PUBLIC DISCLOSURE

AUGUST 24, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

ANB BANK
RSSD# 828651

3033 EAST FIRST AVENUE
DENVER, COLORADO 80206

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: **OUTSTANDING**

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

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

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

SUMMARY OF THE MAJOR FACTORS SUPPORTING THE RATING

Lending Test

- Lending levels reflect excellent responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank's loans are originated within its delineated AAs.
- The bank's distribution of loans by income level of geography (geographic distribution) is good.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes. (borrower distribution) is good.
- The bank makes a relatively high level of community development (CD) loans.

Investment Test

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

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.

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

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* were utilized to evaluate the bank's Community Reinvestment Act (CRA) performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's Denver Metropolitan Statistical Area (MSA) AA, Colorado Springs MSA AA, Mountain Colorado AA in Colorado; Northern Wyoming AA, and Albany County AA in Wyoming; and Kansas City Metropolitan AA using a full-scope review. The Boulder MSA AA, Grand Junction MSA AA, Fort Collins MSA AA, San Miguel County AA in Colorado; Casper MSA AA and Cheyenne MSA AA in Wyoming were assessed using a limited-scope review. The following data was reviewed:

- The bank's home purchase, home refinance, home improvement, multifamily, and other purpose closed/exempt loans reported on the bank's 2017, 2018, and 2019 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2017, 2018, and 2019 CRA LARs;
- CD loans originated from January 1, 2017 to December 31, 2019;
- Qualified investments that were made from January 1, 2017 to December 31, 2019, qualified investments made prior to but still outstanding during this period, and qualifying grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2017 to December 31, 2019.

When determining the overall institutional rating, more weight was placed on the Colorado state rating, followed by the Wyoming state rating. With the lending analysis, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending. More consideration was also given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served. Additional emphasis was placed on the bank's performance in comparison to aggregate lending data, as it is considered representative of credit demand. Due to lack of volume, home mortgage lending was evaluated collectively in all AAs except for the Denver MSA AA and Mountain Colorado AA. In these AAs, home purchase and home refinance loans were each evaluated independently, while home improvement, multifamily, and other purpose closed/exempt loans were not evaluated due to a lack of volume, making an analysis not meaningful. Additionally, due to a lack of volume in most of the bank's markets, small farm lending was only evaluated in the Northern Wyoming AA.

Table 1 illustrates the bank's presence in each AA by numbers of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2019 deposit market share, as a percent of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

TABLE 1
REVIEW TYPE AND MARKET SHARE BY AA

Assessment Area	Review Type	Br. #	Percent of Bank's Lending by $[1]		Percent of Bank's Deposits by $[1]		Deposit Market Share	
			Bank	State	Bank	State	% Market Share[2]	Market Share Rank[3]
State of Colorado		23	81.1	100.0	68.1	100.0		
Denver MSA	Full	3	23.6	29.1	24.3	35.8	0.6	19 of 66
Colorado Springs MSA	Full	5	10.2	12.5	16.5	24.2	4.1	5 of 38
Mountain Colorado	Full	7	26.8	33.0	12.3	18.1	5.3	5 of 13
Grand Junction MSA	Limited	4	4.0	5.0	10.7	15.7	7.9	6 of 13
Boulder MSA	Limited	1	4.4	5.5	2.1	3.1	0.4	19 of 31
Fort Collins MSA	Limited	2	9.9	12.2	2.2	3.1	0.4	20 of 25
San Miguel County	Limited	1	2.1	2.6	1.3	2.0	8.2	5 of 5
State of Wyoming		7	13.4	100.0	23.5	100.0		
Northern Wyoming	Full	3	3.2	24.0	4.7	19.8	2.4	12 of 16
Albany County	Full	1	3.5	26.0	6.9	29.2	21.8	2 of 7
Cheyenne MSA	Limited	2	4.9	36.9	10.0	42.6	14.2	2 of 18
Casper MSA	Limited	1	1.8	1.8	2.0	8.4	2.1	8 of 8
State of Kansas		2	5.5	100.0	8.4	100.0		
Kansas City Metropolitan	Full	2	5.5	100.0	8.4	100.0	0.3	34 of 91

1 Based on the bank's outstanding loan balances as of June 30, 2020.
2 Based on the June 30, 2019 FDIC's Market Share Report.
3. Based on the bank's ranking among FDIC-insured financial institutions in each AA.

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Sturm Financial Group, Inc., Denver, Colorado.
- The bank has total assets of $2.6 billion as of December 31, 2019.
- The bank operates 32 locations throughout its four-state geographic footprint that includes 23 branches in Colorado, 7 locations in Wyoming, and 2 locations in

Kansas/Missouri.

- The bank's primary business focus is commercial lending, which makes up over half of the bank's loan portfolio.
- There has been no merger or acquisition activity since the prior evaluation.

TABLE 2
COMPOSITION OF LOAN PORTFOLIO AS OF DECEMBER 31, 2019

Loan Type	$(000)	%
Commercial	859,577	53.8
Residential Real Estate	471,129	29.5
Other	158,821	9.9
Agricultural	99,800	6.3
Consumer	7,726	0.5
Gross Loans	**1,597,053**	**100.0**

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

The bank was rated Satisfactory under the CRA at its June 19, 2017 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

While conclusions with respect to lending performance were evaluated for all three years, only 2018 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank's 2017 and 2019 lending data for AAs that received full-scope reviews can be found in Appendix D of this report. Lending data for AAs that received limited-scope reviews can be found in Appendix E. The performance evaluation first discusses the bank's overall performance, followed by an in-depth analysis of the bank's record of lending, investment, and service activities in each state and specific AAs.

LENDING TEST

The bank's overall performance under the lending test is rated High Satisfactory. The lending test performance for Colorado, Wyoming and Kansas are each rated High Satisfactory, as well.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect excellent responsiveness to AA credit needs. Table 3 summarizes the bank's lending activity. The bank's overall loan origination volume has increased since the previous evaluation, driven largely by the addition of loan products designed to serve the needs of LMI individuals and small businesses, as discussed in the following section. While

HMDA data cannot be directly compared to lending volumes at the prior evaluation due to data submission changes, the origination volume of home mortgage loans has increased significantly. Additionally, small business loans have increased 153.6 percent and small farm loans have increased 68.6 percent since the prior evaluation. By dollar volume, small business lending has increased by 13.7 percent, and small farm lending has increased by 106.0 percent. Of note, these trends indicate the bank is providing a higher percentage of small dollar loans to businesses.

TABLE 3
SUMMARY OF LENDING ACTIVITY REVIEWED

Loan Type	#	$(000)	#%	$%
2017 HMDA Loans				
Home Purchase	176	59,370	4.4	7.6
Home Refinance	149	30,856	3.7	4.0
Home Improvement	42	11,838	1.0	1.5
Multifamily	11	9,843	0.3	1.3
2017 Total HMDA Loans	**378**	**111,907**	**9.4**	**14.3**
2018-2019 HMDA Loans				
Home Purchase	414	131,639	10.3	16.9
Home Refinance	338	90,880	8.4	11.6
Home Improvement	61	5,783	1.5	0.7
Multifamily	57	163,047	1.4	20.9
Other Purpose Closed-End	76	7,370	1.9	0.9
Loan Purpose Not Applicable	7	673	0.2	0.1
2018-2019 Total HMDA Loans	**953**	**399,392**	**23.6**	**51.2**
Small Business Loans*	**2,525**	**245,569**	**62.6**	**31.5**
Small Farm Loans*	**176**	**23,418**	**4.4**	**3.0**
TOTAL LOANS	**4,032**	**780,286**	**100.0**	**100.0**

Note: Percentages may not add to 100.0 percent due to rounding.
** Includes all originations from January 1, 2017 through December 31, 2019.*

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers, and these loan programs are offered across all the bank's markets. The bank offers a small dollar mortgage loan program with no minimum loan amount and a reduced origination fee of $100 for loan amounts less than $500,000. These products typically have limited availability to LMI borrowers through lenders on the secondary market. The bank also offers a mobile home lending product particularly desirable to borrowers located in rural communities, which are a credit need in many of the banks AAs not commonly served by other financial institutions. Additionally, the bank continues to offer Small Business Administration (SBA) 504 and 7(a) loan programs.

Since the prior evaluation, the bank also developed multiple new credit products in response to LMI consumer and small business credit needs within its AAs. The Home Advantage Mortgage product combines any first mortgage product with a shorter term, fully amortizing second mortgage at up to 90 percent loan-to-value. This allows a reduced down payment without the requirement for mortgage insurance, allowing the borrower to build equity faster with a similar payment to a traditional mortgage. The bank charges no fees and pays for the borrower's appraisal. The bank also introduced a Small Business Line of Credit that provides small dollar, recurring loans, a common need of small businesses. The product was also designed with streamlined underwriting requirements to ease the burden of the application process. Additionally, in 2019, a $15 million (MM) pool of 30-year fixed rate funds was approved for use with government and nonprofit programs designed to assist LMI individuals. The initial opportunity identified was in the San Miguel AA, providing LMI borrowers loans to purchase deed restricted properties in this extremely high cost area (Telluride, Colorado). These borrowers fall outside the strict requirements of most secondary market programs and this program satisfies a critical credit need not served by other financial institutions.

Additionally, a national emergency (the COVID-19 pandemic) was declared during the evaluation process. During this national emergency, the regulatory agencies called upon financial institutions to provide flexibility to their customers and borrowers in an effort to help prevent a national and international recession. The bank actively participated in this effort by waiving fees, providing loan accommodations, and participating in the SBA's Paycheck Protection Program loan program. These significant efforts will be included in the bank's next performance evaluation more specifically; however, given the significance of the financial burden related to the health emergency on consumers, small businesses, and small farms, the bank's response measures warrant special mention in this evaluation.

Assessment Area Concentration

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

Total small farm loan origination volume was significantly lower than the other evaluated products; therefore, lending performance under this criteria carried little weight in the overall rating. Additionally, while the percent of small farm loans located within the AA is lower than other products, this lending pattern is in line with industry trends, as borrowers and/or properties tend to be located further from branch locations situated within population centers.

TABLE 4
LENDING INSIDE AND OUTSIDE THE AAs

Loan Type	Inside				Outside			
	#	$(000)	#%	$%	#	$(000)	#%	$%
2017 HMDA Loans								
Home Purchase	158	55,225	89.8	93.0	18	4,145	10.2	7.0
Home Refinance	147	30,573	98.7	99.1	2	283	1.3	0.9
Home Improvement	41	9,838	97.6	83.1	1	2,000	2.4	16.9
Multifamily	9	7,544	81.8	76.6	2	2,299	18.2	23.4
2017 Total HMDA Loans	**355**	**103,180**	**93.9**	**92.2**	**23**	**8,727**	**6.1**	**7.8**
2018-2019 HMDA Loans								
Home Purchase	383	121,395	92.5	92.2	31	10,244	7.5	7.8
Home Refinance	301	80,937	89.1	89.1	37	9,943	10.9	10.9
Home Improvement	61	5,783	100.0	100.0	0	0	0.0	0.0
Multifamily	57	163,047	100.0	100.0	0	0	0.0	0.0
Other Purpose Closed-End	72	7,222	94.7	98.0	4	148	5.3	2.0
Loan Purpose Not Applicable	7	673	100.0	100.0	0	0	0.0	0.0
2018-2019 Total HMDA Loans	**881**	**379,057**	**92.4**	**94.9**	**72**	**20,335**	**7.6**	**5.1**
Small Business Loans*	**2,458**	**237,511**	**97.3**	**96.7**	**67**	**8,058**	**2.7**	**3.3**
Small Farm Loans*	**116**	**13,319**	**65.9**	**56.9**	**60**	**10,099**	**34.1**	**43.1**
Total Loans	**3,810**	**733,067**	**94.5**	**93.9**	**222**	**47,219**	**5.5**	**6.1**

Note: Percentages may not add to 100.0 percent due to rounding.
**Includes all originations from January 1, 2017 through December 31, 2019.*

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

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts. The bank's overall geographic distribution of lending reflects good penetration throughout the AAs. The state ratings for Colorado and Kansas are consistent with the overall rating, while performance in Wyoming is rated adequate.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different sizes. The bank's lending has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. All state and most AA ratings for this criterion are consistent with the overall rating.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank is a leader in making CD loans. The bank is a leader in making CD loans in Colorado and Kansas, and makes a relatively high level of CD loans in Wyoming. The bank originated 62 CD loans totaling

$199.2MM. Given the significant volume of CD lending with respect to the bank's lending, deposits, and branching presence in each AA, the performance resulted in a positive impact to the overall lending test rating. Examples of how the bank was responsive to the needs of the AAs include:

- Forty-one CD loans totaling approximately $138.4MM supported affordable housing initiatives, which is considered a critical need in many of the bank's AAs.
- Affordable housing loans are often complex and require a high level of industry knowledge and strong partnerships with nonprofit and government entities.
- Of the total 62 CD loans the bank originated, nearly all were new loans, with only 5 renewals of existing loans/lines of credit. This demonstrates the bank's initiative to create new opportunities for impact within its AAs.
- Within Colorado, the Fort Collins MSA AA had the highest volume of CD loans, while in Wyoming, the highest volume was in the Albany County AA.

TABLE 5
COMMUNITY DEVELOPMENT LOANS
ALL AAs

Community Development Purpose	#	$(000's)
Affordable Housing	41	138,348
Community Services	7	8,537
Economic Development	7	13,858
Revitalization and Stabilization	7	38,470
TOTAL LOANS	**62**	**199,215**

(NOTE: Total percentages may vary due to automated rounding differences.)

INVESTMENT TEST

The bank's overall performance under the investment test is rated Outstanding. The Colorado, Wyoming and Kansas state ratings are each considered Outstanding as well.

This performance criterion evaluates the bank's level of qualifying grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of CD. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AAs. The bank made 41 CD investments for $64.4MM during the evaluation period. Summary details describing the bank's performance include:

- Current investments in 24 mortgage-backed securities (MBS) for $51.3MM specifically supporting mortgages for LMI individuals and families within the banks AAs.
- Many of the MBS purchased by the bank include pools of loans distributed throughout the bank's AAs in Colorado, Wyoming, and Kansas. These were included in either the institutional or state level, but were applied to the individual AA when determining

performance conclusions.

- A significant number of the bank's investments consisted of bonds to provide funding to school districts with a majority of their students qualifying for the national free or reduced lunch program.
- MBS and school district bonds, while not particularly complex investments, reflect a responsiveness to area needs and are in line with the size and complexity of the bank.
- Additionally, the bank maintained ten prior period investments located outside the banks AAs, totaling $2.0MM.

Additionally, the bank made 354 CD donations for over $592,000 during the evaluation period.

- The bank continued its historically high level of qualified donations.
- In areas where investment opportunities are limited, such as in many areas of Wyoming, the bank utilizes donations to supplement its CRA efforts.

TABLE 6
INVESTMENTS, GRANTS, AND DONATIONS
ALL AAs

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	34	40,794	24	51,293	50	110	108	92,197
Community Services	25	22,787	16	10,226	279	413	320	33,426
Economic Development	0	0	0	0	17	39	17	39
Revitalization and Stabilization	2	504	1	2,845	8	30	11	3,379
TOTAL	**61**	**64,085**	**41**	**64,364**	**354**	**592**	**456**	**129,041**

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*
(NOTE: Total percentages may vary due to automated rounding differences.)

SERVICE TEST

The bank's overall performance under the service test is rated Outstanding. The Colorado, Wyoming and Kansas state ratings are Outstanding, High Satisfactory, and Low Satisfactory, respectively.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geography classification.

Branch locations and alternative delivery systems, such as limited-service automated teller machines (ATMs) and drive-through facilities, are accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank also provides 24/7 telephone access, internet banking services, and mobile banking, including Remote Deposit Capture.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior examination, the bank has closed two mobile branches that serviced senior living facilities. Additionally, the bank has opened two branches, one in an upper-income census tract and one in a moderate-income census tract, and relocated three branches to within a few blocks of their original location. These minor changes have not adversely affected the accessibility of bank products and services, as the remaining branches and alternative delivery systems can satisfactorily service customer needs.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours at all branches are from 9:00 am to 5:00 pm, Monday through Friday, and four locations offer lobby hours on Saturday from 9:00 am to noon. Of the bank's 24 branches offering drive-through services, weekday hours are from 8:30 am to 5:30 pm, Monday through Friday, and 11 locations offer drive-through hours on Saturday from 9:00 am to noon. All locations except the downtown Denver Branch have on-site limited-service ATMs; however, the bank offers access to the MoneyPass ATM network with no surcharge, significantly increasing ATM access across its AAs.

TABLE 7
RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES
ALL AAs

Branch Accessibility	**Location of Branches by Tract (%)**						**Percent of Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	3.2	19.4	41.9	35.5	0.0	100.0	9.8	23.2	35.6	29.3	2.1	100.0
Changes in Branch Location	**Number of Branches (#)**						**Net Change in Branch Locations (#)**					
	Total Branches		**Openings (#)**		**Closings (#)**		**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	32		2		2		0	1	0	(1)	0	0
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	69		291		31		5		396		124	

[1] Based on 2019 FFIEC census tract definitions.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank is a leader in providing CD services. The bank officers and staff provided 396 qualified services to 124 different organizations, donating 7,010 hours of their time. Services provided included serving on boards or committees and providing technical assistance on financial matters, such as budgeting, financial planning, and credit review, and providing financial education and literacy training and support for marketing and fundraising efforts of these organizations.

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 COLORADO

CRA RATING FOR COLORADO:	**Outstanding**
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

Major factors supporting the rating include:

Lending Test

- Lending levels reflect excellent responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography (geographic distribution) is good.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes (borrower distribution) is good.
- The bank is a leader in making CD loans within its AAs.

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

Full-scope reviews were conducted for the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA. The overall state rating was based predominantly on the bank's performance in the three aforementioned AAs, with slightly more weight given to performance in the Denver MSA AA, followed by the Mountain Colorado AA.

Limited-scope reviews were conducted for the Boulder MSA AA, Grand Junction MSA AA, Fort Collins MSA AA, and San Miguel County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates 7 of its 12 AAs and operates 23 of its 32 branches in the state of Colorado. The bank's AAs include most major metropolitan areas along the Front Range of Colorado, as well as the Interstate-70 corridor through the Rocky Mountains, and the largest metropolitan area on the Western Slope, Grand Junction, Colorado. The bank's Colorado operations represent 81.1 percent of the bank's lending activity and 68.1 percent of its deposits. Loan and deposit products, and bank services offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial lending followed by residential real estate. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is rated High Satisfactory. The Denver MSA, Colorado Springs MSA and Mountain Colorado AA ratings are all High Satisfactory.

Lending Activity

The bank's lending activities in the state of Colorado reflect excellent responsiveness to AA credit needs. The Home Advantage Mortgage, Small Business Line of Credit, 30-year fixed rate fund pool, and other LMI and small business accessible product offerings are well-utilized across the bank's markets in Colorado. Additionally, the bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank provided its expertise in complex affordable housing lending to complete successful partnerships with nonprofits and government entities on multiple projects across various markets.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Colorado reflects good penetration throughout the AAs. The distribution of loans across different geographies is good in the Denver MSA AA and the Colorado Springs MSA AA and adequate in the Mountain Colorado AA. The adequate geographic rating in the Mountain Colorado AA is driven by the lack of LMI census tracts and carries little weight overall.

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

The bank's lending within Colorado has an overall good penetration among individuals of different income levels and businesses of different sizes. The distribution of loans to borrowers of different income levels and to businesses of different sizes is good in a majority of the AAs, and adequate in the Denver MSA AA. While Denver carries the most weight of any AA, performance in the other AAs supported an overall rating of good.

Community Development Lending

In the state of Colorado, the bank is a leader in providing CD loans. The bank originated 46 CD loans totaling $172.7MM in AAs within the state. Of those, 37 loans for $136.4MM were for affordable housing, 4 loans for $7.4MM were for community service, 3 loans for $9.8MM were for economic development, and 2 loans for $19.1MM were for revitalization and stabilization. Examples of particularly responsive loans include:

- Two loans totaling $19.1MM to a government entity to develop an affordable housing project and to make improvements to the downtown convention center.
- One $16.2MM loan for the construction of a 96-unit affordable housing complex within the Fort Collins MSA AA.

INVESTMENT TEST

The bank's performance under the investment test in the state of Colorado is rated Outstanding. The Denver MSA, Colorado Springs MSA and Mountain Colorado AA ratings are all Outstanding, as well.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its Colorado AAs. The majority of the bank's investments are government agency-issued MBS pools that support affordable housing by providing loans to LMI individuals. A total of $47.5MM of the bank's funds is invested in these MBS pools across the Colorado AAs. Additionally, the bank demonstrates its strong support to public school education by investing in 22 school district bonds for $25.8MM across the Colorado AAs, and 10 school bonds for $1.6MM in other areas of Colorado. These schools primarily serve LMI students.

To further demonstrate the bank's dedication to meeting critical AA needs, it made donations in the amount of approximately $78,800 to affordable housing organizations. The bank's donations to all qualifying organizations across Colorado totaled $404,800.

SERVICE TEST

The bank's performance under the service test in the state of Colorado is rated Outstanding. The Denver MSA, Colorado Springs MSA and Mountain Colorado AA ratings are all Outstanding, as well.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. The Denver MSA AA has only three total branch locations that serve a very large geographic area and are reasonably accessible.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior examination, the bank has closed one mobile branch in an upper-income tract; opened two branches, one in a moderate-income census tract and one in an upper-income census tract; and relocated two branches to nearby sites.

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

Community Development Services

The bank is a leader in providing CD services in its Colorado AAs.

- Many qualified activities were attributed to bank representatives providing their financial expertise by serving in key positions; for example, providing financial, educational, and technical assistance to small businesses targeting economic development or to affordable housing organizations.
- Additionally, many services provided financial education to schools with a majority of students utilizing the national free and reduced lunch program.
- In total, bank staff provided 289 services and donated 4,886 hours in the various markets across Colorado.

DENVER METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

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

The bank's AA is comprised of the Denver-Aurora-Lakewood, Colorado MSA and includes Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties in their entireties (see Appendix C for an AA map).

- The AA is comprised of 51 low-, 150- moderate, 205 middle-, 207 upper-, and 8 unknown-income census tracts. At the prior examination, the AA was comprised of 69 low-, 140 moderate-, 208 middle-, 197 upper-, and 7 unknown-income census tracts.
- Three of the bank's 31 branches are located in the Denver MSA AA. Two of the three branches have an on-site ATM and operate a drive-through.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank holds 0.60 percent market share, ranking 19th out of 66 FDIC-insured depository institutions operating in the AA.
- Two previously conducted community contacts were referenced to supplement this evaluation. These individuals were representatives of a small business assistance organization and an affordable housing organization within the AA.

TABLE 8
POPULATION CHANGE

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

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

- As noted in Table 8, the AA experienced significant population growth from 2010 to 2015, particularly within Denver County and the surrounding urban/suburban counties.

- According to the 2015 American Community Survey (ACS), the percent of the population 65 years and older was notably higher in the counties of Clear Creek, Jefferson, and Park (17.1 percent, 14.1 percent, and 15.5 percent, respectively) than the AA overall (11.2 percent).

TABLE 9
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Adams County, CO	62,864	66,619	6.0
Arapahoe County, CO	72,459	76,437	5.5
Broomfield County, CO	94,135	97,886	4.0
Clear Creek County, CO	73,134	86,563	18.4
Denver County, CO	57,182	69,783	22.0
Douglas County, CO	108,613	115,309	6.2
Elbert County, CO	83,074	96,535	16.2
Gilpin County, CO	82,632	75,694	(8.4)
Jefferson County, CO	81,136	86,565	6.7
Park County, CO	73,815	69,234	(6.2)
Denver-Aurora-Lakewood, CO MSA	75,101	80,820	7.6
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

- Both the median family income and the change in median family income varied widely between counties, from $66,619 to $115,309, and increasing as much as 22.0 percent and decreasing as much as 8.4 percent during this period, indicating varying economic and business conditions across the AA.
- According to the 2015 ACS, the percent of families living below the poverty threshold varied, with the highest percentages in Adams County and Denver County (10.3 percent and 12.8 percent, respectively) when compared to the AA as a whole (8.0 percent).

TABLE 10
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Adams County, CO	196,100	198,800	1.4	878	1,039	18.3
Arapahoe County, CO	232,300	247,600	6.6	880	1,077	22.4
Broomfield County, CO	270,500	295,500	9.2	982	1,336	36.0
Clear Creek County, CO	280,000	283,900	1.4	793	813	2.5
Denver County, CO	240,900	271,300	12.6	798	962	20.6
Douglas County, CO	338,700	354,700	4.7	1,174	1,399	19.2
Elbert County, CO	346,400	337,400	(2.6)	909	1,083	19.1
Gilpin County, CO	316,400	252,800	(20.1)	1,017	1,029	1.2
Jefferson County, CO	259,300	279,500	7.8	900	1,052	16.9
Park County, CO	245,800	244,800	(0.4)	1,206	1,088	(9.8)
Denver-Aurora-Lakewood, CO MSA	246,226	267,007	8.4	871	1,049	20.4
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

- According to the 2015 ACS, the percent of the AA population with housing rental costs above 30 percent of residents' income is 47.7 percent within the AA, potentially making saving for a home purchase down payment difficult.
- The affordability ratio[1] within the AA indicates that the area's affordability is relatively low, at 24.6 percent. The least affordable county is Denver at 19.8 percent and most affordable county is Adams at 29.7 percent. This factor likely impacts mortgage lenders' ability to provide loans to LMI borrowers.
- The age of housing stock varies widely across the AA, with an average age in Douglas, Broomfield, and Elbert counties of 18, 20 and 22 years, respectively, compared to Denver, Adams and Clear Creek at 49, 31, and 40 years, respectively.
- A community member further explained that housing costs have continued to rise both for owner-occupied and rental units. The member stated this is particularly true for the Denver Metropolitan area, where the median home price in 2018 was over $400,000 and quickly approaching the size of a jumbo mortgage loan, providing additional barriers to LMI individuals.
- The community member added that moderate-income borrowers are often outbid when making home purchase offers because they do not have the monetary resources to compete, and additionally must be mindful to stay within any loan program requirements, such as loan amount compared to the appraised value restrictions.
- The community member's organization hosted focus groups covering various topics, including barriers to home ownership. Individuals stated that the price of housing and the amount required for down payment were the primary barriers to home ownership.

[1] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio indicates that housing is generally less affordable.

Additional concerns included credit score requirements for loans and personal student loan debt.

TABLE 11 UNEMPLOYMENT RATES					
Region	2014	2015	2016	2017	2018
Adams County, CO	5.7	4.4	3.6	2.9	3.5
Arapahoe County, CO	4.9	3.7	3.1	2.7	3.2
Broomfield County, CO	4.3	3.3	2.9	2.5	2.9
Clear Creek County, CO	4.7	3.7	3.2	2.5	3.0
Denver County, CO	4.9	3.7	3.1	2.6	3.2
Douglas County, CO	4.0	3.1	2.7	2.3	2.9
Elbert County, CO	4.3	3.2	2.7	2.3	2.8
Gilpin County, CO	4.4	3.1	2.4	1.9	2.5
Jefferson County, CO	4.6	3.5	3.0	2.5	3.0
Park County, CO	4.6	3.4	2.8	2.3	2.9
Denver-Aurora-Lakewood, CO MSA	4.8	3.7	3.1	2.6	3.2
State of Colorado	5.0	3.9	3.3	2.7	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The Denver MSA's economy is strong, growing, and well-diversified. Top industries include aerospace, aviation, beverage production, broadcasting and telecommunications, energy, financial services, healthcare and wellness, and information technology and software.
- Major employers include U.S., state, and local government, public school districts, large healthcare systems - HealthOne, SCL Health, Centura, UC Health and Children's Hospital; Lockheed Martin, Comcast, and United Airlines.
- A community member stated that a challenge to economic development in the state is a lag in the financing of start-ups, even late stage start-ups, which is not at the level of the demand for credit.
- Additionally, the member mentioned that the lack of affordable housing impacts economic development through lack of housing for employees, and also lagging workforce development that has not kept up with employer demands.
- A community member also mentioned economic development in the rural areas of the AA lags behind more urban areas. Many rural areas have strategic plans based on bringing retirees, remote workers, or new business to the local area, but they lack the infrastructure and housing needed to fulfill these plans. Conversely, in the urban areas across Colorado, the high cost of land is also a barrier to economic development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER MSA AA

LENDING TEST

The bank's performance under the lending test in the Denver MSA AA is good.

Lending Activity

The bank’s lending activities reflect excellent responsiveness to AA credit needs. Within the Denver MSA AA, individuals and businesses have utilized the bank’s products designed to serve LMI individuals and small businesses. During the evaluation period, the bank originated:

- 21 Home Advantage Mortgage loans totaling $2.8MM.
- 250 Small Business Lines of Credit totaling $507,000.
- Six Mobile Home loans totaling $196,000.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Within the Denver MSA AA, the bank has partnered with affordable housing organizations to navigate the complex process combining financing and government grants successfully.

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is good. The bank’s lending performance in 2017 was consistent with 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations in the low-income census tracts were above aggregate lending data by number and by dollar and the percentage of owner-occupied housing units (the demographic figure) by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and was below by dollar, and was comparable to the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

<u>Home Purchase Loans</u>

The geographic distribution of home purchase lending is good. The bank’s lending performance for 2017 was weaker than 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations in the low-income census tracts were comparable to aggregate lending data by number and by dollar, and also the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and comparable by dollar, and was above the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank’s lending performance in both 2017 and 2019 were stronger than 2018.

The bank's 2018 loan originations in the low-income census tracts were above aggregate lending data by number and by dollar and the demographic figure by number. Lending in moderate-income census tracts was below aggregate lending data by number and by dollar, and also the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 12.1 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY DENVER MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	9	6,878	11.7	12.8	4.8	4.2	4.6
Moderate	14	2,176	18.2	4.0	19.1	16.8	18.7
Middle	31	22,451	40.3	41.8	34.3	31.3	34.4
Upper	23	22,262	29.9	41.4	41.8	47.8	42.3
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
Home Purchase Loans							
Low	2	185	4.9	1.7	5.0	3.9	4.6
Moderate	10	1,442	24.4	13.2	18.6	14.7	18.7
Middle	16	3,656	39.0	33.5	32.7	29.7	34.4
Upper	13	5,616	31.7	51.5	43.6	51.7	42.3
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
Home Refinance Loans							
Low	3	1,087	21.4	25.2	4.9	3.7	4.6
Moderate	1	55	7.1	1.3	21.1	16.6	18.7
Middle	7	2,479	50.0	57.4	36.5	33.8	34.4
Upper	3	700	21.4	16.2	37.6	45.9	42.3
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
Home Improvement Loans							
Low	0	0	0.0	0.0	3.5	2.9	4.6
Moderate	1	100	33.3	41.0	15.4	13.5	18.7
Middle	1	94	33.3	38.5	34.1	30.9	34.4
Upper	1	50	33.3	20.5	47.0	52.7	42.3
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
Multifamily Loans							% of Multifamily Units
Low	4	5,606	30.8	14.8	18.4	8.5	13.6
Moderate	1	566	7.7	1.5	30.8	35.3	29.8
Middle	5	16,054	38.5	42.3	29.5	34.3	37.4
Upper	3	15,730	23.1	41.4	21.4	21.9	19.2
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.

TABLE 12.2
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
DENVER MSA AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0	3.2	2.3	4.6
Moderate	0	0	0.0	0.0	15.2	10.6	18.7
Middle	0	0	0.0	0.0	33.7	27.9	34.4
Upper	0	0	0.0	0.0	47.8	59.1	42.3
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
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0	3.2	2.6	4.6
Moderate	1	13	16.7	3.7	15.6	11.1	18.7
Middle	2	168	33.3	48.4	33.7	22.2	34.4
Upper	3	166	50.0	47.8	47.6	64.1	42.3
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
Purpose Not Applicable							
Low	0	0	0.0	0.0	5.5	5.3	4.6
Moderate	0	0	0.0	0.0	23.4	16.6	18.7
Middle	0	0	0.0	0.0	36.4	33.2	34.4
Upper	0	0	0.0	0.0	34.7	44.8	42.3
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

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 good. The bank’s lending performance for 2017 was consistent with 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations in the low-income census tracts were consistent with aggregate lending data by number and by dollar and the percentage of businesses (the demographic figure) by number. Lending in moderate-income census tracts was above aggregate lending data by number and below by dollar, and above the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 13 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY DENVER MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	20	2,818	7.9	11.3	7.8	10.9	6.6
Moderate	63	5,505	25.0	22.0	18.4	20.5	18.3
Middle	62	8,082	24.6	32.3	30.5	29.6	32.6
Upper	107	8,625	42.5	34.5	41.8	37.2	42.2
Unknown	0	0	0.0	0.0	0.4	1.1	0.3
Not Reported	0	0	0.0	0.0	1.1	0.7	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not 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 an adequate penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank’s lending performance for 2017 was weaker than 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations to low-income borrowers were comparable to aggregate lending data by number and by dollar and below the percentage of families (the demographic figure) by number. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar, and also below the demographic figure.

Additional performance context considered in the overall rating for this product included the numbers of loans to individuals with unknown incomes, the bank's strategic focus on commercial lending, and the high housing costs within the AA. The loans to borrowers with unknown incomes were for rental or multifamily properties, which are business-purpose loans. When factoring out loans with unknown incomes from both bank lending and aggregate lending data, the bank's performance was above aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The bank’s lending performance for both 2017 and 2019 was weaker than 2018 performance.

The bank's 2018 loan originations to low-income borrowers were comparable to aggregate lending data by number and by dollar and below the percentage of families (the demographic figure) by number. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar, and also the demographic figure.

Additional performance context considered in the overall rating for this product included the numbers of loans to individuals with unknown incomes, the bank's strategic focus on commercial lending, and the high housing costs within the AA.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank’s lending performance for 2017 was weaker than 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations to low-income borrowers was above aggregate lending data by number and by dollar and was below the demographic figure by number. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar, and also the demographic figure.

Additional performance context considered in the overall rating for this product included the numbers of loans to individuals with unknown incomes and the bank's strategic focus on commercial lending.

TABLE 14.1
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
DENVER MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	6	523	7.8	1.0	6.0	3.0	21.3
Moderate	8	1,058	10.4	2.0	18.6	12.8	17.5
Middle	3	568	3.9	1.1	23.2	19.7	20.5
Upper	15	4,821	19.5	9.0	37.1	41.2	40.8
Unknown	45	46,797	58.4	87.0	15.2	23.3	0.0
Home Purchase Loans							
Low	2	61	4.9	0.6	3.7	1.8	21.3
Moderate	5	773	12.2	7.1	17.7	12.6	17.5
Middle	2	548	4.9	5.0	23.4	21.4	20.5
Upper	7	3,346	17.1	30.7	38.8	47.4	40.8
Unknown	25	6,171	61.0	56.6	16.3	16.8	0.0
Home Refinance Loans							
Low	2	439	14.3	10.2	9.5	5.8	21.3
Moderate	1	100	7.1	2.3	21.3	17.0	17.5
Middle	1	20	7.1	0.5	23.2	22.5	20.5
Upper	4	1,192	28.6	27.6	31.1	38.7	40.8
Unknown	6	2,570	42.9	59.5	14.9	16.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	4.9	3.5	21.3
Moderate	1	94	33.3	38.5	15.7	12.2	17.5
Middle	0	0	0.0	0.0	23.9	19.8	20.5
Upper	1	50	33.3	20.5	49.5	51.8	40.8
Unknown	1	100	33.3	41.0	6.1	12.7	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	21.3
Moderate	0	0	0.0	0.0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	0.5	0.0	20.5
Upper	0	0	0.0	0.0	2.4	0.2	40.8
Unknown	13	37,956	100.0	100.0	97.0	99.8	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.

TABLE 14.2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL DENVER MSA AA							
Borrower Income Level	**Bank Loans**				**Aggregate HMDA Data**		**Families by Family Income %**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
Other Purpose LOC							
Low	0	0	0.0	0.0	6.5	3.9	21.3
Moderate	0	0	0.0	0.0	17.0	10.8	17.5
Middle	0	0	0.0	0.0	25.1	19.2	20.5
Upper	0	0	0.0	0.0	50.3	64.2	40.8
Unknown	0	0	0.0	0.0	1.2	1.8	0.0
Other Purpose Closed/Exempt							
Low	2	23	33.3	6.6	7.2	4.3	21.3
Moderate	1	91	16.7	26.2	16.9	9.5	17.5
Middle	0	0	0.0	0.0	23.7	15.0	20.5
Upper	3	233	50.0	67.1	47.0	63.7	40.8
Unknown	0	0	0.0	0.0	5.2	7.5	0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0	2.3	1.2	21.3
Moderate	0	0	0.0	0.0	3.3	2.2	17.5
Middle	0	0	0.0	0.0	2.4	2.0	20.5
Upper	0	0	0.0	0.0	3.5	3.8	40.8
Unknown	0	0	0.0	0.0	88.5	90.8	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 adequate. The bank’s lending performance for both 2017 and 2019 was weaker than 2018 performance.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and comparable by dollar and below the percentage of businesses by number.

TABLE 15 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES DENVER MSA AA							
Business Revenue By Size	**Small Business Loans**				**Aggregate CRA Data**		**% of Businesses by Revenue**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
$1MM or less	154	7,272	61.1	29.1	48.4	32.7	92.5
Over $1MM	86	14,313	34.1	57.2	Not Reported		6.4
Unknown	12	3,445	4.8	13.8			1.1

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

Community Development Lending

The bank is a leader in making CD loans and makes use of innovative and/or lending practices in serving the AA credit needs. The bank originated 12 CD loans totaling $60.8MM in this AA.

- CD loans primarily consisted of providing funding for affordable housing units targeted at providing housing for LMI individuals, a critical need within the AA.
- Two loans totaling $12.9MM provided funding for the construction of an affordable housing low-income housing tax credit (LIHTC) project within the AA.
- One loan for $4.4MM provided funding to rehabilitate an existing property into a 47-unit apartment building for LMI individuals.

TABLE 16 COMMUNITY DEVELOPMENT LOANS DENVER MSA AA		
Community Development Purpose	**#**	**$(000's)**
Affordable Housing	11	58,913
Community Services	1	1,855
Economic Development	0	0
Revitalization and Stabilization	0	0
TOTAL LOANS	**12**	**60,768**

INVESTMENT TEST

The bank's performance under the investment test in the Denver MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

- Portions of 21 additional MBS investments allocated at the state level directly impacted the AA that were not included in Table 17. The underlying loans in the MBS investments assisted LMI individuals within the Denver AA to obtain affordable housing and totaled $24.7MM.
- Ten bonds totaling $18.5MM provided funds to multiple school districts within Denver, Adams, and Arapahoe Counties, supporting education at schools where a majority of the students qualify for the national free or reduced lunch program.
- Multiple donations supported an area hospital's medical foundation that provides financial support for LMI families whose children are in need of care.
- Donations in support of an organization targeting childhood poverty within the AA, through education, health and well-being, and child advocacy.

TABLE 17
INVESTMENTS, GRANTS, AND DONATIONS
DENVER MSA AA

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	2	5,900	2	3,244	1	1	5	9,145
Community Services	4	12,301	6	6,178	53	86	63	18,565
Economic Development	0	0	0	0	2	2	2	2
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	6	18,201	8	9,422	56	89	70	27,712

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates three branches, two with on-site ATMs and drive-through facilities. The downtown branch is located in a large office building with no ability to house a drive-through. All three facilities are located in upper-income census tracts; however, the two Denver locations are near LMI census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed one mobile branch serving a senior living facility and relocated one branch to within a few blocks of the original location, with no significant change in its accessibility.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary by market. Branch hours typically range from 9:00 am to 5:00 pm daily, Monday through Friday, with additional Saturday hours offered at the Cherry Creek Branch.

<table>
<tr><th colspan="13">TABLE 18
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
DENVER MSA AA</th></tr>
<tr><th rowspan="3">Branch Accessibility</th><th colspan="6">Location of Branches by Tract (%)</th><th colspan="6">Percent of Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>0.0</td><td>0.0</td><td>0.0</td><td>100.0</td><td>0.0</td><td>100.0</td><td>8.2</td><td>24.2</td><td>33.0</td><td>33.3</td><td>1.3</td><td>100.0</td></tr>
<tr><th rowspan="3">Changes in Branch Location</th><th colspan="6">Number of Branches (#)</th><th colspan="6">Net Change in Branch Locations (#)</th></tr>
<tr><th colspan="2">Total Branches</th><th colspan="2">Openings (#)</th><th colspan="2">Closings (#)</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td colspan="2">3</td><td colspan="2">0</td><td colspan="2">1</td><td>0</td><td>0</td><td>0</td><td>(1)</td><td>0</td><td>(1)</td></tr>
<tr><th rowspan="2">Community Development Services</th><th colspan="2">Affordable Housing</th><th colspan="2">Community Services</th><th colspan="2">Economic Development</th><th colspan="2">Revitalization & Stabilization</th><th colspan="2">Total Services</th><th colspan="2">Total Organizations</th></tr>
<tr><td colspan="2">10</td><td colspan="2">82</td><td colspan="2">8</td><td colspan="2">1</td><td colspan="2">101</td><td colspan="2">28</td></tr>
<tr><td colspan="13">[1] *Based on 2019 FFIEC census tract definitions.*
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)</td></tr>
</table>

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 1,711 hours of CD qualifying services over the evaluation period. The following is a sample of activities that were considered particularly responsive to CD needs in the AA:

- Multiple bank officers donated approximately 62 hours serving as Loan Committee members for an organization that provides financing, training, education, and technical assistance to primarily small businesses within the AA.
- Four bank employees were on the Finance Committee of an organization that partners with high-poverty, high-performing schools to help Denver students with the greatest need graduate high school and enter higher education. These employees donated approximately 59 hours per year to this organization.

COLORADO SPRINGS METROPOLITAN STATISTICAL AREA ASSESSMENT AREA METROPOLITAN AREA

(Full-Scope Review)

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

The bank's AA is comprised of Teller and El Paso Counties in their entireties, which also comprises the entire Colorado Springs, Colorado MSA (see Appendix C for an AA map).

- The AA is comprised of 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts. At the prior examination, the AA was comprised of 7 low-, 42 moderate-, 55 middle-, 31 upper-, and 1 unknown-income census tracts.
- Five of the bank's branches are located in the Colorado Springs MSA AA. Each location has an on-site ATM and drive-through services.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 4.1 percent market share, ranking 5th out of 38 FDIC-insured depository institutions operating in the AA.
- Three previously conducted community contacts were referenced to supplement this evaluation. These individuals were representatives of a chamber of commerce, economic development organization, and an affordable housing organization, which serve the AA.

TABLE 19
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Teller County, CO	23,350	23,340	(0.0)
El Paso County, CO	622,263	655,024	5.3
Colorado Springs, CO 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

- As noted in Table 19, El Paso County, the location of the Colorado Spring metropolitan area, experienced significant population growth from 2010 to 2015, in line with the state. Teller County is a rural area in the foothills of the Rocky Mountains that experienced no material change in population.
- Due to the government's military presence in the AA, there is a significant veteran population in the AA, with over 50,000 veterans remaining or returning to the area after leaving service.
- According to the 2015 ACS, the percent of the population 65 years and older was notably higher in Teller County when compared to El Paso County, at 17.2 percent and 11.1 percent, respectively. Additionally, El Paso County is in line with the state at 12.2 percent.

TABLE 20
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Teller County, CO	68,328	76,540	12.0
El Paso County, CO	68,813	71,174	3.4
Colorado Springs, CO 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

- As Table 20 indicates, the increase in the median family income within El Paso County was lower than that of Teller County and the state, leading to a larger income gap between El Paso County and Teller County and the state.
- According to the 2015 ACS, the percent of families living below the poverty threshold also varies, with Teller County reporting a lower percentage than El Paso County, at 4.8 percent and 8.4 percent, respectively, and also the state at 8.5 percent.

TABLE 21
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Teller County, CO	226,000	239,000	5.8	873	985	12.8
El Paso County, CO	216,800	218,300	0.7	817	976	19.5
Colorado Springs, CO 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

- According to the 2015 ACS, the percent of the AA population with housing rental costs above 30 percent of the residents' income is 48.9 percent within the AA, making saving for a home purchase down payment difficult for many of these individuals.
- The affordability ratio within the AA indicates that the area's affordability is relatively low, at 26.7 percent. This is in line with the state, at 24.5 percent.
- A community member explained that housing costs have continued to rise for both owner-occupied and rental units within the AA. In 2019, the average cost to purchase a three-bed two-bath home was $340,000, and rent for a two-bed two-bath apartment was $1,300 per month.
- A community member added that, similar to the Denver market, Colorado Springs is highly competitive and LMI borrowers seeking home purchases are often outbid because they do not have the monetary resources to compete, and additionally, must be mindful stay within any loan program requirements.

TABLE 22 UNEMPLOYMENT RATES					
Region	**2014**	**2015**	**2016**	**2017**	**2018**
Teller County, CO	5.9	4.5	3.8	3.1	3.7
El Paso County, CO	6.0	4.6	3.8	3.1	3.9
Colorado Springs, CO MSA	6.0	4.6	3.8	3.1	3.9
State of Colorado	5.0	3.9	3.3	2.7	3.3
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Aerospace and national defense are major industries in the AA, with primary employers including the Fort Carson Military Base, Peterson Air Force Base, and the Air Force Academy. Beyond the military, the next largest employers are United Services Auto Association and Progressive Insurance. Medical services is also a major industry with significant employment coming from the major hospital systems, UC Health and Penrose St. Francis. The sports industry is also significant, driven by 57 national and international sports organizations, including the Olympic Center. Colorado Springs also has a significant manufacturing industry.
- A community member stated that a major issue facing small businesses is finding skilled workers to fill positions as they grow due to the low unemployment rate in the AA. The contact’s organization is working with other organizations to help provide "upskilling" programs for unskilled workers to help fill this gap.
- A community member mentioned that while the AA is highly competitive and saturated with financial institutions, one remaining credit need is a small dollar loan program for small businesses. Many small businesses are requesting these types of loans, but have trouble finding area banks that offer them.
- Another community member stated that the biggest credit need in the area is funding for startup businesses; however, they also stated that many startups seek investors rather than bank loan financing.

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

LENDING TEST

The bank’s performance under the lending test in the Colorado Springs MSA AA is good.

Lending Activity

The bank’s lending activities reflect excellent responsiveness to AA credit needs. Within the Colorado Springs MSA AA, individuals and businesses have utilized the bank’s products designed to serve LMI individuals and small businesses. During the evaluation period, the bank originated:

- 22 Home Advantage Mortgage loans totaling $2.6MM.
- 308 Small Business Lines of Credit totaling $335,000.
- Three Mobile Home loans totaling $230,000.
- Nine SBA 504 loans totaling $5.3MM.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Within the Colorado Springs MSA AA, the bank has partnered with affordable housing organizations to help borrowers navigate the complex mortgage loan process, combining financing and government grants successfully for qualified borrowers.

Geographic Distribution of Loans

The geographic distribution of lending reflects excellent penetration throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank’s lending performance for both 2017 and 2019 was consistent with 2018 performance.

The bank's 2018 loan originations in the low-income census tracts were above aggregate lending data by number and were comparable by dollar and also were above the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar, and also the demographic figure.

While a lack of home mortgage lending is noted in the LMI census tracts surrounding the Fort Carson Military Base south of the Colorado Springs metropolitan area, this gap is reasonable given this area houses a largely transient military population. Additionally, the bank does not offer VA loans, which would be the most attractive option for purchasing a home to this population.

TABLE 23
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS MSA AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	4	557	10.3	4.2	2.6	2.4	3.2
Moderate	15	9,061	38.5	67.8	18.8	15.1	19.8
Middle	13	1,180	33.3	8.8	44.0	40.8	42.1
Upper	7	2,564	17.9	19.2	34.6	41.6	34.9
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 good. The bank's lending performance for 2017 was stronger than 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations in the low-income census tracts were consistent with aggregate lending data by number and by dollar and the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar, and also the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 24
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	22	2,476	8.4	22.1	7.2	11.0	7.1
Moderate	84	4,082	32.2	36.4	21.6	25.2	22.6
Middle	74	3,259	28.4	29.1	33.1	29.4	33.7
Upper	81	1,395	31.0	12.4	36.8	33.2	36.4
Unknown	0	0	0.0	0.0	0.1	0.0	0.1
Not Reported	0	0	0.0	0.0	1.3	1.1	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not 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 good penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's lending performance for 2017 was weaker than 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations to low-income borrowers was above aggregate lending data by number and was comparable by dollar and was below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and below by dollar, while comparable to the demographic figure.

Additional performance context considered in the overall rating for this product included the numbers of loans to individuals with unknown incomes, the bank's strategic focus on commercial lending, and the high cost of housing in the AA. The loans with unknown borrower incomes are for rental or multifamily properties, which are business-purpose loans. When factoring out loans with unknown incomes from both bank lending and aggregate lending data, the bank's performance was above aggregate lending.

TABLE 25
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
COLORADO SPRINGS MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	5	328	12.8	2.5	5.5	3.0	20.2
Moderate	7	534	17.9	4.0	19.9	15.1	18.5
Middle	2	333	5.1	2.5	23.7	21.4	20.3
Upper	15	3,413	38.5	25.5	33.5	36.7	41.0
Unknown	10	8,754	25.6	65.5	17.4	23.9	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.

<u>Small Business Lending</u>

The borrower distribution of small business lending is good. The bank's lending performance for 2017 was weaker than 2018, while performance in 2019 was consistent.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and were below by dollar, and were below the demographic figure by number.

TABLE 26
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
COLORADO SPRINGS MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	206	1,965	78.9	17.5	52.7	39.5	94.2
Over $1MM	47	9,073	18.0	80.9	Not Reported		4.9
Unknown	8	174	3.1	1.6			0.9

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

Community Development Lending

The bank makes a relatively high-level CD loans. The bank originated six CD loans totaling $11.9MM in this AA.

- All the originated CD loans were new loans primarily for construction or renovation of businesses or operating lines of credit.
- One line of credit provided an affordable housing organization with operational funds to support its mission of bringing people together to build homes, communities, and hope for LMI individuals.
- One loan for $1.4MM provided funding for construction of a business that will provide jobs for LMI individuals in a moderate-income census tract.

TABLE 27
COMMUNITY DEVELOPMENT LOANS
COLORADO SPRINGS MSA AA

Community Development Purpose	#	$(000's)
Affordable Housing	2	2,062
Community Services	1	10
Economic Development	3	9,831
Revitalization and Stabilization	0	0
TOTAL LOANS	**6**	**11,903**

INVESTMENT TEST

The bank's performance under the investment test in the Colorado Springs MSA AA is excellent.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

- Portions of 23 MBS investments allocated at the state level that impacted the AA were not included in Table 28. These MBS investments contained underlying mortgage loans that helped LMI individuals within the Colorado Springs AA obtain affordable housing and totaled $14.0MM.
- Four bonds totaling $1.8MM provided funds to multiple school districts within El Paso and Teller Counties, supporting education at schools where a majority of the students' family incomes qualify them for free or reduced school lunches.
- Bank donations totaling $50,000 supported an organization whose programs include employment, basic need, and residential services for unemployed, underemployed, disabled, elderly, and at-risk youths working toward self-sufficiency.

TABLE 28 INVESTMENTS, GRANTS, AND DONATIONS COLORADO SPRINGS MSA AA								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	3	1,500	1	3,984	11	17	15	5,501
Community Services	3	1,303	1	450	43	73	47	1,826
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	1	3	1	3
TOTAL	**6**	**2,803**	**2**	**4,434**	**56**	**94**	**64**	**7,331**

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank’s performance under the service test in the Colorado Springs MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates five branches, all with on-site ATMs and drive-through facilities. One branch is located in a low-income tract, two branches are in moderate-income tracts and one is in an upper-income tract.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems in LMI areas or to LMI individuals. The bank did not open or close any branches in the AA.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary materially by market. Branch hours typically range from 9:00 am to 5:00 pm daily, with additional Saturday hours offered at the Academy and Circle Branches.

<table>
<tr><th colspan="13">TABLE 29
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
COLORADO SPRINGS MSA AA</th></tr>
<tr><th rowspan="3">Branch Accessibility</th><th colspan="6">Location of Branches by Tract (%)</th><th colspan="6">Percent of Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>25.0</td><td>50.0</td><td>0.0</td><td>25.0</td><td>0.0</td><td>100.0</td><td>5.1</td><td>30.1</td><td>39.0</td><td>24.3</td><td>1.5</td><td>100.0</td></tr>
<tr><th rowspan="3">Changes in Branch Location</th><th colspan="6">Number of Branches (#)</th><th colspan="6">Net Change in Branch Locations (#)</th></tr>
<tr><th colspan="2">Total Branches</th><th colspan="2">Openings (#)</th><th colspan="2">Closings (#)</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td colspan="2">5</td><td colspan="2">0</td><td colspan="2">0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr>
<tr><th rowspan="2">Community Development Services</th><th colspan="2">Affordable Housing</th><th colspan="2">Community Services</th><th colspan="2">Economic Development</th><th colspan="2">Revitalization & Stabilization</th><th colspan="2">Total Services</th><th colspan="2">Total Organizations</th></tr>
<tr><td colspan="2">13</td><td colspan="2">52</td><td colspan="2">1</td><td colspan="2">0</td><td colspan="2">66</td><td colspan="2">24</td></tr>
<tr><td colspan="13">[1] Based on 2019 FFIEC census tract definitions.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)</td></tr>
</table>

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total for 1,295 hours of CD-qualifying services over the evaluation period. The following is a sample of activities that were considered particularly responsive to CD needs in the AA:

- A bank officer donated approximately 66 hours serving as a Loan Committee member for an organization that provides financing, training, education and technical assistance to primarily small businesses within the AA.
- Five bank employees served on the board and various committees of an organization that provides housing and support services for LMI individuals, including nutrition, financial management, and transportation. These employees donated approximately 143 hours per year to this organization.
- Two bank officers served as both board and committee members, utilizing their financial expertise, for an affordable housing organization, donating approximately 78 hours.

MOUNTAIN COLORADO ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MOUNTAIN COLORADO AA

The bank's AA is comprised of Eagle, Garfield, and Pitkin Counties in their entireties (see Appendix C for an AA map).

- The AA is comprised of 9 middle- and 20 upper-income census tracts. At the prior examination, the AA was comprised of 1 moderate-, 8 middle-, and 20 upper-income census tracts.
- Seven of the bank's branches are located in the AA. All have an on-site ATM and five branches offer drive-through services.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 5.3 percent market share, ranking 5th out of 13 FDIC-insured depository institutions operating in the AA.
- Two previously conducted community contacts were referenced to supplement this evaluation. These individuals were representatives of economic development organizations within the AA.

TABLE 30
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Eagle County, CO	52,197	52,576	0.7
Garfield County, CO	56,389	57,076	1.2
Pitkin County, CO	17,148	17,420	1.6
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

- According to the 2015 ACS, the percent of the population 65 years and older was notably lower in Eagle County and Garfield County, at 7.4 percent and 10.1 percent, respectively, than in other nonmetropolitan areas of the state at 15.6 percent. However, Pitkin County, at 15.2 percent, was in line with other nonmetropolitan areas.

TABLE 31
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Eagle County, CO	80,621	82,465	2.3
Garfield County, CO	70,123	67,871	(3.2)
Pitkin County, CO	103,438	102,399	(1.0)
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

- Due to the high home and rental prices demanded in the AA, a community member stated that typically many LMI individuals commute from more affordable areas in the western part of the AA to work at businesses in the more expensive areas in the AA.

TABLE 32
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Eagle County, CO	530,900	419,400	(21.0)	1,225	1,272	3.8
Garfield County, CO	341,600	287,500	(15.8)	1,052	1,140	8.4
Pitkin County, CO	670,200	620,700	(7.4)	1,259	1,278	1.5
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

- According to the 2015 ACS, the percent of the AA population with housing rental costs above 30 percent of their income is 46.6 percent, potentially making saving for a home purchase down payment difficult for many residents.
- The affordability ratio within the AA indicates that the area is highly unaffordable, at 17.8 percent, when compared with the state at 24.5 percent. The least affordable county is Pitkin at 11.5 percent, and the more affordable county is Garfield at 19.7 percent.
- Of the housing units within the AA, 44.6 percent are owner-occupied, 23.3 percent are rental units, and 32.2 percent are vacant. The percentage of vacant units is high compared to the state, at 10.5 percent. Vacant units in high tourism areas are often second homes, or may potentially be used as short-term rentals. Short-term rentals are a growing issue, reducing housing stock available for purchase and providing additional upward pressure on rental and home purchase prices.
- A community member affirmed the high cost of housing in the AA, stating that the community is affluent, resulting in very high home prices and very low availability of affordable housing. The contact further indicated that the area is a vacation destination that demands very high land values.
- Another member also mentioned that the greatest area need is affordable housing, which has been an ongoing problem. The member stated that there is a shortage of

both homes for purchase and rental properties, and that the area is currently deficient by 4,600 family housing units.

- A Workforce Housing Coalition has been developed and is an advocate for more and better housing. One major barrier to providing this housing is the high cost and lack of open land for building due to the mountainous nature of the area. Most new construction in the AA consists of small, in-fill projects.

TABLE 33
UNEMPLOYMENT RATES

Region	2014	2015	2016	2017	2018
Eagle County, CO	4.2	3.2	2.8	2.2	2.7
Garfield County, CO	5.2	4.2	3.6	2.8	3.2
Pitkin County, CO	4.9	3.9	3.4	3.0	3.8
State of Colorado	5.0	3.9	3.3	2.7	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The key industry driving the economy of the AA is tourism and, in particular, skiing. Consequently, major employers include the various ski resorts (particularly Vail Resorts), medical centers, and local public school districts. Local government and hospitality are also a major source for employment.
- A community member stated that the local economy is currently strong. Unemployment is extremely low; however, the member indicated that at least half of the businesses in the area have positions that cannot be filled due to lack of workers.
- One of the community members indicated that a CD need is infrastructure, primarily related to bridge and road improvements, as many are in poor condition. There are existing plans for area bridge projects, which will be partially funded through tax revenue bonds and could provide investment opportunities for financial institutions.
- The bank was mentioned by a community member as being active in the community and providing sponsorships of local CD initiatives.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MOUNTAIN COLORADO AA

LENDING TEST

The bank’s performance under the lending test in the Mountain Colorado AA is good.

Lending Activity

The bank’s lending activities reflect excellent responsiveness to AA credit needs.

Within the Mountain Colorado AA, individuals and businesses have utilized the bank’s products designed to serve LMI individuals and small businesses:

- The bank reported 14 Home Advantage Mortgage loans totaling $1.5MM.
- The bank reported 307 Small Business Lines of Credit totaling $373,000.
- The bank reported 21 Mobile Home loans totaling $3.1MM.
- The bank reported 4 SBA 504 loans totaling $803,000

The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. However, the bank's Home Advantage Mortgage loan product displays some product innovation to serve the AA credit needs.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. Given the AA consists of only middle- and upper-income census tracts, the bank's performance in this AA carries very little weight in the state and overall ratings.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank's lending performance in both 2017 and 2019 were consistent with 2018 performance.

The bank's 2018 loan originations in the middle-income census tracts were consistent with aggregate lending data by number and below by dollar and consistent with the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and above by dollar, and was comparable to the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's lending performance in both 2017 and 2019 were consistent with 2018 performance.

The bank's 2018 loan originations in the middle-income census tracts were below aggregate lending data by number and by dollar and also the demographic figure by number. Lending in upper-income census tracts was above aggregate lending data by number and by dollar, and also the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's lending performance in both 2017 and 2019 was consistent with 2018 performance.

The bank's 2018 loan originations in the middle-income census tracts were above aggregate lending data by number and were comparable by dollar, while comparable to the demographic figure by number. Lending in upper-income census tracts was below aggregate lending data by number and comparable by dollar, and also comparable to the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 34.1 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO 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	0.0	0.0	0.0
Middle	34	8,680	32.7	13.7	30.6	19.0	30.9
Upper	70	54,774	67.3	86.3	69.3	81.0	69.1
Unknown	0	0	0.0	0.0	0.1	0.0	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	0	0	0.0	0.0	0.0	0.0	0.0
Middle	15	4,236	25.9	12.3	32.2	21.7	30.9
Upper	43	30,066	74.1	87.7	67.7	78.2	69.1
Unknown	0	0	0.0	0.0	0.1	0.1	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	0	0	0.0	0.0	0.0	0.0	0.0
Middle	10	2,841	33.3	13.6	28.1	15.3	30.9
Upper	20	18,028	66.7	86.4	71.9	84.7	69.1
Unknown	0	0	0.0	0.0	0.1	0.0	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	0.0	0.0	0.0
Middle	2	85	100.0	100.0	30.3	16.7	30.9
Upper	0	0	0.0	0.0	69.7	83.3	69.1
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	0	0	0.0	0.0	0.0	0.0	0.0
Middle	2	1,050	40.0	14.3	42.1	28.9	24.6
Upper	3	6,273	60.0	85.7	57.9	71.1	75.4
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.

TABLE 34.2 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	27.1	11.3	30.9
Upper	0	0	0.0	0.0	72.9	88.7	69.1
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
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	3	346	50.0	47.3	29.4	10.3	30.9
Upper	3	385	50.0	52.7	70.6	89.7	69.1
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
Purpose Not Applicable							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	2	122	66.7	84.7	42.6	28.3	30.9
Upper	1	22	33.3	15.3	57.4	71.7	69.1
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 adequate. The bank’s lending performance in both 2017 and 2019 was consistent with 2018 performance.

The bank's 2018 loan originations in the middle-income census tracts were above aggregate lending data by number and by dollar and were consistent with the demographic figure by number. Lending in upper-income census tracts was above aggregate lending data by number and was below by dollar, and was above the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 35 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(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	86	6,057	31.6	43.5	28.0	31.1	34.0
Upper	186	7,867	68.4	56.5	61.9	64.1	66.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	10.2	4.7	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not 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 good penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank’s lending performance for 2017 was weaker than 2018, and 2019 performance was consistent with 2018.

The bank's 2018 loan originations in low-income borrowers were comparable to aggregate lending data by number and by dollar and below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and was comparable by dollar, and was consistent with the demographic figure.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank’s lending performance for 2017 was weaker than 2018, and 2019 performance was consistent with 2018.

The bank's 2018 loan originations to low-income borrowers was comparable to aggregate lending data by number and by dollar and below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and was comparable by dollar, and was above the demographic figure.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank’s lending performance for 2017 was stronger than 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations to low-income borrowers were comparable to aggregate lending data by number and by dollar and were below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and by dollar, and was below the demographic figure.

**TABLE 36.1
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
MOUNTAIN COLORADO AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	3	184	2.9	0.3	2.3	0.9	13.7
Moderate	18	2,659	17.3	4.2	8.0	2.9	14.9
Middle	22	4,290	21.2	6.8	16.9	7.8	17.9
Upper	40	17,777	38.5	28.0	56.8	57.6	53.6
Unknown	21	38,544	20.2	60.7	15.9	30.9	0.0
Home Purchase Loans							
Low	2	99	3.4	0.3	1.6	0.5	13.7
Moderate	14	2,138	24.1	6.2	8.7	3.2	14.9
Middle	13	2,900	22.4	8.5	17.6	8.8	17.9
Upper	21	10,562	36.2	30.8	55.8	61.6	53.6
Unknown	8	18,603	13.8	54.2	16.4	25.9	0.0
Home Refinance Loans							
Low	1	85	3.3	0.4	3.4	1.6	13.7
Moderate	3	486	10.0	2.3	8.5	3.3	14.9
Middle	5	884	16.7	4.2	17.5	8.3	17.9
Upper	17	7,115	56.7	34.1	55.2	57.1	53.6
Unknown	4	12,299	13.3	58.9	15.5	29.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	2.8	2.3	13.7
Moderate	0	0	0.0	0.0	3.9	2.2	14.9
Middle	1	35	50.0	41.2	15.1	7.9	17.9
Upper	1	50	50.0	58.8	70.6	76.8	53.6
Unknown	0	0	0.0	0.0	7.6	10.8	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	13.7
Moderate	0	0	0.0	0.0	0.0	0.0	14.9
Middle	0	0	0.0	0.0	0.0	0.0	17.9
Upper	0	0	0.0	0.0	0.0	0.0	53.6
Unknown	5	7,323	100.0	100.0	100.0	100.0	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.

TABLE 36.2
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
MOUNTAIN COLORADO AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0	1.6	0.6	13.7
Moderate	0	0	0.0	0.0	4.9	0.8	14.9
Middle	0	0	0.0	0.0	14.2	4.7	17.9
Upper	0	0	0.0	0.0	72.1	78.6	53.6
Unknown	0	0	0.0	0.0	7.3	15.2	0.0
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0	2.2	0.3	13.7
Moderate	1	35	16.7	4.8	8.1	0.6	14.9
Middle	3	471	50.0	64.4	10.3	1.6	17.9
Upper	1	50	16.7	6.8	66.2	53.3	53.6
Unknown	1	175	16.7	23.9	13.2	44.2	0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0	2.1	0.7	13.7
Moderate	0	0	0.0	0.0	0.0	0.0	14.9
Middle	0	0	0.0	0.0	8.5	0.0	17.9
Upper	0	0	0.0	0.0	8.5	2.8	53.6
Unknown	3	144	100.0	100.0	80.9	96.4	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 good. The bank’s lending performance for 2017 was weaker than 2018, while performance in 2019 was consistent with 2018 performance.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and were below by dollar, and were below the demographic figure by number.

TABLE 37 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES MOUNTAIN COLORADO AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	209	2,977	76.8	21.4	45.7	39.0	90.4
Over $1MM	50	9,943	18.4	71.4	Not Reported		8.0
Unknown	13	1,004	4.8	7.2			1.6

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

Community Development Lending

The bank makes an adequate level of CD loans. The bank originated one CD loan totaling $4.7MM in this AA. The loan was for an affordable housing apartment community located in a high-cost area within the AA. While CD lending within the AA was limited, this is considered acceptable given the lack of CD opportunities.

TABLE 38 COMMUNITY DEVELOPMENT LOANS MOUNTAIN COLORADO AA		
Community Development Purpose	**#**	**$(000's)**
Affordable Housing	1	4,671
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	0	0
TOTAL LOANS	**1**	**4,671**

INVESTMENT TEST

The bank's performance under the investment test in the Mountain Colorado AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

- Portions of 16 MBS investments allocated at the state level that impacted the AA were not included in Table 39. The underlying mortgage loans in these MBS investments helped LMI individuals within the Mountain Colorado AA obtain affordable housing and totaled $2.6MM.
- Four bonds totaling $3.4MM provided funds to multiple school districts within Garfield County, supporting education at schools where a majority of the students qualify for

the national free or reduced lunch program.

- Multiple donations totaling $20,200 supported affordable housing organizations, a critical need in the AA.

TABLE 39
INVESTMENTS, GRANTS, AND DONATIONS
MOUNTAIN COLORADO AA

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	0	0	0	0	6	20	6	20
Community Services	3	3,061	1	306	12	18	16	3,385
Economic Development	0	0	0	0	1	3	1	3
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	3	3,061	1	306	19	41	23	3,408

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Mountain Colorado AA is excellent.

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates seven branches, all with on-site ATMs and five with drive-through facilities. Two branches are located in middle-income census tracts and five are located in upper-income census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank opened one branch in an upper-income census tract.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary materially by market. Branch lobby hours range from 9:00 am to 5:00 pm, Monday through Friday, and include Saturday hours at some branches.

TABLE 40 RETAIL AND COMMUNITY DEVELOPMENT SERVICES MOUNTAIN COLORADO AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	28.6	71.4	0.0	100.0	0.0	0.0	31.0	69.0	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	7		1		0		0	0	0	1	0	1
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	13		16		5		1		35		15	

[1] *Based on 2019 FFIEC census tract definitions.*
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 610 hours of CD qualifying services over the evaluation period. The following is a sample of activities that were considered particularly responsive to CD needs in the AA:

- A bank officer donated approximately 150 hours serving as a board member for an organization that provides resources to primarily small businesses within the AA.
- A bank officer worked as an advisory board member of an organization that conducts workforce development and provides training programs for LMI individuals.
- A bank officer served as a board member, utilizing his financial expertise, for an affordable housing organization, donating approximately 89 hours.

OTHER COLORADO METROPOLITAN ASSESSMENT AREAS

(Limited-Scope Reviews)

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

Boulder MSA AA

The bank's AA is comprised of Boulder County in its entirety, which also comprises the Boulder, Colorado MSA (see Appendix C for an AA map).

- The AA is comprised of 5 low-, 14 moderate-, 30 middle-, and 19 upper-income census tracts. At the prior examination, the AA consisted of 5 low-, 11 moderate-, 32 middle-, and 20 upper-income census tracts.
- Of the bank's 31 full-service locations, there is 1 branch located in a moderate-income census tract that offers lobby services and an ATM.
- According to the 2015 ACS, the population of the AA is 310,032.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 0.4 percent market share, ranking 19th out of 31 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation. The individual was a representative of a CD financial institution serving the AA.

Fort Collins MSA AA

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

- The AA is comprised of 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tracts. At the prior examination, the AA was comprised of 2 low-, 18 moderate-, 36 middle-, 16 upper-, and 1 unknown-income census tracts.
- Of the bank's 31 full-service locations, there are 2 branch locations in the AA; 1 location in Fort Collins offers an ATM, full lobby, and drive-through services. The other branch located in Loveland offers lobby services and an ATM. The Fort Collins branch is in a middle-income census tract, and the Loveland branch is in a moderate-income census tract.
- According to the 2015 ACS, the population of the AA is 318,227.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 0.4 percent market share, ranking 20th out of 25 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation. The individual was a representative of an economic development organization in the AA.

Grand Junction MSA AA

The bank's AA is comprised of Mesa County in its entirety, which also comprises the Grand Junction, Colorado MSA (see Appendix C for an AA map).

- The AA is comprised of 7 moderate-, 16 middle-, and 6 upper-income census tracts. At the prior examination, the AA was comprised of 6 moderate-, 16 middle- , and 7 upper-income census tracts.
- Of the bank's 31 full-service locations, there are 4 branches located in the AA offering lobby and drive-through services, along with ATMs at each location.
- According to the 2015 ACS, the population of the AA is 147,834.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 7.9 percent market share, ranking 6th out of 13 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation. The individual was a representative of an economic development organization.

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

The three Colorado AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Boulder MSA AA	consistent	consistent	consistent
Fort Collins MSA AA	consistent	consistent	consistent
Grand Junction MSA AA	consistent	consistent	consistent

SAN MIGUEL COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Reviews)

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

San Miguel County AA

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

- The AA is comprised of 2 middle- and 2 upper-income census tracts. This is unchanged since the prior examination.
- Of the bank's 31 full-service locations, there is 1 branch located in a middle-income census tract that offers full lobby services and an ATM. There is no drive-through at this location.
- According to the 2015 ACS, the population of the AA is 7,676.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 8.2 percent market share, ranking 5th out of 5 FDIC-insured depository institutions operating in the AA.

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

The Colorado AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
San Miguel County AA	consistent	below	below

STATE OF WYOMING

CRA RATING FOR WYOMING:	**Satisfactory**
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes limited use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography (geographic distribution) is adequate.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses and farms of different sizes (borrower distribution) is good.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Wyoming was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests, with the exception of small farms loans, which were evaluated in the Northern Wyoming AA only.

Full-scope reviews were conducted for the Northern Wyoming AA and Albany County AA. The overall state rating was based predominantly on the bank's performance in the two aforementioned AAs, with most weight given to the bank's performance in the Albany County AA.

Limited-scope reviews were conducted for the Casper MSA AA and Cheyenne MSA AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN WYOMING

The bank delineates 4 of its 12 AAs and operates 7 of its 31 branches in the state of Wyoming. 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 lending followed by 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 WYOMING

LENDING TEST

The bank's performance under the lending test in the state of Wyoming is rated High Satisfactory.

Lending Activity

The bank's lending activities in the state of Wyoming reflect good responsiveness to AA credit needs. The Home Advantage Mortgage, Small Business Line of Credit, 30-year fixed rate fund pool, and other LMI and small business accessible product offerings were utilized across the bank's markets in Wyoming. The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Wyoming reflects adequate penetration throughout the AAs. The distribution of loans among geographies of different income levels is adequate within both AAs.

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

The bank's lending within Wyoming has an overall good penetration among individuals of different income levels and businesses and farms of different sizes, consistent with performance in both AAs.

Community Development Lending

In the state of Wyoming, the bank provides a relatively high level of CD loans. The bank originated 11 CD loans totaling $23.4MM in AAs within the state. Of those, one loan for $250,000 was for affordable housing, three loans for $1.2MM were for community service, three loans for $3.7MM were for economic development, and four loans for $18.3MM were for revitalization and stabilization. Examples of particularly responsive loans include:

- Two loans totaling $1.0MM to an organization that provides health insurance for LMI individuals and families unable to afford coverage.
- One $250,000 loan to an affordable housing entity with the purpose of developing empty land lots into homes for LMI individuals and families.

INVESTMENT TEST

The bank's overall performance in the state of Wyoming under the investment test is rated Outstanding.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AAs. The majority of the bank's investments are government agency-issued MBS pools that support affordable housing by providing loans to LMI individuals. A total of $11.4MM of the bank's funds is invested in this way across Wyoming. Additionally, the bank made an investment for $2.8MM in a water bond project to revitalize an underserved area and $4.7MM in bonds to a school serving predominately LMI students. To further demonstrate the bank's dedication to critical AA needs, it made donations to a wide variety of organizations that target services to LMI individuals and families within the state. These include food banks, medical facilities, and housing for the homeless. The bank's donations to all qualifying organizations across Wyoming totaled $165,000.

SERVICE TEST

The bank's performance under the service test in the state of Wyoming is rated High Satisfactory.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are accessible to the bank's various geographies and to individuals of different income levels in each AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior examination, the bank relocated one branch to within a few blocks of the original location.

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

Community Development Services

The bank provides a relatively high level of CD services in its Wyoming AAs.

- Many qualified activities were attributed to bank representatives providing their financial expertise by serving in key positions, for example, providing financial, educational, and technical assistance to organizations serving basic needs of LMI individuals or providing affordable housing.
- Additionally, many services provided financial education to LMI individuals or at schools with a majority of students utilizing the national free and reduced lunch program.
- In total, bank staff provided 71 services and donated 1,723 hours in the various markets across Wyoming.

NORTHERN WYOMING ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHERN WYOMING AA

The bank's AA is comprised of Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties in their entireties (see Appendix C for an AA map).

- The AA is comprised of 4 moderate-, 20 middle-, and 4 upper-income census tracts. At the prior examination, the AA was comprised of 4 moderate-, 22 middle-, and 2 upper-income census tracts.
- Three of the bank's 31 branches are located in the AA. Each branch offers full lobby and drive-through services, along with an ATM. However, the drive-through is closed on Saturdays at all locations.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 2.42 percent market share, ranking 12th out of 16 FDIC-insured depository institutions operating in the AA.
- Two previously conducted community contacts were referenced to supplement this evaluation. These individuals were representatives of economic development organizations serving the AA.

TABLE 41
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Big Horn County, WY	11,668	11,895	1.9
Campbell County, WY	46,133	48,013	4.1
Hot Springs County, WY	4,812	4,809	(0.1)
Johnson County, WY	8,569	8,600	0.4
Park County, WY	28,205	28,985	2.8
Sheridan County, WY	29,116	29,738	2.1
Washakie County, WY	8,533	8,400	(1.6)
State of Wyoming	563,626	579,679	2.8

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

- As noted in Table 41, the AA experienced minor changes to the population, generally growth, from 2010 to 2015. The most populated county is Campbell, which also has the largest city in the AA, Gillette, with a population of 32,030.
- According to the 2015 ACS, the percent of the population 65 years and older was notably higher in almost all AA counties, ranging from 17.5 percent to 22.4 percent, than in other nonmetropolitan areas of Wyoming at 13.6 percent, with the exception of Campbell County, whose percentage was notably lower, at 6.6 percent.
- A community member confirmed that while demographics vary by community, a large section of the population is over 50 years of age. However, the member stated that

younger millennials are moving back to the area, attracted by the quality of life amenities and outdoor recreation opportunities.

TABLE 42
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Big Horn County, WY	57,705	59,519	3.1
Campbell County, WY	83,965	87,858	4.6
Hot Springs County, WY	54,709	59,787	9.3
Johnson County, WY	58,983	64,351	9.1
Park County, WY	58,297	67,122	15.1
Sheridan County, WY	61,959	71,020	14.6
Washakie County, WY	61,340	66,113	7.8
State of Wyoming	65,964	73,194	11.0

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

- According to the 2015 ACS, the percent of families living below the poverty threshold also varies, with the highest percentage in Washakie County at 10.1 percent and the lowest in Johnson County at 3.9 percent, compared to other nonmetropolitan areas in the state at 7.9 percent.

TABLE 43
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Big Horn County, WY	116,100	141,400	21.8	526	595	13.1
Campbell County, WY	197,700	212,200	7.3	795	936	17.7
Hot Springs County, WY	117,800	151,600	28.7	493	669	35.7
Johnson County, WY	208,400	227,700	9.3	642	854	33.0
Park County, WY	191,500	221,300	15.6	652	692	6.1
Sheridan County, WY	211,900	228,000	7.6	670	731	9.1
Washakie County, WY	130,000	160,800	23.7	504	605	20.0
State of Wyoming	174,000	194,800	12.0	666	789	18.5

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

- According to the 2015 ACS, the percent of the AA population with housing rental costs above 30 percent of their income is 30.6 percent within the AA, compared to other nonmetropolitan areas of Wyoming at 34.6 percent.
- The affordability ratio within the AA indicates that the area is reasonably affordable at 29.5 percent and comparable to other nonmetropolitan areas of Wyoming at 29.0 percent. The least affordable county is Johnson at 23.7 percent and the more affordable county is Campbell at 37.7 percent.
- The age of housing stock varies widely across the AA, with an average age in Big

Horn County and Hot Springs County of 50 years and 45 years, respectively, compared to Campbell County at 24 years.

- A community member commented that housing is generally an issue in the area, with a shortage of quality, affordable housing. In particular, smaller communities have difficulty attracting workers due to the lack of quality and affordable properties both to purchase or rent.

TABLE 44
UNEMPLOYMENT RATES

Region	2014	2015	2016	2017	2018
Big Horn County, WY	4.7	4.4	4.9	4.2	4.7
Campbell County, WY	3.5	3.9	7.1	4.9	4.1
Hot Springs County, WY	4.3	4.2	4.8	3.9	3.7
Johnson County, WY	4.7	4.9	5.3	4.2	4.0
Park County, WY	4.7	4.3	4.7	4.3	4.4
Sheridan County, WY	4.8	4.2	4.6	3.9	4.0
Washakie County, WY	4.5	4.2	4.7	4.0	4.2
State of Wyoming	4.3	4.2	5.3	4.2	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member stated that the local economy is supported by fossil fuel and mineral production. The Powder River Basin, which is the nation's largest source of coal production, is recovering from an economic downturn precipitated by low commodity prices and changes to government regulations. Resource production was consequently scaled back and local unemployment increased. The economic decline was felt throughout the area, with job losses and business closures in all sectors.
- A contact noted that in addition to fossil fuel and mineral production, agriculture; healthcare; education; and manufacturing represent the largest industries.
- The community member stated that going forward, CD organizations hope to help diversify the economy to reduce the reliance on the mining/extraction industry. Recently, hiring has picked up as coal production has increased and the community is optimistic about the economy recovering.
- A community member felt that one unmet credit need is for entrepreneurs looking to start a business or to expand an existing business, as they have difficulty securing credit.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHERN WYOMING AA

LENDING TEST

The bank's performance under the lending test in the Northern Wyoming AA is good.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs.

Within the Northern Wyoming AA, individuals and businesses have utilized the bank's products designed to serve LMI individuals and small businesses:

- The bank reported 12 Home Advantage Mortgage loans totaling $598,000.
- The bank reported 57 Small Business Lines of Credit totaling $61,000.
- The bank reported 22 Mobile Home loans totaling $1.6MM.

The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank's Home Advantage Mortgage loan program displays some product innovation to serve the AA credit needs.

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank's lending performance for both 2017 and 2019 was stronger than in 2018.

The bank's 2018 loan originations in the moderate-income census tracts was below aggregate lending data by number and by dollar and the demographic figure by number.

When loan dispersion within the AA was evaluated, a gap in lending to a rural, moderate-income census tract and also a moderate-income census tract within the city of Cody was identified; however, this can be explained by the significant distance of both areas to the bank's branches.

TABLE 45 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY NORTHERN WYOMING 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	2	111	8.0	4.1	12.9	10.6	12.2
Middle	20	2,407	80.0	89.4	64.5	65.2	68.3
Upper	3	175	12.0	6.5	22.6	24.2	19.6
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.

<u>Small Business Lending</u>

The geographic distribution of small business lending is adequate. The bank’s lending performance for 2017 was consistent with 2018, while performance in 2019 was stronger than 2018 performance.

The bank's 2018 loan originations in the moderate-income census tracts were consistent with aggregate lending data by number and by dollar and the demographic figure by number.

When loan dispersion within the AA was evaluated, a gap in lending to a rural, moderate-income census tract and a moderate-income census tract in Cody was identified; however, this can be explained by the significant distance of both areas to the bank’s branches.

<u>Small Farm Lending</u>

The geographic distribution of small farm lending is adequate. The bank’s lending performance for both 2017 and 2019 was consistent with 2018 performance.

The bank's 2018 loan originations in the moderate-income census tracts was below aggregate lending data by number and by dollar and the demographic figure by number.

The bank’s lending is adequate when the distance to the one rural moderate-income census tract is considered. The rural moderate-income census tract is located in Northern Big Horn County, which is 48 miles from the nearest bank branch. Also considered was the low numbers of farms located in moderate-income census tracts.

TABLE 46
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY
NORTHERN WYOMING AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	180	9.3	10.0	8.7	6.7	11.4
Middle	39	1,579	72.2	87.8	78.5	76.0	75.7
Upper	10	40	18.5	2.2	10.0	15.2	12.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.9	2.1	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	9.1	11.0	6.9
Middle	30	3,029	100.0	100.0	83.6	86.8	87.4
Upper	0	0	0.0	0.0	6.9	2.2	5.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.4	0.0	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not 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 good 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 good. The bank's lending performance for both 2017 and 2019 was similar to 2018.

The bank's 2018 loan originations to low-income borrowers were above aggregate lending data by number and by dollar and were consistent with the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and by dollar, and also the demographic figure.

TABLE 47 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL NORTHERN WYOMING AA							
Borrower Income Level	**Bank Loans**				**Aggregate HMDA Data**		**Families by Family Income %**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
Low	5	395	20.0	14.7	9.5	5.6	18.3
Moderate	5	398	20.0	14.8	21.5	17.1	18.4
Middle	9	760	36.0	28.2	20.5	20.3	23.5
Upper	5	790	20.0	29.3	23.7	30.1	39.8
Unknown	1	350	4.0	13.0	24.8	26.9	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 Business Lending

The borrower distribution of small business lending is good**.** The bank's lending performance for 2017 was similar to 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and below by dollar, and were below the demographic figure by number.

Small Farm Lending

The borrower distribution of small farm lending is good. The bank's lending performance for 2017 was similar to 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations to farms with revenues of less than $1MM were above aggregate lending data by number and below by dollar, and were below the demographic figure by number.

TABLE 48 DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS NORTHERN WYOMING AA							
Business Revenue By Size	**Small Business Loans**				**Aggregate CRA Data**		**% of Businesses by Revenue**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
$1MM or less	39	367	72.2	20.4	52.0	43.2	90.5
Over $1MM	7	1,082	13.0	60.1	Not Reported		8.0
Unknown	8	350	14.8	19.5			1.5
Farm Revenue By Size	**Small Farm Loans**				**Aggregate CRA Data**		**% of Farms by Revenue**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
$1MM or less	21	1,616	70.0	53.4	61.8	80.2	98.8
Over $1MM	5	1,223	16.7	40.4	Not Reported		1.1
Unknown	4	190	13.3	6.3			0.2

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

Community Development Lending

The bank makes an adequate level of CD loans. The bank originated three CD loans totaling $8.3MM in this AA. The loans consisted of two renewals and were all made to the same entity, an agricultural business that is a major employer in the region. While CD lending within the AA was limited, this is considered acceptable given the lack of CD lending opportunities.

TABLE 49 COMMUNITY DEVELOPMENT LOANS NORTHERN WYOMING AA		
Community Development Purpose	**#**	**$(000's)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	3	8,250
TOTAL LOANS	**3**	**8,250**

INVESTMENT TEST

The bank's performance under the investment test in the Northern Wyoming AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to credit and CD needs of its AA.

- Portions of 15 MBS investments allocated at the state level that impacted the AA were not included in Table 49. The underlying mortgage loans in these MBS investments helped LMI individuals within the Northern Wyoming AA obtain affordable housing and totaled $2.1MM.
- Multiple donations supported an economic development organization that provides services to small businesses in the AA.
- Eleven donations totaling $8,000 were made to support essential services to LMI students or schools.

TABLE 50
INVESTMENTS, GRANTS, AND DONATIONS
NORTHERN WYOMING AA

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	0	0	0	0	1	1	1	1
Community Services	0	0	0	0	22	13	22	13
Economic Development	0	0	0	0	5	3	5	3
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	28	17	28	17

[1] Book Value of Investment
[2] Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the Northern Wyoming AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates three branches, all with on-site ATMs and drive-through facilities. Two branches are located in middle-income census tracts and one is located in a moderate-income census tract.

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

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary materially by market. Branch lobby hours range from 9:00 am to 5:00 pm, Monday through Friday.

TABLE 51
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
NORTHERN WYOMING AA

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	66.7	0.0	0.0	100.0	0.0	14.3	71.4	14.3	0.0	100.0

Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)					
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total
	3	0	0	0	0	0	0	0	0

Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations
	5	5	1	0	11	6

[1] *Based on 2019 FFIEC census tract definitions.*
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank provides a relatively high level of CD services. Bank staff provided a total of 345 hours of CD qualifying services over the evaluation period. The following is a sample of activities that were considered particularly responsive to CD needs in the AA:

- A branch manager donated 63 hours serving as a board member for an organization serving LMI individuals struggling with substance abuse issues.
- A bank officer served as a board member, utilizing his financial expertise, for an affordable housing organization serving seniors, donating approximately 20 hours.

ALBANY COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

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

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

- The AA is comprised of 2 low-, 1 moderate-, and 7 middle-income census tracts. At the prior examination, the AA consisted of 1 low-, 3 moderate-, 4 middle-, and 2 upper-income census tracts.
- The bank operates one branch in a middle-income census tract and offers full lobby and drive-through services, along with an ATM.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 21.8 percent market share, ranking second out of seven FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation, a representative of a CD organization serving the AA.

TABLE 52
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Albany County, WY	36,299	37,565	3.5
State of Wyoming	563,626	579,679	2.8

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

- According to the 2015 ACS, the percent of the population 65 years and older was lower in the AA at 9.2 percent than the state at 13.5 percent. This is likely driven by the presence of the University of Wyoming.

TABLE 53
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Albany County, WY	70,054	67,355	(3.9)
State of Wyoming	65,964	73,194	11.0

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

- According to the 2015 ACS, the percent of families living below the poverty threshold was relatively high in the AA, at 13.3 percent compared to 7.7 percent in the state.
- A member of the community stated that lower incomes in the area are driven by the

young, college demographic. The member stated that a primary concern for residents is a lack of higher income employment opportunities.

TABLE 54
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Albany County, WY	189,500	216,100	14.0	646	727	12.5
State of Wyoming	174,000	194,800	12.0	666	789	18.5

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

- According to the 2015 ACS, the percent of the AA population with housing rental costs above 30 percent of residents' income is 57.5 percent within the AA, compared to the state at 35.7 percent.
- The affordability ratio within the AA indicates that the area is relatively unaffordable, at 19.9 percent, compared to the state at 30.2 percent.
- A member of the community indicated that the primary concern of residents is affordable housing and few high income opportunities and went on to say that the current housing stock is old and in poor condition.
- The community member stated that the City of Laramie is planning to begin requiring new housing developments include a portion dedicated to affordable housing. The contact indicated that securing funding for affordable housing projects has not been the major issue; the true barriers are difficulty in finding experienced developers that can meet project needs and timelines.

TABLE 55
UNEMPLOYMENT RATES

Region	2014	2015	2016	2017	2018
Albany County, WY	3.6	3.1	3.2	2.9	3.3
State of Wyoming	4.3	4.2	5.3	4.2	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member commented that the University of Wyoming provides the economic base of the AA and is the primary economic driver for the City of Laramie. Additionally, the member stated that land in Albany County is not conducive to farming due to poor soil quality and therefore, ranching is the primary agricultural product.
- Major industries providing employment within the AA include government, medical services, retail, and hospitality.
- The City of Laramie has had some difficulty attracting outside businesses, one of the major issues being a lack of housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ALBANY COUNTY AA

LENDING TEST

The bank’s performance under the lending test in the Albany County AA is good.

Lending Activity

The bank’s lending activities reflect good responsiveness to AA credit needs. Within the Northern Wyoming AA, individuals and businesses have utilized the bank’s products designed to serve LMI individuals and small businesses. During the evaluation period, the bank originated:

- 13 Home Advantage Mortgage loans totaling $722,000.
- 57 Small Business Lines of Credit totaling $77,000.
- 10 Mobile Home loans totaling $668,000.
- 4 SBA 504 loans totaling $4.1MM.

The bank makes limited use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank’s Home Advantage Mortgage loan program displays some product innovation to serve the AA.

Geographic Distribution of Loans

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

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is good. The bank’s lending performance for 2017 was weaker than 2018, while performance in 2019 was similar.

The bank's 2018 loan originations in the low-income census tracts were above aggregate lending data by number and by dollar and the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and was above by dollar, and was comparable to the demographic figure.

When loan dispersion within the AA was evaluated, no gaps or lapses in lending of concern were identified.

TABLE 56 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY ALBANY COUNTY AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	2	171	7.7	4.9	2.1	1.2	3.4
Moderate	1	279	3.8	7.9	5.6	4.6	5.5
Middle	23	3,070	88.5	87.2	92.3	94.2	91.1
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
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 adequate. The bank's lending performance for 2017 and 2019 were weaker than 2018.

The bank's 2018 loan originations in the low-income census tracts were consistent with aggregate lending data by number and by dollar and the percentage of businesses (the demographic figure) by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar, and also the demographic figure.

When loan dispersion within the AA was evaluated, no significant gaps or lapses in lending of concern were identified.

TABLE 57 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY ALBANY COUNTY AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	7	1,375	13.5	29.4	10.5	21.9	12.9
Moderate	14	1,103	26.9	23.6	21.3	19.6	19.2
Middle	31	2,205	59.6	47.1	66.3	57.9	67.9
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

Source: 2018 FFIEC Census Data
2018 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 good penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's lending performance for 2017 was weaker than 2018, while performance in 2019 was similar.

The bank's 2018 loan originations to low-income borrowers were above aggregate lending data by number and comparable by dollar, and were below the percentage of families by income percentage (the demographic figure) by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar, and also the demographic figure.

TABLE 58
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
ALBANY COUNTY AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	5	199	19.2	5.7	7.4	4.0	26.7
Moderate	7	1,049	26.9	29.8	21.3	15.5	16.5
Middle	6	750	23.1	21.3	28.6	26.4	21.1
Upper	5	1,122	19.2	31.9	31.8	35.9	35.7
Unknown	3	400	11.5	11.4	10.9	18.2	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 good. The bank's lending performance for 2017 and 2019 was consistent with 2018.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and below by dollar, and were below the demographic figure by number.

TABLE 59
DISTRIBUTION OF 2018 SMALL BUSINESS BY REVENUE SIZE OF BUSINESSES
ALBANY COUNTY AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	40	1,989	76.9	42.5	59.8	52.9	91.8
Over $1MM	7	1,572	13.5	33.6	Not Reported		7.1
Unknown	5	1,122	9.6	24.0			1.1

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

Community Development Lending

The bank makes a relatively high level of CD loans. The bank originated four CD loans totaling $13.7MM in this AA.

- The CD loans were made to three different entities for construction of new businesses or operating lines of credit to support qualifying CD activities.
- One loan's purpose was to construct a new medical facility that will provide essential services within an underserved nonmetropolitan middle-income census tract and to the surrounding LMI census tracts.
- Two loans totaling $3.7MM provided funding for construction of a new business that will provide between 25 and 50 permanent jobs for LMI individuals.

TABLE 60
COMMUNITY DEVELOPMENT LOANS
ALBANY COUNTY AA

Community Development Purpose	#	$(000's)
Affordable Housing	0	0
Community Services	0	0
Economic Development	3	3,738
Revitalization and Stabilization	1	10,000
TOTAL LOANS	**4**	**13,738**

INVESTMENT TEST

The bank's performance under the investment test in the Albany County AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

- Portions of five MBS investments allocated at the state level that impacted the AA were not included in Table 60. The underlying loans in the MBS investments helped LMI individuals within the Albany County AA obtain affordable housing and totaled $883,000.
- Multiple bonds totaling $2.8MM were invested in city bonds issued to finance improvements to the water system, providing essential services to an underserved area.
- Donations totaling approximately $26,000 were made to a regional hospital located in an underserved area, supporting essential infrastructure and services to the local community.
- Additionally, the bank donated over $5,000 to a nonprofit organization that raises and distributes funds to feed, educate, and help people find emergency services, a majority of which are targeted to LMI individuals and families.

TABLE 61
INVESTMENTS, GRANTS, AND DONATIONS
ALBANY COUNTY AA

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	26	42	26	42
Economic Development	0	0	0	0	2	20	2	20
Revitalization and Stabilization	0	0	32	2,845	3	15	36	2,860
TOTAL	0	0	32	2,845	31	77	63	2,922

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Albany County AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates one branch located in a middle-income tract with an on-site ATM and a drive-through.

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

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary by market. Branch lobby hours range from 9:00 am to 5:00 pm, Monday through Friday, with additional Saturday hours offered via the drive-through.

TABLE 62
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
ALBANY COUNTY AA

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	20.0	10.0	70.0	0.0	0.0	100.0

Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)					
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total
	1	0	0	0	0	0	0	0	0

Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations
	0	3	7	0	10	7

[1] *Based on 2019 FFIEC census tract definitions.*
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank provides a relatively high level of CD services. Bank staff provided a total of 359 hours of CD qualifying services over the evaluation period. The following is a sample of activities that were considered particularly responsive to CD needs in the AA:

- A bank officer donated approximately 55 hours serving as a board member for an economic development organization that provides education and technical assistance to primarily small businesses.
- A bank officer served as a board member for a medical facility located in an underserved middle-income tract that provides vital services, donating approximately 33 hours.

OTHER WYOMING METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Reviews)

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

Casper MSA AA

The bank's AA is comprised of Natrona County in its entirety, which also comprises the Casper, Wyoming MSA (see Appendix C for an AA map).

- The AA is comprised of 1 low-, 3 moderate-, 11 middle- and 3 upper-income census tracts. At the prior examination, the AA was comprised of 4 moderate-, 9 middle- and 5 upper-income census tracts.
- Of the bank's 31 full-service locations, there is 1 branch located in the AA and it offers full lobby and drive-through services, along with an ATM.
- According to the 2015 ACS, the population of the AA is 80,011.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 2.1 percent market share, ranking eighth out of eight FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation, a representative of an economic development organization.

Cheyenne MSA AA

The bank's AA is comprised of Laramie County in its entirety, which also comprises the Cheyenne, Wyoming MSA (see Appendix C for an AA map).

- The AA is comprised of 6 moderate-, 10 middle-, 4 upper- and 1 unknown-income census tracts. At the prior examination, the AA was comprised of 6 moderate-, 9 middle-, 5 upper- and 1 unknown-income census tracts.
- Of the bank's 31 full-service locations, there are 2 branches located in the AA. One branch offers both lobby and drive-through services and the other offers full lobby services with no drive-through. Both locations have an ATM.
- According to the 2015 ACS, the population of the AA is 95,431.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 14.2 percent market share, ranking 2nd of 18 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced to supplement this evaluation, a representative of an economic development organization within the AA.

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

The two Wyoming AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Casper MSA	consistent	consistent	exceeds
Cheyenne MSA	consistent	consistent	exceeds

STATE OF KANSAS

CRA RATING FOR KANSAS:	**Satisfactory**
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect excellent responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography (geographic distribution) is good.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes (borrower distribution) is good.
- The bank is a leader in making CD loans within its AA.

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

A full-scope review was conducted for the Kansas City Metropolitan AA, the only AA within the state. The overall state rating was based on the bank's performance in the aforementioned AA, and will be discussed concurrently with the performance in the AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KANSAS CITY METROPOLITAN AA/STATE OF KANSAS

The bank's AA is comprised of Clay, Jackson, and Platte Counties in Missouri, and Johnson, and Wyandotte Counties in Kansas in their entireties (see Appendix C for an AA map).

- The AA is comprised of 78 low-, 103 moderate-, 135 middle-, 128 upper-, and 19 unknown-income census tracts. At the prior examination, the AA had 65 low-, 111 moderate-, 133 middle-, 138 upper-, and 16 unknown-income tracts.
- Two of the bank's branches are located in the AA, each with an on-site ATM and both offer drive-through services.
- According to the June 30, 2019 FDIC Deposit Market Share Report, the bank has 0.3 percent market share, ranking 34th out of 91 FDIC-insured depository institutions operating in the AA.
- Two previously conducted community contacts were referenced during the evaluation. One contact was a representative from an affordable housing support program serving LMI residents in the AA. The other contact is from an organization focused on community research and specializes in small business and entrepreneurship.

TABLE 63
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Clay County, MO	221,939	230,361	3.8
Jackson County, MO	674,158	680,905	1.0
Platte County, MO	89,322	93,394	4.6
Johnson County, KS	544,179	566,814	4.2
Wyandotte County, KS	157,505	160,806	2.1
Kansas City, MO-KS MSA	2,009,342	2,055,675	2.3
State of Kansas	2,853,118	2,892,987	1.4

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

- A member of the community stated that the population growth stems from several major regional universities and relatively low competition from other nearby large cities and commented that many individuals migrating into the AA, especially downtown, are more affluent than the current population.

TABLE 64
MEDIAN FAMILY INCOME CHANGE

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Clay County, MO	71,009	75,104	5.8
Jackson County, MO	58,831	61,076	3.8
Platte County, MO	79,472	84,309	6.1
Johnson County, KS	90,380	94,850	4.9
Wyandotte County, KS	47,653	47,117	(1.1)
Kansas City, MO-KS MSA	68,846	72,623	5.5
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

- According to the 2015 ACS, the percent of families living below the poverty threshold also varies, with the highest percentages in the counties of Wyandotte and Jackson, at 19.1 percent and 13.5 percent, respectively, compared to the AA at 9.3 percent.
- A community contact further explained that these average income increases have not been experienced across all income levels and that LMI individuals have seen little-to-no income growth.

TABLE 65
HOUSING COSTS CHANGE

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Clay County, MO	153,900	154,900	0.6	736	828	12.5
Jackson County, MO	129,900	125,500	(3.4)	723	807	11.6
Platte County, MO	185,100	190,300	2.8	809	880	8.8
Johnson County, KS	209,900	215,600	2.7	857	947	10.5
Wyandotte County, KS	97,600	89,200	(8.6)	698	777	11.3
Kansas City, MO-KS MSA	158,603	159,473	0.5	760	844	11.1
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

- According to the 2015 ACS, the percent of the population with housing rental costs above 30 percent of residents' income was higher in Wyandotte County and Jackson County, at 48.0 percent and 47.7 percent, when compared to 44.1 percent within the AA. High rental costs likely make saving for a home purchase down payment difficult.
- The affordability ratio within the AA indicates that the area is relatively less affordable at 35.6 percent, than the state at 39.6 percent. The least affordable county is Johnson at 35.3 percent and more affordable is Wyandotte at 48.0 percent.
- The age of housing stock varies widely across the AA, with an average age in Platte County and Johnson County of 28 and 31 years, respectively, compared to Wyandotte County and Jackson County at 55 and 48 years, respectively. Older homes may be

inaccessible to LMI individuals who cannot afford to do major remodeling or improvements to make it livable.

- A community member noted that the most significant barrier to increasing the amount of affordable housing is the cost of housing development in the AA, and few developers are willing to pass up the huge profit margins gained from building market rate properties. Additionally, the community member mentioned another barrier to the creation of affordable housing is the limited amount of LIHTCs that usually fund one small to medium size project per year.
- A community member stated that a major credit need for current senior and LMI homeowners to help them stay in their homes is low-fee and low-cost repair or rehabilitation loans. If the LMI homeowner is forced to move because the home falls into disrepair, investors quickly purchase and renovate the property, raising the value and potentially pricing out any LMI individuals.
- The member specifically mentioned the bank as the only financial institution the member knew of providing these type of low-cost and low-fee loans to those who may be outside of typical lending standards.

TABLE 66
UNEMPLOYMENT RATES

Region	2014	2015	2016	2017	2018
Clay County, MO	5.4	4.5	3.9	3.6	2.9
Jackson County, MO	7.1	5.9	5.1	4.4	3.7
Platte County, MO	5.1	4.2	3.6	3.2	2.6
Johnson County, KS	3.8	3.4	3.3	3.0	2.9
Wyandotte County, KS	6.9	6.1	5.7	5.2	4.8
Kansas City, MO-KS MSA	5.6	4.8	4.3	3.8	3.4
State of Kansas	4.5	4.2	4.2	3.7	3.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The community member stated that healthcare and social assistance, retail, manufacturing, professional and technical services, and education are the largest employers. In particular, the University of Kansas Hospital System and Cerner, a medical sales and consulting firm, are significant regional employers.
- A community member stated that the AA is experiencing economic growth, but the development has been “pocketed” in some suburban areas and also the core downtown area.
- When asked about the low unemployment rate in the AA, the member said that for the unemployed and those living in poverty, living in Kansas City has become very challenging. Getting to and from work without a car is a challenge due to a lack of public transportation systems and the aforementioned growth has caused rent rates to increase significantly. These factors are causing LMI residents to be displaced and move outside the AA.
- When asked about credit needs in the AA, a community member stated that small businesses and entrepreneurs need credit products that are more flexible and easier to understand and obtain.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY METROPOLITAN AA/STATE OF KANSAS

LENDING TEST

The bank's performance under the lending test in the Kansas City Metropolitan AA and the state of Kansas is rated High Satisfactory.

Lending Activity

The bank's lending activities reflect excellent responsiveness to AA credit needs. Within the Kansas City Metropolitan AA, individuals and businesses have utilized the bank's products designed to serve LMI individuals and small businesses. During the evaluation period, the bank originated:

- 10 Home Advantage Mortgage loans totaling $714,000.
- 108 Small Business Lines of Credit totaling $139,000.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Within the Kansas City Metropolitan AA, the bank has partnered with affordable housing organizations to assist home buyers in navigating the complex home buying process, combining financing and government grants successfully.

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is excellent. The bank's lending performance for 2017 and 2019 were consistent with 2018.

The bank's 2018 loan originations in the low-income census tracts were above aggregate lending data by number and by dollar and the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar and also the demographic figure.

When loan dispersion within the AA was evaluated, it was identified that the bank's lending did not reach into the LMI census tracts within the Northeast portion of the Kansas City Metropolitan AA. However, this area is a significant distance from the bank's two branches, which are located in the far Southwest portion of the AA. Additionally, the AA is served by 91 FDIC-insured financial institutions, presenting many competing financial institutions.

TABLE 67
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY
KANSAS CITY METROPOLITAN AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	8	5,439	16.0	56.1	3.2	2.4	6.6
Moderate	21	1,679	42.0	17.3	16.1	11.0	18.0
Middle	8	682	16.0	7.0	35.7	31.6	35.5
Upper	13	1,888	26.0	19.5	44.8	54.3	39.7
Unknown	0	0	0.0	0.0	0.2	0.6	0.2
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 adequate. The bank’s lending performance for 2017 was similar to 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations in the low-income census tracts were consistent with aggregate lending data by number and by dollar and the demographic figure by number. Lending in moderate-income census tracts was comparable with aggregate lending data by number and below by dollar, and also comparable to the demographic figure.

When loan dispersion within the AA was evaluated, it was identified that the bank’s lending did not reach into the census tracts within the Northeast portion of the Kansas City metropolitan area. However, this area is a significant distance from the banks two branches, and the AA is served by 91 FDIC-insured financial institutions presenting significant competition.

TABLE 68
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
KANSAS CITY METROPOLITAN AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	7	337	7.8	7.1	7.1	9.3	7.4
Moderate	17	577	18.9	12.1	17.0	16.8	19.2
Middle	23	443	25.6	9.3	29.6	28.1	32.7
Upper	37	3,013	41.1	63.0	42.7	39.3	38.7
Unknown	6	409	6.7	8.6	2.7	6.2	2.0
Not Reported	0	0	0.0	0.0	1.0	0.3	0.0

Source: 2018 FFIEC Census Data
2018 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 good penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank's lending performance for 2017 was weaker than 2018, while performance in 2019 was stronger.

The bank's 2018 loan originations to low-income borrowers were above aggregate lending data by number and comparable by dollar and were below the demographic figure by number. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar, and also the demographic figure.

Additional performance context considered in the overall rating for this product included the numbers of loans to individuals with unknown incomes, the bank's strategic focus on commercial lending, and the lack of affordable housing for LMI individuals in the AA. These loans to borrowers with unknown incomes are for rental or multifamily properties, which are business-purpose loans. When factoring out loans with unknown borrower incomes from both bank lending and aggregate lending data, the bank's lending performance was above aggregate lenders.

TABLE 69
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
KANSAS CITY METROPOLITAN AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	6	441	12.0	4.6	8.0	3.9	21.4
Moderate	5	435	10.0	4.5	19.5	13.3	17.2
Middle	4	443	8.0	4.6	21.6	18.3	20.0
Upper	7	1,045	14.0	10.8	35.7	42.1	41.4
Unknown	28	7,324	56.0	75.6	15.2	22.4	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 good. The bank's lending performance for 2017 was consistent with 2018, while performance in 2019 was weaker.

The bank's 2018 loan originations to businesses with revenues of less than $1MM were above aggregate lending data by number and by dollar and were below the demographic figure by number.

TABLE 70
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING
BY REVENUE SIZE OF BUSINESSES
KANSAS CITY METROPOLITAN AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	66	1,689	73.3	35.3	43.0	28.4	89.5
Over $1MM	21	2,857	23.3	59.8	Not Reported		9.6
Unknown	3	233	3.3	4.9			0.9

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

Community Development Lending

The bank is a leader in making CD loans. The bank originated five CD loans totaling $3.1MM in this AA.

- CD loans primarily consisted of providing funding for affordable housing units targeted at providing housing for LMI individuals, a critical need within the AA.
- One loan will be utilized for working capital to purchase new properties by an organization that provides first-time home buyer programs, affordable housing, and financial assistance for LMI individuals.
- One loan for $289,000 to renovate and improve a small office building, in line with a government revitalization plan within the AA.

TABLE 71
COMMUNITY DEVELOPMENT LOANS
KANSAS CITY METROPOLITAN AA

Community Development Purpose	#	$(000's)
Affordable Housing	3	1,664
Community Services	0	0
Economic Development	1	289
Revitalization and Stabilization	1	1,100
TOTAL LOANS	**5**	**3,053**

INVESTMENT TEST

The bank's performance under the investment test in the Kansas City Metropolitan AA and state of Kansas is rated Outstanding.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA.

- Portions of 11 MBS investments allocated at the state level that impacted the AA were not included in Table 71. The underlying mortgage loans in these MBS investments helped LMI individuals within the Kansas City Metropolitan AA obtain affordable housing and totaled $4.2MM.
- A $2,500 donation was made to support the education and provision of resources to young women from LMI households.
- Donations totaling over $10,000 were made to a nonprofit organization to support scholarships for extremely low-income students.

TABLE 72
INVESTMENTS, GRANTS, AND DONATIONS
KANSAS CITY METROPOLITAN AA

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	0	0	2	5,531	1	3	3	5,534
Community Services	0	0	2	944	15	19	17	963
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	0	0	4	6,475	16	21	20	6,497

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Kansas City Metropolitan AA and state of Kansas is rated Low Satisfactory.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates two branches, both with on-site ATMs and drive-through facilities, located in upper-income census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed a mobile branch that serviced a senior living facility, causing no significant change in branch accessibility to LMI individuals.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed under the overall bank review and did not vary materially by market. Branch lobby hours range from 9:00 am to 5:00 pm, Monday through Friday, and 9:00 am to noon on Saturday.

TABLE 73 RETAIL AND COMMUNITY DEVELOPMENT SERVICES KANSAS CITY METROPOLITAN AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	100.0	0.0	100.0	16.8	22.2	29.2	27.6	4.1	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	2		0		1		0	0	0	(1)	0	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	4		28		1		2		35		16	

[1] *Based on 2019 FFIEC census tract definitions.*
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank provides an adequate level of CD services. Bank staff provided a total of 354 hours of CD qualifying services over the evaluation period. The following is a sample of activities that were considered responsive to CD needs in the AA:

- Multiple bank staff donated approximately 105 hours teaching financial education curriculum to LMI students.
- Multiple bank officers served as board members, utilizing their financial expertise, for an affordable housing organization, donating approximately 42 hours.

APPENDIX A

SCOPE OF EXAMINATION

FINANCIAL INSTITUTION	PRODUCTS/SERVICES REVIEWED	
ANB Bank Denver, Colorado	• Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Other-Purpose Loans	• Small Business Loans • Small Farm Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services

TIME PERIODS REVIEWED

HMDA LAR:	January 1, 2017 to December 31, 2019
CRA LAR:	January 1, 2017 to December 31, 2019
Community Development Activities:	January 1, 2017 to December 31, 2019

LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION

AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Sturm Financial Group	Holding Company	None
Sturm Financial Capital Trust II	Sub of Holding Company	None
First National Wyoming Statutory Trust I	Sub of Holding Company	None
Aspen Branch Holdings, LLC	Sub of Holding Company	None
SE BCC Building, LLC	Sub of Holding Company	None
Community First Data Services, Inc.	Sub of Bank	None

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	COMMUNITY CONTACTS
COLORADO			
MSA 19740 (Denver MSA)	Full Review	None	2 prior
MSA 17820 (Colorado Springs MSA)	Full Review	None	3 prior
MSA 99999 (Mountain Colorado)	Full Review	None	2 prior
MSA 24300 (Grand Junction MSA)	Limited Review	None	1 prior
MSA 14500 (Boulder MSA)	Limited Review	None	1 prior
MSA 22660 (Fort Collins MSA)	Limited Review	None	1 prior
MSA 99999 (San Miguel County)	Limited Review	None	none
WYOMING			
MSA 99999 (Northern Wyoming)	Full Review	None	2 prior
MSA 99999 (Albany County)	Full Review	None	1 prior
MSA 18940 (Cheyenne MSA)	Limited Review	None	1 prior
MSA 16220 (Casper MSA)	Limited Review	None	1 prior
KANSAS			
MSA 28140 (Kansas City MSA)	Full Review	None	2 prior

APPENDIX B

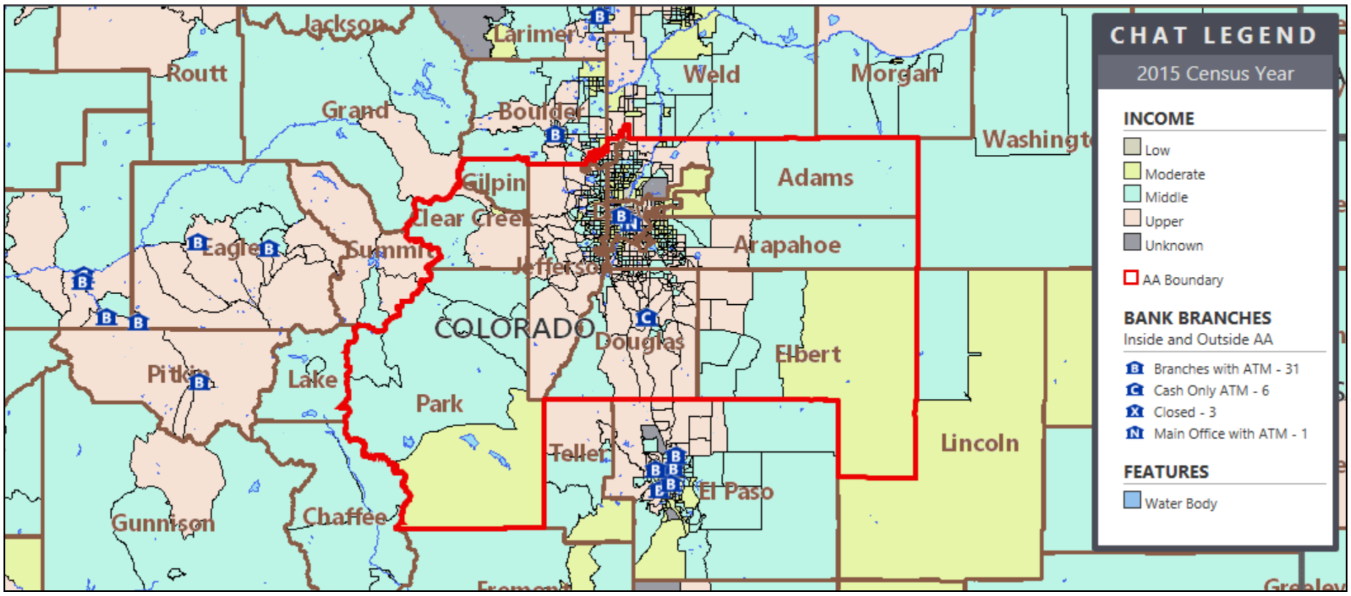
SUMMARY OF STATE RATINGS

STATE NAME	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Wyoming	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Kansas	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

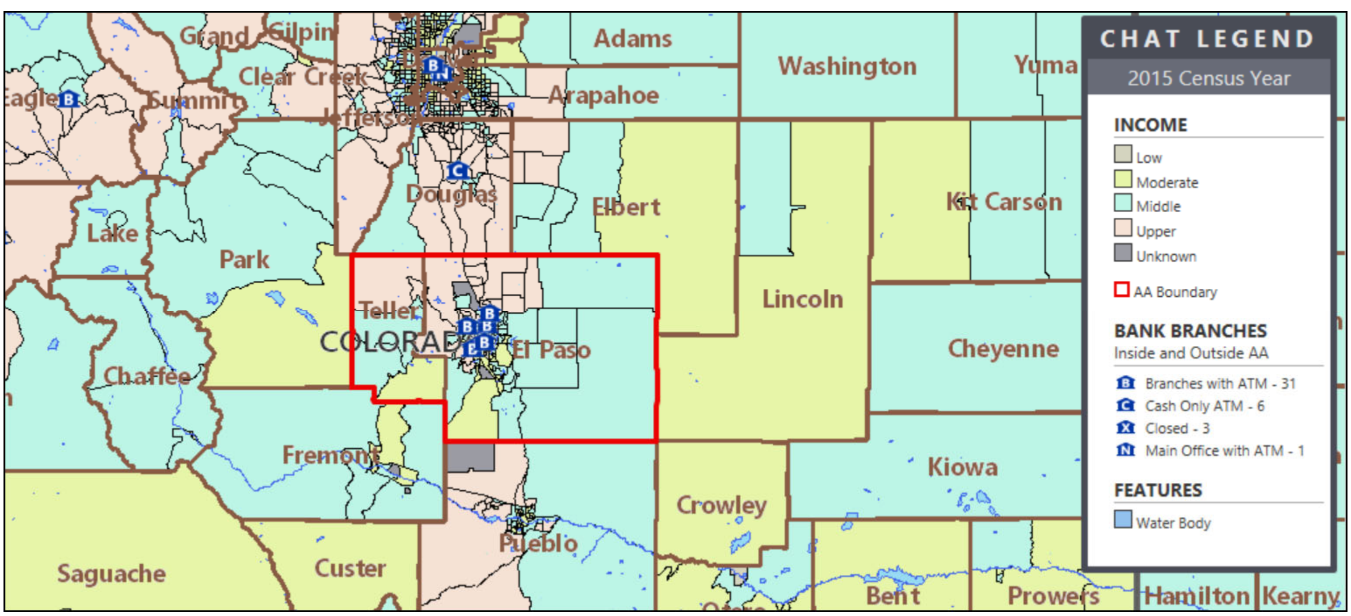
APPENDIX C

MAPS OF THE ASSESSMENT AREAS

A. Denver MSA AA

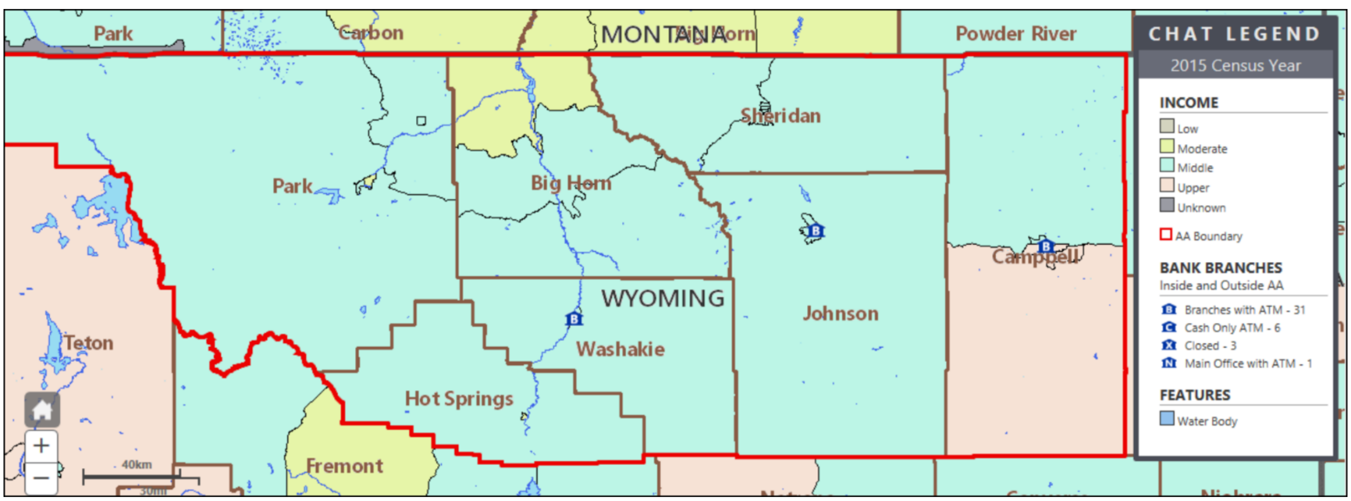


B. Colorado Springs MSA AA



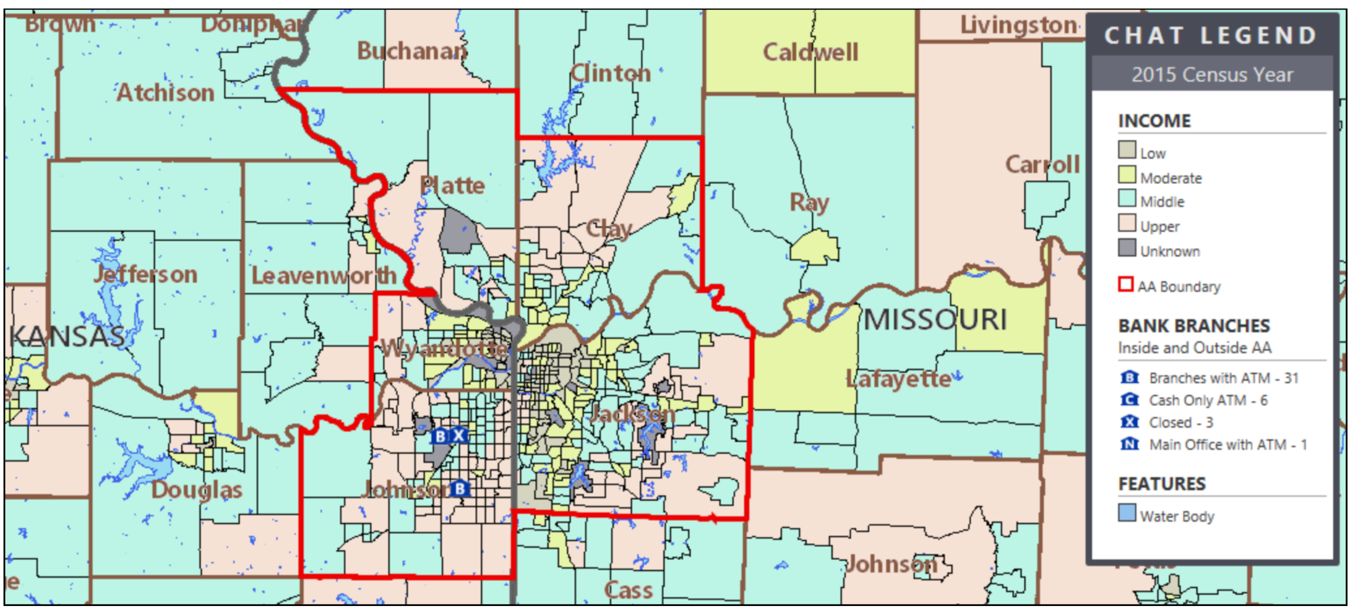
C. Mountain Colorado AA

D. Northern Wyoming AA



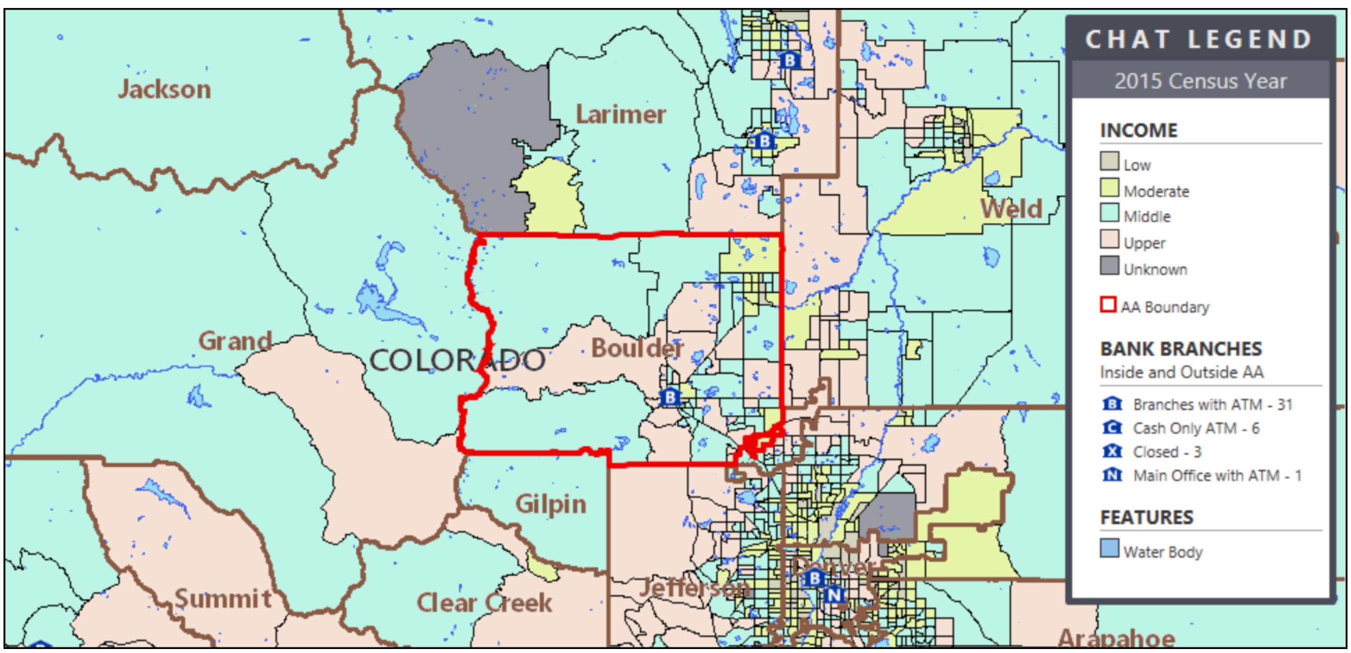
E. Albany County AA

F. Kansas City Metropolitan AA

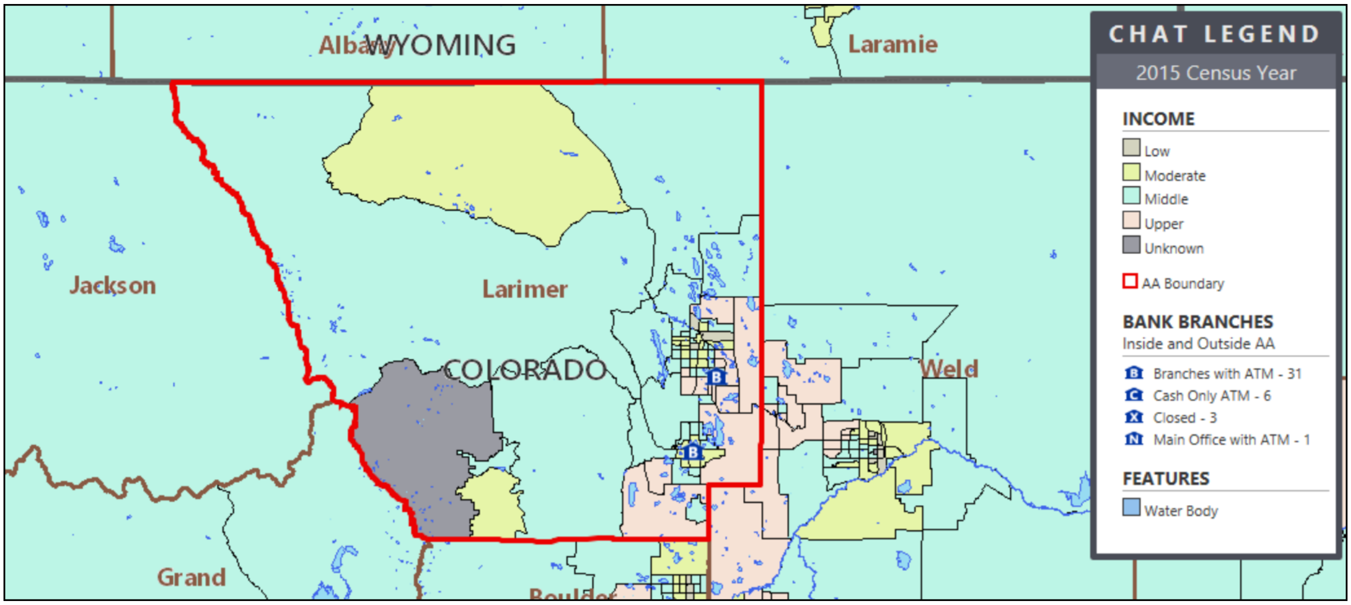


G. Grand Junction MSA AA

H. Boulder MSA AA

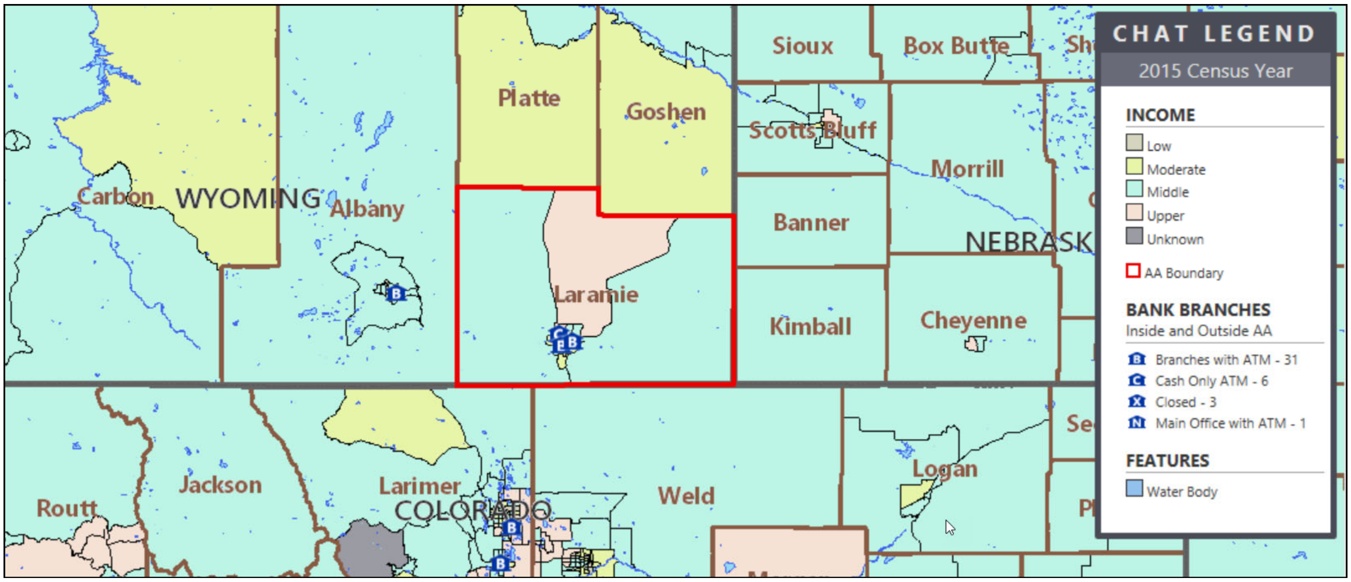


I. Fort Collins MSA AA

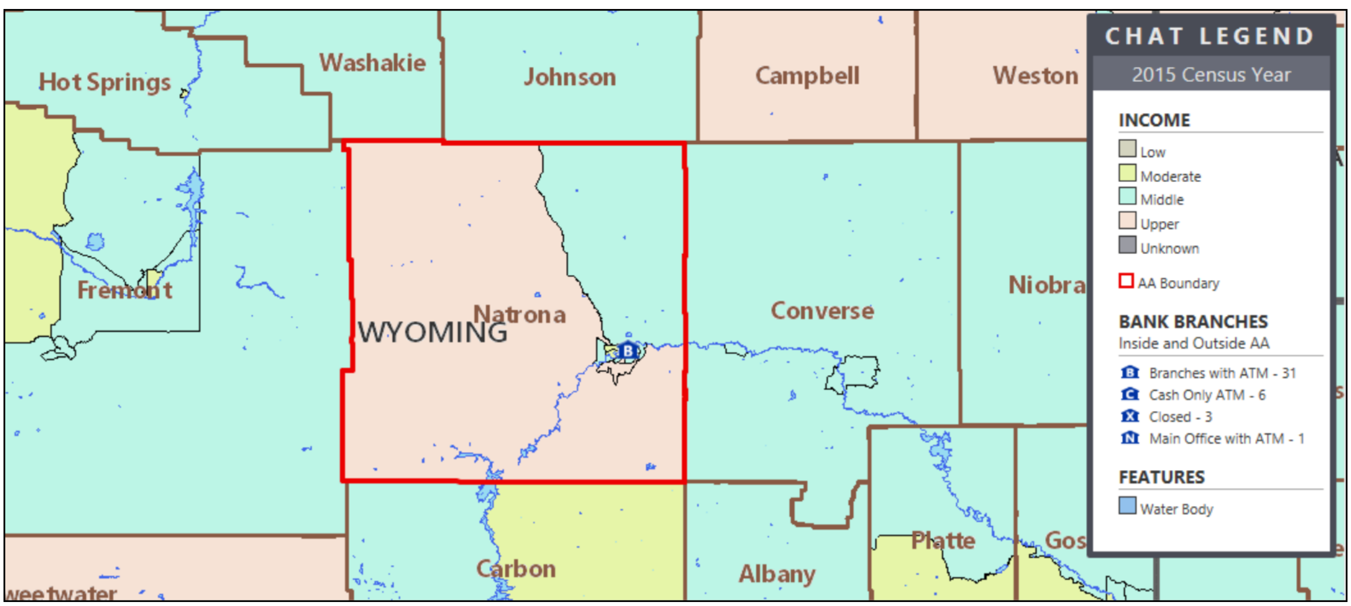


J. San Miguel County AA

K. Cheyenne MSA AA



L. Casper MSA AA



APPENDIX D

2019 AND 2017 ANALYSIS TABLES FOR FULL-SCOPE ASSESSMENT AREAS

A. Denver MSA AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables
B. Colorado Springs MSA AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables
C. Mountain Colorado AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables
D. Northern Wyoming AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables
E. Albany County AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables
F. Kansas City Metropolitan AA (Full-Scope Review) – 2017, 2018, 2019 Demographic and 2017 and 2019 Lending Tables

Footnotes for all Analysis and Demographics Tables

- 2019, 2018, 2017 FFIEC Census Data
- Business and Farm data based on 2019, 2018, and 2017 Dun & Bradstreet Data
- 2011 – 2015 U.S. Census Bureau: American Community Survey
- Note: Percentages may not add up to 100.0 due to rounding.

A. Denver MSA AA

TABLE D-1 2017 DENVER MSA AA DEMOGRAPHICS								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	**621**	**100.0**	**658,359**	**100.0**	**52,836**	**8.0**	**658,359**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	**1,105,423**	**658,882**	**100.0**	**59.6**	**383,221**	**34.7**	**63,320**	**5.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	9,757	6.3	8,271	5.9	1,429	11.8	57	4.4
Moderate	27,470	17.8	24,708	17.5	2,599	21.5	163	12.7
Middle	50,393	32.7	46,320	32.9	3,683	30.5	390	30.4
Upper	66,120	42.9	61,306	43.5	4,156	34.4	658	51.4
Unknown	502	0.3	281	0.2	208	1.7	13	1.0
Total AA	**154,242**	**100.0**	**140,886**	**100.0**	**12,075**	**100.0**	**1,281**	**100.0**
Percentage of Total Businesses:				**91.3**		**7.8**		**0.8**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	57	3.8	51	3.5	6	20.0	0	0.0
Moderate	216	14.4	211	14.4	5	16.7	0	0.0
Middle	505	33.7	499	34.0	6	20.0	0	0.0
Upper	717	47.9	704	48.0	13	43.3	0	0.0
Unknown	3	0.2	3	0.2	0	0.0	0	0.0
Total AA	**1,498**	**100.0**	**1,468**	**100.0**	**30**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.0**		**2.0**		**0.0**

TABLE D-2
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
DENVER MSA AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	15	4,521	20.8	14.3	4.9	4.4	4.6
Moderate	8	2,317	11.1	7.3	20.1	16.1	18.7
Middle	16	6,189	22.2	19.6	35.8	32.9	34.4
Upper	33	18,531	45.8	58.7	39.2	46.5	42.3
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
Home Purchase Loans							
Low	5	1,824	13.9	11.0	5.2	3.9	4.6
Moderate	4	1,538	11.1	9.3	18.8	14.5	18.7
Middle	8	3,167	22.2	19.1	34.6	31.6	34.4
Upper	19	10,048	52.8	60.6	41.4	49.9	42.3
Unknown	0	0	0.0	0.0	0.0	0.1	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	9	2,179	30.0	23.2	4.6	3.3	4.6
Moderate	4	779	13.3	8.3	21.5	16.2	18.7
Middle	5	1,614	16.7	17.2	37.1	34.0	34.4
Upper	12	4,801	40.0	51.2	36.8	46.4	42.3
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
Home Improvement Loans							
Low	0	0	0.0	0.0	4.8	3.8	4.6
Moderate	0	0	0.0	0.0	20.0	16.1	18.7
Middle	2	898	66.7	78.2	35.8	33.4	34.4
Upper	1	250	33.3	21.8	39.4	46.7	42.3
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
Multifamily Loans							**% of Multifamily Units**
Low	1	518	33.3	11.6	18.2	14.4	13.6
Moderate	0	0	0.0	0.0	26.8	29.7	29.8
Middle	1	510	33.3	11.4	36.7	37.4	37.4
Upper	1	3,432	33.3	77.0	18.2	18.5	19.2
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

TABLE D-3 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY DENVER MSA AA							
Census Tract Income Level	**Small Business Loans**				**Aggregate CRA Data**		**% of Businesses**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
Low	12	3,261	13.3	12.2	8.1	11.2	6.3
Moderate	19	5,528	21.1	20.6	18.7	20.3	17.8
Middle	29	9,104	32.2	33.9	31.0	30.2	32.7
Upper	30	8,927	33.3	33.3	40.7	36.6	42.9
Unknown	0	0	0.0	0.0	0.4	1.1	0.3
Not Reported	0	0	0.0	0.0	1.1	0.7	0.0

TABLE D-4
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL
DENVER MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	1	595	1.4	1.9	5.6	2.7	21.3
Moderate	5	983	6.9	3.1	20.0	13.9	17.5
Middle	6	2,393	8.3	7.6	23.2	20.3	20.5
Upper	34	14,924	47.2	47.3	35.5	42.2	40.8
Unknown	26	12,663	36.1	40.1	15.8	20.9	0.0
Home Purchase Loans							
Low	1	595	2.8	3.6	3.5	1.7	21.3
Moderate	3	630	8.3	3.8	19.2	13.7	17.5
Middle	3	1,278	8.3	7.7	23.7	21.8	20.5
Upper	16	8,814	44.4	53.2	39.5	48.8	40.8
Unknown	13	5,260	36.1	31.7	14.1	14.1	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	7.6	4.4	21.3
Moderate	2	353	6.7	3.8	20.8	16.2	17.5
Middle	2	865	6.7	9.2	22.5	21.1	20.5
Upper	16	5,212	53.3	55.6	30.5	39.3	40.8
Unknown	10	2,943	33.3	31.4	18.6	19.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	8.7	5.8	21.3
Moderate	0	0	0.0	0.0	22.3	18.6	17.5
Middle	1	250	33.3	21.8	25.3	24.3	20.5
Upper	2	898	66.7	78.2	39.4	46.6	40.8
Unknown	0	0	0.0	0.0	4.4	4.6	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	21.3
Moderate	0	0	0.0	0.0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	0.0	0.0	20.5
Upper	0	0	0.0	0.0	0.0	0.0	40.8
Unknown	3	4,460	100.0	100.0	100.0	100.0	0.0

TABLE D-5
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES
DENVER MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	28	6,745	31.1	25.1	53.4	35.3	91.3
Over $1MM	53	17,987	58.9	67.1	Not Reported		7.8
Unknown	9	2,088	10.0	7.8			0.8

TABLE D-6
2018 DENVER MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	**621**	**100.0**	**658,359**	**100.0**	**52,836**	**8.0**	**658,359**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	**1,105,423**	**658,882**	**100.0**	**59.6**	**383,221**	**34.7**	**63,320**	**5.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12,873	6.6	11,293	6.2	1,471	11.8	109	5.0
Moderate	35,872	18.3	32,984	18.2	2,607	20.9	281	12.8
Middle	63,755	32.6	59,271	32.7	3,808	30.6	676	30.9
Upper	82,658	42.2	77,191	42.6	4,359	35.0	1,108	50.7
Unknown	603	0.3	388	0.2	202	1.6	13	0.6
Total AA	**195,761**	**100.0**	**181,127**	**100.0**	**12,447**	**100.0**	**2,187**	**100.0**
Percentage of Total Businesses:				**92.5**		**6.4**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	90	4.6	82	4.3	8	24.2	0	0.0
Moderate	256	13.1	252	13.1	4	12.1	0	0.0
Middle	668	34.1	660	34.3	6	18.2	2	66.7
Upper	938	47.9	922	47.9	15	45.5	1	33.3
Unknown	7	0.4	7	0.4	0	0.0	0	0.0
Total AA	**1,959**	**100.0**	**1,923**	**100.0**	**33**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.2**		**1.7**		**0.2**

TABLE D-7
2019 DENVER MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	**621**	**100.0**	**658,359**	**100.0**	**52,836**	**8.0**	**658,359**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	**1,105,423**	**658,882**	**100.0**	**59.6**	**383,221**	**34.7**	**63,320**	**5.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12,103	6.9	10,605	6.5	1,409	11.9	89	5.5
Moderate	32,658	18.6	30,013	18.5	2,448	20.7	197	12.1
Middle	57,327	32.6	53,155	32.8	3,658	30.9	514	31.5
Upper	73,029	41.6	68,083	42.0	4,125	34.9	821	50.4
Unknown	584	0.3	388	0.2	187	1.6	9	0.6
Total AA	**175,701**	**100.0**	**162,244**	**100.0**	**11,827**	**100.0**	**1,630**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.7**		**0.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	114	6.0	104	5.6	10	27.0	0	0.0
Moderate	266	14.0	260	14.0	6	16.2	0	0.0
Middle	640	33.7	631	33.9	7	18.9	2	66.7
Upper	863	45.4	849	45.6	13	35.1	1	33.3
Unknown	17	0.9	16	0.9	1	2.7	0	0.0
Total AA	**1,900**	**100.0**	**1,860**	**100.0**	**37**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**97.9**		**1.9**		**0.2**

TABLE D-8.1 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY DENVER MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	7	1,452	10.6	3.6			4.6
Moderate	17	3,342	25.8	8.4			18.7
Middle	16	23,077	24.2	58.0			34.4
Upper	26	11,933	39.4	30.0			42.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Home Purchase Loans							
Low	3	910	15.0	8.7			4.6
Moderate	4	747	20.0	7.1			18.7
Middle	4	2,340	20.0	22.3			34.4
Upper	9	6,509	45.0	62.0			42.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Home Refinance Loans							
Low	4	542	11.1	6.1			4.6
Moderate	10	1,661	27.8	18.7			18.7
Middle	9	1,682	25.0	18.9			34.4
Upper	13	5,007	36.1	56.3			42.3
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			4.6
Moderate	0	0	0.0	0.0			18.7
Middle	0	0	0.0	0.0			34.4
Upper	2	340	100.0	100.0			42.3
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			13.6
Moderate	0	0	0.0	0.0			29.8
Middle	3	19,055	100.0	100.0			37.4
Upper	0	0	0.0	0.0			19.2
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-8.2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
DENVER MSA AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0			4.6
Moderate	0	0	0.0	0.0			18.7
Middle	0	0	0.0	0.0			34.4
Upper	0	0	0.0	0.0			42.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0			4.6
Moderate	3	934	60.0	92.4			18.7
Middle	0	0	0.0	0.0			34.4
Upper	2	77	40.0	7.6			42.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0			4.6
Moderate	0	0	0.0	0.0			18.7
Middle	0	0	0.0	0.0			34.4
Upper	0	0	0.0	0.0			42.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-9
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
DENVER MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	6	1,402	4.3	6.9			6.9
Moderate	28	4,458	19.9	21.9			18.6
Middle	42	8,560	29.8	42.0			32.6
Upper	65	5,966	46.1	29.3			41.6
Unknown	0	0	0.0	0.0			0.3
Not Reported	0	0	0.0	0.0			0.0

TABLE D-10.1 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL DENVER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	5	504	7.6	1.3			21.3
Moderate	11	1,539	16.7	3.9			17.5
Middle	9	2,606	13.6	6.5			20.5
Upper	18	11,396	27.3	28.6			40.8
Unknown	23	23,759	34.8	59.7			0.0
Home Purchase Loans							
Low	0	0	0.0	0.0			21.3
Moderate	0	0	0.0	0.0			17.5
Middle	2	594	10.0	5.7			20.5
Upper	10	7,693	50.0	73.2			40.8
Unknown	8	2,219	40.0	21.1			0.0
Home Refinance Loans							
Low	5	504	13.9	5.7			21.3
Moderate	9	1,429	25.0	16.1			17.5
Middle	5	1,955	13.9	22.0			20.5
Upper	6	2,769	16.7	31.1			40.8
Unknown	11	2,235	30.6	25.1			0.0
Home Improvement Loans							
Low	0	0	0.0	0.0			21.3
Moderate	0	0	0.0	0.0			17.5
Middle	0	0	0.0	0.0			20.5
Upper	1	90	50.0	26.5			40.8
Unknown	1	250	50.0	73.5			0.0
Multifamily Loans							
Low	0	0	0.0	0.0			21.3
Moderate	0	0	0.0	0.0			17.5
Middle	0	0	0.0	0.0			20.5
Upper	0	0	0.0	0.0			40.8
Unknown	3	19,055	100.0	100.0			0.0

TABLE D-10.2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
DENVER MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0			21.3
Moderate	0	0	0.0	0.0			17.5
Middle	0	0	0.0	0.0			20.5
Upper	0	0	0.0	0.0			40.8
Unknown	0	0	0.0	0.0			0.0
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0			21.3
Moderate	2	110	40.0	10.9			17.5
Middle	2	57	40.0	5.6			20.5
Upper	1	844	20.0	83.5			40.8
Unknown	0	0	0.0	0.0			0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0			21.3
Moderate	0	0	0.0	0.0			17.5
Middle	0	0	0.0	0.0			20.5
Upper	0	0	0.0	0.0			40.8
Unknown	0	0	0.0	0.0			0.0

TABLE D-11
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
DENVER MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	65	3,372	46.1	16.5			92.3
Over $1MM	65	13,351	46.1	65.5	Not Reported		6.7
Unknown	11	3,663	7.8	18.0			0.9

B. Colorado Springs MSA AA

TABLE D-12
2017 COLORADO SPRINGS MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	**136**	**100.0**	**174,943**	**100.0**	**14,460**	**8.3**	**174,943**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	**274,475**	**161,082**	**100.0**	**58.7**	**93,786**	**34.2**	**19,607**	**7.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,874	7.1	2,546	6.7	307	15.5	21	5.7
Moderate	9,143	22.6	8,508	22.4	561	28.3	74	20.1
Middle	13,595	33.7	13,006	34.2	477	24.1	112	30.4
Upper	14,721	36.4	13,936	36.6	626	31.6	159	43.2
Unknown	58	0.1	47	0.1	9	0.5	2	0.5
Total AA	**40,391**	**100.0**	**38,043**	**100.0**	**1,980**	**100.0**	**368**	**100.0**
Percentage of Total Businesses:				**94.2**		**4.9**		**0.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13	2.7	13	2.7	0	0.0	0	0.0
Moderate	64	13.1	63	13.0	1	16.7	0	0.0
Middle	233	47.6	230	47.5	3	50.0	0	0.0
Upper	180	36.7	178	36.8	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**490**	**100.0**	**484**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.8**		**1.2**		**0.0**

TABLE D-13 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY COLORADO SPRINGS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	3	220	7.7	4.9	2.7	2.0	3.2
Moderate	21	1,564	53.8	34.6	18.5	14.7	19.8
Middle	8	1,224	20.5	27.1	45.7	41.4	42.1
Upper	7	1,510	17.9	33.4	33.1	42.0	34.9
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 D-14 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY COLORADO SPRINGS MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	5	941	16.7	17.9	7.1	10.6	7.5
Moderate	10	2,499	33.3	47.5	22.0	24.4	22.3
Middle	9	750	30.0	14.3	32.5	28.7	33.4
Upper	6	1,071	20.0	20.4	37.1	35.3	36.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.1
Not Reported	0	0	0.0	0.0	1.3	1.0	0.0

TABLE D-15 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL COLORADO SPRINGS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	2	139	5.1	3.1	5.1	2.7	20.2
Moderate	6	579	15.4	12.8	19.0	14.2	18.5
Middle	4	219	10.3	4.8	24.8	22.7	20.3
Upper	6	1,548	15.4	34.3	31.8	37.3	41.0
Unknown	21	2,033	53.8	45.0	19.3	23.0	0.0

TABLE D-16
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
COLORADO SPRINGS MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	8	349	26.7	6.6	56.5	42.1	93.1
Over $1MM	18	4,414	60.0	83.9	Not Reported		6.2
Unknown	4	498	13.3	9.5			0.6

TABLE D-17
2018 COLORADO SPRINGS MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	**136**	**100.0**	**174,943**	**100.0**	**14,460**	**8.3**	**174,943**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	**274,475**	**161,082**	**100.0**	**58.7**	**93,786**	**34.2**	**19,607**	**7.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,874	7.1	2,546	6.7	307	15.5	21	5.7
Moderate	9,143	22.6	8,508	22.4	561	28.3	74	20.1
Middle	13,595	33.7	13,006	34.2	477	24,1	112	30.4
Upper	14,721	36.4	13,936	36.6	626	31.6	159	43.2
Unknown	58	0.1	47	0.1	9	0.5	2	0.5
Total AA	**40,391**	**100.0**	**38,043**	**100.0**	**1,980**	**100.0**	**368**	**100.0**
Percentage of Total Businesses:				**94.2**		**4.9**		**0.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13	0.0	13	2.7	0	0.0	0	0.0
Moderate	64	13.1	63	13.0	1	16.7	0	0.0
Middle	233	47.6	230	47.5	3	50.0	0	0.0
Upper	180	36.7	178	36.8	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**490**	**100.0**	**484**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.5**		**1.5**		**0.0**

TABLE D-18
2019 COLORADO SPRINGS MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	**136**	**100.0**	**174,943**	**100.0**	**14,460**	**8.3**	**174,943**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	**274,475**	**161,082**	**100.0**	**58.7**	**93,786**	**34.2**	**19,607**	**7.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,742	7.4	2,432	7.0	295	15.8	15	5.8
Moderate	8,527	23.0	7,945	22.8	535	28.6	47	18.1
Middle	12,414	33.5	11,879	34.1	446	23.8	89	34.2
Upper	13,271	35.9	12,574	36.1	588	31.4	109	41.9
Unknown	55	0.1	48	0.1	7	0.4	0	0.0
Total AA	**37,009**	**100.0**	**34,878**	**100.0**	**1,871**	**100.0**	**260**	**100.0**
Percentage of Total Businesses:				**94.2**		**5.1**		**0.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	4.5	22	4.6	0	0.0	0	0.0
Moderate	75	15.4	74	15.4	1	14.3	0	0.0
Middle	220	45.3	216	45.1	4	57.1	0	0.0
Upper	169	34.8	167	34.9	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**486**	**100.0**	**479**	**100.0**	**7**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.6**		**1.4**		**0.0**

TABLE D-19 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY COLORADO SPRINGS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	3	356	6.8	5.1			3.2
Moderate	16	1,889	36.4	27.2			19.8
Middle	16	1,982	36.4	28.5			42.1
Upper	9	2,724	20.5	39.2			34.9
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-20 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY COLORADO SPRINGS MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	14	669	11.1	12.3			7.4
Moderate	27	1,235	21.4	22.7			23.0
Middle	57	626	45.2	11.5			33.5
Upper	28	2,922	22.2	53.6			35.9
Unknown	0	0	0.0	0.0			0.1
Not Reported	0	0	0.0	0.0			0.0

TABLE D-21 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL COLORADO SPRINGS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	10	786	22.7	11.3			20.2
Moderate	9	594	20.5	8.5			18.5
Middle	4	1,098	9.1	15.8			20.3
Upper	15	3,729	34.1	53.6			41.0
Unknown	6	744	13.6	10.7			0.0

TABLE D-22 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES COLORADO SPRINGS MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	103	1,861	81.7	34.1			94.2
Over $1MM	17	3,569	13.5	65.5	Not Reported		5.1
Unknown	6	22	4.8	0.4			0.7

C. Mountain Colorado AA

TABLE D-23
2017 MOUNTAIN COLORADO 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	4,097	13.7
Moderate	0	0.0	0	0.0	0	0.0	4,447	14.9
Middle	9	31.0	10,743	35.9	1,225	11.4	5,356	17.9
Upper	20	69.0	19,184	64.1	907	4.7	16,027	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**29,927**	**100.0**	**2,132**	**7.1**	**29,927**	**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	19,767	9,355	30.9	47.3	6,359	32.2	4,053	20.5
Upper	48,072	20,884	69.1	43.4	9,434	19.6	17,754	36.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**67,839**	**30,239**	**100.0**	**44.6**	**15,793**	**23.3**	**21,807**	**32.1**
	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	2,946	32.5	2,627	32.4	282	34.1	37	30.8
Upper	6,113	67.5	5,484	67.6	546	65.9	83	69.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,059**	**100.0**	**8,111**	**100.0**	**828**	**100.0**	**120**	**100.0**
Percentage of Total Businesses:				**89.5**		**9.1**		**1.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	87	42.9	87	43.1	0	0.0	0	0.0
Upper	116	57.1	115	56.9	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**203**	**100.0**	**202**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.5**		**0.5**		**0.0**

TABLE D-24 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO 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	0.0	0.0	0.0
Middle	11	3,243	22.9	9.7	32.1	19.9	30.9
Upper	37	30,193	77.1	90.3	67.9	80.1	69.1
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 Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	4	1,043	14.3	5.2	33.6	21.3	30.9
Upper	24	19,042	85.7	94.8	66.4	78.7	69.1
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	0	0	0.0	0.0	0.0	0.0	0.0
Middle	5	1,120	31.3	9.9	29.5	16.7	30.9
Upper	11	10,223	68.8	90.1	70.5	83.3	69.1
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 Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	2	1,080	50.0	53.8	34.8	17.7	30.9
Upper	2	928	50.0	46.2	65.2	82.3	69.1
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	0	0	0.0	0.0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	31.3	32.8	24.6
Upper	0	0	0.0	0.0	68.8	67.2	75.4
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 D-25 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(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	27	7,177	40.9	48.9	28.5	31.7	32.5
Upper	39	7,509	59.1	51.1	62.2	63.6	67.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	9.3	4.7	0.0

TABLE D-26 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL MOUNTAIN COLORADO AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	1	5	2.1	0.0	1.6	0.5	13.7
Moderate	3	402	6.3	1.2	7.7	2.5	14.9
Middle	7	1,502	14.6	4.5	17.3	7.9	17.9
Upper	22	7,333	45.8	21.9	58.7	63.0	53.6
Unknown	15	24,194	31.3	72.4	14.6	26.1	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	1.1	0.4	13.7
Moderate	1	115	3.6	0.6	8.1	2.8	14.9
Middle	4	908	14.3	4.5	18.2	8.8	17.9
Upper	10	2,618	35.7	13.0	57.9	63.5	53.6
Unknown	13	16,444	46.4	81.9	14.7	24.6	0.0
Home Refinance Loans							
Low	1	5	6.3	0.0	2.4	0.7	13.7
Moderate	2	287	12.5	2.5	7.1	2.4	14.9
Middle	3	594	18.8	5.2	16.3	7.6	17.9
Upper	9	3,557	56.3	31.4	60.4	69.2	53.6
Unknown	1	6,900	6.3	60.8	13.8	20.1	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	1.4	0.2	13.7
Moderate	0	0	0.0	0.0	8.6	2.8	14.9
Middle	0	0	0.0	0.0	16.7	5.3	17.9
Upper	3	1,158	75.0	57.7	58.6	55.0	53.6
Unknown	1	850	25.0	42.3	14.8	36.6	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	13.7
Moderate	0	0	0.0	0.0	0.0	0.0	14.9
Middle	0	0	0.0	0.0	0.0	0.0	17.9
Upper	0	0	0.0	0.0	0.0	0.0	53.6
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

TABLE D-27 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES MOUNTAIN COLORADO AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	28	4,574	42.4	31.1	49.6	39.8	89.5
Over $1MM	35	10,019	53.0	68.2	Not Reported		9.1
Unknown	3	93	4.5	0.6			1.3

TABLE D-28
2018 MOUNTAIN COLORADO 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	4,097	13.7
Moderate	0	0.0	0	0.0	0	0.0	4,447	14.9
Middle	9	31.0	10,743	35.9	1,225	11.4	5,356	17.9
Upper	20	69.0	19,184	64.1	907	4.7	16,027	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**29,927**	**100.0**	**2,132**	**7.1**	**29,927**	**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	19,767	9,355	30.9	47.3	6,359	32.2	4,053	20.5
Upper	48,072	20,884	69.1	43.4	9,434	19.6	17,754	36.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**67,839**	**30,239**	**100.0**	**44.6**	**15,793**	**23.3**	**21,807**	**32.1**

	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	3,443	34.0	3,096	33.8	292	36.0	55	33.7
Upper	6,696	66.0	6,069	66.2	519	64.0	108	66.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10,139**	**100.0**	**9,165**	**100.0**	**811**	**100.0**	**163**	**100.0**
Percentage of Total Businesses:				**90.4**		**8.0**		**1.6**

	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	108	45.2	106	45.1	1	50.0	1	50.0
Upper	131	54.8	129	54.9	1	50.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**239**	**100.0**	**235**	**100.0**	**2**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**98.3**		**0.8**		**0.8**

TABLE D-29
2019 MOUNTAIN COLORADO 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	4,097	13.7
Moderate	0	0.0	0	0.0	0	0.0	4,447	14.9
Middle	9	31.0	10,743	35.9	1,225	11.4	5,356	17.9
Upper	20	69.0	19,184	64.1	907	4.7	16,027	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**29,927**	**100.0**	**2,132**	**7.1**	**29,927**	**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	19,767	9,355	30.9	47.3	6,359	32.2	4,053	20.5
Upper	48,072	20,884	69.1	43.4	9,434	19.6	17,754	36.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**67,839**	**30,239**	**100.0**	**44.6**	**15,793**	**23.3**	**21,807**	**32.1**

	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	3,138	34.1	2,843	34.1	267	35.2	28	25.7
Upper	6,064	65.9	5,492	65.9	491	64.8	81	74.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,202**	**100.0**	**8,335**	**100.0**	**758**	**100.0**	**109**	**100.0**
Percentage of Total Businesses:				**90.6**		**8.2**		**1.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	105	44.7	103	45.0	1	25.0	1	50.0
Upper	130	55.3	126	55.0	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**235**	**100.0**	**229**	**100.0**	**4**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**97.4**		**1.7**		**0.9**

TABLE D-30.1 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY MOUNTAIN COLORADO 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
Moderate	0	0	0.0	0.0			0.0
Middle	14	10,484	27.5	17.5			30.9
Upper	37	49,357	72.5	82.5			69.1
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	0	0	0.0	0.0			0.0
Middle	8	2,345	30.8	10.6			30.9
Upper	18	19,877	69.2	89.4			69.1
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	0	0	0.0	0.0			0.0
Middle	5	939	26.3	8.0			30.9
Upper	14	10,830	73.7	92.0			69.1
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	0	0	0.0	0.0			0.0
Middle	0	0	0.0	0.0			30.9
Upper	1	675	100.0	100.0			69.1
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	0	0	0.0	0.0			0.0
Middle	1	7,200	25.0	28.7			24.6
Upper	3	17,862	75.0	71.3			75.4
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-30.2
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY
MOUNTAIN COLORADO AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			0.0
Middle	0	0	0.0	0.0			30.9
Upper	0	0	0.0	0.0			69.1
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			0.0
Middle	0	0	0.0	0.0			30.9
Upper	0	0	0.0	0.0			69.1
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			0.0
Middle	0	0	0.0	0.0			30.9
Upper	1	113	100.0	100.0			69.1
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-31
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY
MOUNTAIN COLORADO AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			0.0
Middle	36	5,328	31.6	47.4			34.1
Upper	78	5,922	68.4	52.6			65.9
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-32.1 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL MOUNTAIN COLORADO AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	2	757	3.9	1.3			13.7
Moderate	4	1,177	7.8	2.0			14.9
Middle	7	960	13.7	1.6			17.9
Upper	23	15,497	45.1	25.9			53.6
Unknown	15	41,450	29.4	69.3			0.0
Home Purchase Loans							
Low	1	750	3.8	3.4			13.7
Moderate	3	1,150	11.5	5.2			14.9
Middle	2	326	7.7	1.5			17.9
Upper	11	4,396	42.3	19.8			53.6
Unknown	9	15,600	34.6	70.2			0.0
Home Refinance Loans							
Low	1	7	5.3	0.1			13.7
Moderate	1	27	5.3	0.2			14.9
Middle	5	634	26.3	5.4			17.9
Upper	12	11,101	63.2	94.3			53.6
Unknown	0	0	0.0	0.0			0.0
Home Improvement Loans							
Low	0	0	0.0	0.0			13.7
Moderate	0	0	0.0	0.0			14.9
Middle	0	0	0.0	0.0			17.9
Upper	0	0	0.0	0.0			53.6
Unknown	1	675	100.0	100.0			0.0
Multifamily Loans							
Low	0	0	0.0	0.0			13.7
Moderate	0	0	0.0	0.0			14.9
Middle	0	0	0.0	0.0			17.9
Upper	0	0	0.0	0.0			53.6
Unknown	4	25,062	100.0	100.0			0.0

TABLE D-32.2 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL MOUNTAIN COLORADO AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Other Purpose LOC							
Low	0	0	0.0	0.0			13.7
Moderate	0	0	0.0	0.0			14.9
Middle	0	0	0.0	0.0			17.9
Upper	0	0	0.0	0.0			53.6
Unknown	0	0	0.0	0.0			0.0
Other Purpose Closed/Exempt							
Low	0	0	0.0	0.0			13.7
Moderate	0	0	0.0	0.0			14.9
Middle	0	0	0.0	0.0			17.9
Upper	0	0	0.0	0.0			53.6
Unknown	0	0	0.0	0.0			0.0
Purpose Not Applicable							
Low	0	0	0.0	0.0			13.7
Moderate	0	0	0.0	0.0			14.9
Middle	0	0	0.0	0.0			17.9
Upper	0	0	0.0	0.0			53.6
Unknown	1	113	100.0	100.0			0.0

TABLE D-33 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES MOUNTAIN COLORADO AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	80	2,367	70.2	21.0			90.6
Over $1MM	25	5,767	21.9	51.3	Not Reported		8.2
Unknown	9	3,116	7.9	27.7			1.2

D. Northern Wyoming AA

TABLE D-34
2017 NORTHERN WYOMING 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	6,704	18.3
Moderate	4	14.3	4,570	12.5	289	6.3	6,725	18.4
Middle	20	71.4	24,111	66.0	1,292	5.4	8,575	23.5
Upper	4	14.3	7,866	21.5	414	5.3	14,543	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**28**	**100.0**	**36,547**	**100.0**	**1,995**	**5.5**	**36,547**	**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	7,936	4,852	12.2	61.1	2,135	26.9	949	12.0
Middle	44,359	27,244	68.3	61.4	10,919	24.6	6,196	14.0
Upper	11,605	7,813	19.6	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,900**	**39,909**	**100.0**	**62.5**	**15,835**	**24.8**	**8,156**	**12.8**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	884	13.6	771	13.4	96	14.4	17	20.7
Middle	4,736	73.1	4,202	73.3	472	70.9	62	75.6
Upper	863	13.3	762	13.3	98	14.7	3	3.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6,483**	**100.0**	**5,735**	**100.0**	**666**	**100.0**	**82**	**100.0**
Percentage of Total Businesses:				**88.5**		**10.3**		**1.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	38	6.9	38	6.9	0	0.0	0	0.0
Middle	480	86.6	475	86.5	5	100.0	0	0.0
Upper	36	6.5	36	6.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**554**	**100.0**	**549**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

TABLE D-35 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY NORTHERN WYOMING 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	3	183	15.8	11.1	12.9	11.0	12.2
Middle	16	1,462	84.2	88.9	62.7	64.1	68.3
Upper	0	0	0.0	0.0	24.4	25.0	19.6
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

TABLE D-36 DISTRIBUTION OF 2017 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY NORTHERN WYOMING AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	143	14.3	5.6	8.1	6.6	13.6
Middle	20	1,529	71.4	59.4	77.8	74.6	73.1
Upper	4	903	14.3	35.1	11.3	16.6	13.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.8	2.1	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	12.1	9.4	6.9
Middle	27	2,948	96.4	92.2	82.3	86.8	86.6
Upper	1	251	3.6	7.8	5.2	3.7	6.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.3	0.0	0.0

TABLE D-37
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
NORTHERN WYOMING AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	3	38	15.8	2.3	8.0	4.7	18.3
Moderate	2	248	10.5	15.1	16.9	13.1	18.4
Middle	6	448	31.6	27.2	20.7	20.6	23.5
Upper	7	843	36.8	51.2	24.9	31.7	39.8
Unknown	1	68	5.3	4.1	29.5	30.0	0.0

TABLE D-38
DISTRIBUTION OF 2017 SMALL BUSINESS AND SMALL FARM LENDING
BY REVENUE SIZE OF BUSINESSES AND FARMS
NORTHERN WYOMING AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	21	1,122	75.0	43.6	56.2	47.1	88.5
Over $1MM	3	642	10.7	24.9	Not Reported		10.3
Unknown	4	811	14.3	31.5			1.3
Farm Revenue By Size	**Small Farm Loans**				**Aggregate CRA Data**		**% of Farms by Revenue**
	#	$(000)	#%	$%	#%	$%	
$1MM or less	23	2,204	82.1	68.9	64.6	78.4	99.1
Over $1MM	4	965	14.3	30.2	Not Reported		0.9
Unknown	1	30	3.6	0.9			0.0

TABLE D-39 2018 NORTHERN WYOMING 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	6,704	18.3
Moderate	4	14.3	4,570	12.5	289	6.3	6,725	18.4
Middle	20	71.4	24,111	66.0	1,292	5.4	8,575	23.5
Upper	4	14.3	7,866	21.5	414	5.3	14,543	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**28**	**100.0**	**36,547**	**100.0**	**1,995**	**5.5**	**36,547**	**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	7,936	4,852	12.2	61.1	2,135	26.9	949	12.0
Middle	44,359	27,244	68.3	61.4	10,919	24.6	6,196	14.0
Upper	11,605	7,813	19.6	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,900**	**39,909**	**100.0**	**62.5**	**15,835**	**24.8**	**8,156**	**12.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	977	11.4	866	11.2	95	14.0	16	12.7
Middle	6,463	75.7	5,877	76.0	484	71.1	102	81.0
Upper	1,099	12.9	989	12.8	102	15.0	8	6.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,539**	**100.0**	**7,732**	**100.0**	**681**	**100.0**	**126**	**100.0**
Percentage of Total Businesses:				**90.5**		**8.0**		**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	44	6.9	43	6.8	1	14.3	0	0.0
Middle	560	87.4	553	87.4	6	85.7	1	100.0
Upper	37	5.8	37	5.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**641**	**100.0**	**633**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**1.1**		**0.2**

TABLE D-40
2019 NORTHERN WYOMING 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	6,704	18.3
Moderate	4	14.3	4,570	12.5	289	6.3	6,725	18.4
Middle	20	71.4	24,111	66.0	1,292	5.4	8,575	23.5
Upper	4	14.3	7,866	21.5	414	5.3	14,543	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**28**	**100.0**	**36,547**	**100.0**	**1,995**	**5.5**	**36,547**	**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	7,936	4,852	12.2	61.1	2,135	26.9	949	12.0
Middle	44,359	27,244	68.3	61.4	10,919	24.6	6,196	14.0
Upper	11,605	7,813	19.6	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,900**	**39,909**	**100.0**	**62.5**	**15,835**	**24.8**	**8,156**	**12.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	971	11.0	859	10.7	98	14.4	14	10.4
Middle	6,790	76.7	6,198	77.1	478	70.2	114	84.4
Upper	1,091	12.3	979	12.2	105	15.4	7	5.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,852**	**100.0**	**8,036**	**100.0**	**681**	**100.0**	**135**	**100.0**
Percentage of Total Businesses:				**90.8**		**7.7**		**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	40	6.3	39	6.3	1	11.1	0	0.0
Middle	557	88.3	548	88.2	8	88.9	1	100.0
Upper	34	5.4	34	5.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**631**	**100.0**	**621**	**100.0**	**9**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.4**		**1.4**		**0.2**

TABLE D-41 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY NORTHERN WYOMING AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	5	304	14.3	8.0			12.2
Middle	26	2,827	74.3	74.3			68.3
Upper	4	674	11.4	17.7			19.6
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-42 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY INCOME LEVEL OF GEOGRAPHY NORTHERN WYOMING AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	8	730	20.5	20.2			11.0
Middle	26	2,610	66.7	72.2			76.7
Upper	5	276	12.8	7.6			12.3
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				Aggregate CRA Data		% of Farms
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			6.3
Middle	25	2,736	100.0	100.0			88.3
Upper	0	0	0.0	0.0			5.4
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-43
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
NORTHERN WYOMING AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	7	456	20.0	12.0			18.3
Moderate	6	613	17.1	16.1			18.4
Middle	5	717	14.3	18.8			23.5
Upper	14	1,494	40.0	39.3			39.8
Unknown	3	525	8.6	13.8			0.0

TABLE D-44
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING
BY REVENUE SIZE OF BUSINESSES AND FARMS
NORTHERN WYOMING AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	21	1,344	53.8	37.2			90.8
Over $1MM	8	1,883	20.5	52.1	Not Reported		7.7
Unknown	10	389	25.6	10.8			1.5
Farm Revenue By Size	**Small Farm Loans**				**Aggregate CRA Data**		**% of Farms by Revenue**
	#	$(000)	#%	$%	#%	$%	
$1MM or less	16	1,496	64.0	54.7			98.4
Over $1MM	3	900	12.0	32.9	Not Reported		1.4
Unknown	6	340	24.0	12.4			0.2

E. Albany County AA

TABLE D-45 2017 ALBANY COUNTY AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1
Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**7,595**	**100.0**	**1,006**	**13.2**	**7,595**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
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	**18,537**	**7,591**	**100.0**	**41.0**	**8,071**	**43.5**	**2,875**	**15.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	164	12.1	135	11.0	27	23.5	2	9.5
Moderate	277	20.4	249	20.4	22	19.1	6	28.6
Middle	918	67.5	839	68.6	66	57.4	13	61.9
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,359**	**100.0**	**1,223**	**100.0**	**115**	**100.0**	**21**	**100.0**
Percentage of Total Businesses:				**90.0**		**8.5**		**1.5**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	1.8	1	1.8	0	0.0	0	0.0
Moderate	3	5.3	3	5.3	0	0.0	0	0.0
Middle	53	93.0	53	93.0	0	0.0	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	**57**	**100.0**	**57**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

**TABLE D-46
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
ALBANY COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	3	514	10.0	8.6	4.4	3.2	3.4
Moderate	0	0	0.0	0.0	6.0	5.1	5.5
Middle	27	5,489	90.0	91.4	89.6	91.6	91.1
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
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

**TABLE D-47
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
ALBANY COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	3	218	7.3	3.5	10.2	8.4	12.1
Moderate	10	1,791	24.4	28.5	21.9	21.8	20.4
Middle	28	4,265	68.3	68.0	67.0	69.5	67.5
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	0.9	0.4	0.0

**TABLE D-48
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
ALBANY COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	3	223	10.0	3.7	6.4	3.4	26.7
Moderate	1	190	3.3	3.2	20.1	14.2	16.5
Middle	5	696	16.7	11.6	23.8	20.6	21.1
Upper	20	4,882	66.7	81.3	31.6	36.7	35.7
Unknown	1	12	3.3	0.2	18.1	25.0	0.0

TABLE D-49
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
ALBANY COUNTY AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	26	2,619	63.4	41.7	57.5	51.3	90.0
Over $1MM	14	3,405	34.1	54.3	Not Reported		8.5
Unknown	1	250	2.4	4.0			1.5

TABLE D-50
2018 ALBANY COUNTY AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1
Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**7,595**	**100.0**	**1,006**	**13.2**	**7,595**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
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	**18,537**	**7,591**	**100.0**	**41.0**	**8,071**	**43.5**	**2,875**	**15.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	214	12.9	192	12.6	22	18.8	0	0.0
Moderate	318	19.2	290	19.0	22	18.8	6	31.6
Middle	1,127	67.9	1,041	68.4	73	62.4	13	68.4
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,659**	**100.0**	**1,523**	**100.0**	**117**	**100.0**	**19**	**100.0**
Percentage of Total Businesses:				**91.8**		**7.1**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	8.3	5	8.3	0	0.0	0	0.0
Moderate	2	3.3	2	3.3	0	0.0	0	0.0
Middle	53	88.3	53	88.3	0	0.0	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	**60**	**100.0**	**60**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

TABLE D-51 2019 ALBANY COUNTY AA DEMOGRAPHICS								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1
Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**7,595**	**100.0**	**1,006**	**13.2**	**7,595**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
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	**18,537**	**7,591**	**100.0**	**41.0**	**8,071**	**43.5**	**2,875**	**15.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	209	12.8	187	12.5	21	17.5	1	5.0
Moderate	315	19.3	287	19.2	23	19.2	5	25.0
Middle	1,110	67.9	1,020	68.3	76	63.3	14	70.0
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	**1,634**	**100.0**	**1,494**	**100.0**	**120**	**100.0**	**20**	**100.0**
Percentage of Total Businesses:				**91.4**		**7.3**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	3	5.6	3	5.6	0	0.0	0	0.0
Moderate	2	3.7	2	3.7	0	0.0	0	0.0
Middle	49	90.7	49	90.7	0	0.0	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	**54**	**100.0**	**54**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

**TABLE D-52
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
ALBANY COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	5	328	15.6	6.7			3.4
Moderate	0	0	0.0	0.0			5.5
Middle	27	4,582	84.4	93.3			91.1
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 D-53
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
ALBANY COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	3	989	7.3	40.7			12.8
Moderate	8	8	19.5	0.3			19.3
Middle	30	1,433	73.2	59.0			67.9
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 D-54.1
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
ALBANY COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	4	197	12.5	4.0			26.7
Moderate	9	939	28.1	19.1			16.5
Middle	4	672	12.5	13.7			21.1
Upper	10	1,986	31.3	40.4			35.7
Unknown	5	1,116	15.6	22.7			0.0

TABLE D-55
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
ALBANY COUNTY AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	30	304	73.2	12.5			91.4
Over $1MM	8	1,701	19.5	70.0	Not Reported		7.3
Unknown	3	425	7.3	17.5			1.2

F. Kansas City Metropolitan AA

TABLE D-56
2017 KANSAS CITY METROPOLITAN AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.8	38,810	8.9	13,572	35.0	92,640	21.4
Moderate	103	22.2	87,531	20.2	13,548	15.5	74,840	17.2
Middle	135	29.2	149,313	34.4	9,347	6.3	86,630	20.0
Upper	128	27.6	157,223	36.2	3,271	2.1	179,755	41.4
Unknown	19	4.1	988	0.2	451	45.6	0	0.0
Total AA	**463**	**100.0**	**433,865**	**100.0**	**40,189**	**9.3**	**433,865**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,021	28,654	6.6	31.5	42,815	47.0	19,552	21.5
Moderate	171,048	78,377	18.0	45.8	73,191	42.8	19,480	11.4
Middle	256,687	154,854	35.5	60.3	83,371	32.5	18,462	7.2
Upper	223,791	172,920	39.7	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	**746,566**	**435,668**	**100.0**	**58.4**	**242,654**	**32.5**	**68,244**	**9.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,987	7.3	4,100	6.9	857	10.9	30	7.2
Moderate	12,972	19.1	11,354	19.0	1,552	19.8	66	15.9
Middle	22,190	32.6	19,657	32.9	2,388	30.5	145	34.9
Upper	26,533	39.0	23,917	40.0	2,452	31.3	164	39.5
Unknown	1,346	2.0	745	1.2	591	7.5	10	2.4
Total AA	**68,028**	**100.0**	**59,773**	**100.0**	**7,840**	**100.0**	**415**	**100.0**
Percentage of Total Businesses:				**87.9**		**11.5**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	17	2.4	16	2.4	1	5.0	0	0.0
Moderate	64	9.2	63	9.3	1	5.0	0	0.0
Middle	295	42.2	290	42.7	5	25.0	0	0.0
Upper	320	45.8	309	45.5	11	55.0	0	0.0
Unknown	3	0.4	1	0.1	2	10.0	0	0.0
Total AA	**699**	**100.0**	**679**	**100.0**	**20**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.1**		**2.9**		**0.0**

TABLE D-57 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY KANSAS CITY METROPOLITAN AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	14	1,121	16.7	18.7	2.8	1.9	6.6
Moderate	58	2,883	69.0	48.0	15.3	9.7	18.0
Middle	8	818	9.5	13.6	36.8	31.7	35.5
Upper	4	1,187	4.8	19.8	44.9	56.2	39.7
Unknown	0	0	0.0	0.0	0.2	0.5	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE D-58 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY KANSAS CITY METROPOLITAN AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	3	218	7.3	3.5	10.2	8.4	12.1
Moderate	10	1,791	24.4	28.5	21.9	21.8	20.4
Middle	28	4,265	68.3	68.0	67.0	69.5	67.5
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	0.8	0.3	0.0

TABLE D-59 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL KANSAS CITY METROPOLITAN AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	7.2	3.3	21.4
Moderate	0	0	0.0	0.0	17.4	11.4	17.2
Middle	1	28	1.2	0.5	20.7	17.0	20.0
Upper	13	1,282	15.5	21.3	36.2	44.0	41.4
Unknown	70	4,699	83.3	78.2	18.6	24.3	0.0

TABLE D-60 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES KANSAS CITY METROPOLITAN AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	26	2,619	63.4	41.7	57.5	51.3	90.0
Over $1MM	14	3,405	34.1	54.3	Not Reported		8.5
Unknown	1	250	2.4	4.0			1.5

TABLE D-61
2018 KANSAS CITY METROPOLITAN AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.8	38,810	8.9	13,572	35.0	92,640	21.4
Moderate	103	22.2	87,531	20.2	13,548	15.5	74,840	17.2
Middle	135	29.2	149,313	34.4	9,347	6.3	86,630	20.0
Upper	128	27.6	157,223	36.2	3,271	2.1	179,755	41.4
Unknown	19	4.1	988	0.2	451	45.6	0	0.0
Total AA	**463**	**100.0**	**433,865**	**100.0**	**40,189**	**9.3**	**433,865**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,021	28,654	6.6	31.5	42,815	47.0	19,552	21.5
Moderate	171,048	78,377	18.0	45.8	73,191	42.8	19,480	11.4
Middle	256,687	154,854	35.5	60.3	83,371	32.5	18,462	7.2
Upper	223,791	172,920	39.7	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	**746,566**	**435,668**	**100.0**	**58.4**	**242,654**	**32.5**	**68,244**	**9.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,153	7.4	5,239	7.0	868	10.9	46	6.2
Moderate	16,008	19.2	14,331	19.2	1,565	19.6	112	15.0
Middle	27,245	32.7	24,558	32.9	2,441	30.6	246	32.9
Upper	32,299	38.7	29,482	39.5	2,491	31.3	326	43.6
Unknown	1,676	2.0	1,054	1.4	605	7.6	17	2.3
Total AA	**83,381**	**100.0**	**74,664**	**100.0**	**7,970**	**100.0**	**747**	**100.0**
Percentage of Total Businesses:				**89.5**		**9.6**		**0.9**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	20	2.3	18	2.1	1	5.3	1	33.3
Moderate	77	8.9	77	9.1	0	0.0	0	0.0
Middle	367	42.5	361	42.9	5	26.3	1	33.3
Upper	398	46.1	386	45.8	11	57.9	1	33.3
Unknown	2	0.2	0	0.0	2	10.5	0	0.0
Total AA	**864**	**100.0**	**842**	**100.0**	**19**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**97.5**		**2.2**		**0.3**

TABLE D-62 2019 KANSAS CITY METROPOLITAN AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.8	38,810	8.9	13,572	35.0	92,640	21.4
Moderate	103	22.2	87,531	20.2	13,548	15.5	74,840	17.2
Middle	135	29.2	149,313	34.4	9,347	6.3	86,630	20.0
Upper	128	27.6	157,223	36.2	3,271	2.1	179,755	41.4
Unknown	19	4.1	988	0.2	451	45.6	0	0.0
Total AA	**463**	**100.0**	**433,865**	**100.0**	**40,189**	**9.3**	**433,865**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,021	28,654	6.6	31.5	42,815	47.0	19,552	21.5
Moderate	171,048	78,377	18.0	45.8	73,191	42.8	19,480	11.4
Middle	256,687	154,854	35.5	60.3	83,371	32.5	18,462	7.2
Upper	223,791	172,920	39.7	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	**746,566**	**435,668**	**100.0**	**58.4**	**242,654**	**32.5**	**68,244**	**9.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,343	7.6	5,459	7.3	844	10.9	40	6.4
Moderate	16,214	19.4	14,620	19.4	1,507	19.4	87	13.9
Middle	27,288	32.7	24,698	32.9	2,389	30.8	201	32.0
Upper	32,041	38.3	29,337	39.0	2,419	31.2	285	45.4
Unknown	1,686	2.0	1,068	1.4	603	7.8	15	2.4
Total AA	**83,572**	**100.0**	**75,182**	**100.0**	**7,762**	**100.0**	**628**	**100.0**
Percentage of Total Businesses:				**90.0**		**9.3**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	2.6	20	2.4	1	5.6	1	33.3
Moderate	73	8.6	73	8.8	0	0.0	0	0.0
Middle	366	43.3	360	43.6	5	27.8	1	33.3
Upper	384	45.4	372	45.1	11	61.1	1	33.3
Unknown	1	0.1	0	0.0	1	5.6	0	0.0
Total AA	**846**	**100.0**	**825**	**100.0**	**18**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**97.5**		**2.1**		**0.4**

TABLE D-63 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY KANSAS CITY METROPOLITAN AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	3	1,682	8.3	16.5			6.6
Moderate	11	1,662	30.6	16.3			18.0
Middle	8	2,045	22.2	20.0			35.5
Upper	14	4,835	38.9	47.3			39.7
Unknown	0	0	0.0	0.0			0.2
Not Reported	0	0	0.0	0.0			0.0

TABLE D-64 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY KANSAS CITY METROPOLITAN AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	2	83	2.9	1.8			7.6
Moderate	9	558	12.9	11.9			19.4
Middle	17	135	24.3	2.9			32.7
Upper	34	3,500	48.6	74.4			38.3
Unknown	8	426	11.4	9.1			2.0
Not Reported	0	0	0.0	0.0			0.0

TABLE D-65 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL KANSAS CITY METROPOLITAN AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	3	144	8.3	1.4			21.4
Moderate	2	120	5.6	1.2			17.2
Middle	2	95	5.6	0.9			20.0
Upper	7	2,254	19.4	22.0			41.4
Unknown	22	7,611	61.1	74.4			0.0

TABLE D-66 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES KANSAS CITY METROPOLITAN AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	42	679	60.0	14.4			90.0
Over $1MM	23	3,425	32.9	72.8	Not Reported		9.3
Unknown	5	598	7.1	12.7			0.8

APPENDIX E

2019, 2018, AND 2017 DEMOGRAPHIC AND ANALYSIS TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

G. Grand Junction MSA AA (Limited Review) - 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables
H. Boulder MSA AA (Limited Review) – 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables
I. Fort Collins MSA AA (Limited Review) - 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables
J. San Miguel County AA (Limited Review) - 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables
K. Cheyenne MSA AA (Limited Review) - 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables
L. Casper MSA AA (Limited Review) - 2017, 2018, 2019 Demographic and 2017, 2018, 2019 Lending Tables

Footnotes for all Analysis and Demographics Tables

- 2019, 2018, 2017 FFIEC Census Data
- Business and Farm data based on 2019, 2018, and 2017 Dun & Bradstreet Data
- 2011 – 2015 U.S. Census Bureau: American Community Survey
- Note: Percentages may not add up to 100.0 due to rounding.

G. Grand Junction MSA AA

TABLE E-1
2017 GRAND JUNCTION MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**38,714**	**100.0**	**4,432**	**11.4**	**38,714**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,472**	**40,908**	**100.0**	**64.5**	**18,307**	**28.8**	**4,257**	**6.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,366	18.7	1,263	18.9	99	17.6	4	6.7
Middle	4,161	57.0	3,766	56.4	353	62.9	42	70.0
Upper	1,767	24.2	1,644	24.6	109	19.4	14	23.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7,294**	**100.0**	**6,673**	**100.0**	**561**	**100.0**	**60**	**100.0**
Percentage of Total Businesses:				**91.5**		**7.7**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	5.2	12	5.2	0	0.0	0	0.0
Middle	89	38.4	88	38.4	1	33.3	0	0.0
Upper	131	56.5	129	56.3	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**232**	**100.0**	**229**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.7**		**1.3**		**0.0**

TABLE E-2 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY GRAND JUNCTION MSA 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	2	105	9.1	2.8	19.0	14.3	19.1
Middle	14	2,011	63.6	54.2	62.0	60.6	58.3
Upper	6	1,595	27.3	43.0	18.9	25.1	22.7
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

TABLE E-3 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY GRAND JUNCTION MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	10	914	27.8	19.3	16.6	17.3	18.7
Middle	17	2,063	47.2	43.5	56.1	55.3	57.0
Upper	9	1,761	25.0	37.2	25.4	26.1	24.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.9	1.3	0.0

TABLE E-4 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL GRAND JUNCTION MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	6	238	27.3	6.4	9.2	5.2	21.6
Moderate	1	100	4.5	2.7	21.3	17.4	18.0
Middle	3	132	13.6	3.6	21.6	21.5	19.9
Upper	9	2,636	40.9	71.0	29.9	37.6	40.5
Unknown	3	605	13.6	16.3	18.0	18.2	0.0

TABLE E-5 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES GRAND JUNCTION MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	25	1,547	69.4	32.7	48.6	34.9	91.5
Over $1MM	11	3,191	30.6	67.3	Not Reported		7.7
Unknown	0	0	0.0	0.0			0.8

TABLE E-6 2018 GRAND JUNCTION MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**38,714**	**100.0**	**4,432**	**11.4**	**38,714**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,472**	**40,908**	**100.0**	**64.5**	**18,307**	**28.8**	**4,257**	**6.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,664	18.7	1,558	18.9	96	17.1	10	9.9
Middle	5,147	57.7	4,721	57.2	363	64.5	63	62.4
Upper	2,104	23.6	1,972	23.9	104	18.5	28	27.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,915**	**100.0**	**8,251**	**100.0**	**563**	**100.0**	**101**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.3**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	5.6	16	5.7	0	0.0	0	0.0
Middle	124	43.5	120	42.9	4	80.0	0	0.0
Upper	145	50.9	144	51.4	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**285**	**100.0**	**280**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**0.0**

TABLE E-7
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
GRAND JUNCTION MSA 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	3	172	7.5	3.6	19.3	15.1	19.1
Middle	28	2,969	70.0	62.2	61.0	59.5	58.3
Upper	9	1,632	22.5	34.2	19.8	25.4	22.7
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

TABLE E-8
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
GRAND JUNCTION MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	41	2,466	28.7	44.3	16.0	20.9	18.7
Middle	77	1,896	53.8	34.0	54.0	53.5	57.7
Upper	25	1,208	17.5	21.7	27.5	24.0	23.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.5	1.6	0.0

TABLE E-9
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
GRAND JUNCTION MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	7	201	17.5	4.2	6.9	3.8	21.6
Moderate	10	901	25.0	18.9	19.7	14.8	18.0
Middle	11	1,086	27.5	22.8	23.3	21.5	19.9
Upper	12	2,585	30.0	54.2	35.0	41.9	40.5
Unknown	0	0	0.0	0.0	15.1	18.0	0.0

TABLE E-10 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES GRAND JUNCTION MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	119	3,486	83.2	62.6	48.8	38.5	92.6
Over $1MM	16	2,045	11.2	36.7	Not Reported		6.3
Unknown	8	39	5.6	0.7			1.1

TABLE E-11
2019 GRAND JUNCTION MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**38,714**	**100.0**	**4,432**	**11.4**	**38,714**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**63,472**	**40,908**	**100.0**	**64.5**	**18,307**	**28.8**	**4,257**	**6.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,596	19.7	1,498	19.9	90	17.0	8	11.9
Middle	4,625	57.0	4,253	56.6	333	62.8	39	58.2
Upper	1,895	23.3	1,768	23.5	107	20.2	20	29.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,116**	**100.0**	**7,519**	**100.0**	**530**	**100.0**	**67**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.5**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	19	6.8	19	6.9	0	0.0	0	0.0
Middle	122	43.6	119	43.1	3	75.0	0	0.0
Upper	139	49.6	138	50.0	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**280**	**100.0**	**276**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.6**		**1.4**		**0.0**

TABLE E-12 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY GRAND JUNCTION MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	9	973	18.0	15.2			19.1
Middle	29	2,573	58.0	40.3			58.3
Upper	12	2,837	24.0	44.4			22.7
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-13 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY GRAND JUNCTION MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	23	2,145	32.4	38.9			19.7
Middle	36	2,325	50.7	42.1			57.0
Upper	12	1,050	16.9	19.0			23.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-14 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL GRAND JUNCTION MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	9	511	18.0	8.0			21.6
Moderate	6	724	12.0	11.3			18.0
Middle	14	1,174	28.0	18.4			19.9
Upper	17	3,573	34.0	56.0			40.5
Unknown	4	401	8.0	6.3			0.0

TABLE E-15
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
GRAND JUNCTION MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	51	2,430	71.8	44.0			92.6
Over $1MM	17	2,573	23.9	46.6	Not Reported		6.5
Unknown	3	517	4.2	9.4			0.8

H. Boulder MSA AA

TABLE E-16
2017 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	893	3.9	829	3.9	60	3.6	4	2.2
Moderate	6,499	28.5	5,711	27.2	746	45.4	42	23.2
Middle	8,557	37.5	8,006	38.1	481	29.3	70	38.7
Upper	6,875	30.1	6,453	30.7	357	21.7	65	35.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22,824**	**100.0**	**20,999**	**100.0**	**1,644**	**100.0**	**181**	**100.0**
Percentage of Total Businesses:				**92.0**		**7.2**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	2.0	6	2.0	0	0.0	0	0.0
Moderate	52	17.4	50	16.9	2	66.7	0	0.0
Middle	134	44.8	133	44.9	1	33.3	0	0.0
Upper	107	35.8	107	36.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**299**	**100.0**	**296**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**0.0**

TABLE E-17 DISTRIBUTION OF 2017 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)	#%	$%	#%	$%	
Low	1	118	12.5	2.2	4.4	3.4	3.0
Moderate	3	1,639	37.5	31.1	19.7	15.7	18.0
Middle	2	823	25.0	15.6	46.7	44.8	45.6
Upper	2	2,696	25.0	51.1	29.1	36.1	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-18 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY BOULDER MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	3.8	4.3	3.9
Moderate	3	1,125	42.9	51.6	29.3	36.2	28.5
Middle	3	1,024	42.9	47.0	36.0	33.1	37.5
Upper	1	30	14.3	1.4	29.1	25.4	30.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.8	1.1	0.0

TABLE E-19 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL BOULDER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	7.6	3.6	22.3
Moderate	0	0	0.0	0.0	16.4	10.6	17.0
Middle	0	0	0.0	0.0	21.1	17.1	19.9
Upper	4	1,564	50.0	29.6	43.0	51.6	40.8
Unknown	4	3,712	50.0	70.4	12.0	17.2	0.0

TABLE E-20
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
BOULDER MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	3	916	42.9	42.0	54.6	40.0	92.0
Over $1MM	4	1,263	57.1	58.0	Not Reported		7.2
Unknown	0	0	0.0	0.0			0.8

TABLE E-21
2018 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	1,123	4.0	1,053	4.1	63	3.7	7	2.5
Moderate	8,110	29.1	7,308	28.2	739	43.9	63	22.6
Middle	10,601	38.1	9,981	38.6	515	30.6	105	37.6
Upper	8,009	28.8	7,538	29.1	367	21.8	104	37.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**27,843**	**100.0**	**25,880**	**100.0**	**1,684**	**100.0**	**279**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.0**		**1.0**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	13	3.1	13	3.2	0	0.0	0	0.0
Moderate	82	19.8	79	19.3	3	75.0	0	0.0
Middle	172	41.4	170	41.5	1	25.0	1	100.0
Upper	148	35.7	148	36.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**415**	**100.0**	**410**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**1.0**		**0.2**

TABLE E-22
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)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	4.0	17.5	3.0
Moderate	1	2,400	14.3	17.7	19.0	13.3	18.0
Middle	2	465	28.6	3.4	45.9	36.5	45.6
Upper	4	10,698	57.1	78.9	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-23
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
BOULDER MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	5	408	10.6	8.0	3.6	3.9	4.0
Moderate	21	1,873	44.7	36.9	29.4	38.0	29.1
Middle	10	1,330	21.3	26.2	37.5	32.7	38.1
Upper	11	1,465	23.4	28.9	27.3	24.3	28.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.1	1.1	0.0

TABLE E-24
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)	#%	$%	#%	$%	
Low	1	200	14.3	1.5	8.3	3.4	22.3
Moderate	0	0	0.0	0.0	16.9	9.4	17.0
Middle	0	0	0.0	0.0	21.2	14.3	19.9
Upper	4	1,663	57.1	12.3	41.2	42.2	40.8
Unknown	2	11,700	28.6	86.3	12.3	30.6	0.0

TABLE E-25 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES BOULDER MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	23	828	48.9	16.3	46.9	35.6	92.9
Over $1MM	21	3,058	44.7	60.2	Not Reported		6.0
Unknown	3	1,190	6.4	23.4			1.0

TABLE E-26
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-27 DISTRIBUTION OF 2019 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)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			3.0
Moderate	2	1,095	22.2	31.4			18.0
Middle	5	905	55.6	25.9			45.6
Upper	2	1,488	22.2	42.7			33.3
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-28 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY BOULDER MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	5	739	14.7	11.5			4.1
Moderate	16	2,771	47.1	43.1			30.4
Middle	8	2,210	23.5	34.4			37.5
Upper	5	711	14.7	11.1			28.0
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-29 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL BOULDER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	1	185	11.1	5.3			22.3
Moderate	3	594	33.3	17.0			17.0
Middle	0	0	0.0	0.0			19.9
Upper	5	2,709	55.6	77.7			40.8
Unknown	0	0	0.0	0.0			0.0

TABLE E-30
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
BOULDER MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	9	259	26.5	4.0			92.9
Over $1MM	21	4,652	61.8	72.3	Not Reported		6.3
Unknown	4	1,520	11.8	23.6			0.8

I. Fort Collins MSA

TABLE E-31
2017 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	622	3.3	504	2.9	114	9.5	4	2.7
Moderate	5,591	30.0	5,185	29.9	370	30.9	36	24.3
Middle	8,012	42.9	7,530	43.5	411	34.3	71	48.0
Upper	4,431	23.7	4,093	23.6	303	25.3	35	23.6
Unknown	6	0.0	4	0.0	0	0.0	2	1.4
Total AA	**18,662**	**100.0**	**17,316**	**100.0**	**1,198**	**100.0**	**148**	**100.0**
Percentage of Total Businesses:				**92.8**		**6.4**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	1.8	6	1.6	1	12.5	0	0.0
Moderate	56	14.7	56	15.0	0	0.0	0	0.0
Middle	199	52.2	195	52.3	4	50.0	0	0.0
Upper	118	31.0	115	30.8	3	37.5	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
Total AA	**381**	**100.0**	**373**	**100.0**	**8**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.9**		**2.1**		**0.0**

TABLE E-32 DISTRIBUTION OF 2017 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	1.5	2.1	1.5
Moderate	7	2,407	50.0	45.8	20.7	22.4	20.5
Middle	3	1,090	21.4	20.8	49.0	43.8	52.7
Upper	4	1,754	28.6	33.4	28.9	31.6	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

TABLE E-33 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY FORT COLLINS MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	2	1,675	16.7	42.5	4.9	8.6	3.3
Moderate	1	159	8.3	4.0	26.1	27.8	30.0
Middle	3	1,065	25.0	27.0	40.4	31.6	42.9
Upper	6	1,042	50.0	26.4	26.7	31.0	23.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.9	1.1	0.0

TABLE E-34 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL FORT COLLINS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	4.5	2.3	20.5
Moderate	2	393	14.3	7.5	16.5	11.4	17.2
Middle	1	222	7.1	4.2	24.2	20.2	22.6
Upper	5	1,376	35.7	26.2	41.7	48.8	39.6
Unknown	6	3,260	42.9	62.1	13.1	17.3	0.0

TABLE E-35
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
FORT COLLINS MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	3	909	25.0	23.1	52.0	35.5	92.8
Over $1MM	7	2,608	58.3	66.2	Not Reported		6.4
Unknown	2	424	16.7	10.8			0.8

TABLE E-36
2018 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	794	3.4	669	3.0	116	9.4	9	3.5
Moderate	6,829	29.0	6,386	28.9	381	30.7	62	24.2
Middle	10,162	43.1	9,634	43.7	411	33.1	117	45.7
Upper	5,775	24.5	5,375	24.4	332	26.8	68	26.6
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	**23,562**	**100.0**	**22,066**	**100.0**	**1,240**	**100.0**	**256**	**100.0**
Percentage of Total Businesses:				**93.7**		**5.3**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	1.6	7	1.4	1	12.5	0	0.0
Moderate	72	14.2	71	14.2	0	0.0	1	100.0
Middle	255	50.2	252	50.5	3	37.5	0	0.0
Upper	172	33.9	168	33.7	4	50.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**508**	**100.0**	**499**	**100.0**	**8**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.2**		**1.6**		**0.2**

TABLE E-37
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	2	999	4.1	4.2	1.2	1.1	1.5
Moderate	10	8,208	20.4	34.9	21.7	19.6	20.5
Middle	33	12,431	67.3	52.8	47.2	45.0	52.7
Upper	4	1,897	8.2	8.1	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

TABLE E-38
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
FORT COLLINS MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	3	1,906	6.7	33.7	4.6	7.5	3.4
Moderate	13	1,789	28.9	31.6	26.8	29.2	29.0
Middle	18	973	40.0	17.2	39.7	31.0	43.1
Upper	11	992	24.4	17.5	26.8	31.1	24.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.2	1.2	0.0

TABLE E-39
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	62	4.1	0.3	5.8	3.1	20.5
Moderate	4	569	8.2	2.4	17.3	13.1	17.2
Middle	6	1,254	12.2	5.3	24.0	21.2	22.6
Upper	7	2,388	14.3	10.1	39.8	43.4	39.6
Unknown	30	19,262	61.2	81.8	13.1	19.2	0.0

TABLE E-40 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES FORT COLLINS MSA AA							
Business Revenue By Size	**Small Business Loans**				**Aggregate CRA Data**		**% of Businesses by Revenue**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
$1MM or less	28	1,854	62.2	32.8	46.9	34.8	93.7
Over $1MM	14	3,520	31.1	62.2	Not Reported		5.3
Unknown	3	286	6.7	5.1			1.1

TABLE E-41
2019 FORT COLLINS MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution #	Tract Distribution %	Families by Tract Income #	Families by Tract Income %	Families < Poverty Level as % of Families by Tract #	Families < Poverty Level as % of Families by Tract %	Families by Family Income #	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 #	Owner-occupied % by tract	Owner-occupied % by unit	Rental #	Rental % by unit	Vacant #	Vacant % 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 #	Total Businesses by Tract %	Businesses by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	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 #	Total Farms by Tract %	Farms by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	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 E-42 DISTRIBUTION OF 2019 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	1	34	3.0	0.1			1.5
Moderate	8	3,516	24.2	10.5			20.5
Middle	17	27,673	51.5	82.9			52.7
Upper	7	2,162	21.2	6.5			25.2
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-43 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY FORT COLLINS MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	4	1,123	7.5	29.3			3.5
Moderate	18	1,085	34.0	28.3			29.2
Middle	22	1,447	41.5	37.7			42.6
Upper	9	180	17.0	4.7			24.7
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-44 DISTRIBUTION OF 2019 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	8	546	24.2	1.6			20.5
Moderate	6	932	18.2	2.8			17.2
Middle	5	262	15.2	0.8			22.6
Upper	7	1,726	21.2	5.2			39.6
Unknown	7	29,919	21.2	89.6			0.0

TABLE E-45
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
FORT COLLINS MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	36	578	67.9	15.1			93.7
Over $1MM	13	2,915	24.5	76.0	Not Reported		5.4
Unknown	4	342	7.5	8.9			0.9

J. San Miguel County AA

TABLE E-46
2017 SAN MIGUEL 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	260	15.3
Moderate	0	0.0	0	0.0	0	0.0	228	13.4
Middle	2	50.0	733	43.2	69	9.4	364	21.5
Upper	2	50.0	963	56.8	54	5.6	844	49.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**1,696**	**100.0**	**123**	**7.3**	**1,696**	**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	2,895	920	46.0	31.8	662	22.9	1,313	45.4
Upper	3,792	1,081	54.0	28.5	647	17.1	2,064	54.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**6,687**	**2,001**	**100.0**	**29.9**	**1,309**	**19.6**	**3,377**	**50.5**

	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	324	46.8	278	45.6	38	56.7	8	53.3
Upper	368	53.2	332	54.4	29	43.3	7	46.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**692**	**100.0**	**610**	**100.0**	**67**	**100.0**	**15**	**100.0**
Percentage of Total Businesses:				**88.2**		**9.7**		**2.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	40.0	4	40.0	0	0.0	0	0.0
Upper	6	60.0	6	60.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**10**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

TABLE E-47 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL 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	3	457	42.9	10.3	40.4	33.8	46.0
Upper	4	3,981	57.1	89.7	59.6	66.2	54.0
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 E-48 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL COUNTY AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(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	0	0	0.0	0.0	44.5	49.7	46.8
Upper	1	120	100.0	100.0	37.9	38.9	53.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	17.6	11.4	0.0

TABLE E-49 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL SAN MIGUEL COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	1.5	0.4	15.3
Moderate	0	0	0.0	0.0	7.5	2.0	13.4
Middle	0	0	0.0	0.0	9.4	3.0	21.5
Upper	4	3,007	57.1	67.8	69.5	71.4	49.8
Unknown	3	1,431	42.9	32.2	12.1	23.3	0.0

TABLE E-50
DISTRIBUTION OF 2017 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
SAN MIGUEL COUNTY AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	1	120	100.0	100.0	56.4	51.9	88.2
Over $1MM	0	0	0.0	0.0	Not Reported		9.7
Unknown	0	0	0.0	0.0			2.2

TABLE E-51 2018 SAN MIGUEL 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	260	15.3	
Moderate	0	0.0	0	0.0	0	0.0	228	13.4	
Middle	2	50.0	733	43.2	69	9.4	364	21.5	
Upper	2	50.0	963	56.8	54	5.6	844	49.8	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**4**	**100.0**	**1,696**	**100.0**	**123**	**7.3**	**1,696**	**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	2,895	920	46.0	31.8	662	22.9	1,313	45.4	
Upper	3,792	1,081	54.0	28.5	647	17.1	2,064	54.4	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	**6,687**	**2,001**	**100.0**	**29.9**	**1,309**	**19.6**	**3,377**	**50.5**	
	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	331	45.1	285	43.8	38	56.7	8	47.1	
Upper	403	54.9	365	56.2	29	43.3	9	52.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**734**	**100.0**	**650**	**100.0**	**67**	**100.0**	**17**	**100.0**	
Percentage of Total Businesses:				**88.6**		**9.1**		**2.3**	
	Total Farms by Tract		**Farms by Tract & Revenue Size**						
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	5	55.6	5	55.6	0	0.0	0	0.0	
Upper	4	44.4	4	44.4	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**9**	**100.0**	**9**	**100.0**	**0**	**0.0**	**0**	**0.0**	
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**	

TABLE E-52 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL 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	5	4,431	50.0	54.2	42.5	36.8	46.0
Upper	5	3,738	50.0	45.8	57.3	63.2	54.0
Unknown	0	0	0.0	0.0	0.3	0.1	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

TABLE E-53 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL COUNTY AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(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	13	1,263	59.1	98.4	40.9	58.5	45.1
Upper	9	21	40.9	1.6	34.3	28.1	54.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	24.8	13.4	0.0

TABLE E-54 DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL SAN MIGUEL COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	2.0	0.7	15.3
Moderate	0	0	0.0	0.0	7.5	2.3	13.4
Middle	3	548	30.0	6.7	9.8	3.3	21.5
Upper	5	5,919	50.0	72.5	66.8	70.7	49.8
Unknown	2	1,702	20.0	20.8	13.8	22.9	0.0

TABLE E-55 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES SAN MIGUEL COUNTY AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	16	52	72.7	4.0	47.4	38.2	88.6
Over $1MM	6	1,232	27.3	96.0	Not Reported		9.1
Unknown	0	0	0.0	0.0			2.3

TABLE E-56
2019 SAN MIGUEL 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	260	15.3
Moderate	0	0.0	0	0.0	0	0.0	228	13.4
Middle	2	50.0	733	43.2	69	9.4	364	21.5
Upper	2	50.0	963	56.8	54	5.6	844	49.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**1,696**	**100.0**	**123**	**7.3**	**1,696**	**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	2,895	920	46.0	31.8	662	22.9	1,313	45.4
Upper	3,792	1,081	54.0	28.5	647	17.1	2,064	54.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**6,687**	**2,001**	**100.0**	**29.9**	**1,309**	**19.6**	**3,377**	**50.5**

	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	315	46.3	276	45.3	34	56.7	5	41.7
Upper	366	53.7	333	54.7	26	43.3	7	58.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**681**	**100.0**	**609**	**100.0**	**60**	**100.0**	**12**	**100.0**
Percentage of Total Businesses:				**89.4**		**8.8**		**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	6	66.7	6	66.7	0	0.0	0	0.0
Upper	3	33.3	3	33.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9**	**100.0**	**9**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

TABLE E-57 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL 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
Moderate	0	0	0.0	0.0			0.0
Middle	8	1,667	80.0	80.3			46.0
Upper	2	410	20.0	19.7			54.0
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-58 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY SAN MIGUEL COUNTY AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	0	0	0.0	0.0			0.0
Middle	4	157	66.7	44.0			46.3
Upper	2	200	33.3	56.0			53.7
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-59 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL SAN MIGUEL COUNTY AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			15.3
Moderate	0	0	0.0	0.0			13.4
Middle	5	960	50.0	46.2			21.5
Upper	5	1,117	50.0	53.8			49.8
Unknown	0	0	0.0	0.0			0.0

TABLE E-60 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES SAN MIGUEL COUNTY AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	4	157	66.7	44.0			89.4
Over $1MM	2	200	33.3	56.0	Not Reported		8.8
Unknown	0	0	0.0	0.0			1.8

K. Cheyenne MSA AA

TABLE E-61
2017 CHEYENNE MSA 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	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**24,950**	**100.0**	**1,781**	**7.1**	**24,950**	**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	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**41,256**	**25,632**	**100.0**	**62.1**	**11,662**	**28.3**	**3,962**	**9.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	682	17.5	581	16.9	68	19.0	33	30.0
Middle	2,432	62.4	2,132	62.1	240	67.2	60	54.5
Upper	771	19.8	707	20.6	48	13.4	16	14.5
Unknown	14	0.4	12	0.3	1	0.3	1	0.9
Total AA	**3,899**	**100.0**	**3,432**	**100.0**	**357**	**100.0**	**110**	**100.0**
Percentage of Total Businesses:				**88.0**		**9.2**		**2.8**

	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	8	5.6	8	5.8	0	0.0	0	0.0
Middle	114	79.7	110	79.1	4	100.0	0	0.0
Upper	21	14.7	21	15.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**143**	**100.0**	**139**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.2**		**2.8**		**0.0**

TABLE E-62 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY CHEYENNE MSA 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	5	374	55.6	33.0	18.6	13.8	22.8
Middle	2	162	22.2	14.3	58.3	58.1	50.7
Upper	2	597	22.2	52.7	23.1	28.1	26.5
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-63 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY CHEYENNE MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	410	27.8	15.3	13.2	17.0	17.5
Middle	10	2,096	55.6	78.1	69.3	65.7	62.4
Upper	3	177	16.7	6.6	15.3	12.2	19.8
Unknown	0	0	0.0	0.0	0.3	3.3	0.4
Not Reported	0	0	0.0	0.0	1.9	1.8	0.0

TABLE E-64 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL CHEYENNE MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	7.2	3.9	19.5
Moderate	2	217	22.2	19.2	22.0	16.8	18.2
Middle	4	354	44.4	31.2	22.4	22.2	23.1
Upper	1	400	11.1	35.3	27.2	33.7	39.3
Unknown	2	162	22.2	14.3	21.1	23.4	0.0

TABLE E-65 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES CHEYENNE MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	8	399	44.4	14.9	56.3	41.8	88.0
Over $1MM	10	2,284	55.6	85.1	Not Reported		9.2
Unknown	0	0	0.0	0.0			2.8

TABLE E-66
2018 CHEYENNE MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution #	Tract Distribution %	Families by Tract Income #	Families by Tract Income %	Families < Poverty Level as % of Families by Tract #	Families < Poverty Level as % of Families by Tract %	Families by Family Income #	Families by Family Income %
Low	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**24,950**	**100.0**	**1,781**	**7.1**	**24,950**	**100.0**

	Housing Units by Tract	Housing Type by Tract: Owner-occupied #	Owner-occupied % by tract	Owner-occupied % by unit	Rental #	Rental % by unit	Vacant #	Vacant % by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**41,256**	**25,632**	**100.0**	**62.1**	**11,662**	**28.3**	**3,962**	**9.6**

	Total Businesses by Tract #	Total Businesses by Tract %	Businesses by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	864	16.4	768	16.1	72	18.9	24	17.6
Middle	3,464	65.6	3,113	65.4	261	68.7	90	66.2
Upper	930	17.6	863	18.1	46	12.1	21	15.4
Unknown	20	0.4	18	0.4	1	0.3	1	0.7
Total AA	**5,278**	**100.0**	**4,762**	**100.0**	**380**	**100.0**	**136**	**100.0**
Percentage of Total Businesses:				**90.2**		**7.2**		**2.6**

	Total Farms by Tract #	Total Farms by Tract %	Farms by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	5.7	9	5.3	0	0.0	1	100.0
Middle	135	77.1	131	77.1	4	100.0	0	0.0
Upper	30	17.1	30	17.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**175**	**100.0**	**170**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.1**		**2.3**		**0.6**

TABLE E-67
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
CHEYENNE MSA 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	8	1,079	27.6	23.2	20.0	15.8	22.8
Middle	15	3,028	51.7	65.2	57.2	57.9	50.7
Upper	6	537	20.7	11.6	22.7	26.3	26.5
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-68
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
CHEYENNE MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	13	826	25.0	18.7	12.3	12.5	16.4
Middle	30	3,295	57.7	74.4	69.8	70.8	65.6
Upper	9	305	17.3	6.9	15.8	14.6	17.6
Unknown	0	0	0.0	0.0	0.2	0.3	0.4
Not Reported	0	0	0.0	0.0	1.9	1.7	0.0

TABLE E-69
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
CHEYENNE MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	4	238	13.8	5.1	7.6	4.4	19.5
Moderate	4	412	13.8	8.9	23.4	18.4	18.2
Middle	10	966	34.5	20.8	24.8	24.3	23.1
Upper	4	799	13.8	17.2	26.9	32.4	39.3
Unknown	7	2,229	24.1	48.0	17.3	20.5	0.0

TABLE E-70
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
CHEYENNE MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	34	695	65.4	15.7	50.3	38.8	90.2
Over $1MM	16	3,729	30.8	84.3	Not Reported		7.2
Unknown	2	2	3.8	0.0			2.6

TABLE E-71
2019 CHEYENNE MSA 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	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**24,950**	**100.0**	**1,781**	**7.1**	**24,950**	**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	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**41,256**	**25,632**	**100.0**	**62.1**	**11,662**	**28.3**	**3,962**	**9.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	875	16.3	788	16.1	67	18.3	20	15.4
Middle	3,553	66.1	3,214	65.8	252	68.9	87	66.9
Upper	931	17.3	862	17.7	46	12.6	23	17.7
Unknown	20	0.4	19	0.4	1	0.3	0	0.0
Total AA	**5,379**	**100.0**	**4,883**	**100.0**	**366**	**100.0**	**130**	**100.0**
Percentage of Total Businesses:				**90.8**		**6.8**		**2.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	5.1	9	5.2	0	0.0	0	0.0
Middle	137	78.3	134	77.9	3	100.0	0	0.0
Upper	29	16.6	29	16.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**175**	**100.0**	**172**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.3**		**1.7**		**0.0**

TABLE E-72 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY CHEYENNE MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	10	543	29.4	11.6			22.8
Middle	17	2,135	50.0	45.6			50.7
Upper	7	2,003	20.6	42.8			26.5
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-73 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY CHEYENNE MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			0.0
Moderate	8	48	22.9	1.8			16.3
Middle	18	2,646	51.4	97.6			66.1
Upper	9	18	25.7	0.7			17.3
Unknown	0	0	0.0	0.0			0.4
Not Reported	0	0	0.0	0.0			0.0

TABLE E-74 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL CHEYENNE MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	14	900	41.2	19.2			19.5
Moderate	9	941	26.5	20.1			18.2
Middle	5	278	14.7	5.9			23.1
Upper	5	2,151	14.7	46.0			39.3
Unknown	1	411	2.9	8.8			0.0

TABLE E-75
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
CHEYENNE MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	25	693	71.4	25.6			90.8
Over $1MM	9	2,018	25.7	74.4	Not Reported		6.8
Unknown	1	1	2.9	0.0			2.4

A. Casper MSA AA

TABLE E-76
2017 CASPER MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**20,267**	**100.0**	**1,530**	**7.5**	**20,267**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**35,316**	**21,409**	**100.0**	**60.6**	**10,722**	**30.4**	**3,185**	**9.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	707	20.5	585	19.5	117	27.6	5	17.9
Moderate	335	9.7	263	8.8	68	16.0	4	14.3
Middle	1,850	53.6	1,662	55.4	174	41.0	14	50.0
Upper	558	16.2	488	16.3	65	15.3	5	17.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,450**	**100.0**	**2,998**	**100.0**	**424**	**100.0**	**28**	**100.0**
Percentage of Total Businesses:				**86.9**		**12.3**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	5.3	3	4.1	1	50.0	0	0.0
Moderate	4	5.3	4	5.4	0	0.0	0	0.0
Middle	30	39.5	30	40.5	0	0.0	0	0.0
Upper	38	50.0	37	50.0	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**76**	**100.0**	**74**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.4**		**2.6**		**0.0**

TABLE E-77 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY CASPER MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	1	60	33.3	29.7	2.6	1.4	4.0
Moderate	0	0	0.0	0.0	11.3	8.6	10.2
Middle	1	113	33.3	55.9	71.1	69.2	68.1
Upper	1	29	33.3	14.4	15.0	20.8	17.7
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

TABLE E-78 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY CASPER MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	4	1,607	23.5	31.6	14.9	16.7	20.5
Moderate	2	1,250	11.8	24.6	12.6	18.9	9.7
Middle	9	1,722	52.9	33.8	52.1	46.4	53.6
Upper	2	510	11.8	10.0	17.8	16.1	16.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.7	1.9	0.0

TABLE E-79 DISTRIBUTION OF 2017 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL CASPER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0	11.0	5.7	21.1
Moderate	1	60	33.3	29.7	21.8	16.0	16.4
Middle	0	0	0.0	0.0	22.8	22.3	21.7
Upper	2	142	66.7	70.3	23.4	31.4	40.7
Unknown	0	0	0.0	0.0	21.1	24.6	0.0

TABLE E-80 DISTRIBUTION OF 2017 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES CASPER MSA AA							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	6	1,262	35.3	24.8	54.3	44.9	86.9
Over $1MM	10	3,795	58.8	74.6	Not Reported		12.3
Unknown	1	32	5.9	0.6			0.8

TABLE E-81
2018 CASPER MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**20,267**	**100.0**	**1,530**	**7.5**	**20,267**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**35,316**	**21,409**	**100.0**	**60.6**	**10,722**	**30.4**	**3,185**	**9.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	778	18.7	658	17.7	110	25.9	10	30.3
Moderate	415	10.0	336	9.1	75	17.6	4	12.1
Middle	2,278	54.7	2,091	56.4	176	41.4	11	33.3
Upper	695	16.7	623	16.8	64	15.1	8	24.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,166**	**100.0**	**3,708**	**100.0**	**425**	**100.0**	**33**	**100.0**
Percentage of Total Businesses:				**89.0**		**10.2**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	6.3	5	5.3	1	100.0	0	0.0
Moderate	10	10.4	10	10.5	0	0.0	0	0.0
Middle	37	38.5	37	38.9	0	0.0	0	0.0
Upper	43	44.8	43	45.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**96**	**100.0**	**95**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**0.0**

TABLE E-82
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY
CASPER MSA AA

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	1	108	7.1	11.3	2.4	1.2	4.0
Moderate	10	512	71.4	53.3	10.7	7.9	10.2
Middle	3	340	21.4	35.4	72.8	69.1	68.1
Upper	0	0	0.0	0.0	14.1	21.7	17.7
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

TABLE E-83
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY
CASPER MSA AA

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	7	450	25.0	15.5	15.9	19.1	18.7
Moderate	4	1,204	14.3	41.6	11.7	13.1	10.0
Middle	14	1,228	50.0	42.4	49.8	49.9	54.7
Upper	3	12	10.7	0.4	19.0	14.9	16.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	3.6	3.0	0.0

TABLE E-84
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
CASPER MSA AA

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	1	41	7.1	4.3	12.1	6.3	21.1
Moderate	0	0	0.0	0.0	22.6	15.8	16.4
Middle	0	0	0.0	0.0	23.5	22.2	21.7
Upper	2	264	14.3	27.5	23.9	31.3	40.7
Unknown	11	655	78.6	68.2	17.8	24.4	0.0

TABLE E-85
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
CASPER MSA AA

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	$(000)	#%	$%	#%	$%	
$1MM or less	18	126	64.3	4.4	49.7	42.7	89.0
Over $1MM	10	2,768	35.7	95.6	Not Reported		10.2
Unknown	0	0	0.0	0.0			0.8

TABLE E-86
2019 CASPER MSA AA DEMOGRAPHICS

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**20,267**	**100.0**	**1,530**	**7.5**	**20,267**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**35,316**	**21,409**	**100.0**	**60.6**	**10,722**	**30.4**	**3,185**	**9.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	775	18.7	660	17.8	106	25.4	9	28.1
Moderate	412	9.9	336	9.1	72	17.3	4	12.5
Middle	2,268	54.7	2,085	56.4	172	41.2	11	34.4
Upper	694	16.7	619	16.7	67	16.1	8	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,149**	**100.0**	**3,700**	**100.0**	**417**	**100.0**	**32**	**100.0**
Percentage of Total Businesses:				**89.2**		**10.1**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	5.5	4	4.4	1	100.0	0	0.0
Moderate	9	9.9	9	10.0	0	0.0	0	0.0
Middle	35	38.5	35	38.9	0	0.0	0	0.0
Upper	42	46.2	42	46.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**91**	**100.0**	**90**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**

TABLE E-87 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY CASPER MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner-Occupied Units
	#	$(000)	#%	$%	#%	$%	
Low	0	0	0.0	0.0			4.0
Moderate	2	123	18.2	8.9			10.2
Middle	8	1,227	72.7	88.9			68.1
Upper	1	30	9.1	2.2			17.7
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-88 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY CASPER MSA AA							
Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	$(000)	#%	$%	#%	$%	
Low	8	847	22.9	19.7			18.7
Moderate	3	1,251	8.6	29.0			9.9
Middle	18	1,250	51.4	29.0			54.7
Upper	6	962	17.1	22.3			16.7
Unknown	0	0	0.0	0.0			0.0
Not Reported	0	0	0.0	0.0			0.0

TABLE E-89 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL CASPER MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	$(000)	#%	$%	#%	$%	
Low	2	156	18.2	11.3			21.1
Moderate	1	140	9.1	10.1			16.4
Middle	1	29	9.1	2.1			21.7
Upper	4	933	36.4	67.6			40.7
Unknown	3	122	27.3	8.8			0.0

TABLE E-90 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES CASPER MSA AA							
Business Revenue By Size	**Small Business Loans**				**Aggregate CRA Data**		**% of Businesses by Revenue**
	#	**$(000)**	**#%**	**$%**	**#%**	**$%**	
$1MM or less	22	445	62.9	10.3			89.2
Over $1MM	11	3,364	31.4	78.1	Not Reported		10.1
Unknown	2	501	5.7	11.6			0.8

APPENDIX F

GLOSSARY

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

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

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

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units**.**

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

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share or grant that has as its primary purpose community development.
Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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