



PUBLIC DISCLOSURE

JULY 27, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**ADAMS BANK & TRUST
RSSD# 463650**

**315 NORTH SPRUCE STREET
OGALLALA, NEBRASKA 69153**

**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 Lending Test is rated: **Satisfactory.**
The Community Development Test is rated: **Satisfactory.**

Adams Bank and Trust (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development (CD) Tests.

- The bank's net loan-to-deposit ratio (NLTD) is more than reasonable given the bank's size, financial condition, and assessment areas' (AAs) credit needs.
- A majority of the bank's loans are originated in the bank's AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor this Reserve Bank received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- CD activity reflects adequate responsiveness to CD needs of its AAs.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed using the full-scope review procedures for the bank's Western Nebraska AA; Fort Collins Metropolitan Statistical Area (MSA) AA; Colorado Springs Metropolitan AA; and the Thomas County AA. Limited-scope reviews were conducted for the bank's Red Willow County AA; Boulder MSA AA; Greeley MSA AA; and the Logan County AA. Predominant weight in the overall institution's CRA rating and conclusions was placed on the bank's performance in the Western Nebraska AA as a significant amount of loans and deposits and the majority of the bank's branches are located in this AA. The following data was reviewed:

- The bank's 15-quarter average NLTD ratio;
- The universe of 904 home mortgage loans reported on the bank's 2018 and 2019 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers.
- A statistical sample of 174 small business loans from a universe of 441 loans and 156 small farm loans from a universe of 340 loans originated between January 1, 2019 and December 31, 2019.
- To provide a meaningful analysis for the AAs in Colorado and Kansas, the original small business and small farm loan samples were supplemented with an additional

statistical sample of 41 small business loans within all Colorado AAs and eight small farm loans originated in the Logan County AA, while the sample in the sole AA in Kansas was supplemented with an additional eight small farm loans. The original samples were utilized for the lending inside the AA test while the additional samples of loans were included in the geographic and borrower distribution tests.

- CD loans, qualified investments, and CD services from November 28, 2016 through March 31, 2020.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Ogallala, Nebraska. The bank’s characteristics include:

- The bank is wholly owned by Adbanc Inc., which in turn, is owned by Adage LLC. Both are located in Ogallala, Nebraska.
- The bank has total assets of \$846.1 million as of March 31, 2020.
- In addition to its main office, the bank has 19 additional offices across Nebraska, Colorado, and Kansas. The bank has 11 offices in western Nebraska, 7 offices along the Front Range and another office on the Eastern Plains of Colorado, and 1 office in Colby, Kansas.
- Since the prior CRA evaluation, the bank opened a new branch in downtown Fort Collins, Colorado on January 1, 2019. There have not been any branch closures.
- Each branch office is equipped with cash-dispensing automated teller machines (ATMs), except for the Brule, Nebraska location. Additionally, two ATMs are off-site and located at local convenience stores.
- The bank provides traditional banking products and services with an emphasis on agricultural loans in Nebraska, Kansas, and the eastern plains of Colorado and on commercial loans in its urban markets in Colorado. The bank also originates a significant volume of home mortgage loans that are sold into the secondary market, and therefore not reflected in its loan portfolio totals.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF MARCH 31, 2020		
Loan Type	\$(000)	%
Commercial	345,159	47.0
Agricultural	235,712	32.1
Residential Real Estate	128,270	17.5
Consumer	15,774	2.2
Other	8,838	1.2
Gross Loans	733,753	100.0

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

The bank was rated Satisfactory under the CRA at its November 28, 2016 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The evaluation discusses the bank’s overall performance based on the NLTD ratio, level of lending within its delineated AAs, and CD activities. This is followed by a more in-depth discussion of the bank’s record of lending and CD activities in each state and specific AAs.

While conclusions with respect to home mortgage lending performance were evaluated for both years, only 2018 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank’s 2019 home mortgage lending data for AAs that received full-scope reviews can be found in Appendix B of this report while all lending data for AAs that received limited-scope reviews can also be found in Appendix B.

LENDING TEST

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to several similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on their asset sizes, product offerings, and location. The bank’s NLTD ratio is more than reasonable, as it exceeds the NLTD ratios of the similarly situated banks.

TABLE 2 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			15-Quarter Average
Adams Bank and Trust	Ogallala, Nebraska	846,119	105.2
Exchange Bank	Kearney, Nebraska	1,006,127	96.3
Nebraskaland National Bank	North Platte, Nebraska	751,228	83.5
Five Points Bank of Hastings	Hastings, Nebraska	352,785	58.6
Stockmens Bank	Colorado Springs, Colorado	376,297	86.2
Points West Community Bank	Windsor, Colorado	681,370	78.4

Assessment Area Concentration

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

The penetration of small farm loans inside the bank’s AAs is lower than that of HMDA and small business loans. The bank attributed this to lending to farms located just outside of the Nebraska AAs, in northeast Colorado and northwest Kansas. Many farms in these areas are located closer to the bank’s branches than competitor banks in communities within their own state.

TABLE 3 LENDING INSIDE AND OUTSIDE THE AAs								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	424	66,949	78.5	72.8	116	25,048	21.5	27.2
Home Refinance	234	43,570	83.3	83.4	47	8,672	16.7	16.6
Home Improvement	31	857	96.9	95.4	1	41	3.1	4.6
Multifamily	33	14,861	64.7	75.5	18	4,813	35.3	24.5
Total HMDA Loans	722	126,237	79.9	76.6	182	38,574	20.1	23.4
Small Business Loans	147	13,020	84.5	71.6	27	5,169	15.5	28.4
Small Farm Loans	100	9,254	64.1	54.3	56	7,790	35.9	45.7
Total Loans	969	148,511	78.5	74.2	265	51,533	21.5	25.8

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts. The bank’s overall geographic distribution of loans reflects reasonable distribution throughout the AAs. The distribution by income level of census tracts in the state of Nebraska AA is reasonable, while the distribution of loan products in the Colorado AAs is poor. The geographic distribution in the Thomas County AA is also reasonable.

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 revenue sizes. The bank’s lending has an overall reasonable penetration among individuals of different income levels and businesses and farms of different sizes. The bank’s lending to borrowers of different income levels and to businesses and farms of different revenue sizes in Nebraska, Colorado, and Kansas is reasonable.

COMMUNITY DEVELOPMENT TEST

The bank’s overall performance under the CD test is Satisfactory. The CD test evaluates the bank’s responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services; considering the bank’s capacity and the need and availability of such opportunities in the bank’s AAs. The bank’s overall CD performance demonstrates adequate responsiveness in each full-scope AA review. The majority of the bank’s CD loans were originated in Colorado, while nearly all of the investments benefitted the Western Nebraska AA, where a majority of the bank’s loans, deposits, and branches are located. All of the investment activity represented prior

period investments, except for four low-income housing tax credits (LIHTCs) that included \$618,322 in current-period contributions. One of the investments benefits multiple states including AAs in Nebraska, Colorado, and Kansas, while the other three investments benefit Nebraska statewide, including the Western Nebraska AA.

Since the bank is responsive to activities in its AAs, consideration was given for CD activities that took place outside of the bank’s delineated AAs, but within the greater statewide/regional area that met the requirements for qualified CD credit. These included two CD loans totaling \$4.0 million originated in Denver, Colorado and four prior-period investments of \$590,000 benefitting two underserved non-metropolitan middle-income census tracts in a county with close proximity to the bank’s Western Nebraska AA, yet still outside the Nebraska AAs.

TABLE 4 COMMUNITY DEVELOPMENT ACTIVITIES									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments¹		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	3	2,663	4	1,264	12	64	12	64	9
Community Services	0	0	0	0	62	39	62	39	8
Economic Development	12	15,469	0	0	8	15	8	15	3
Revitalization and Stabilization	5	7,579	24	1,210	28	48	52	1,258	6
Totals	20	25,711	28	2,474	110	166	138	2,612	26

¹ Includes an unfunded commitment of \$299,000 under the CD purpose of affordable housing

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.

STATE OF NEBRASKA

COMMUNITY REINVESTMENT ACT RATING FOR NEBRASKA: *Satisfactory*

The Lending Test is rated: *Satisfactory*

The Community Development Test is rated: *Satisfactory*

Major factors supporting the rating include:

Lending Test:

- The geographic distribution of home mortgage, small business, and small farm loans reflects a reasonable penetration of lending throughout the bank's AAs.
- The distribution of lending reflects a reasonable dispersion of lending to individuals of different income levels and businesses and farms of different revenue sizes.

Community Development Test:

- The level of CD loans, qualified investments, donations, and services demonstrates an adequate level of responsiveness to CD needs of the bank's AAs.

SCOPE OF EXAMINATION

The scope of the review for the state of Nebraska was consistent with the overall scope for the entire institution. The Western Nebraska AA received a full-scope review in the state of Nebraska due to a greater percentage of the bank's lending, deposits, and branch locations. A limited-scope review was conducted in the Red Willow County AA, the other Nebraska AA. Predominant weight was afforded to the bank's home mortgage lending in the Western Nebraska AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NEBRASKA

The bank delineates two of its eight AAs and operates 11 of its 20 branches in the state of Nebraska. 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 commercial, agricultural, and residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA

LENDING TEST

The bank's performance with respect to the lending test in the state of Nebraska is Satisfactory.

Geographic and Borrower Distribution:

Overall, the bank's geographic distribution is reasonable. The geographic distribution of home mortgage and small farm loans reflects a reasonable penetration throughout the Nebraska AAs, while the distribution of small business loans by geography is poor.

Overall, the borrower distribution of home mortgage, small business, and small farm lending is reasonable. The distribution of home mortgage loans to borrowers of different levels is reasonable while the distribution of small business and small farm loans by revenue size is also reasonable.

Performance in the limited-scope review of the Red Willow County AA was consistent with the full-scope review of the Western Nebraska AA.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test for the state of Nebraska is Satisfactory. The bank demonstrates an adequate level of responsiveness to CD needs through its CD loans, qualified investments, and services in the Western Nebraska AA. The bank's CD performance in the limited-scope review of the Red Willow County AA was below the state rating.

The bank originated two CD loans totaling \$1.3 million in the Western Nebraska AA. Both of the loans had an affordable housing component and were part of a LIHTC program. The bank has 24 prior-period investments totaling \$1.2 million that were for revitalization and stabilization efforts in underserved nonmetropolitan middle-income census tracts. In addition, the bank has four LIHTCs to a firm that creates affordable housing projects. Three of the LIHTCs benefit the state of Nebraska, including the Western Nebraska AA, with \$346,874 in prior-period investments, \$448,630 in current period contributions, and \$94,240 in unfunded commitments. The other LIHTC fund benefits multiple states, including Nebraska, that has \$169,692 in current contributions and \$204,878 in unfunded commitments. As stated previously, consideration was given to four prior-period investments totaling \$590,000 that benefited the broader state of Nebraska, but did not benefit the two Nebraska AAs.

In addition, the bank provided 55 donations for \$110,667 in its Nebraska AAs. Six donations were made for the purpose of affordable housing, 20 were made to community service organizations serving LMI persons, four were for economic development, and 25 were for revitalization and stabilization efforts.

Bank staff participated in 15 services for CD purposes within Nebraska. Two services supported economic development, five services supported affordable housing, three services supported community services targeting LMI individuals, and five supported revitalization and stabilization efforts.

**WESTERN NEBRASKA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE WESTERN NEBRASKA AA

The bank’s AA is comprised of Chase, Cheyenne, Deuel, Keith, Lincoln, and Perkins Counties in their entireties (see Appendix A for an AA map).

- The composition of the AA includes 17 census tracts, of which 3 are moderate-, 12 are middle-, and 2 are upper-income census tracts. Although the total numbers of census tracts remains the same since the prior CRA evaluation, the composition of the AA previously consisted of only 13 middle- and 4 upper-income census tracts.
- The bank operates ten branches in the Western Nebraska AA. The offices are located in the communities of Ogallala, Imperial, Lodgepole, Chappell, Brule, Sutherland, Grant, Madrid, and two offices in North Platte.
- The June 30, 2019 FDIC Deposit Market Share Report shows the bank has an 18.0 percent market share, ranking 1st of 21 FDIC-insured depository institutions with 52 branch offices operating within the AA.
- Five previously conducted interviews with members of the communities within the bank’s AA were referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. All but one contact represented organizations focused on economic development. The remaining contact was a manager from an agricultural business.

**TABLE 5
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Chase County, Nebraska	3,966	3,897	(1.7)
Cheyenne County, Nebraska	9,998	10,077	0.8
Deuel County, Nebraska	1,941	1,946	0.3
Keith County, Nebraska	8,368	8,146	(2.7)
Lincoln County, Nebraska	36,288	35,896	(1.1)
Perkins County, Nebraska	2,970	2,924	(1.5)
State of Nebraska	1,826,341	1,869,365	2.4

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

- The six-county AA’s 2015 population of 62,886 equaled 3.4 percent of the total statewide population.
- The largest city in the AA is North Platte, Nebraska, which is located in Lincoln County.
- The AA has an older population, with people aged 65 and older accounting for 18.2 percent of the population, compared to the statewide figure of 14.1 percent. Adults 18 to 24 years of age only comprise 7.0 percent of the AA’s population, while the state of Nebraska has 10.1 percent in that age range of the population.

- A community member stated that the population is aging and many younger individuals do not return to the area after attending college.

TABLE 6 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Chase County, Nebraska	49,152	60,278	22.6
Cheyenne County, Nebraska	63,788	71,406	11.9
Deuel County, Nebraska	49,375	58,571	18.6
Keith County, Nebraska	54,350	58,371	7.4
Lincoln County, Nebraska	60,815	62,439	2.7
Perkins County, Nebraska	58,750	65,972	12.3
State of Nebraska	61,888	67,225	8.6

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

- Per the 2015 U.S. Census Bureau: American Community Survey (ACS) data, 35.4 percent of AA families are LMI, which is comparable to the statewide nonmetropolitan figure of 37.2 percent.
- The percentage of AA families living below the poverty line, at 8.8 percent, was comparable to the statewide nonmetropolitan figure of 8.3 percent.

TABLE 7 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Chase County, NE	82,600	91,200	10.4	434	583	34.3
Cheyenne County, NE	94,200	113,700	20.7	555	600	8.1
Deuel County, NE	65,600	69,400	5.8	500	607	21.4
Keith County, NE	88,200	99,700	13.0	553	603	9.0
Lincoln County, NE	109,100	114,200	4.7	596	631	5.9
Perkins County, NE	77,100	97,700	26.7	593	650	9.6
State of Nebraska	123,900	133,200	7.5	648	726	12.0

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

- Housing and rent values increased significantly and showed a correlation with the increase in median family income.
- The AA's affordability¹ ratio at 46.7 percent was slightly less affordable than the statewide nonmetropolitan ratio of 48.0 percent, but the ratio indicates housing costs may limit the bank's ability to originate residential real estate loans, especially purchases.

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

- The AA has a large concentration of mobile homes with 9.6 percent compared to 6.1 percent for the statewide nonmetropolitan areas.
- The AA vacancy rate of 13.4 percent is comparable to the statewide nonmetropolitan rate of 12.8 percent. However, Keith County, where Lake McConaughy is located, had the highest vacancy rate at 27.4 percent, likely due to a larger concentration of vacation homes.
- One community member stated that the housing market in the area was improving, with more houses on the market for individuals to select. However, another community member indicated that there is a disparity in the housing stock, as many homes are either old, low-quality housing or new, but expensive housing.
- Another contact stated that moderately priced housing was a major issue because of low incomes and underemployment in the area. New housing developments are not being built because the cost of construction is usually higher than the appraisal values.

**TABLE 8
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Chase County, Nebraska	1.9	2.2	1.9	2.2	2.3
Cheyenne County, Nebraska	2.2	3.0	2.8	2.9	3.7
Deuel County, Nebraska	2.5	2.8	2.5	3.0	2.9
Keith County, Nebraska	2.7	3.1	3.0	3.1	3.2
Lincoln County, Nebraska	2.9	3.2	3.0	3.1	3.5
Perkins County, Nebraska	1.9	2.3	1.9	2.0	2.3
State of Nebraska	3.0	3.2	2.9	2.9	3.0

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member indicated that economic conditions in the region are stable and that unemployment is low.
- Agriculture is the area’s largest industry, followed by administrative, support, waste and removal services; other services; and retail trade. Lake McConaughy State Recreation Area in Keith County also provides a significant tourist industry.
- Some of the AA’s largest employers include Union Pacific Railroad, Great Plains Regional Medical Center, Walmart, American Shizuki Corporation, Banner Health, and the local public school districts.
- A community member stated the area is dependent on row crop and livestock production. Agricultural credit was noted as the predominant credit need in the area. Another contact identified agricultural operating capital and small business start-up lending as the primary credit needs of the community.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN
NEBRASKA AA**

LENDING TEST

Geographic Distribution of Loans

The geographic distribution of lending reflects reasonable penetration throughout the AA. The evaluation of the dispersion of home mortgage, small business, and small farm lending did not reveal any significant gaps in lending within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank's lending in 2018 was consistent with its 2019 performance. As noted in Table 9 below, the bank's lending in 2018 in the moderate-income census tracts was comparable to both the aggregate lending data and the percentage of owner-occupied units, while lending in the middle-income census tracts was above the aggregate lending data and demographic figure. The bank's lending in upper-income census tracts was below the aggregate lending data and the demographic figure. The bank's loan dispersion of home mortgage lending products revealed no significant gaps or lapses in the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The distribution of home purchase loans in 2019 reflected a stronger performance than the 2018 lending, along with higher lending volume in 2019. The distribution of home purchase lending for 2018 in the moderate-income census tracts is comparable to the aggregate lending data and demographic figure. Lending in the middle-income census tracts was above the aggregate lending data and the demographic figure, while the distribution of lending in the upper-income census tracts was below both the aggregate lending data and the demographic figure. The bank's loan dispersion of home purchase lending revealed no significant gaps or lapses in the AA.

Home Refinance Lending

The geographic distribution of home refinance lending is reasonable. The distribution of home refinance loans in 2018 reflected a comparable performance to the 2019 lending. The bank's lending in the moderate-income census tracts was comparable to that of the aggregate lending data and the demographic figure. Home refinance lending in the middle-income census tracts was comparable to the aggregate lending data and demographic figures, while lending in the upper-income census tracts was also comparable to both aggregate lending data and the demographic figure. The bank's loan dispersion of home refinance lending revealed no significant gaps or lapses in the AA.

Home Improvement Lending

The geographic distribution of home improvement lending is poor. The distribution of home improvement loans in 2019 reflected a comparable performance to 2018. In 2019, the bank made one home improvement loan in a moderate-income census tract. In 2018, the bank made no loans in moderate-income census tracts. All home improvement lending was made in the middle-income census tracts, which exceeded the aggregate lending data and demographic figure. While the volume of home improvement loans was low, the bank's loan dispersion further supports the poor rating, as there was limited home improvement lending throughout the AA in 2018 and 2019.

Multifamily Lending

The geographic distribution of multifamily lending is reasonable. The distribution of multifamily loans in 2019 was consistent with the 2018 lending performance. In 2018, the bank's lending in moderate-income census tracts was comparable to the aggregate lending data and above the demographic figures. The lending in middle-income tracts was also comparable with the aggregate lending data, but below the demographic figure. The bank's loan dispersion of multifamily lending revealed no significant gaps or lapses in the AA.

**TABLE 9
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
WESTERN NEBRASKA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	27	1,836	12.3	7.4	13.1	9.0	14.8
Middle	175	19,845	79.9	80.3	72.9	74.7	70.4
Upper	17	3,045	7.8	12.3	13.9	16.1	14.7
Unknown	0	0	0.0	0.0	0.1	0.2	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	15	884	11.3	5.7	11.8	7.6	14.8
Middle	110	13,158	82.7	85.3	73.8	75.3	70.4
Upper	8	1,392	6.0	9.0	14.4	17.1	14.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	8	612	11.6	7.4	13.9	10.4	14.8
Middle	52	6,015	75.4	72.6	74.8	73.9	70.4
Upper	9	1,653	13.0	20.0	11.0	14.9	14.7
Unknown	0	0	0.0	0.0	0.3	0.8	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	4.7	3.8	14.8
Middle	9	136	100.0	100.0	79.7	62.3	70.4
Upper	0	0	0.0	0.0	15.6	34.0	14.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	340	50.0	38.8	47.8	17.6	21.7
Middle	4	536	50.0	61.2	52.2	82.4	70.6
Upper	0	0	0.0	0.0	0.0	0.0	7.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is poor. The bank’s lending in the AA’s moderate-income census tracts was below the percentage of businesses operating in those census tracts. The bank’s lending in the middle-income census tracts was above the demographic figure, while lending in the upper-income census tracts was below the demographic figure. The analysis of loan dispersion further supports the distribution rating of poor, as gaps in lending were noted in the AA.

**TABLE 10
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
WESTERN NEBRASKA AA**

Census Tract Income Level	Bank Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	14	675	13.6	11.5	22.6
Middle	83	4,874	80.6	83.1	67.6
Upper	6	317	5.8	5.4	9.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	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 add up to 100.0 due to rounding.

Small Farm Lending

The geographic distribution of small farm lending is reasonable. Although the bank did not originate any small farm loans in moderate-income census tracts, only 1.8 percent of AA farms are located within these tracts. The bank’s lending in the middle-income census tracts was above the demographic figure, while the bank’s lending in the upper-income census tracts was comparable with the demographic figure. Additionally, the loan dispersion evaluation showed no major gaps or lapses in lending identified within the AA.

**TABLE 11
DISTRIBUTION OF 2019 SMALL FARM LENDING
BY INCOME LEVEL OF GEOGRAPHY
WESTERN NEBRASKA AA**

Census Tract Income Level	Bank Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	1.8
Middle	66	5,980	90.4	90.8	84.4
Upper	7	605	9.6	9.2	13.8
Unknown	0	0	0.0	0.0	0.0
Not Reported	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 add up to 100.0 due to rounding.

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

The bank's lending has a reasonable penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank's 2018 lending performance was similar to the 2019 lending levels. As noted in Table 12 below, the bank's lending to low-income borrowers was above the aggregate lending data, but comparable to the percentage of families. The bank's lending to moderate-, middle-, and upper-income borrowers was comparable to both the aggregate lending data and the demographic figure.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The bank's 2018 lending performance was similar to the 2019 lending levels, although lending to low-income borrowers dropped in 2019. Home purchase lending to low-income borrowers was above the aggregate lending data and comparable to the demographic figure. Lending to moderate-income borrowers was comparable to both the aggregate lending data and demographic figure. Home purchase lending to middle-income borrowers was comparable to the aggregate lending data and demographic figure, while lending to upper-income borrowers was above aggregate lending data and below the demographic figure by number, but above by dollar volume.

Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The distribution of home refinance loans in 2018 was similar to 2019 lending performance, although lending to low-income borrowers was lower in 2019. In 2018, home refinance lending to low-income borrowers was above aggregate lending data and comparable to the demographic figure by number, although it was significantly below demographic by dollar. Lending to moderate-income borrowers was comparable to the aggregate lending data and demographic figure. Home refinance lending to middle-income borrowers was below the aggregate lending data and demographic figure, while lending to upper-income borrowers was comparable to the aggregate lending data and demographic figure.

Home Improvement Lending

The borrower distribution of home improvement lending is reasonable. The distribution of home improvement loans in 2018 was similar to 2019 lending performance. In 2018, home improvement lending to low-income borrowers was above aggregate lending data, but below the demographic figure by number and comparable by dollar. Lending to moderate-income borrowers was comparable to the aggregate lending data and demographic figure. Home improvement lending to middle-income borrowers was below the aggregate lending data and demographic figure, while lending to upper-income borrowers was above both the aggregate lending data and demographic figure.

Multifamily Lending

Given that all loans originated in 2018 and 2019 were to borrowers with unknown incomes, this home mortgage lending product is not rated.

**TABLE 12
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
WESTERN NEBRASKA AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	31	1,737	14.2	7.0	8.0	4.2	18.2
Moderate	46	4,153	21.0	16.8	20.0	14.5	17.2
Middle	41	5,607	18.7	22.7	22.2	21.5	22.2
Upper	84	11,635	38.4	47.1	34.2	42.4	42.3
Unknown	17	1,594	7.8	6.4	15.5	17.5	0.0
Home Purchase Loans							
Low	18	1,125	13.5	7.3	8.1	4.3	18.2
Moderate	29	2,811	21.8	18.2	20.3	15.2	17.2
Middle	30	3,972	22.6	25.7	23.7	23.6	22.2
Upper	50	7,029	37.6	45.5	32.3	43.5	42.3
Unknown	6	497	4.5	3.2	15.7	13.5	0.0
Home Refinance Loans							
Low	12	582	17.4	7.0	9.2	4.8	18.2
Moderate	15	1,324	21.7	16.0	20.7	15.8	17.2
Middle	10	1,620	14.5	19.6	22.0	21.2	22.2
Upper	29	4,533	42.0	54.7	38.8	48.2	42.3
Unknown	3	221	4.3	2.7	9.2	10.0	0.0
Home Improvement Loans							
Low	1	30	11.1	22.1	6.3	2.6	18.2
Moderate	2	18	22.2	13.2	18.8	11.7	17.2
Middle	1	15	11.1	11.0	26.6	42.6	22.2
Upper	5	73	55.6	53.7	45.3	40.8	42.3
Unknown	0	0	0.0	0.0	3.1	2.4	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	18.2
Moderate	0	0	0.0	0.0	0.0	0.0	17.2
Middle	0	0	0.0	0.0	4.3	0.5	22.2
Upper	0	0	0.0	0.0	21.7	9.9	42.3
Unknown	8	876	100.0	100.0	73.9	89.6	0.0

Source: 2018 FFIEC Census Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenues of \$1 million or less was significantly below the percentage of small businesses in the AA. However, of the 44 loans to businesses over \$1 million in revenue, 22 of those loans were made to only two businesses. If these loans are removed from the sample, the percentage of businesses under \$1 million or less would have been at 72.8 percent, although that performance is still below the demographic figure. Information for

aggregate lenders who report data under the CRA showed lending to small businesses in the AA at 56.3 percent in 2018. While institutions included in aggregate lending data are not a direct comparison as the bank is not a CRA reporter, these aggregate lending levels are representative of the overall demand for credit from small businesses in the AA.

Additionally, when the bank’s small businesses loans were stratified by loan size, 98.0 percent of the bank’s 2019 small business loans were for loan amounts of \$250,000 or less. Typically, smaller businesses do not have the need or the capacity to borrow large amounts, and as such, smaller loan amounts are used as a proxy to estimate the support of smaller businesses. Given these factors, the bank’s performance is considered reasonable.

TABLE 13 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES WESTERN NEBRASKA AA					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	59	3,447	57.3	58.8	91.7
Over \$1 Million	44	2,419	42.7	41.2	6.6
Not Known	0	0	0.0	0.0	1.7
Total	103	5,867	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	91	3,044	88.3	51.9	
\$100,001 – \$250,000	10	1,675	9.7	28.5	
\$250,001 – \$1 Million	2	1,148	1.9	19.6	
Total	103	5,867	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	54	1,740	91.5	50.5	
\$100,001 – \$250,000	3	560	5.1	16.2	
\$250,001 – \$1 Million	2	1,148	3.4	33.3	
Total	59	3,447	100.0	100.0	
<i>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i> NOTE: Percentages may not add up to 100.0 due to rounding.					

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank’s lending to farms with gross annual revenues of \$1 million or less was below the demographic figure. Again, using 2018 aggregate lending data to represent potential loan demand, the bank’s performance was above aggregate lending of 61.5 percent of loans originated to small farms.

When the bank’s small business loans were stratified by loan size, 93.2 percent of the bank’s 2019 small business loans were for loan amounts of \$250,000 or less. Typically, smaller

businesses do not have the need or the capacity to borrow large amounts, and as such, smaller loan amounts are used as a proxy to estimate the support of smaller businesses.

TABLE 14 DISTRIBUTION OF 2019 SMALL FARM LENDING BY REVENUE SIZE OF FARMS WESTERN NEBRASKA AA					
	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	58	4,310	79.5	65.5	97.7
Over \$1 Million	15	2,275	20.5	34.5	2.2
Not Known	0	0	0.0	0.0	0.1
Total	73	6,585	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	54	2,261	74.0	34.3	
\$100,001 – \$250,000	14	2,304	19.2	35.0	
\$250,001 – \$500,000	5	2,019	6.8	30.7	
Total	73	6,584	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	44	1,694	75.9	39.3	
\$100,001 – \$250,000	12	1,990	20.7	46.2	
\$250,001 – \$500,000	2	626	3.4	14.5	
Total	58	4,310	100.0	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 add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank’s responsiveness to CD needs of its AA through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA. The bank’s CD performance demonstrates adequate responsiveness.

The bank originated two loans in the AA which provided funding for housing complexes that maintain low rent, including one complex providing housing for families with incomes 60.0 percent or below the median family income of the area. AA investments, all prior-period, were purchases of municipal revenue bonds that support essential community needs including hospitals, fire departments, street improvements, and storm sewer maintenance.

TABLE 15 COMMUNITY DEVELOPMENT ACTIVITIES WESTERN NEBRASKA AA									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	2	1,332	0	0	6	53	6	53	5
Community Services	0	0	0	0	19	4	19	4	3
Economic Development	0	0	0	0	4	11	4	11	2
Revitalization and Stabilization	0	0	24	1,210	24	42	48	1,252	5
Totals	2	1,332	24	1,210	53	110	77	1,320	15

**RED WILLOW COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE RED WILLOW COUNTY AA

The bank's Red Willow County AA consists of Red Willow County in its entirety. The bank's presence in the AA includes one full-service branch location with a cash-dispensing only ATM located in a middle-income census tract in the town of Indianola, Nebraska. According to 2015 ACS data, the AA is sparsely populated with 10,946 residents. The AA includes one moderate- and two middle-income census tracts.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank's total market share in the area was 4.3 percent, ranking sixth of eight FDIC-insured financial institutions operating from nine offices in the AA. Additionally, according to the same report, deposits in this area comprised 3.2 percent of total bank-wide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RED WILLOW COUNTY AA

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, which are included in Appendix B.

The institution's lending performance in the area is consistent with the institution's lending performance in the state. The institution's CD performance in the area is below the institution's CD performance for the state. The conclusions regarding the bank's performance did not significantly impact the overall state rating.

STATE OF COLORADO

COMMUNITY REINVESTMENT ACT RATING FOR COLORADO:

Needs to Improve

The Lending Test is rated:

Needs to Improve

The Community Development Test is rated:

Satisfactory

Major factors supporting the rating include:

Lending Test:

- The geographic distribution of home mortgage and small business lending reflects poor lending performance throughout the bank's AAs.
- The distribution of lending reflects a poor penetration of lending to borrowers of different income levels and to businesses of different revenue sizes.

Community Development Test:

- The level of CD loans, qualified investments, and services demonstrates adequate responsiveness to the CD needs of the bank's AAs.

SCOPE OF EXAMINATION

The scope of the examination for the state of Colorado was generally consistent with the scope for the entire institution, except an analysis of small farm loans was not conducted in the Colorado metropolitan AAs because of limited loan activity. Branch locations are in predominantly urban locations and the volume of small farm loans was too limited to result in a meaningful conclusion in the Colorado AAs, except for the Logan County AA. The volume of home mortgage lending by individual product was limited; therefore, the bank's home lending was reviewed collectively. In addition, the original sample of small business loans in the Colorado AAs and small farm loans in the Logan AA were supplemented with additional loans to provide a more meaningful geographic and borrower distribution analysis. More weight was given to the analysis of small business loans in the Colorado AAs, except for the Logan County AA, which was weighted more toward small farm loans.

The Fort Collins MSA AA and Colorado Springs Metropolitan AA both received full-scope reviews. Limited-scope reviews were conducted in the state of Colorado's other three AAs: the Greeley MSA AA, Boulder MSA AA, and the Logan County AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates five of its eight AAs and operates eight of its 20 branches in the state of Colorado. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial and residential real estate lending. 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 with respect to the lending test in the state of Colorado is Needs to Improve.

Geographic and Borrower Distribution:

The overall geographic distribution of loans reflects a poor penetration throughout the geographies in the Colorado AAs. More weight was given to the Fort Collins MSA AA lending performance due to the bank's higher deposit and lending percentages within this AA. Greater weight was also given to the bank's small business lending in determining overall performance ratings, given the bank's overall focus on small business lending in the state of Colorado. The geographic distribution is poor for the Fort Collins MSA AA, but reasonable for the Colorado Springs Metropolitan AA.

The bank's overall borrower distribution of home mortgage, small business, and small farm lending is poor. The distribution of home mortgage loans to borrowers of different income levels and the distribution of small business loans by revenue size is poor, while the distribution of farm loans by revenue size (assessed only in the limited-scope review of the Logan County AA) is reasonable.

Lending performance in the limited-scope reviews of the Greeley MSA AA and the Logan County AA is consistent with the rating in the State of Colorado, while it is above for the Boulder MSA AA.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test is Satisfactory for the state of Colorado. The bank demonstrated an adequate level of responsiveness to CD needs through CD loans, qualified investments, and donations, and CD services in both the Fort Collins MSA AA and the Colorado Springs Metropolitan AA. The bank's CD performance in the limited-scope review of the Boulder MSA AA was consistent with the state rating, while the Greeley MSA AA and the Logan County

AA was below the overall state performance.

The bank originated 18 CD loans totaling \$24.4 million in Colorado. The majority of the loans were for economic development purposes. Two additional loans benefitted the broader state of Colorado.

No investment activity occurred within the state of Colorado. Although there were no qualified investments in the Colorado AAs, the bank made 51 CD donations in the Colorado AAs, totaling \$49,454. These donations included 41 donations to community service organizations that provide benefits to LMI persons, 6 donations to entities that focus efforts toward affordable housing, and 4 donations to entities that promote economic development.

Overall, the bank supported 11 qualified services in the state of Colorado. These included four services that support affordable housing, five community service activities benefiting LMI, one supporting economic development, and one that helped with revitalization and stabilization efforts.

**FORT COLLINS MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE FORT COLLINS MSA AA

The bank’s AA is comprised of Larimer County in its entirety, which also comprises the Fort Collins-Loveland, Colorado MSA (Fort Collins MSA) (see Appendix A for an AA map).

- The composition of the AA includes 73 census tracts, of which 3 are low-, 20 are moderate-, 36 are middle-, 13 are upper, and 1 is an unknown-income census tracts. The census tract designations represent a slight change since the prior evaluation; however, the total number of census tracts remains the same.
- The bank operates two branches in the Fort Collins MSA AA.
- The June 30, 2019 FDIC Deposit Market Share Report, shows the bank has a 1.2 percent market share, ranking 16th of 25 FDIC-insured depository institutions with 93 branch offices operating within the AA.
- Two previously conducted interviews with members of the communities within the bank’s AA were referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. Both community members represented economic development organizations that focus on small businesses.

TABLE 16 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Fort Collins MSA	299,630	318,227	6.2
State of 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*

- Area demographics were reflective of a larger student population due to Colorado State University’s presence in the city of Fort Collins. Young adults between the ages of 18 years and 24 years old equaled 14.8 percent of the total population in the AA, compared to the state of Colorado’s 9.8 percent.
- The MSA has a slightly older population as well, with 13.4 percent of residents over 65 years of age compared to 12.2 percent statewide.
- A community member stated that the population is increasing due to new businesses relocating to Fort Collins.

TABLE 17 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Fort Collins MSA	73,771	76,886	4.2
State of Colorado	70,046	74,826	6.8

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

- According to the 2015 ACS data, 37.7 percent of families in the AA are LMI, which is consistent with the state of Colorado average of 38.9 percent.
- The AA has a lower number of families living below the poverty line at 6.4 percent compared to the statewide average of 8.5 percent.
- A community member stated that while wages overall are growing in Fort Collins, most of the wage growth is occurring in the top 20.0 percent of incomes in the area and one of the challenges is boosting wage growth for workers in the bottom 80.0 percent of incomes.

TABLE 18 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Fort Collins MSA	245,979	263,405	7.1	849	1,035	21.9
State of Colorado	236,600	247,800	4.7	852	1,002	17.6

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

- The Fort Collins MSA affordability ratio of 22.7 percent was slightly below the statewide affordability ratio of 24.5 percent, but the low figure indicates high housing costs for the AA and overall state.
- Although the median gross rent was similar to statewide figures, over 54.5 percent of renters have rent payments exceeding 30.0 percent of their income.
- A community member stated that multifamily and affordable housing is needed as median gross rents continue to rise.
- The AA has a lower percentage of owner-occupied units than rental units within LMI census tracts.
- A community member indicated that affordable housing will continue to be a challenge and is one of the biggest issues contributing to a shortage of individuals moving to the area.

TABLE 19 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Fort Collins MSA	3.3	2.8	2.4	2.7	2.4
State of Colorado	3.9	3.3	2.8	3.2	2.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Major employers in the AA include Anheuser-Busch, Banner Health, Colorado State University, Kaiser Permanente, UC Health, Wells Fargo, First National Bank, Xcel Energy, Broadcom, Inc. (semiconductor components), Woodward, Inc. (aircraft control systems), and Hewlett Packard Enterprises.
- Some of the key industries include aerospace and aviation, health and wellness, energy, information technology, and advanced manufacturing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT COLLINS MSA AA

LENDING TEST

Geographic Distribution of Loans

The bank’s geographic distribution of loans is poor among the different census tracts within the AA. The evaluation of the dispersion of home mortgage, small business, and small farm lending did not reveal any significant gaps in lending within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank’s 2019 lending performance was above the 2018 lending levels and showed noticeable improvement in lending in the low-income census tracts. Although the distribution of total HMDA lending in 2018 shows the bank had no loans in low-income census tracts, the aggregate lending data had a very limited volume while the percentage of owner-occupied units in the low-income census tracts was low as well. Given the low volumes, there are limited lending opportunities for the bank and other lenders to make loans in these low-income census tracts. The distribution in the moderate-income census tracts was comparable to the aggregate lending data and demographic figure. Lending by the bank in the middle-income census tracts was above both the aggregate lending data and demographic figures, while upper-income census tract lending by the bank was below the aggregate lending data and comparable with the demographic figure.

Additionally, loan dispersion was evaluated and no significant gaps or lapses in lending were identified within the AA.

**TABLE 20
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
FORT COLLINS MSA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	%	#%	%	
Low	0	0	0.0	0.0	1.2	1.1	1.5
Moderate	7	1,846	17.5	16.4	21.7	19.6	20.5
Middle	24	6,892	60.0	61.1	47.2	45.0	52.7
Upper	9	2,540	22.5	22.5	30.0	34.3	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is poor. As illustrated in Table 21, the bank’s lending was comparable with the percentage of businesses in low-income census tracts. Lending by the bank in the moderate-income census tracts was below the demographic figure and its lending performance has been trending downward since the prior evaluation. Lending in the middle-income census tracts by the bank was comparable to the percentage of businesses within the AA, while lending in the upper-income census tracts was above the demographic figure.

Gaps were noted in the dispersion with no loans in the western half of the AA; however, the AA is separated by the Rocky Mountains and the bank’s three locations are located in the eastern half of the AA, thus limiting the bank’s ability to lend in the western portion.

**TABLE 21
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
FORT COLLINS MSA AA**

Census Tract Income Level	Bank Small Business Loans				% of Businesses
	#	\$(000)	#%	%	
Low	1	137	2.8	2.3	3.5
Moderate	4	375	11.1	6.2	29.2
Middle	14	2,871	38.9	47.8	42.6
Upper	17	2,629	47.2	43.7	24.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	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 add up to 100.0 due to rounding.

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

The bank’s lending has a poor penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank’s 2018 lending performance was above the 2019 lending levels. The bank’s lending to low-income borrowers was comparable to aggregate lending data, but well below the percentage of families. As mentioned, the Fort Collins MSA has a very low affordability rate and it is a challenge to find affordable housing for low-income residents. Lending to moderate-income borrowers by the bank was comparable to that of the aggregate lending data and the demographic figure. The bank’s lending to middle-income borrowers was above both aggregate lending data and the demographic percentage of families in the AA, while lending to upper-income borrowers was comparable to the aggregate lending data and demographic figure.

TABLE 22 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL FORT COLLINS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	2	337	5.0	3.0	5.8	3.1	20.5
Moderate	9	2,082	22.5	18.5	17.3	13.1	17.2
Middle	13	3,841	32.5	34.1	24.0	21.2	22.6
Upper	16	5,018	40.0	44.5	39.8	43.4	39.6
Unknown	0	0	0.0	0.0	13.1	19.2	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is poor. The bank’s lending to businesses with gross annual revenues of \$1 million or less was well below the percentage of small businesses in the AA. Stratifying loans by dollar amount revealed that 77.8 percent of the bank’s small business loans were in the amount of \$250,000 or less. Despite the bank’s originations of smaller dollar loans, which can be used as a proxy for lending to small businesses, demographic data indicates the majority of the bank’s lending is to businesses with greater than \$1 million in annual revenues.

TABLE 23 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES FORT COLLINS MSA AA					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	17	1,757	47.2	29.2	93.7
Over \$1 Million	19	4,255	52.8	70.8	5.4
Not Known	0	0	0.0	0.0	0.9
Total	36	6,012	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	17	748	47.2	12.4	
\$100,001 – \$250,000	11	1,708	30.6	28.4	
\$250,001 – \$1 Million	8	3,556	22.2	59.1	
Total	36	6,012	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	11	571	64.7	32.5	
\$100,001 – \$250,000	4	595	23.5	33.9	
\$250,001 – \$1 Million	2	591	11.8	33.6	
Total	17	1,757	100.0	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 add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The bank’s CD performance demonstrated adequate responsiveness to AA needs. The bank increased its CD activity levels in this AA as compared to levels noted in the 2016 CRA evaluation. This included originating 12 CD loans with nine for the purpose of economic development. One loan was made to an entity to fund the construction of a pediatric care facility, while another loan was for affordable housing and funded the purchase and improvement of an apartment complex in a moderate-income census tract. The complex is a United States Department of Housing and Urban Development Section 8 property. No investments were made in the AA. However, the bank made 22 donations totaling \$23,300, of which 15 of the donations were made to organizations that help provide community services to LMI individuals.

TABLE 24 COMMUNITY DEVELOPMENT ACTIVITIES FORT COLLINS MSA AA									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	1	1,331	0	0	6	11	6	11	3
Community Services	0	0	0	0	15	11	15	11	1
Economic Development	9	11,568	0	0	1	1	1	1	0
Revitalization and Stabilization	2	4,100	0	0	0	0	0	0	0
Totals	12	16,999	0	0	22	23	22	23	4

**COLORADO SPRINGS METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE COLORADO SPRINGS METROPOLITAN AA

The bank’s AA is comprised of El Paso County in its entirety, which is one of two counties that comprise the Colorado Springs, Colorado MSA (see Appendix A for an AA map).

- The composition of the AA includes 130 census tracts, of which 7 are low-, 40 are moderate-, 50 are middle-, 31 are upper-income, and 2 are unknown-income census tracts. The census tract designations represent a slight change since the prior evaluation in 2016; however, the total numbers of census tracts remains the same.
- The bank operates two branches in the Colorado Springs Metropolitan AA.
- The June 30, 2019 FDIC Deposit Market Share Report, shows the bank has a 0.9 percent market share, ranking 24th of 37 FDIC-insured depository institutions with 129 branch offices operating within the AA.
- Two previously conducted interviews with members of the communities within the bank’s AA were referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. These community members represented two economic development organizations.

**TABLE 25
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
El Paso County, Colorado	622,263	655,024	5.3
Colorado Springs MSA	645,613	678,364	5.1
State of 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 contains the majority of the population for the MSA, at 96.6 percent.
- The AA has a significant percentage of persons living in military quarters with five military installations located in the AA.

TABLE 26 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
El Paso County, Colorado	68,813	71,174	3.4
Colorado Springs MSA	68,800	71,351	3.7
State of Colorado	70,046	74,826	6.8

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

- LMI families make up 38.8 percent of the AA and 38.7 percent of the MSA, which are both similar to the statewide average of 38.9 percent.
- Families living below the poverty line in El Paso County is 8.4 percent, compared to 8.3 percent for the MSA with the state of Colorado at 8.5 percent.

TABLE 27 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
El Paso County, Colorado	216,800	218,300	0.7	817	976	19.5
Colorado Springs MSA	217,214	219,345	1.0	819	976	19.2
State of Colorado	236,600	247,800	4.7	852	1,002	17.6

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

- Per the 2015 ACS data, rental units make up 35.1 percent of the housing units in the AA.
- The area’s affordability ratio of 26.8 is only slightly more affordable than the statewide figure of 24.5, and the MSA figure at 26.6 percent. Given the low affordability ratio, high housing costs are an issue for the AA.

TABLE 28 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
El Paso County, Colorado	4.6	3.8	3.2	3.8	3.3
Colorado Springs MSA	4.6	3.8	3.2	3.8	3.3
State of Colorado	3.9	3.3	2.8	3.2	2.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The economy of Colorado Springs is based primarily on the military installations in the area as well as on the aerospace and electronics industries and tourism. The area is home to five military installations: Fort Carson, Peterson and Schriever Air Force Bases, Cheyenne Mountain Air Force Station, and the Air Force Academy. Defense contractors who support military operations are also prevalent in the area.

- Other non-military employers in the AA include Lockheed Martin, Progressive Insurance, Microchip Technologies, Newmont Mining Corporation, United Services Auto Association, and the U.S. Olympic Committee. The Broadmoor Hotel is also a major employer; however, many employees are part-time and seasonal.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO SPRINGS METROPOLITAN AA

LENDING TEST

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts within the AA. The evaluation of the dispersion of home mortgage, small business, and small farm lending did not reveal any significant gaps in lending within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. Although the bank's 2019 lending performance was above the 2018 lending levels with increased lending in the LMI census tracts for 2019, the low volume of lending in LMI tracts in 2018 impacted the overall conclusions. In 2018, the bank had no lending in low-income census tracts; however, the opportunities are limited with only a small percent of owner-occupied units located in these census tracts. Lending in the moderate-income census tracts was below the aggregate lending data and the percentage of owner-occupied units. The bank's lending activity in the middle-income census tract was above both the aggregate lending data and demographic figure, while lending in the upper-income census tracts was comparable to that of the aggregate lending data and the demographic figure by number. By dollar, the lending was below the aggregate and demographic data in the upper-income tracts. Loan dispersion was evaluated with no major gaps or lapses in lending identified within the AA, considering the low volume of loans originated.

TABLE 29
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS METROPOLITAN AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	2.7	2.5	3.3
Moderate	3	1,195	11.1	9.5	19.5	15.7	20.7
Middle	16	8,974	59.3	71.2	44.1	40.8	42.2
Upper	8	2,443	29.6	19.4	33.8	41.0	33.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending activity in low-income census tracts was significantly above the percentage of businesses, while the bank's lending in the moderate-income census tracts was also above the demographic figure. Lending in the middle-income census tracts by the bank was below the demographic figure, while lending in the upper-income census tracts was comparable to the demographic figure by number, but below by dollar.

Loan dispersion was evaluated with no significant gaps or lapses in lending identified within the AA.

TABLE 30
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS METROPOLITAN AA

Census Tract Income Level	Bank Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	4	1,549	20.0	40.1	7.7
Moderate	7	1,100	35.0	28.5	24.0
Middle	3	537	15.0	13.9	33.2
Upper	6	676	30.0	17.5	35.0
Unknown	0	0	0.0	0.0	0.2
Not Reported	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 add up to 100.0 due to rounding.

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

The bank’s lending has a poor penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The bank’s 2019 lending performance was slightly above the 2018 lending levels, with slightly higher lending to LMI borrowers. No loans were made to low-income borrowers in 2018. Lending to moderate-income borrowers was significantly below the aggregate lending data and the percentage of families. The bank’s lending to LMI borrowers is trending downward from its prior CRA performance evaluated in 2016. The bank’s lending to middle-income borrowers was comparable to aggregate lending data and the demographic figure, while lending to upper-income borrowers was comparable to aggregate lenders by number but below the demographic figure. By dollar, the bank’s lending was below both the aggregate lending and demographic data.

TABLE 31 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL COLORADO SPRINGS METROPOLITAN AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	5.4	2.9	20.4
Moderate	2	360	7.4	2.9	19.9	15.1	18.5
Middle	7	2,056	25.9	16.3	23.8	21.4	20.3
Upper	8	2,773	29.6	22.0	33.3	36.4	40.8
Unknown	10	7,423	37.0	58.9	17.6	24.3	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is poor. The numbers of business loans originated were significantly below the percentage of businesses with revenues of \$1 million or less. Performance is trending downward from the prior CRA evaluation for number volume.

TABLE 32 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES COLORADO SPRINGS METROPOLITAN AA					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	10	1,599	50.0	41.4	94.2
Over \$1 Million	10	2,263	50.0	58.6	5.1
Not Known	0	0	0.0	0.0	0.7
Total	20	3,862	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	11	678	55.0	17.6	
\$100,001 – \$250,000	4	826	20.0	21.4	
\$250,001 – \$1 Million	5	2,359	25.0	61.1	
Total	20	3,862	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	4	201	40.0	12.6	
\$100,001 – \$250,000	4	826	40.0	51.6	
\$250,001 – \$1 Million	2	572	20.0	35.8	
Total	10	1,599	100.0	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 add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The bank’s CD performance demonstrates adequate responsiveness. The bank originated three CD loans for approximately \$4.0 million. Two of the loans were made to organizations that will assist in stabilization activities in moderate-income census tracts that will help retain merchant tenants and bring in new businesses. The bank did not have any qualified investments in the AA, but had 14 CD donations to organizations that provided community services to LMI persons. This was an increase from the prior examination’s performance. The bank also had four qualifying CD services.

**TABLE 33
COMMUNITY DEVELOPMENT ACTIVITIES
COLORADO SPRINGS METROPOLITAN AA**

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	1
Community Services	0	0	0	0	14	8	14	8	3
Economic Development	1	1,624	0	0	0	0	0	0	0
Revitalization and Stabilization	2	2,409	0	0	0	0	0	0	0
Totals	3	4,033	0	0	14	8	14	8	4

**BOULDER MSA AA
METROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's Boulder MSA AA consists of Boulder County in its entirety, which also comprises the Boulder, Colorado MSA. The bank's presence in the AA includes one full-service branch with a cash-dispensing only ATM located in a middle-income census tract in the town of Longmont, Colorado. According to 2015 ACS data, the AA is heavily populated with 310,032 residents. The AA includes 5 low-, 14 moderate-, 30 middle-, and 19 upper-income census tracts.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.3 percent, ranking 21st of 31 FDIC-insured financial institutions operating from 100 offices in the AA. Additionally, based on this report, deposits in this area comprised 5.2 percent of total bank-wide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOULDER MSA AA

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, which are included in Appendix B.

The institution's lending performance in the area is above the institution's lending performance for the state. The institution's CD performance in the area is consistent with the institution's CD performance for the state. The conclusions regarding the bank's performance did not significantly impact the overall state rating.

**GREELEY MSA AA
METROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's Greeley MSA AA consists of Weld County in its entirety, which also comprises the Greeley, Colorado MSA. The bank's presence in the AA includes one full-service branch with a cash-dispensing only ATM located in a middle-income census tract in the town of Firestone. According to 2015 ACS data, the AA is heavily populated with 270,948 residents. The AA includes 7 low-, 16 moderate-, 26 middle-, 27 upper-, and 1 unknown-income census tracts.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.9 percent, ranking 20th of 22 FDIC-insured financial institutions operating from 71 offices in the AA. Additionally, deposits in this area comprised 6.0 percent of total bank-wide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREELEY MSA AA

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, which are included in Appendix B.

The institution's lending performance in the area is consistent with the institution's lending performance for the state. The institution's CD performance in the area is below the institution's CD performance for the state. The conclusions regarding the bank's performance did not significantly impact the overall state rating.

**LOGAN COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's Logan County AA consists of Logan County in its entirety and is the only nonmetropolitan AA in the Colorado market. The bank's presence in the AA includes one full-service branch with a cash-dispensing only ATM located in a moderate-income census tract in the town of Sterling, Colorado. Logan County is located in the northeast corner of the state, adjacent to the Greeley MSA. According to 2015 ACS data, the AA is populated with 21,928 residents. The AA includes one moderate- and five middle-income census tracts.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.9 percent, ranking eighth of eight FDIC-insured financial institutions operating from eight offices in the AA. Additionally, based on this same report, deposits in this area comprised 0.6 percent of total bank-wide deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LOGAN COUNTY AA

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, which are included in Appendix B.

The institution's lending performance in the area is consistent with the institution's lending performance for the state, although this is the only AA in which small farm lending had sufficient volume for analysis. The institution's CD performance in the area is below the institution's CD performance for the state. The conclusions regarding the bank's performance did not significantly impact the overall state rating.

STATE OF KANSAS

COMMUNITY REINVESTMENT ACT RATING FOR KANSAS: *Satisfactory*

The Lending Test is rated: *Satisfactory*

The Community Development Test is rated: *Satisfactory*

Major factors supporting the rating include:

Lending Test:

- The geographic distribution of home mortgage and small farm loans reflects reasonable lending throughout the bank's AA.
- The distribution of lending reflects a reasonable penetration of lending to borrowers of different income levels and farms of different revenue sizes.

Community Development Test:

- The level of CD loans, qualified investments, and services demonstrated an adequate level of responsiveness to the CD needs of the bank's AA. However, CD opportunities in the AA are more limited than in the bank's other AAs.

SCOPE OF EXAMINATION

For the state of Kansas, a full-scope review of the bank's sole AA was conducted. Since there is only one AA, the statewide performance will be discussed concurrently with the Thomas County AA. The scope of the review assessed the home mortgage loans collectively due to the limited numbers of home mortgage loans by product. Additionally, the bank's small business loans were not reviewed due to limited loan originations in 2019.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS/THOMAS COUNTY AA

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

- The composition of the AA includes one middle- and one upper-income census tract. The census tract designations did not change since the prior evaluation.
- The bank operates one branch in the Thomas County AA.
- The June 30, 2019 FDIC Deposit Market Share Report, shows the bank has a 2.4 percent market share, ranking 8th of 8 FDIC-insured depository institutions with 10 branch offices operating within the AA.
- Two previously conducted interviews with members of the community within the bank's AA were referenced to ascertain the credit needs of the community, the

responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community contacts were both with organizations that monitor and support the agricultural sector.

TABLE 34 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Thomas County	7,900	7,925	0.3
State of 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 has a relatively small population, making up less than one percent of the state of Kansas population.
- The 2015 ACS data shows that 48.0 percent of the AA’s population is 25 to 64 years of age.
- The AA has a low LMI family population of 27.3 percent compared to the statewide nonmetropolitan figure of 37.9 percent.
- A community member stated there is limited retail and health care facilities in the area, which has had a negative effect on population growth.

TABLE 35 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Thomas County	64,462	68,432	6.2
State of Kansas	62,424	66,389	6.4

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

- The percentage of families below the poverty level in the AA at 3.5 percent is significantly lower than the statewide nonmetropolitan figure and statewide figures of 10.3 percent and 9.1 percent, respectively.

TABLE 36 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Thomas County	83,900	105,100	25.3	448	463	3.3
State of Kansas	122,600	132,000	7.7	671	757	12.8

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

- The area’s housing affordability ratio of 45.7 percent reflects more affordable housing

than the statewide figure at 39.6 percent, and is slightly less affordable than the statewide nonmetropolitan figure of 50.0 percent.

- The AA has a larger concentration of mobile homes at 10.1 percent versus 4.8 percent across the state and 7.8 percent in other statewide nonmetropolitan areas.
- According to a community member, many houses are older and in need of repair.

TABLE 37 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Thomas County, Kansas	2.7	2.9	2.6	2.5	2.3
State of Kansas	4.2	4.2	3.6	3.3	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member stated that farming, agricultural-related services, schools, colleges, and federal agencies are predominant sources of employment in the AA.
- According to one community member, farmers were impacted by the spring floods of 2019, which caused cash flow and debt management issues. In addition, low crop prices are affecting farmers’ yields and profitability.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS/THOMAS COUNTY AA

The overall rating and conclusions for the state of Kansas were based on the bank’s performance in the Thomas County AA.

LENDING TEST

The bank’s performance with respect to the lending test in the state of Kansas is Satisfactory.

Geographic Distribution of Loans

The geographic distribution of lending reflects reasonable penetration throughout the AA. The evaluation of the dispersion of home mortgage and small farm lending did not reveal any significant gaps within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank’s 2018 lending performance was above the 2019 lending levels. The bank’s lending in the middle-income census tract was above the aggregate lending data and comparable to the percentage of owner-occupied units. Lending in the upper-income census tract was below the aggregate lending data, but was comparable to the demographic figure.

No significant gaps or lapses in lending were identified in the dispersion of home mortgage lending.

TABLE 38 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY THOMAS COUNTY AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	4	584	28.6	34.6	18.3	18.1	25.8
Upper	10	1,104	71.4	65.4	81.7	81.9	74.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Farm Lending

The geographic distribution of small farm lending is reasonable. The bank's lending in the middle-income census tract was below the percentage of farms in the middle-income census tract and was above the demographic figure in the upper-income census tract.

No significant gaps or lapses in lending were identified in the dispersion of small farm lending.

TABLE 39 DISTRIBUTION OF 2019 SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY THOMAS COUNTY AA					
Census Tract Income Level	Bank Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	3	280	18.8	17.4	60.8
Upper	13	1,331	81.3	82.6	39.2
Unknown	0	0	0.0	0.0	0.0
Not Reported	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 add up to 100.0 due to rounding.

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

The bank’s lending has a reasonable penetration among individuals of different income levels and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank’s 2018 lending performance was above the 2019 lending levels. There were no home mortgage loans to low-income borrowers, which is below the lending by aggregate lenders and the percent of low-income families in the AA. The bank’s lending to moderate-income borrowers was above the aggregate lending data and above the demographic figure. Lending to middle-income borrowers was comparable to both the aggregate lending data and the demographic figure, while lending to upper-income borrowers was above aggregate lending data and comparable to the demographic figure. Given the limited volume of lending, the bank’s home mortgage lending is considered reasonable.

TABLE 40 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL THOMAS COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	12.7	10.2	14.2
Moderate	3	286	21.4	16.9	16.7	12.8	13.0
Middle	4	346	28.6	20.5	24.6	23.3	25.2
Upper	6	1,028	42.9	60.9	29.4	41.9	47.5
Unknown	1	28	7.1	1.7	16.7	11.9	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank’s lending to farms with revenues of \$1 million or less is below the demographic figure; however, the performance is considered reasonable considering the limited lending volume. In addition, based on loan size, 87.5 percent of the bank’s small farm loans were in the amount of \$250,000 or less. Typically, small farms do not have the need or capacity to borrow large amounts.

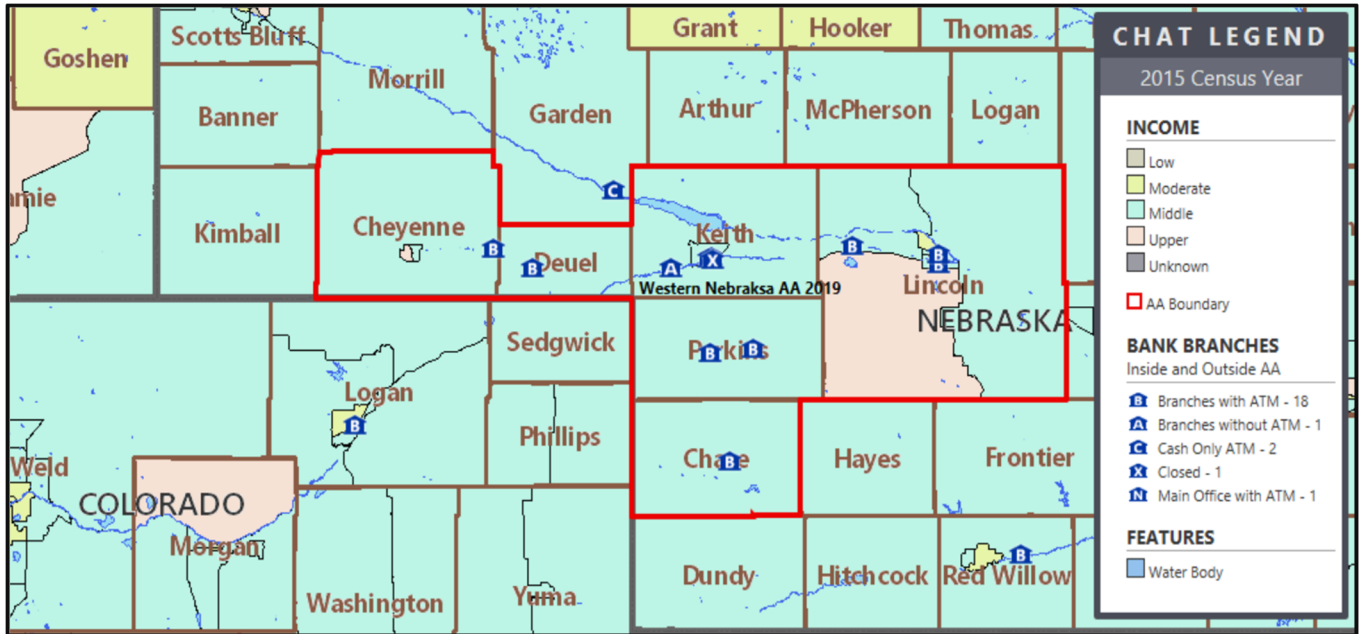
TABLE 41 DISTRIBUTION OF 2019 SMALL FARM LENDING BY REVENUE SIZE OF FARMS THOMAS COUNTY AA					
	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	14	1,431	87.5	88.8	98.0
Over \$1 Million	2	180	12.5	11.2	2.0
Not Known	0	0	0.0	0.0	0.0
Total	16	1,611	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	10	499	62.5	31.0	
\$100,001 – \$250,000	4	550	25.0	34.2	
\$250,001 – \$500,000	2	561	12.5	34.8	
Total	16	1,611	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	8	319	57.1	22.3	
\$100,001 – \$250,000	4	550	28.6	38.5	
\$250,001 – \$500,000	2	561	14.3	39.2	
Total	14	1,431	100.0	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 add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

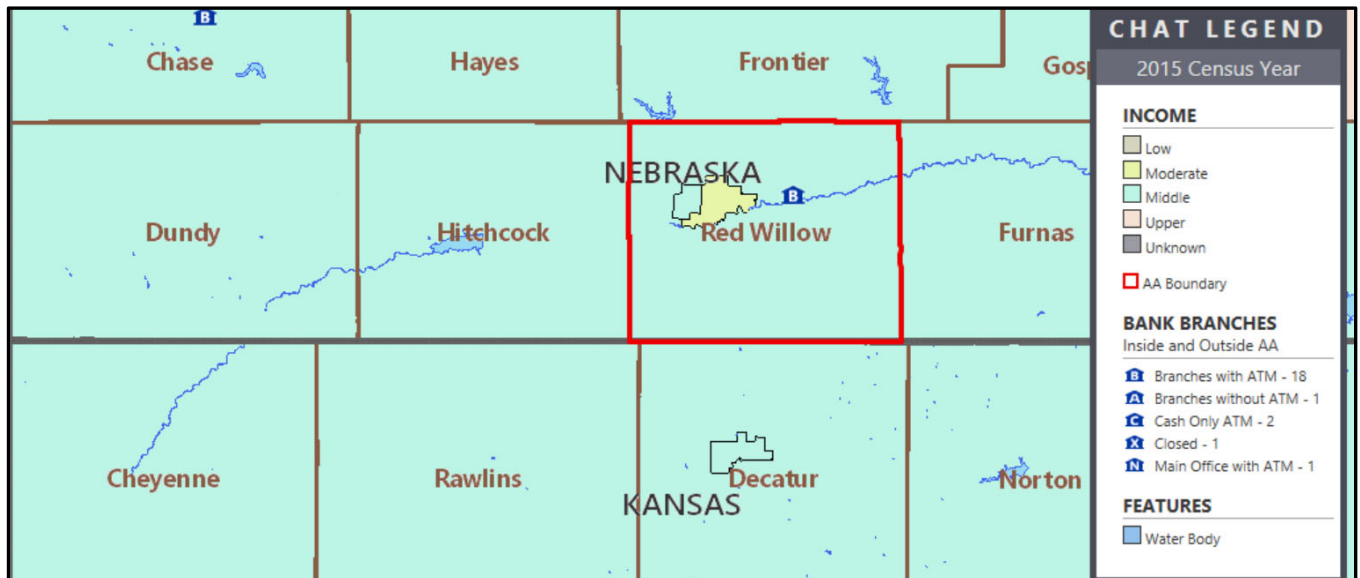
The bank’s performance under the CD test was considered Satisfactory for the state of Kansas. The bank’s CD performance demonstrated adequate responsiveness to AA needs. With very limited opportunities available in the AA, CD activity for the bank also was limited. The bank made four donations totaling \$6,025, with three of the four donations for revitalization and stabilization activities in the AA. One of the donations was made to an educational entity for the campus expansion project, which will help improve/maintain essential infrastructure for educational services.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

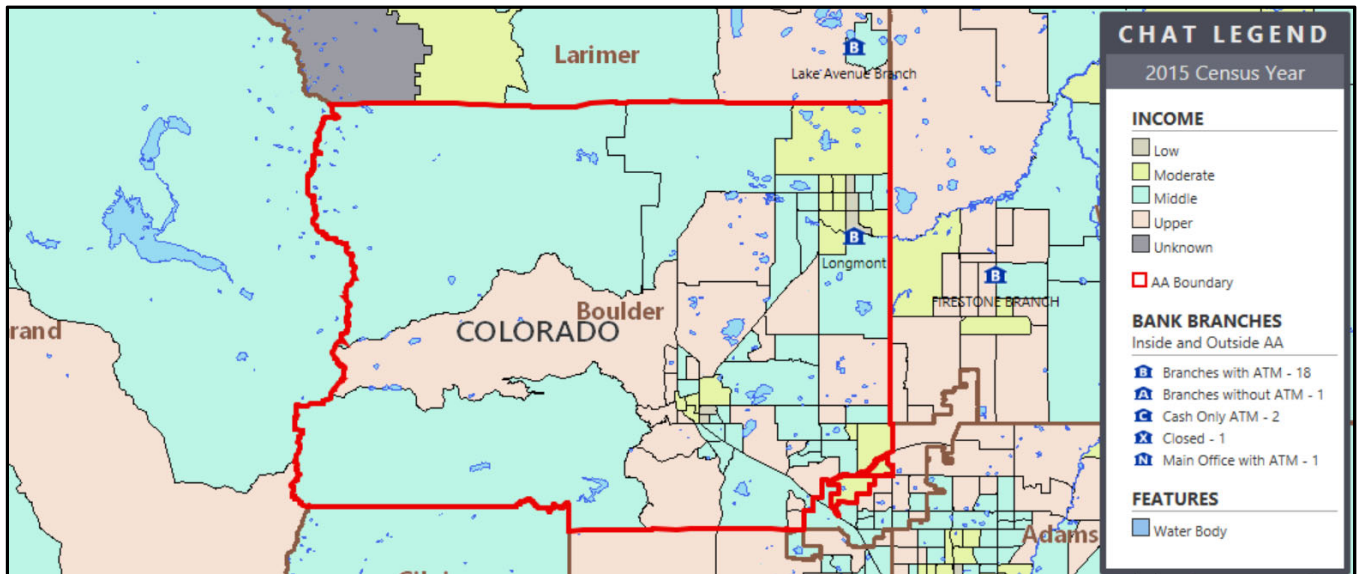
A. Western Nebraska AA



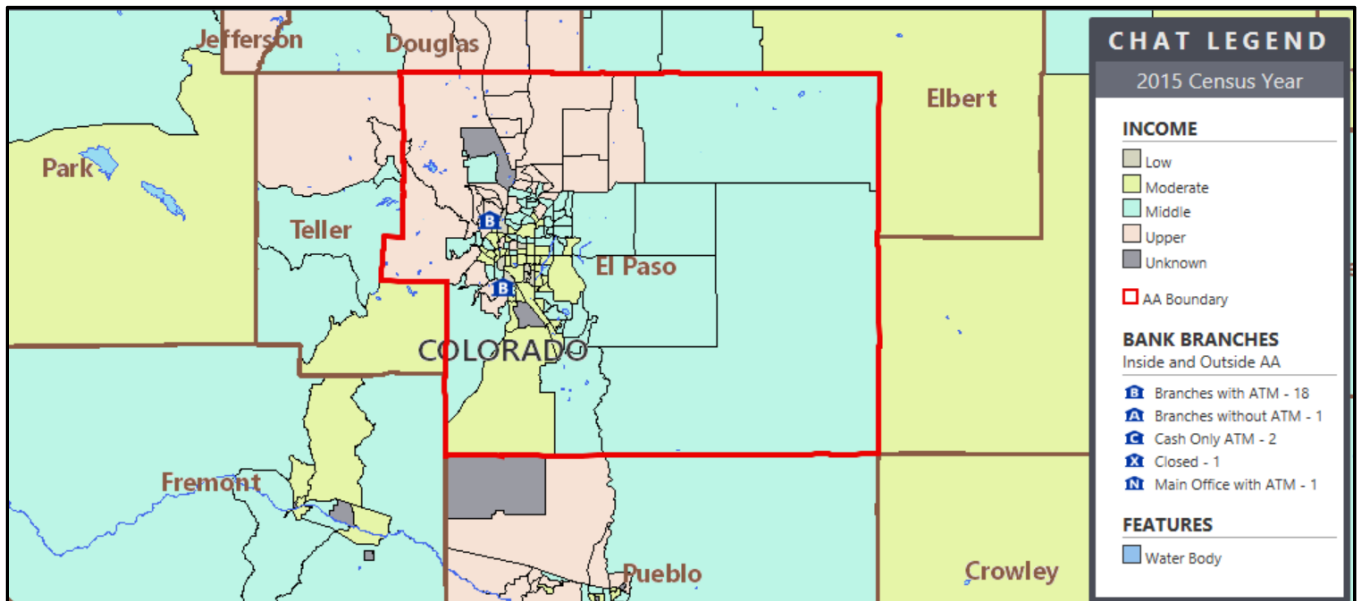
B. Red Willow County AA



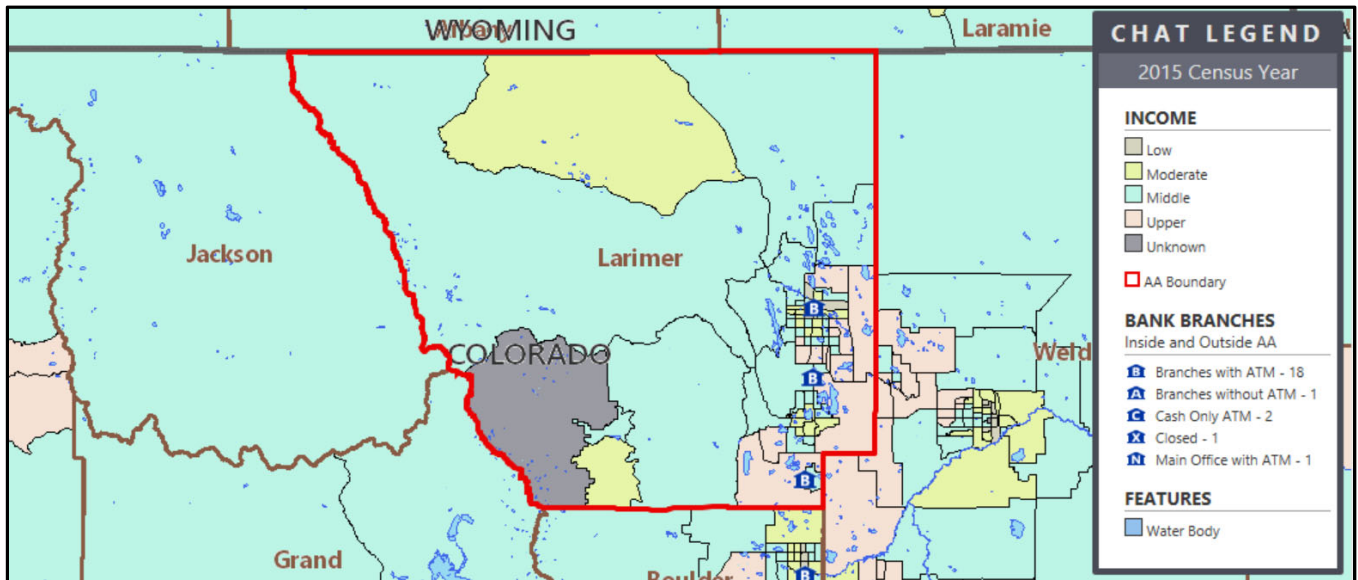
C. Boulder MSA AA



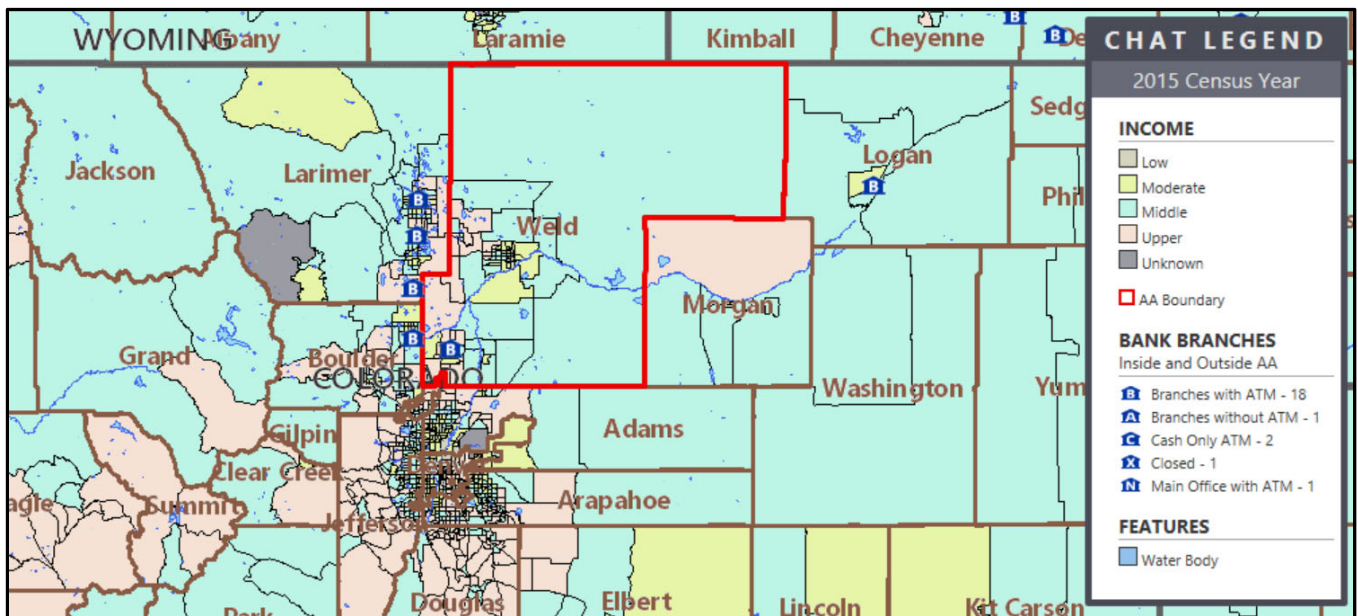
D. Colorado Springs Metropolitan AA



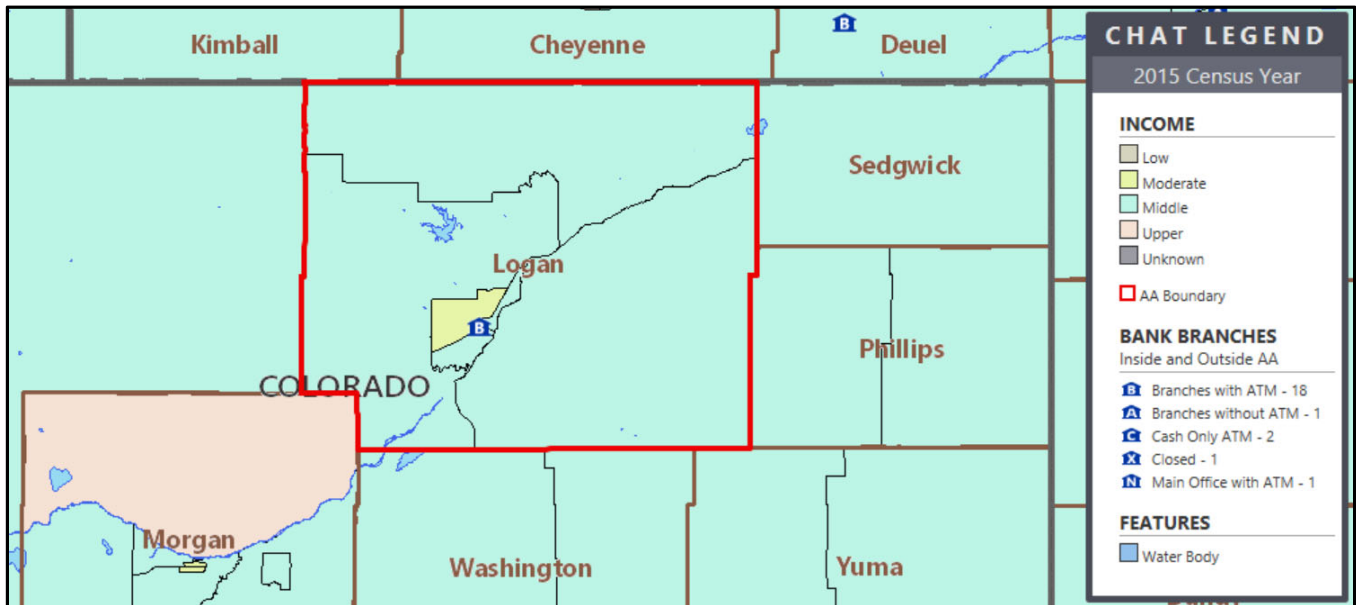
E. Fort Collins MSA AA



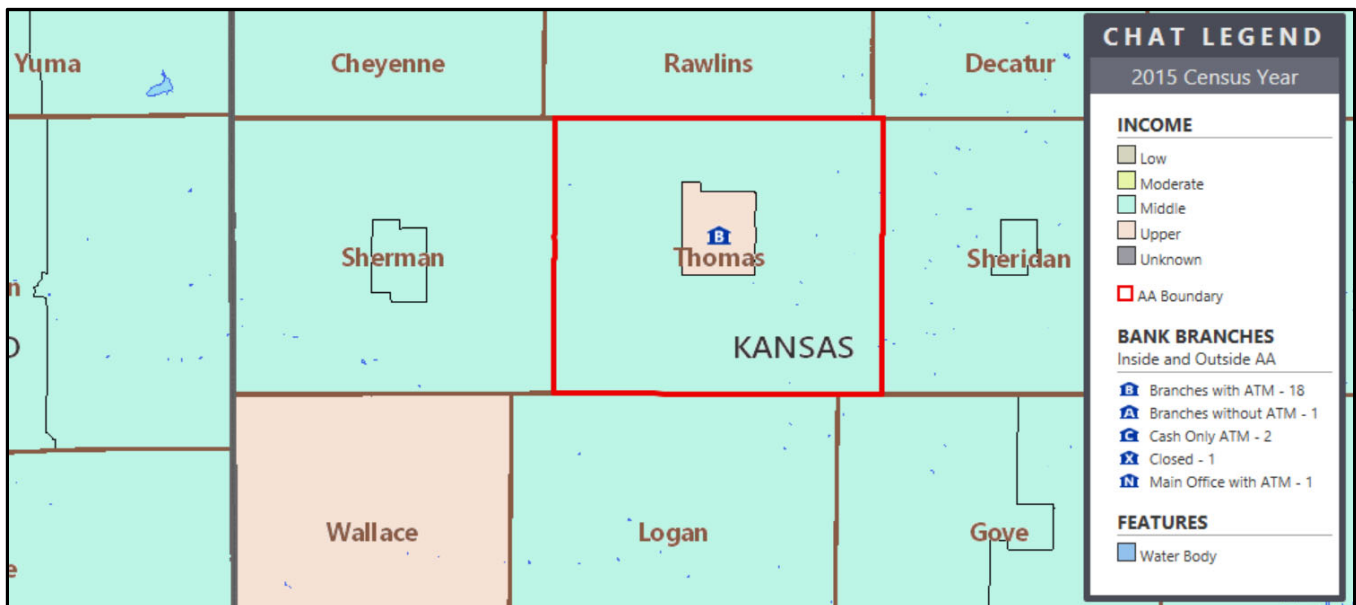
F. Greeley MSA AA



G. Logan County AA



H. Thomas County AA



**APPENDIX B
ADDITIONAL DEMOGRAPHIC AND ANALYSES TABLES**

- A. Western Nebraska AA (Full-Scope Review) – 2019 Demographic and Lending Tables
- B. Red Willow County AA (Limited-Scope Review) – 2018 and 2019 Lending Tables and 2019 Demographic Table
- C. Colorado Springs Metropolitan AA (Full-Scope Review) – 2019 Demographic and Lending Tables
- D. Fort Collins Metropolitan Statistical Area AA (Full-Scope Review) – 2019 Demographic and Lending Tables
- E. Boulder Metropolitan Statistical Area AA (Limited-Scope Review) – 2018 and 2019 Lending Tables and 2019 Demographic Table
- F. Greeley Metropolitan Statistical Area AA (Limited-Scope Review) – 2018 and 2019 Lending Tables and 2019 Demographic Table
- G. Logan County AA (Limited-Scope Review) – 2018 and 2019 Lending Tables and 2019 Demographic Table
- H. Thomas County AA (Full-Scope Review) – 2019 Demographic and Lending Tables

Footnotes for all Appendix Tables

- Demographic Tables:
 - Income Categories and Housing statistics based on 2018 FFIEC Census Data
 - Business and Farm data based on 2019 Dun & Bradstreet Data
- Analysis Tables:
 - 2018 and 2019 FFIEC Census Data
 - Business and Farm data based on 2019 Dun & Bradstreet Data
 - 2011 – 2015 U.S. Census Bureau: American Community Survey
- Note: Percentage may not add up to 100.0 due to rounding.

A. 2019 Full-Scope Review Western Nebraska Assessment Area

TABLE A-1 2019 WESTERN NEBRASKA 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	3,123	18.2
Moderate	3	17.6	2,888	16.8	475	16.4	2,962	17.3
Middle	12	70.6	11,923	69.5	876	7.3	3,818	22.3
Upper	2	11.8	2,343	13.7	160	6.8	7,251	42.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	17	100.0	17,154	100.0	1,511	8.8	17,154	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	5,318	2,739	14.8	51.5	1,970	37.0	609	11.5
Middle	22,042	13,030	70.4	59.1	5,852	26.5	3,160	14.3
Upper	3,902	2,728	14.7	69.9	755	19.3	419	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	31,262	18,497	100.0	59.2	8,577	27.4	4,188	13.4
	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	746	22.6	687	22.7	54	24.7	5	9.1
Middle	2,231	67.6	2,031	67.2	155	70.8	45	81.8
Upper	321	9.7	306	10.1	10	4.6	5	9.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,298	100.0	3,024	100.0	219	100.0	55	100.0
Percentage of Total Businesses:				91.7		6.6		1.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	13	1.8	13	1.8	0	0.0	0	0.0
Middle	616	84.4	600	84.2	15	93.8	1	100.0
Upper	101	13.8	100	14.0	1	6.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	730	100.0	713	100.0	16	100.0	1	100.0
Percentage of Total Farms:				97.7		2.2		0.1

TABLE A-2 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY WESTERN NEBRASKA AA					
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	47	3,745	17.9	12.5	14.8
Middle	203	24,246	77.5	80.7	70.4
Upper	12	2,036	4.6	6.8	14.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	24	1,798	16.0	9.9	14.8
Middle	119	15,105	79.3	83.4	70.4
Upper	7	1,215	4.7	6.7	14.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	13	1,270	17.3	14.0	14.8
Middle	58	7,379	77.3	81.6	70.4
Upper	4	396	5.3	4.4	14.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	6	5.3	1.0	14.8
Middle	18	586	94.7	99.0	70.4
Upper	0	0	0.0	0.0	14.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	9	671	50.0	29.5	32.4
Middle	8	1,176	44.4	51.8	62.7
Upper	1	425	5.6	18.7	4.9
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE A-3
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
WESTERN NEBRASKA AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Total Home Mortgage Loans					
Low	22	1,540	8.4	5.1	18.2
Moderate	55	4,712	21.0	15.7	17.3
Middle	61	6,598	23.3	22.0	22.3
Upper	93	13,130	35.5	43.7	42.3
Unknown	31	4,047	11.8	13.5	0.0
Home Purchase Loans					
Low	15	891	10.0	4.9	18.2
Moderate	35	3,166	23.3	17.5	17.3
Middle	38	4,872	25.3	26.9	22.3
Upper	53	8,122	35.3	44.8	42.3
Unknown	9	1,067	6.0	5.9	0.0
Home Refinance Loans					
Low	6	643	8.0	7.1	18.2
Moderate	18	1,517	24.0	16.8	17.3
Middle	17	1,615	22.7	17.9	22.3
Upper	30	4,562	40.0	50.4	42.3
Unknown	4	708	5.3	7.8	0.0
Home Improvement Loans					
Low	1	6	5.3	1.0	18.2
Moderate	2	29	10.5	4.9	17.3
Middle	6	111	31.6	18.8	22.3
Upper	10	446	52.6	75.3	42.3
Unknown	0	0	0.0	0.0	0.0
Multifamily Loans					
Low	0	0	0.0	0.0	18.2
Moderate	0	0	0.0	0.0	17.3
Middle	0	0	0.0	0.0	22.3
Upper	0	0	0.0	0.0	42.3
Unknown	18	1,782	100.0	100.0	0.0

B. 2018 and 2019 Limited-Scope Review Red Willow County Assessment Area

TABLE B-1 2019 RED WILLOW COUNTY 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	552	18.9
Moderate	1	33.3	790	27.1	107	13.5	659	22.6
Middle	2	66.7	2,126	72.9	117	5.5	702	24.1
Upper	0	0.0	0	0.0	0	0.0	1,003	34.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3	100.0	2,916	100.0	224	7.7	2,916	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	1,774	895	26.4	50.5	606	34.2	273	15.4
Middle	3,505	2,499	73.6	71.3	651	18.6	355	10.1
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	5,279	3,394	100.0	64.3	1,257	23.8	628	11.9
	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	248	41.5	224	41.1	21	47.7	3	33.3
Middle	350	58.5	321	58.9	23	52.3	6	66.7
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	598	100.0	545	100.0	44	100.0	9	100.0
Percentage of Total Businesses:				91.1		7.4		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	0.0
Moderate	10	10.6	10	10.9	0	0.0	0	0.0
Middle	84	89.4	82	89.1	2	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	94	100.0	92	100.0	2	100.0	0	0.0
Percentage of Total Farms:				97.9		2.1		0.0

TABLE B-2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY RED WILLOW COUNTY AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	27.4	24.1	26.4
Middle	9	722	100.0	100.0	72.6	75.9	73.6
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
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE B-3 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY RED WILLOW COUNTY AA					
Census Tract Income Level	Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	1	447	50.0	73.7	41.5
Middle	1	159	50.0	26.3	58.5
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Census Tract Income Level	Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	2	274	33.3	41.2	10.6
Middle	4	392	66.7	58.8	89.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

TABLE B-4 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL RED WILLOW COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	1	85	11.1	11.8	9.9	7.7	18.9
Moderate	4	242	44.4	33.5	17.9	15.2	22.6
Middle	2	140	22.2	19.4	19.3	19.8	24.1
Upper	2	255	22.2	35.3	25.0	33.0	34.5
Unknown	0	0	0.0	0.0	27.8	24.3	0.0

TABLE B-5 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS RED WILLOW COUNTY AA					
Business Revenue By Size	Small Business Loans				% of Businesses by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	1	159	50.0	26.2	91.1
Over \$1MM	1	447	50.0	73.8	7.4
Unknown	0	0	0.0	0.0	1.5
Farm Revenue By Size	Small Farm Loans				% of Farms by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	6	667	100.0	100.0	97.9
Over \$1MM	0	0	0.0	0.0	2.1
Unknown	0	0	0.0	0.0	0.0

**TABLE B-6
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
RED WILLOW COUNTY AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	26.4
Middle	3	166	100.0	100.0	73.6
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE B-7
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
RED WILLOW COUNTY AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	1	24	33.3	14.5	18.9
Moderate	1	48	33.3	28.9	22.6
Middle	0	0	0.0	0.0	24.1
Upper	1	94	33.3	56.6	34.4
Unknown	0	0	0.0	0.0	0.0

C. 2019 Full-Scope Review Colorado Springs Metropolitan Assessment Area

TABLE C-1 2019 COLORADO SPRINGS METROPOLITAN AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.4	6,804	4.0	2,104	30.9	34,246	20.4
Moderate	40	30.8	41,729	24.8	6,105	14.6	31,046	18.5
Middle	50	38.5	68,668	40.8	3,967	5.8	34,169	20.3
Upper	31	23.8	50,821	30.2	1,920	3.8	68,642	40.8
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	130	100.0	168,103	100.0	14,131	8.4	168,103	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	3.3	36.9	7,439	54.0	1,246	9.1
Moderate	75,510	31,691	20.7	42.0	38,149	50.5	5,670	7.5
Middle	102,488	64,739	42.2	63.2	32,228	31.4	5,521	5.4
Upper	69,902	51,845	33.8	74.2	14,036	20.1	4,021	5.8
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	261,745	153,354	100.0	58.6	91,933	35.1	16,458	6.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,742	7.7	2,432	7.3	295	16.2	15	6.3
Moderate	8,508	24.0	7,928	23.7	534	29.3	46	19.2
Middle	11,770	33.2	11,278	33.7	416	22.9	76	31.8
Upper	12,408	35.0	11,738	35.1	568	31.2	102	42.7
Unknown	55	0.2	48	0.1	7	0.4	0	0.0
Total AA	35,483	100.0	33,424	100.0	1,820	100.0	239	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	4.9	22	5.0	0	0.0	0	0.0
Moderate	73	16.3	72	16.3	1	16.7	0	0.0
Middle	203	45.3	200	45.2	3	50.0	0	0.0
Upper	150	33.5	148	33.5	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	448	100.0	442	100.0	6	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0

**TABLE C-2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS METROPOLITAN AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	2	576	5.9	3.8	3.3
Moderate	9	1,889	26.5	12.6	20.7
Middle	14	8,869	41.2	59.3	42.2
Upper	9	3,629	26.5	24.3	33.8
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE C-3
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
COLORADO SPRINGS METROPOLITAN AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	3	596	8.8	4.0	20.4
Moderate	5	893	14.7	6.0	18.5
Middle	3	778	8.8	5.2	20.3
Upper	14	5,996	41.2	40.1	40.8
Unknown	9	6,700	26.5	44.8	0.0
Not Reported	0	0	0.0	0.0	0.0

D. 2019 Full-Scope Review Fort Collins Metropolitan Statistical Area Assessment Area

TABLE D-1 2019 FORT COLLINS MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	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

**TABLE D-2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
FORT COLLINS MSA AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	3	998	7.3	7.0	1.5
Moderate	10	3,182	24.4	22.4	20.5
Middle	16	5,253	39.0	36.9	52.7
Upper	12	4,799	29.3	33.7	25.2
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE D-3
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
FORT COLLINS MSA AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	3	346	7.3	2.4	20.5
Moderate	5	1,134	12.2	8.0	17.2
Middle	4	1,435	9.8	10.1	22.6
Upper	21	7,568	51.2	53.2	39.6
Unknown	8	3,749	19.5	26.3	0.0
Not Reported	0	0	0.0	0.0	0.0

E. 2018 and 2019 Limited-Scope Review Boulder Metropolitan Statistical Area Assessment Area

TABLE E-1 2019 BOULDER MSA 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		Businesses by Tract & Revenue Size					
			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	

TABLE E-2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY BOULDER MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	4.0	17.5	3.0
Moderate	1	245	16.7	15.8	19.0	13.3	18.0
Middle	4	936	66.7	60.3	45.9	36.5	45.6
Upper	1	370	16.7	23.9	31.0	32.7	33.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE E-3 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY BOULDER MSA AA					
Census Tract Income Level	Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	4	970	40.0	28.5	4.1
Moderate	3	1,040	30.0	30.6	30.4
Middle	0	0	0.0	0.0	37.5
Upper	3	1,393	30.0	40.9	28.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Census Tract Income Level	Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	3.2
Moderate	0	0	0.0	0.0	19.2
Middle	0	0	0.0	0.0	42.6
Upper	0	0	0.0	0.0	35.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

TABLE E-4 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL BOULDER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	1	150	16.7	9.7	8.3	3.4	22.3
Moderate	1	451	16.7	29.1	16.9	9.4	17.0
Middle	1	100	16.7	6.4	21.2	14.3	19.9
Upper	3	850	50.0	54.8	41.2	42.2	40.8
Unknown	0	0	0.0	0.0	12.3	30.6	0.0

TABLE E-5 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS BOULDER MSA AA					
Business Revenue By Size	Small Business Loans				% of Businesses by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	8	2,888	80.0	84.9	92.9
Over \$1MM	2	514	20.0	15.1	6.3
Unknown	0	0	0.0	0.0	0.8
Farm Revenue By Size	Small Farm Loans				% of Farms by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	0	0	0.0	0.0	98.5
Over \$1MM	0	0	0.0	0.0	1.2
Unknown	0	0	0.0	0.0	0.2

**TABLE E-6
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
BOULDER MSA AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	2	502	40.0	23.8	3.0
Moderate	2	1,229	40.0	58.4	18.0
Middle	1	374	20.0	17.8	45.6
Upper	0	0	0.0	0.0	33.3
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE E-7
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
BOULDER MSA AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	22.3
Moderate	1	219	20.0	10.4	17.0
Middle	2	502	40.0	23.8	19.9
Upper	2	1,384	40.0	65.7	40.8
Unknown	0	0	0.0	0.0	0.0

F. 2018 and 2019 Limited-Scope Review Greeley Metropolitan Statistical Area Assessment Area

TABLE F-1 2019 GREELEY MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	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		Businesses by Tract & Revenue Size					
			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	

TABLE F-2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY GREELEY MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	2.8	2.8	3.5
Moderate	2	485	11.8	9.7	17.3	14.0	19.9
Middle	9	2,971	52.9	59.4	38.5	36.3	40.5
Upper	6	1,547	35.3	30.9	41.4	46.9	36.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE F-3 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY GREELEY MSA AA					
Census Tract Income Level	Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	6.7
Moderate	0	0	0.0	0.0	16.3
Middle	1	295	10.0	7.9	37.9
Upper	9	3,446	90.0	92.1	39.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Census Tract Income Level	Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	2.2
Moderate	0	0	0.0	0.0	10.2
Middle	2	225	50.0	39.1	64.3
Upper	2	350	50.0	60.9	23.3
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

TABLE F-4 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL GREELEY MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	1	194	5.9	3.9	6.1	3.5	20.6
Moderate	1	274	5.9	5.5	18.8	15.2	18.4
Middle	6	2,329	35.3	46.6	28.2	26.9	21.0
Upper	8	1,756	47.1	35.1	30.6	35.1	39.9
Unknown	1	450	5.9	9.0	16.4	19.3	0.0

TABLE F-5 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS GREELEY MSA AA					
Business Revenue By Size	Small Business Loans				% of Businesses by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	7	2,690	70.0	71.9	92.8
Over \$1MM	3	1,050	30.0	28.1	6.3
Unknown	0	0	0.0	0.0	0.9
Farm Revenue By Size	Small Farm Loans				% of Farms by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	2	350	50.0	60.9	93.9
Over \$1MM	2	225	50.0	39.1	6.1
Unknown	0	0	0.0	0.0	0.0

**TABLE F-6
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
GREELEY MSA AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	3.5
Moderate	1	78	8.3	2.3	19.9
Middle	6	1,669	50.0	50.2	40.5
Upper	5	1,579	41.7	47.5	36.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE F-7
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
GREELEY MSA AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	20.6
Moderate	0	0	0.0	0.0	18.4
Middle	6	932	50.0	28.0	21.0
Upper	6	2,394	50.0	72.0	39.9
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

G. 2018 and 2019 Limited-Scope Review Logan County Assessment Area

TABLE G-1 2019 LOGAN COUNTY 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	1,173	23.2
Moderate	1	16.7	1,829	36.2	332	18.2	1,024	20.2
Middle	5	83.3	3,228	63.8	264	8.2	1,082	21.4
Upper	0	0.0	0	0.0	0	0.0	1,778	35.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	5,057	100.0	596	11.8	5,057	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	3,228	1,825	34.6	56.5	1,062	32.9	341	10.6
Middle	5,721	3,446	65.4	60.2	1,633	28.5	642	11.2
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	8,949	5,271	100.0	58.9	2,695	30.1	983	11.0
	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	315	33.2	293	33.9	19	27.9	3	16.7
Middle	635	66.8	571	66.1	49	72.1	15	83.3
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	950	100.0	864	100.0	68	100.0	18	100.0
Percentage of Total Businesses:				90.9		7.2		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	0.0
Moderate	14	7.5	13	7.2	1	16.7	0	0.0
Middle	172	92.5	167	92.8	5	83.3	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	186	100.0	180	100.0	6	100.0	0	0.0
Percentage of Total Farms:				96.8		3.2		0.0

TABLE G-2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY LOGAN COUNTY AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	486	27.3	35.7	36.7	40.4	34.6
Middle	8	874	72.7	64.3	63.3	59.6	65.4
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
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE G-3 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY LOGAN COUNTY AA					
Census Tract Income Level	Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	1	100	16.7	22.9	33.2
Middle	5	336	83.3	77.1	66.8
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0
Census Tract Income Level	Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	1	17	5.9	0.7	7.5
Middle	16	2,267	94.1	99.3	92.5
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

TABLE G-4 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL LOGAN COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	11.1	7.1	23.2
Moderate	1	57	9.1	4.2	19.7	16.8	20.2
Middle	3	361	27.3	26.5	23.9	25.1	21.4
Upper	3	613	27.3	45.1	29.6	34.7	35.2
Unknown	4	329	36.4	24.2	15.7	16.3	0.0

TABLE G-5 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS LOGAN COUNTY AA					
Business Revenue By Size	Small Business Loans				% of Businesses by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	5	286	83.3	65.6	90.9
Over \$1MM	1	150	16.7	34.4	7.2
Unknown	0	0	0.0	0.0	1.9
Farm Revenue By Size	Small Farm Loans				% of Farms by Revenue
	#	\$(000)	#%	\$%	
\$1MM or less	14	1,955	82.4	85.6	96.8
Over \$1MM	3	330	17.6	14.4	3.2
Unknown	0	0	0.0	0.0	0.0

**TABLE G-6
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
LOGAN COUNTY AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	2	108	28.6	14.2	34.6
Middle	5	653	71.4	85.8	65.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE G-7
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
LOGAN COUNTY AA**

Borrower Income Level	Bank Loans				Families by Family Income
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	23.2
Moderate	0	0	0.0	0.0	20.2
Middle	2	92	28.6	12.1	21.4
Upper	3	453	42.9	59.5	35.2
Unknown	2	216	28.6	28.4	0.0
Not Reported	0	0	0.0	0.0	0.0

H. 2019 Full-Scope Review Thomas County Assessment Area

TABLE H-1 2019 THOMAS COUNTY 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	293	14.4
Moderate	0	0.0	0	0.0	0	0.0	270	13.3
Middle	1	50.0	526	25.9	28	5.3	513	25.2
Upper	1	50.0	1,506	74.1	44	2.9	956	47.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	2,032	100.0	72	3.5	2,032	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	842	570	25.8	67.7	172	20.4	100	11.9
Upper	2,697	1,641	74.2	60.8	791	29.3	265	9.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,539	2,211	100.0	62.5	963	27.2	365	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	88	17.9	82	18.2	4	12.9	2	22.2
Upper	403	82.1	369	81.8	27	87.1	7	77.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	491	100.0	451	100.0	31	100.0	9	100.0
Percentage of Total Businesses:			91.9		6.3		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	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	93	60.8	90	60.0	3	100.0	0	0.0
Upper	60	39.2	60	40.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	153	100.0	150	100.0	3	100.0	0	0.0
Percentage of Total Farms:			98.0		2.0		0.0	

**TABLE H-2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
THOMAS COUNTY AA**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	3	215	20.0	12.5	25.8
Upper	12	1,502	80.0	87.5	74.2
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

**TABLE H-3
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
THOMAS COUNTY AA**

Borrower Income Level	Bank Loans				Families by Family Income %
	#	\$(000)	#%	\$%	
Low	1	60	6.7	3.5	14.4
Moderate	1	79	6.7	4.6	13.3
Middle	7	775	46.7	45.1	25.2
Upper	6	803	40.0	46.8	47.0
Unknown	0	0	0.0	0.0	0.0

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

Full-scope review: Performance under the Lending, Investment, and Service Tests 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 under the Lending, Investment, and Service Tests 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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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