100.0		89	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	5	100.0		264	100.0		5	100.0		89	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 Q-8													
Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms													
Assessment Area: North Central MO AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	8	100.0	25.3	339	100.0	50.4	12	100.0	27.5	539	100.0	59.7	98.4
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.6
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	8	100.0		339	100.0		12	100.0		539	100.0		100.0
By Loan Size													
\$100,000 or Less	8	100.0	96.4	339	100.0	59.0	12	100.0	95.0	539	100.0	61.5	
\$100,001 - \$250,000	0	0.0	2.4	0	0.0	20.5	0	0.0	5.0	0	0.0	38.5	
\$250,001 - \$500,000	0	0.0	1.2	0	0.0	20.5	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	339	100.0	100.0	12	100.0	100.0	539	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	8	100.0		339	100.0		12	100.0		539	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	8	100.0		339	100.0		12	100.0		539	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 Q-9 2018 North Central MO AA 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	1,129	17.9
Moderate	1	12.5	439	7.0	99	22.6	897	14.2
Middle	4	50.0	3,331	52.9	483	14.5	1,243	19.7
Upper	3	37.5	2,525	40.1	154	6.1	3,026	48.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8	100.0	6,295	100.0	736	11.7	6,295	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	965	296	4.4	30.7	444	46.0	225	23.3
Middle	5,848	3,388	50.5	57.9	1,393	23.8	1,067	18.2
Upper	4,531	3,025	45.1	66.8	786	17.3	720	15.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	11,344	6,709	100.0	59.1	2,623	23.1	2,012	17.7
	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	198	18.4	158	16.7	35	38.9	5	11.6
Middle	549	50.9	487	51.5	39	43.3	23	53.5
Upper	332	30.8	301	31.8	16	17.8	15	34.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,079	100.0	946	100.0	90	100.0	43	100.0
Percentage of Total Businesses:				87.7		8.3		4.0
	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
Moderate	2	0.8	2	0.8	0	0.0	0	0.0
Middle	132	52.4	130	52.6	2	50.0	0	0.0
Upper	118	46.8	115	46.6	2	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	252	100.0	247	100.0	4	100.0	1	100.0
Percentage of Total Farms:				98.0		1.6		0.4
<i>Source: 2018 FFIEC Census Data 2018 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 Q-10 2019 North Central MO AA 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	1,126	17.9		
Moderate	1	12.5	439	7.0	99	22.6	889	14.1		
Middle	4	50.0	3,331	52.9	483	14.5	1,235	19.6		
Upper	3	37.5	2,525	40.1	154	6.1	3,045	48.4		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	8	100.0	6,295	100.0	736	11.7	6,295	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	965	296	4.4	30.7	444	46.0	225	23.3		
Middle	5,848	3,388	50.5	57.9	1,393	23.8	1,067	18.2		
Upper	4,531	3,025	45.1	66.8	786	17.3	720	15.9		
Unknown	0	0	0.0	0.0	0	0.0	0	0.0		
Total AA	11,344	6,709	100.0	59.1	2,623	23.1	2,012	17.7		
	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	186	17.7	151	16.2	33	37.1	2	6.5		
Middle	543	51.6	485	52.0	40	44.9	18	58.1		
Upper	323	30.7	296	31.8	16	18.0	11	35.5		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	1,052	100.0	932	100.0	89	100.0	31	100.0		
Percentage of Total Businesses:			88.6		8.5		2.9			
	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		
Moderate	3	1.2	3	1.2	0	0.0	0	0.0		
Middle	125	50.6	123	50.6	2	50.0	0	0.0		
Upper	119	48.2	117	48.1	2	50.0	0	0.0		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	247	100.0	243	100.0	4	100.0	0	0.0		
Percentage of Total Farms:			98.4		1.6		0.0			

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.

R. Northeast Missouri AA – 2018 and 2019 Demographic and Lending Tables

Table R-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Northeast MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	\$ %	\$ %	#	%	#	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	16.7	8.4	64	6.6	5.6	3	27.3	9.8	362	22.9	7.7	8.4
Middle	0	0.0	15.3	0	0.0	12.5	0	0.0	13.1	0	0.0	10.6	22.6
Upper	10	83.3	76.3	905	93.4	81.8	8	72.7	77.0	1,220	77.1	81.7	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	969	100.0	100.0	11	100.0	100.0	1,582	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	9.1	4.3	59	7.6	4.2	0	0.0	6.9	0	0.0	4.9	8.4
Middle	4	36.4	22.9	376	48.5	18.0	1	25.0	16.2	40	26.8	15.1	22.6
Upper	6	54.5	72.9	340	43.9	77.7	3	75.0	76.2	109	73.2	79.8	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	775	100.0	100.0	4	100.0	100.0	149	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	10.0	0	0.0	6.4	8.4
Middle	0	0.0	33.3	0	0.0	73.2	0	0.0	0.0	0	0.0	0.0	22.6
Upper	1	100.0	66.7	25	100.0	26.8	4	100.0	90.0	170	100.0	93.6	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	25	100.0	100.0	4	100.0	100.0	170	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	40.1	0	0.0	10.0	0	0.0	21.6	32.0
Middle	0	0.0	25.0	0	0.0	4.6	0	0.0	20.0	0	0.0	34.5	13.6
Upper	0	0.0	25.0	0	0.0	37.7	0	0.0	70.0	0	0.0	43.9	51.1
Unknown	0	0.0	25.0	0	0.0	17.6	0	0.0	0.0	0	0.0	0.0	3.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	10.7	7.2	123	6.5	6.8	3	15.0	9.0	362	18.6	7.5	8.4
Middle	5	17.9	17.4	388	20.5	14.3	1	5.0	13.9	40	2.1	13.4	22.6
Upper	20	71.4	75.1	1,385	73.0	78.0	16	80.0	77.0	1,544	79.3	79.1	69.0
Unknown	0	0.0	0.3	0	0.0	0.9	0	0.0	0.2	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	1,896	100.0	100.0	20	100.0	100.0	1,946	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table R-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Northeast MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	8.4
Middle	1	25.0	11.1	12	9.4	2.2	0	0.0	0.0	0	0.0	0.0	22.6
Upper	3	75.0	88.9	115	90.6	97.8	0	0.0	100.0	0	0.0	100.0	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	127	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	15.9	8.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	39.5	22.6
Upper	0	0.0	100.0	0	0.0	100.0	1	100.0	50.0	45	100.0	44.6	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	8.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	51.9	22.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	48.1	69.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table R-3 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Northeast MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	24.4	37	20.3	23.3	2	66.7	21.3	65	56.5	49.5	26.0
Middle	0	0.0	13.0	0	0.0	23.1	0	0.0	14.1	0	0.0	15.3	15.2
Upper	3	75.0	59.9	145	79.7	53.3	1	33.3	61.6	50	43.5	33.0	58.6
Unknown	0	0.0	0.8	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	0.2
Tract-Unk	0	0.0	1.9	0	0.0	0.3	0	0.0	2.7	0	0.0	2.1	
Total	4	100.0	100.0	182	100.0	100.0	3	100.0	100.0	115	100.0	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 R-4 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Northeast MO AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	33.3	4.3	650	79.1	25.7	0	0.0	5.0	0	0.0	2.4	7.8
Middle	1	16.7	36.2	25	3.0	31.0	1	25.0	32.5	25	17.2	45.3	37.7
Upper	3	50.0	57.4	147	17.9	43.1	3	75.0	60.0	120	82.8	52.0	54.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.1	0	0.0	0.2	0	0.0	2.5	0	0.0	0.2	
Total	6	100.0	100.0	822	100.0	100.0	4	100.0	100.0	145	100.0	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 R-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Northeast MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	8.3	6.5	60	6.2	4.1	2	18.2	5.6	195	12.3	2.9	19.4
Moderate	4	33.3	20.0	233	24.0	15.9	2	18.2	17.4	201	12.7	11.9	12.8
Middle	1	8.3	16.3	104	10.7	15.5	4	36.4	22.3	481	30.4	20.8	18.3
Upper	5	41.7	34.4	519	53.6	45.2	3	27.3	39.3	705	44.6	51.2	49.5
Unknown	1	8.3	22.8	53	5.5	19.3	0	0.0	15.4	0	0.0	13.2	0.0
Total	12	100.0	100.0	969	100.0	100.0	11	100.0	100.0	1,582	100.0	100.0	100.0
Refinance Loans													
Low	1	9.1	5.7	59	7.6	3.1	0	0.0	5.4	0	0.0	2.9	19.4
Moderate	3	27.3	11.4	191	24.6	6.9	1	25.0	11.5	31	20.8	6.0	12.8
Middle	4	36.4	24.3	376	48.5	25.9	1	25.0	10.8	38	25.5	8.7	18.3
Upper	3	27.3	40.0	149	19.2	42.7	2	50.0	48.5	80	53.7	57.2	49.5
Unknown	0	0.0	18.6	0	0.0	21.3	0	0.0	23.8	0	0.0	25.3	0.0
Total	11	100.0	100.0	775	100.0	100.0	4	100.0	100.0	149	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.4
Moderate	0	0.0	16.7	0	0.0	5.6	1	25.0	10.0	30	17.6	7.7	12.8
Middle	0	0.0	0.0	0	0.0	0.0	1	25.0	20.0	15	8.8	22.2	18.3
Upper	1	100.0	66.7	25	100.0	88.4	2	50.0	70.0	125	73.5	70.2	49.5
Unknown	0	0.0	16.7	0	0.0	6.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	25	100.0	100.0	4	100.0	100.0	170	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	7.1	6.3	119	6.3	3.7	2	10.0	5.1	195	10.0	2.7	19.4
Moderate	7	25.0	17.6	424	22.4	12.8	4	20.0	14.9	262	13.5	9.2	12.8
Middle	6	21.4	17.9	492	25.9	16.5	6	30.0	18.3	534	27.4	15.6	18.3
Upper	12	42.9	37.2	808	42.6	44.7	8	40.0	42.6	955	49.1	50.9	49.5
Unknown	1	3.6	20.9	53	2.8	22.2	0	0.0	19.0	0	0.0	21.6	0.0
Total	28	100.0	100.0	1,896	100.0	100.0	20	100.0	100.0	1,946	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Table R-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Northeast MO AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.4
Moderate	0	0.0	11.1	0	0.0	6.1	0	0.0	0.0	0	0.0	0.0	12.8
Middle	1	25.0	22.2	12	9.4	8.2	0	0.0	25.0	0	0.0	24.1	18.3
Upper	3	75.0	66.7	115	90.6	85.7	0	0.0	75.0	0	0.0	75.9	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	127	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	19.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	15.9	12.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	75.0	45	100.0	84.1	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	12.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table R-7 Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast MO AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	3	75.0	62.2	145	79.7	35.9	2	66.7	58.6	90	78.3	53.7	90.6
Over \$1 Million	1	25.0		37	20.3		1	33.3		25	21.7		8.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	4	100.0		182	100.0		3	100.0		115	100.0		100.0
By Loan Size													
\$100,000 or Less	4	100.0	95.8	182	100.0	45.4	3	100.0	97.0	115	100.0	43.8	
\$100,001 - \$250,000	0	0.0	1.9	0	0.0	11.5	0	0.0	0.8	0	0.0	5.7	
\$250,001 - \$1 Million	0	0.0	2.3	0	0.0	43.1	0	0.0	2.3	0	0.0	50.6	
Total	4	100.0	100.0	182	100.0	100.0	3	100.0	100.0	115	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	3	100.0		145	100.0		2	100.0		90	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		145	100.0		2	100.0		90	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 R-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Northeast MO AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	4	66.7	44.7	172	20.9	66.0	4	100.0	52.5	145	100.0	87.4	100.0
Over \$1 Million	2	33.3		650	79.1		0	0.0		0	0.0		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	6	100.0		822	100.0		4	100.0		145	100.0		100.0
By Loan Size													
\$100,000 or Less	4	66.7	80.9	172	20.9	21.7	4	100.0	82.5	145	100.0	26.4	
\$100,001 - \$250,000	1	16.7	14.9	250	30.4	47.7	0	0.0	10.0	0	0.0	28.6	
\$250,001 - \$500,000	1	16.7	4.3	400	48.7	30.6	0	0.0	7.5	0	0.0	45.0	
Total	6	100.0	100.0	822	100.0	100.0	4	100.0	100.0	145	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	100.0		172	100.0		4	100.0		145	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	4	100.0		172	100.0		4	100.0		145	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 R-9 2018 Northeast MO AA 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	1,006	19.5
Moderate	1	14.3	517	10.0	93	18.0	663	12.9
Middle	2	28.6	1,150	22.3	179	15.6	948	18.4
Upper	3	42.9	3,466	67.4	296	8.5	2,529	49.1
Unknown	1	14.3	13	0.3	3	23.1	0	0.0
Total AA	7	100.0	5,146	100.0	571	11.1	5,146	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	1,733	476	8.4	27.5	931	53.7	326	18.8
Middle	2,696	1,272	22.6	47.2	802	29.7	622	23.1
Upper	6,819	3,888	69.0	57.0	2,205	32.3	726	10.6
Unknown	61	0	0.0	0.0	61	100.0	0	0.0
Total AA	11,309	5,636	100.0	49.8	3,999	35.4	1,674	14.8
	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	246	25.5	212	24.4	27	34.6	7	41.2
Middle	154	16.0	142	16.3	7	9.0	5	29.4
Upper	562	58.3	513	59.0	44	56.4	5	29.4
Unknown	2	0.2	2	0.2	0	0.0	0	0.0
Total AA	964	100.0	869	100.0	78	100.0	17	100.0
Percentage of Total Businesses:				90.1		8.1		1.8
	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
Moderate	7	8.5	7	8.5	0	0.0	0	0.0
Middle	28	34.1	28	34.1	0	0.0	0	0.0
Upper	47	57.3	47	57.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	82	100.0	82	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table R-10 2019 Northeast MO AA 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	999	19.4
Moderate	1	14.3	517	10.0	93	18.0	661	12.8
Middle	2	28.6	1,150	22.3	179	15.6	941	18.3
Upper	3	42.9	3,466	67.4	296	8.5	2,545	49.5
Unknown	1	14.3	13	0.3	3	23.1	0	0.0
Total AA	7	100.0	5,146	100.0	571	11.1	5,146	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	1,733	476	8.4	27.5	931	53.7	326	18.8
Middle	2,696	1,272	22.6	47.2	802	29.7	622	23.1
Upper	6,819	3,888	69.0	57.0	2,205	32.3	726	10.6
Unknown	61	0	0.0	0.0	61	100.0	0	0.0
Total AA	11,309	5,636	100.0	49.8	3,999	35.4	1,674	14.8
	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	245	26.0	216	25.3	27	34.2	2	20.0
Middle	143	15.2	132	15.5	7	8.9	4	40.0
Upper	552	58.6	503	59.0	45	57.0	4	40.0
Unknown	2	0.2	2	0.2	0	0.0	0	0.0
Total AA	942	100.0	853	100.0	79	100.0	10	100.0
Percentage of Total Businesses:				90.6		8.4		1.1
	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
Moderate	6	7.8	6	7.8	0	0.0	0	0.0
Middle	29	37.7	29	37.7	0	0.0	0	0.0
Upper	42	54.5	42	54.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	77	100.0	77	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
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.								

S. Albuquerque Metropolitan AA – 2018 and 2019 Demographic and Lending Tables

Table S-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Albuquerque NM Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	1.2	0	0.0	2.5	0	0.0	1.6	2.8
Moderate	0	0.0	25.2	0	0.0	18.1	0	0.0	24.0	0	0.0	17.1	28.4
Middle	1	50.0	28.7	203	33.4	24.9	0	0.0	29.6	0	0.0	25.6	28.6
Upper	1	50.0	43.9	405	66.6	55.7	0	0.0	43.6	0	0.0	55.6	40.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	608	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.5	0	0.0	1.7	0	0.0	1.8	0	0.0	1.1	2.8
Moderate	0	0.0	25.2	0	0.0	19.0	0	0.0	21.6	0	0.0	16.1	28.4
Middle	1	20.0	29.7	60	7.3	25.6	1	33.3	28.6	164	41.8	23.8	28.6
Upper	4	80.0	42.4	758	92.7	53.5	2	66.7	47.9	228	58.2	58.8	40.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	818	100.0	100.0	3	100.0	100.0	392	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.3	0	0.0	1.6	0	0.0	2.4	0	0.0	1.6	2.8
Moderate	0	0.0	22.0	0	0.0	18.1	1	100.0	22.9	30	100.0	19.4	28.4
Middle	0	0.0	30.3	0	0.0	25.8	0	0.0	27.9	0	0.0	21.8	28.6
Upper	0	0.0	45.4	0	0.0	54.5	0	0.0	46.2	0	0.0	56.6	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.7	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	30	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	20.5	0	0.0	7.1	1	100.0	18.8	163	100.0	6.3	17.6
Moderate	0	0.0	29.5	0	0.0	23.3	0	0.0	38.5	0	0.0	32.5	34.8
Middle	0	0.0	28.2	0	0.0	21.3	0	0.0	22.9	0	0.0	25.3	27.0
Upper	0	0.0	21.8	0	0.0	48.3	0	0.0	18.8	0	0.0	35.8	19.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.1	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	163	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.2	0	0.0	2.2	1	20.0	2.3	163	27.9	1.9	2.8
Moderate	0	0.0	25.3	0	0.0	19.2	1	20.0	23.5	30	5.1	18.7	28.4
Middle	2	28.6	29.1	263	18.4	24.6	1	20.0	29.1	164	28.0	24.9	28.6
Upper	5	71.4	43.2	1,163	81.6	53.9	2	40.0	44.9	228	39.0	54.3	40.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,426	100.0	100.0	5	100.0	100.0	585	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table S-2 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Albuquerque NM Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	2.3	0	0.0	1.3	0	0.0	1.7	0	0.0	0.9	2.8
Moderate	0	0.0	19.6	0	0.0	14.5	0	0.0	18.5	0	0.0	10.4	28.4
Middle	0	0.0	23.9	0	0.0	19.3	0	0.0	23.3	0	0.0	16.9	28.6
Upper	0	0.0	53.8	0	0.0	64.8	0	0.0	56.4	0	0.0	71.8	40.1
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	1.6	0	0.0	1.6	2.8
Moderate	0	0.0	26.0	0	0.0	17.5	0	0.0	29.2	0	0.0	22.5	28.4
Middle	0	0.0	31.0	0	0.0	26.5	0	0.0	26.4	0	0.0	22.3	28.6
Upper	0	0.0	42.0	0	0.0	55.4	0	0.0	42.5	0	0.0	53.3	40.1
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.6	0	0.0	0.9	0	0.0	1.6	0	0.0	0.9	2.8
Moderate	0	0.0	34.4	0	0.0	29.0	0	0.0	37.7	0	0.0	28.7	28.4
Middle	0	0.0	32.9	0	0.0	31.2	0	0.0	31.1	0	0.0	29.5	28.6
Upper	0	0.0	31.1	0	0.0	38.8	0	0.0	29.5	0	0.0	41.0	40.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table S-3													
Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography													
Assessment Area: Albuquerque NM Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	6	30.0	11.2	1,127	21.6	16.8	3	17.6	11.3	405	10.1	15.9	10.4
Moderate	5	25.0	25.9	1,675	32.1	32.0	7	41.2	26.2	2,005	49.9	30.1	25.9
Middle	6	30.0	25.4	1,302	25.0	21.9	4	23.5	25.4	1,255	31.3	24.0	29.5
Upper	3	15.0	33.9	1,111	21.3	26.8	3	17.6	33.7	350	8.7	27.1	33.4
Unknown	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0	0.0	0.6	0.8
Tract-Unk	0	0.0	3.1	0	0.0	2.3	0	0.0	2.8	0	0.0	2.2	
Total	20	100.0	100.0	5,215	100.0	100.0	17	100.0	100.0	4,015	100.0	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 S-4													
Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography													
Assessment Area: Albuquerque NM Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	18.0	0	0.0	7.6	0	0.0	12.5	0	0.0	23.2	9.8
Moderate	0	0.0	14.0	0	0.0	10.8	0	0.0	17.5	0	0.0	6.7	21.6
Middle	0	0.0	26.0	0	0.0	20.8	0	0.0	30.0	0	0.0	34.0	25.9
Upper	0	0.0	38.0	0	0.0	55.7	0	0.0	37.5	0	0.0	27.0	42.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	4.0	0	0.0	5.0	0	0.0	2.5	0	0.0	9.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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 S-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Albuquerque NM Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	5.9	0	0.0	2.9	0	0.0	5.3	0	0.0	2.6	25.1
Moderate	0	0.0	19.9	0	0.0	13.1	0	0.0	20.5	0	0.0	13.3	15.3
Middle	0	0.0	22.1	0	0.0	19.8	0	0.0	22.8	0	0.0	19.6	17.8
Upper	2	100.0	38.1	608	100.0	50.7	0	0.0	41.4	0	0.0	54.1	41.8
Unknown	0	0.0	14.0	0	0.0	13.4	0	0.0	10.0	0	0.0	10.4	0.0
Total	2	100.0	100.0	608	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.6	0	0.0	4.9	0	0.0	5.9	0	0.0	3.2	25.1
Moderate	0	0.0	16.6	0	0.0	12.3	1	33.3	13.1	164	41.8	8.7	15.3
Middle	0	0.0	22.1	0	0.0	19.1	0	0.0	19.8	0	0.0	16.2	17.8
Upper	4	80.0	39.7	685	83.7	49.7	2	66.7	40.2	228	58.2	48.0	41.8
Unknown	1	20.0	13.0	133	16.3	14.0	0	0.0	21.0	0	0.0	24.0	0.0
Total	5	100.0	100.0	818	100.0	100.0	3	100.0	100.0	392	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.9	0	0.0	3.8	0	0.0	5.6	0	0.0	3.8	25.1
Moderate	0	0.0	14.8	0	0.0	11.5	0	0.0	12.6	0	0.0	11.4	15.3
Middle	0	0.0	21.1	0	0.0	17.4	0	0.0	25.3	0	0.0	19.9	17.8
Upper	0	0.0	52.3	0	0.0	56.7	1	100.0	54.3	30	100.0	62.9	41.8
Unknown	0	0.0	4.9	0	0.0	10.6	0	0.0	2.3	0	0.0	2.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	30	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.5	0	0.0	2.9	0	0.0	5.4	0	0.0	2.5	25.1
Moderate	0	0.0	18.2	0	0.0	10.7	1	25.0	17.2	164	38.9	10.2	15.3
Middle	0	0.0	21.4	0	0.0	16.3	0	0.0	21.5	0	0.0	16.1	17.8
Upper	6	85.7	38.3	1,293	90.7	42.5	3	75.0	41.1	258	61.1	45.8	41.8
Unknown	1	14.3	15.5	133	9.3	27.6	0	0.0	14.6	0	0.0	25.4	0.0
Total	7	100.0	100.0	1,426	100.0	100.0	4	100.0	100.0	422	100.0	100.0	100.0

Source: 2019 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 S-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Albuquerque NM Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	9.0	0	0.0	4.0	0	0.0	5.6	0	0.0	2.3	25.1
Moderate	0	0.0	15.9	0	0.0	9.0	0	0.0	12.9	0	0.0	7.0	15.3
Middle	0	0.0	23.3	0	0.0	15.7	0	0.0	23.3	0	0.0	14.8	17.8
Upper	0	0.0	49.5	0	0.0	70.2	0	0.0	54.7	0	0.0	71.3	41.8
Unknown	0	0.0	2.3	0	0.0	1.2	0	0.0	3.5	0	0.0	4.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.9	0	0.0	4.4	0	0.0	7.5	0	0.0	5.8	25.1
Moderate	0	0.0	17.8	0	0.0	13.2	0	0.0	18.5	0	0.0	13.7	15.3
Middle	0	0.0	19.7	0	0.0	21.5	0	0.0	23.2	0	0.0	20.1	17.8
Upper	0	0.0	49.1	0	0.0	51.5	0	0.0	46.8	0	0.0	54.9	41.8
Unknown	0	0.0	5.5	0	0.0	9.5	0	0.0	4.0	0	0.0	5.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.7	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	25.1
Moderate	0	0.0	1.4	0	0.0	1.0	0	0.0	0.8	0	0.0	1.2	15.3
Middle	0	0.0	2.1	0	0.0	0.9	0	0.0	0.5	0	0.0	0.4	17.8
Upper	0	0.0	2.6	0	0.0	3.2	0	0.0	2.5	0	0.0	7.4	41.8
Unknown	0	0.0	93.2	0	0.0	94.6	0	0.0	96.2	0	0.0	91.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table S-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Albuquerque NM Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	6	30.0	44.4	1,359	26.1	33.8	6	35.3	46.9	1,225	30.5	35.8	92.1
Over \$1 Million	13	65.0		3,756	72.0		11	64.7		2,790	69.5		7.4
Revenue Unknown	1	5.0		100	1.9		0	0.0		0	0.0		0.5
Total	20	100.0		5,215	100.0		17	100.0		4,015	100.0		100.0
By Loan Size													
\$100,000 or Less	6	30.0	93.7	434	8.3	40.3	8	47.1	94.6	570	14.2	43.5	
\$100,001 - \$250,000	5	25.0	3.0	843	16.2	13.2	4	23.5	2.6	790	19.7	12.5	
\$250,001 - \$1 Million	9	45.0	3.3	3,938	75.5	46.5	5	29.4	2.7	2,655	66.1	44.0	
Total	20	100.0	100.0	5,215	100.0	100.0	17	100.0	100.0	4,015	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	2	33.3		114	8.4		4	66.7		170	13.9		
\$100,001 - \$250,000	2	33.3		368	27.1		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	33.3		877	64.5		2	33.3		1,055	86.1		
Total	6	100.0		1,359	100.0		6	100.0		1,225	100.0		
<i>Source: 2019 FFIEC Census Data 2019 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 S-8 Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms Assessment Area: Albuquerque NM Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	60.0	0	0.0	61.8	0	0.0	67.5	0	0.0	68.6	96.9
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.7
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.4
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	92.0	0	0.0	42.3	0	0.0	97.5	0	0.0	86.1	
\$100,001 - \$250,000	0	0.0	4.0	0	0.0	15.7	0	0.0	2.5	0	0.0	13.9	
\$250,001 - \$500,000	0	0.0	4.0	0	0.0	41.9	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		
<i>Source: 2019 FFIEC Census Data 2019 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 S-9 2018 Albuquerque NM Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.5	8,720	5.4	3,619	41.5	40,583	25.1
Moderate	46	30.1	50,531	31.2	12,027	23.8	24,798	15.3
Middle	44	28.8	43,826	27.1	5,111	11.7	28,802	17.8
Upper	51	33.3	58,355	36.1	3,438	5.9	67,521	41.8
Unknown	2	1.3	272	0.2	73	26.8	0	0.0
Total AA	153	100.0	161,704	100.0	24,268	15.0	161,704	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,770	4,526	2.8	21.8	13,944	67.1	2,300	11.1
Moderate	88,719	46,588	28.4	52.5	34,428	38.8	7,703	8.7
Middle	82,359	46,782	28.6	56.8	28,167	34.2	7,410	9.0
Upper	94,179	65,640	40.1	69.7	22,319	23.7	6,220	6.6
Unknown	1,027	285	0.2	27.8	591	57.5	151	14.7
Total AA	287,054	163,821	100.0	57.1	99,449	34.6	23,784	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3,575	10.4	2,973	9.4	561	21.7	41	16.0
Moderate	8,850	25.6	7,893	24.9	912	35.3	45	17.6
Middle	10,268	29.7	9,575	30.2	612	23.7	81	31.6
Upper	11,563	33.5	10,995	34.7	481	18.6	87	34.0
Unknown	282	0.8	262	0.8	18	0.7	2	0.8
Total AA	34,538	100.0	31,698	100.0	2,584	100.0	256	100.0
Percentage of Total Businesses:			91.8		7.5		0.7	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	19	7.9	18	7.8	0	0.0	1	100.0
Moderate	52	21.8	48	20.7	4	66.7	0	0.0
Middle	59	24.7	58	25.0	1	16.7	0	0.0
Upper	108	45.2	107	46.1	1	16.7	0	0.0
Unknown	1	0.4	1	0.4	0	0.0	0	0.0
Total AA	239	100.0	232	100.0	6	100.0	1	100.0
Percentage of Total Farms:			97.1		2.5		0.4	

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table S-10 2019 Albuquerque NM Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.5	8,720	5.4	3,619	41.5	40,583	25.1
Moderate	46	30.1	50,531	31.2	12,027	23.8	24,798	15.3
Middle	44	28.8	43,826	27.1	5,111	11.7	28,802	17.8
Upper	51	33.3	58,355	36.1	3,438	5.9	67,521	41.8
Unknown	2	1.3	272	0.2	73	26.8	0	0.0
Total AA	153	100.0	161,704	100.0	24,268	15.0	161,704	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,770	4,526	2.8	21.8	13,944	67.1	2,300	11.1
Moderate	88,719	46,588	28.4	52.5	34,428	38.8	7,703	8.7
Middle	82,359	46,782	28.6	56.8	28,167	34.2	7,410	9.0
Upper	94,179	65,640	40.1	69.7	22,319	23.7	6,220	6.6
Unknown	1,027	285	0.2	27.8	591	57.5	151	14.7
Total AA	287,054	163,821	100.0	57.1	99,449	34.6	23,784	8.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3,530	10.4	2,962	9.5	540	21.6	28	16.2
Moderate	8,792	25.9	7,864	25.1	893	35.7	35	20.2
Middle	10,010	29.5	9,364	29.9	595	23.8	51	29.5
Upper	11,354	33.4	10,843	34.6	453	18.1	58	33.5
Unknown	280	0.8	261	0.8	18	0.7	1	0.6
Total AA	33,966	100.0	31,294	100.0	2,499	100.0	173	100.0
Percentage of Total Businesses:				92.1		7.4		0.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	25	9.8	24	9.7	0	0.0	1	100.0
Moderate	55	21.6	52	21.1	3	42.9	0	0.0
Middle	66	25.9	64	25.9	2	28.6	0	0.0
Upper	108	42.4	106	42.9	2	28.6	0	0.0
Unknown	1	0.4	1	0.4	0	0.0	0	0.0
Total AA	255	100.0	247	100.0	7	100.0	1	100.0
Percentage of Total Farms:				96.9		2.7		0.4

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.

T. Austin Metropolitan AA – 2018 and 2019 Demographic and Lending Tables

Table T-1 Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: Austin TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	6.9	0	0.0	6.0	0	0.0	6.1	0	0.0	5.3	6.2
Moderate	0	0.0	19.1	0	0.0	13.8	0	0.0	19.5	0	0.0	14.3	18.6
Middle	0	0.0	34.6	0	0.0	29.3	0	0.0	33.9	0	0.0	28.3	29.9
Upper	0	0.0	38.9	0	0.0	50.5	2	100.0	40.1	709	100.0	51.6	45.0
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.4	0	0.0	0.4	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	709	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.9	0	0.0	4.4	0	0.0	5.9	0	0.0	4.8	6.2
Moderate	0	0.0	17.9	0	0.0	11.1	1	25.0	15.4	217	21.9	10.1	18.6
Middle	0	0.0	31.5	0	0.0	24.4	2	50.0	30.6	312	31.5	24.4	29.9
Upper	1	100.0	44.2	665	100.0	59.7	1	25.0	47.8	461	46.6	60.3	45.0
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	665	100.0	100.0	4	100.0	100.0	990	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.7	0	0.0	3.4	0	0.0	4.7	0	0.0	4.2	6.2
Moderate	0	0.0	12.2	0	0.0	8.8	0	0.0	11.8	0	0.0	8.9	18.6
Middle	0	0.0	28.6	0	0.0	23.5	0	0.0	26.5	0	0.0	20.5	29.9
Upper	0	0.0	54.2	0	0.0	64.3	0	0.0	56.8	0	0.0	66.0	45.0
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	22.5	0	0.0	19.8	0	0.0	30.3	0	0.0	19.1	26.1
Moderate	0	0.0	17.1	0	0.0	12.7	0	0.0	18.9	0	0.0	19.9	13.5
Middle	0	0.0	32.6	0	0.0	41.9	0	0.0	21.2	0	0.0	25.4	31.5
Upper	0	0.0	24.0	0	0.0	23.3	0	0.0	26.5	0	0.0	26.6	25.5
Unknown	0	0.0	3.9	0	0.0	2.4	0	0.0	3.0	0	0.0	9.0	3.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	6.6	0	0.0	7.7	0	0.0	6.0	0	0.0	6.6	6.2
Moderate	0	0.0	18.6	0	0.0	13.2	1	16.7	18.0	217	12.8	13.7	18.6
Middle	0	0.0	33.6	0	0.0	30.1	2	33.3	32.6	312	18.4	26.8	29.9
Upper	1	100.0	40.7	665	100.0	48.5	3	50.0	42.9	1,170	68.9	51.5	45.0
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.4	0	0.0	1.3	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	665	100.0	100.0	6	100.0	100.0	1,699	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table T-2													
Distribution of 2018 and 2019 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Austin TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.8	0	0.0	1.2	0	0.0	2.8	0	0.0	1.2	6.2
Moderate	0	0.0	8.7	0	0.0	4.1	0	0.0	8.4	0	0.0	4.9	18.6
Middle	0	0.0	22.3	0	0.0	16.2	0	0.0	21.7	0	0.0	15.1	29.9
Upper	0	0.0	67.1	0	0.0	78.6	0	0.0	66.5	0	0.0	78.7	45.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.5	0	0.0	4.4	0	0.0	5.0	0	0.0	3.0	6.2
Moderate	0	0.0	16.0	0	0.0	7.4	0	0.0	11.8	0	0.0	3.7	18.6
Middle	0	0.0	28.9	0	0.0	14.9	0	0.0	31.5	0	0.0	15.7	29.9
Upper	0	0.0	48.1	0	0.0	72.7	0	0.0	51.2	0	0.0	77.5	45.0
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.4	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	7.7	0	0.0	5.3	0	0.0	5.5	0	0.0	5.4	6.2
Moderate	0	0.0	27.8	0	0.0	20.4	0	0.0	28.8	0	0.0	16.3	18.6
Middle	0	0.0	34.7	0	0.0	27.6	0	0.0	34.3	0	0.0	28.4	29.9
Upper	0	0.0	29.0	0	0.0	46.4	0	0.0	30.8	0	0.0	49.6	45.0
Unknown	0	0.0	0.7	0	0.0	0.4	0	0.0	0.5	0	0.0	0.3	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table T-3 Distribution of 2018 and 2019 Small Business Lending By Income Level of Geography Assessment Area: Austin TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	2	8.7	9.3	450	6.4	9.4	8	40.0	9.1	5,308	65.6	9.5	8.6
Moderate	7	30.4	13.4	2,150	30.7	13.1	3	15.0	13.2	997	12.3	14.1	12.4
Middle	5	21.7	26.5	1,781	25.4	25.7	3	15.0	26.2	848	10.5	24.2	26.4
Upper	9	39.1	48.2	2,627	37.5	49.4	6	30.0	48.7	937	11.6	49.7	50.8
Unknown	0	0.0	1.1	0	0.0	1.5	0	0.0	1.2	0	0.0	1.5	1.7
Tract-Unk	0	0.0	1.5	0	0.0	0.9	0	0.0	1.6	0	0.0	0.9	
Total	23	100.0	100.0	7,008	100.0	100.0	20	100.0	100.0	8,090	100.0	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 T-4 Distribution of 2018 and 2019 Small Farm Lending By Income Level of Geography Assessment Area: Austin TX Metropolitan AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	6.9	0	0.0	8.7	0	0.0	7.3	0	0.0	9.5	5.3
Moderate	0	0.0	9.4	0	0.0	6.6	0	0.0	13.9	0	0.0	9.1	11.3
Middle	0	0.0	29.6	0	0.0	31.8	0	0.0	24.2	0	0.0	20.8	23.3
Upper	0	0.0	53.5	0	0.0	52.7	0	0.0	50.3	0	0.0	59.5	59.3
Unknown	0	0.0	0.6	0	0.0	0.2	0	0.0	0.6	0	0.0	0.1	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	3.6	0	0.0	0.9	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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 T-5 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Austin TX Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	2.6	0	0.0	1.2	0	0.0	3.4	0	0.0	1.6	24.8
Moderate	0	0.0	13.5	0	0.0	8.6	0	0.0	16.3	0	0.0	10.5	15.9
Middle	0	0.0	20.4	0	0.0	16.4	0	0.0	21.0	0	0.0	17.2	18.1
Upper	0	0.0	51.3	0	0.0	62.7	2	100.0	47.9	709	100.0	59.7	41.2
Unknown	0	0.0	12.2	0	0.0	11.1	0	0.0	11.4	0	0.0	11.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	709	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.7	0	0.0	3.4	0	0.0	5.0	0	0.0	2.3	24.8
Moderate	0	0.0	16.4	0	0.0	9.5	1	25.0	13.2	217	21.9	7.5	15.9
Middle	0	0.0	20.4	0	0.0	14.7	0	0.0	19.5	0	0.0	14.5	18.1
Upper	1	100.0	45.8	665	100.0	61.6	3	75.0	49.7	773	78.1	62.5	41.2
Unknown	0	0.0	10.7	0	0.0	10.8	0	0.0	12.6	0	0.0	13.2	0.0
Total	1	100.0	100.0	665	100.0	100.0	4	100.0	100.0	990	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.1	0	0.0	2.9	0	0.0	4.5	0	0.0	2.2	24.8
Moderate	0	0.0	10.6	0	0.0	7.5	0	0.0	12.2	0	0.0	7.0	15.9
Middle	0	0.0	19.9	0	0.0	14.4	0	0.0	17.7	0	0.0	12.6	18.1
Upper	0	0.0	61.6	0	0.0	68.0	0	0.0	63.2	0	0.0	74.4	41.2
Unknown	0	0.0	3.8	0	0.0	7.1	0	0.0	2.4	0	0.0	3.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.5	0	0.0	1.4	0	0.0	3.9	0	0.0	1.6	24.8
Moderate	0	0.0	13.8	0	0.0	7.4	1	16.7	15.0	217	12.8	8.4	15.9
Middle	0	0.0	20.0	0	0.0	13.6	0	0.0	20.1	0	0.0	14.3	18.1
Upper	1	100.0	50.1	665	100.0	53.3	5	83.3	48.6	1,482	87.2	53.9	41.2
Unknown	0	0.0	12.6	0	0.0	24.3	0	0.0	12.3	0	0.0	21.8	0.0
Total	1	100.0	100.0	665	100.0	100.0	6	100.0	100.0	1,699	100.0	100.0	100.0

Source: 2019 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 T-6 Distribution of 2018 and 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Austin TX Metropolitan AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	3.7	0	0.0	2.8	0	0.0	5.6	0	0.0	2.7	24.8
Moderate	0	0.0	10.5	0	0.0	4.8	0	0.0	11.5	0	0.0	6.2	15.9
Middle	0	0.0	14.4	0	0.0	7.0	0	0.0	13.0	0	0.0	6.5	18.1
Upper	0	0.0	70.0	0	0.0	84.3	0	0.0	66.0	0	0.0	81.5	41.2
Unknown	0	0.0	1.4	0	0.0	1.1	0	0.0	3.8	0	0.0	3.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	5.6	0	0.0	1.9	0	0.0	7.7	0	0.0	2.4	24.8
Moderate	0	0.0	13.7	0	0.0	5.0	0	0.0	11.6	0	0.0	3.5	15.9
Middle	0	0.0	18.1	0	0.0	11.6	0	0.0	19.9	0	0.0	7.8	18.1
Upper	0	0.0	56.9	0	0.0	71.5	0	0.0	54.3	0	0.0	75.2	41.2
Unknown	0	0.0	5.8	0	0.0	10.0	0	0.0	6.6	0	0.0	11.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.1	0	0.0	0.8	0	0.0	1.6	0	0.0	0.7	24.8
Moderate	0	0.0	3.5	0	0.0	1.9	0	0.0	1.6	0	0.0	0.6	15.9
Middle	0	0.0	3.3	0	0.0	2.9	0	0.0	1.2	0	0.0	1.1	18.1
Upper	0	0.0	9.7	0	0.0	14.1	0	0.0	9.5	0	0.0	10.4	41.2
Unknown	0	0.0	81.5	0	0.0	80.4	0	0.0	86.1	0	0.0	87.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table T-7													
Distribution of 2018 and 2019 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Austin TX Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2018						2019						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	12	52.2	42.4	3,329	47.5	31.8	9	45.0	47.2	1,947	24.1	34.0	91.7
Over \$1 Million	11	47.8		3,679	52.5		11	55.0		6,143	75.9		6.9
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.4
Total	23	100.0		7,008	100.0		20	100.0		8,090	100.0		100.0
By Loan Size													
\$100,000 or Less	7	30.4	94.2	500	7.1	41.4	8	40.0	94.6	315	3.9	43.2	
\$100,001 - \$250,000	6	26.1	2.9	1,061	15.1	13.9	3	15.0	2.8	600	7.4	13.8	
\$250,001 - \$1 Million	10	43.5	2.9	5,447	77.7	44.7	9	45.0	2.7	7,175	88.7	42.9	
Total	23	100.0	100.0	7,008	100.0	100.0	20	100.0	100.0	8,090	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	4	33.3		242	7.3		5	55.6		210	10.8		
\$100,001 - \$250,000	3	25.0		490	14.7		2	22.2		400	20.5		
\$250,001 - \$1 Million	5	41.7		2,597	78.0		2	22.2		1,337	68.7		
Total	12	100.0		3,329	100.0		9	100.0		1,947	100.0		
<i>Source: 2019 FFIEC Census Data</i>													
<i>2019 Dun & Bradstreet Data</i>													
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

Table T-8													
Distribution of 2018 and 2019 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Austin TX Metropolitan AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2018						2019						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	44.7	0	0.0	46.7	0	0.0	52.1	0	0.0	63.0	99.3
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.5
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.1
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	94.3	0	0.0	55.2	0	0.0	92.1	0	0.0	42.8	
\$100,001 - \$250,000	0	0.0	5.0	0	0.0	34.1	0	0.0	6.1	0	0.0	35.5	
\$250,001 - \$500,000	0	0.0	0.6	0	0.0	10.7	0	0.0	1.8	0	0.0	21.7	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		
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 T-9 2018 Austin TX Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	33	15.1	30,765	12.6	10,180	33.1	60,677	24.8
Moderate	47	21.6	48,173	19.7	8,425	17.5	38,883	15.9
Middle	64	29.4	72,288	29.6	5,704	7.9	44,230	18.1
Upper	68	31.2	91,856	37.6	2,461	2.7	100,648	41.2
Unknown	6	2.8	1,356	0.6	723	53.3	0	0.0
Total AA	218	100.0	244,438	100.0	27,493	11.2	244,438	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	68,484	13,685	6.2	20.0	48,608	71.0	6,191	9.0
Moderate	87,039	41,139	18.6	47.3	40,015	46.0	5,885	6.8
Middle	142,533	66,190	29.9	46.4	65,422	45.9	10,921	7.7
Upper	159,518	99,699	45.0	62.5	47,711	29.9	12,108	7.6
Unknown	6,623	712	0.3	10.8	5,039	76.1	872	13.2
Total AA	464,197	221,425	100.0	47.7	206,795	44.5	35,977	7.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,564	8.5	5,875	8.4	631	11.5	58	4.8
Moderate	9,440	12.3	8,638	12.3	724	13.2	78	6.4
Middle	20,235	26.3	18,516	26.4	1,455	26.5	264	21.8
Upper	39,308	51.2	36,013	51.4	2,561	46.6	734	60.6
Unknown	1,289	1.7	1,082	1.5	129	2.3	78	6.4
Total AA	76,836	100.0	70,124	100.0	5,500	100.0	1,212	100.0
Percentage of Total Businesses:				91.3		7.2		1.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	35	4.8	33	4.5	1	20.0	1	50.0
Moderate	72	9.8	70	9.6	2	40.0	0	0.0
Middle	168	22.9	168	23.1	0	0.0	0	0.0
Upper	454	61.9	452	62.3	1	20.0	1	50.0
Unknown	4	0.5	3	0.4	1	20.0	0	0.0
Total AA	733	100.0	726	100.0	5	100.0	2	100.0
Percentage of Total Farms:				99.0		0.7		0.3
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table T-10 2019 Austin TX Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	33	15.1	30,765	12.6	10,180	33.1	60,677	24.8
Moderate	47	21.6	48,173	19.7	8,425	17.5	38,883	15.9
Middle	64	29.4	72,288	29.6	5,704	7.9	44,230	18.1
Upper	68	31.2	91,856	37.6	2,461	2.7	100,648	41.2
Unknown	6	2.8	1,356	0.6	723	53.3	0	0.0
Total AA	218	100.0	244,438	100.0	27,493	11.2	244,438	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	68,484	13,685	6.2	20.0	48,608	71.0	6,191	9.0
Moderate	87,039	41,139	18.6	47.3	40,015	46.0	5,885	6.8
Middle	142,533	66,190	29.9	46.4	65,422	45.9	10,921	7.7
Upper	159,518	99,699	45.0	62.5	47,711	29.9	12,108	7.6
Unknown	6,623	712	0.3	10.8	5,039	76.1	872	13.2
Total AA	464,197	221,425	100.0	47.7	206,795	44.5	35,977	7.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,800	8.6	6,146	8.5	604	11.1	50	4.6
Moderate	9,790	12.4	9,010	12.5	717	13.1	63	5.8
Middle	20,764	26.4	19,071	26.4	1,460	26.8	233	21.4
Upper	39,990	50.8	36,760	51.0	2,551	46.8	679	62.2
Unknown	1,336	1.7	1,146	1.6	124	2.3	66	6.0
Total AA	78,680	100.0	72,133	100.0	5,456	100.0	1,091	100.0
Percentage of Total Businesses:				91.7		6.9		1.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	40	5.3	38	5.1	1	25.0	1	100.0
Moderate	85	11.3	83	11.1	2	50.0	0	0.0
Middle	175	23.3	175	23.5	0	0.0	0	0.0
Upper	445	59.3	445	59.7	0	0.0	0	0.0
Unknown	5	0.7	4	0.5	1	25.0	0	0.0
Total AA	750	100.0	745	100.0	4	100.0	1	100.0
Percentage of Total Farms:				99.3		0.5		0.1
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 F

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.

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.