



PUBLIC DISCLOSURE

FEBRUARY 11, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**FIRST STATE BANK OF COLORADO
RSSD# 277053**

**102 EAST BRIDGE STREET
HOTCHKISS, COLORADO 81419**

**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.

TABLE OF CONTENTS

Institution's CRA Rating 2

Institution

 Scope of Examination 2

 Description of Institution 3

 Conclusions with Respect to Performance Criteria 5

North Fork Valley AA (Full Review)

 Description of the Bank's Operations 7

 Conclusions with Respect to Performance Criteria 11

Custer County AA (Full Review)

 Description of the Bank's Operations 17

 Conclusions with Respect to Performance Criteria 20

Colorado Springs MSA AA (Limited Review)

 Description of the Bank's Operations 23

 Conclusions with Respect to Performance Criteria 23

Denver Metropolitan AA (Limited Review)

 Description of the Bank's Operations 24

 Conclusions with Respect to Performance Criteria 24

Appendix

 Community Reinvestment Act Appendix A:
 Demographics and Lending Analysis Tables..... 25

INSTITUTION'S CRA RATING: This institution is rated: ***Satisfactory***

First State Bank of Colorado (the bank) has a satisfactory record of meeting the credit needs of its assessment areas (AAs) in a manner consistent with its resources and operating philosophy. The bank's net loan-to-deposit (NLTD) ratio indicates a reasonable effort to extend credit in its lending market, consistent with safe and sound banking practices. The bank makes a majority of its loans inside its designated AAs. The bank's geographical distribution of loans within its AAs is reasonable. Finally, the bank's lending to borrowers of different income levels, as well as to businesses of different revenue sizes, is reasonable.

SCOPE OF EXAMINATION

The bank's Community Reinvestment Act (CRA) performance was evaluated using the Federal Financial Institutions Examination Council (FFIEC) *Interagency Examination Procedures for Small Institutions*. The evaluation considered CRA performance context about the bank and its AAs, such as its asset size and financial condition, as well as local economic and demographic characteristics and competition. Four out of the five criteria used to evaluate a small bank's lending performance under the CRA were relevant to this review, including the following:

- NLTD Ratio
- Lending Inside the AA
- Distribution of Loans by Income Level of Geographies
- Distribution of Loans to Borrowers of Different Income Levels and to Businesses of Different Revenue Sizes

Additionally, the fifth criterion, the bank's responsiveness to CRA-related complaints, was not evaluated, as neither the bank nor the Federal Reserve Bank of Kansas City has received any CRA-related complaints since the previous evaluation.

The evaluation included full-scope reviews of the bank's lending performance in the North Fork Valley AA and Custer County AA. Limited-scope reviews of the bank's lending performance in the Colorado Springs Metropolitan Statistical Area (MSA) AA and Denver Metropolitan AA were also conducted. The bank's major products were reviewed, including commercial and residential real estate lending. Major product lines were determined through discussions with bank management, a review of the September 30, 2018 Reports of Condition and Income (Call Report), and a review of the number of loan originations since the previous CRA evaluation conducted on October 6, 2014.

Conclusions were derived from an analysis of 114 home purchase, home refinance, home improvement, and multifamily loans, reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan/Application Registers for the years 2016 (52 loans) and 2017 (62 loans), as well as a statistically derived sample of 76 small business loans from a universe of 103 loans originated between January 1, 2017 and December 31, 2017. As defined under the CRA, small business loans included those with loan amounts of \$1 million (MM) or less. Given the bank's

current loan portfolio composition and strategic focus, greater weight was placed on commercial lending performance in the overall evaluation.

The bank's average NLTD ratio was calculated based on a 17-quarter average since the previous evaluation and compared to the ratios of similarly situated financial institutions that operate within the bank's AAs. The geographic distribution analysis was based on the bank's lending amongst the various income levels of census tracts in the AAs, in which geographies were classified based on the 2016 and 2017 FFIEC census tract definitions. Borrower income levels for the HMDA-related products were calculated based on the 2016 and 2017 FFIEC Estimated Median Family Income (MFI) Reports. Both the number and dollar volume of loans were evaluated for each lending test performance criterion. Additionally, only loans made inside the bank's AAs were analyzed with respect to the geographic and borrower distribution analyses.

For evaluative purposes, the bank's lending was compared to local demographic data based on the 2006-2010 and 2011-2015 five-year estimate American Community Survey (2010 ACS and 2015 ACS, respectively) data and 2017 Dun & Bradstreet (D&B) data. The bank's HMDA lending was also compared to 2016 and 2017 aggregate data reported by all HMDA reporters operating in the bank's AAs. While both years of HMDA-related loans were evaluated, only 2017 performance with regards to the geographic and borrower distribution analyses is presented in the main sections of this report with a limited discussion of prior year performance. For reference, the bank's 2016 lending tables are included in the Appendix A.

To further augment the evaluation, three interviews with members of the communities within the bank's AAs were used to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. One community member was a representative of a real estate sales organization, while the other two community members were representatives of economic and business development organizations. Two of these interviews were prior contacts recently conducted as part of the public performance evaluations of other financial institutions.

DESCRIPTION OF INSTITUTION

The bank is an intrastate financial institution headquartered in Hotchkiss, a rural community on the Western Slope of Colorado that is approximately 250 miles west of Denver. The bank is wholly owned by TIG Bancorp, Inc., Durango, Colorado, and has no subsidiaries or affiliates. There has been no merger or acquisition activity since the previous evaluation; however, the bank's holding company has changed.

The bank operates seven full-service branch locations across Colorado located in Hotchkiss, Delta, Paonia, and Crawford, rural communities on the Western Slope; in Westcliffe, a rural mountain town; and in Fountain and Greenwood Village, metropolitan communities along the Front Range. All branches offer drive-through services and cash-only automated teller machines (ATMs), with the exception of the Greenwood Village branch which has a full-service ATM and no drive-through services. Since the previous evaluation, the Greenwood Village location

relocated and the Delta Branch was converted from a loan production office to a full-service branch.

As of the September 30, 2018 Call Report, the bank reported total assets of \$237.1 million (MM), of which gross loans represented \$156.3MM, or approximately 65.9 percent. As illustrated in Table 1, the bank’s primary lending focus is commercial loans followed by residential real estate loans; however, the bank seeks to meet the overall credit needs of its AAs by offering a variety of business and consumer lending and deposit products.

According to the June 30, 2018 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank has a total of \$200.6MM in deposits and a market share of 0.21 percent, ranking 34th of 92 FDIC-insured institutions operating inside the AAs. The top four leaders in the market consist of three national banks and a regional bank, collectively holding over 53.0 percent market share inside the AAs. The bank operates in a competitive environment, which may impact opportunities to extend credit.

Loan Type	Amount \$(000)	Percent of Total
Commercial	100,487	64.4
Residential Real Estate	39,235	25.1
Agricultural	13,485	8.6
Consumer	1,624	1.0
Other	1,473	0.9
<i>Gross Loans</i>	156,304	100.0

There are no known legal, financial or other factors impeding the bank’s ability to meet the credit needs of the communities it serves. The bank received a Satisfactory at its previous CRA evaluation conducted by the Federal Reserve Bank of Kansas City on October 6, 2014.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, and the demographic and economic factors present in the AAs.

The bank’s NLTD ratio was averaged over a 17-quarter period since the previous CRA evaluation and compared to the NLTD ratios of five similarly situated financial institutions operating in the AAs, which were selected based on asset size and loan portfolio composition. The bank’s average NLTD ratio was 71.5 percent, which is comparable to the average ratios of the comparison banks, with NLTD ratios ranging from 63.2 percent to 89.1 percent. The bank’s NLTD reflects a reasonable effort to extend credit based on its size, financial condition, and the credit needs of the AAs.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside the AAs. As illustrated in Table 2, a majority of the bank’s small business and HMDA-related loans were originated to borrowers inside the AAs by both number and dollar volume. Lending performance indicates a reasonable effort by the bank to serve the credit needs of the communities in which it operates.

TABLE 2 LENDING INSIDE AND OUTSIDE THE BANK’S AAs								
Bank Loans	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	38	5,329	76.0	68.2	12	2,484	24.0	31.8
Home Refinance	20	2,609	60.6	61.9	13	1,605	39.4	38.1
Home Improvement	19	1,372	86.4	92.8	3	106	13.6	7.2
Multifamily	6	2,805	66.7	44.2	3	3,535	33.3	55.8
Total HMDA Loans	83	12,115	72.8	61.0	31	7,730	27.2	39.0
Small Business Loans	66	8,811	86.8	76.9	10	2,653	13.2	23.1

The remaining performance criteria consider only those loans originated inside the AA.

Distribution by Income Level of Geographies

This performance criterion evaluates the bank’s distribution of loans within its AAs by income level of census tracts, with emphasis placed on lending in low- and moderate-income (LMI) geographies. The bank’s HMDA loans were compared to the percentage of owner-occupied units located in each census tract income category, while the bank’s small business loans were compared to the percentage of businesses operating in each census tract income category. In

addition, the bank's HMDA lending was compared to aggregate data reported by all HMDA reporters operating in the bank's AA.

The bank's overall geographic distribution reflects a reasonable distribution throughout the AAs, given the economic and demographic factors of the AAs and the bank's strategic focus. A detailed analysis of the geographic distribution is provided in the full-scope review of the North Fork Valley AA. A geographic distribution analysis is not included in the review of the Custer County AA, as it consists of a single census tract and an analysis would not be meaningful.

Distribution by Borrower Income and Revenue Size of Businesses

This performance criterion evaluates the bank's distribution of lending to borrowers of different income levels, with emphasis placed on lending to LMI individuals and businesses with gross annual revenues of \$1MM or less. The bank's HMDA lending was compared to the percentage of families within the AA by income level, while small business lending was compared to the percentage of businesses within each AA by revenue size. In addition, the bank's HMDA lending was compared to aggregate data reported by all HMDA reporters operating in the bank's AAs.

The bank's overall distribution of loans to borrowers of different income levels and businesses of different revenue sizes is reasonable. A detailed analysis of the borrower distribution is provided in the full-scope reviews of the North Fork Valley and Custer County AAs.

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 illegal credit practices inconsistent with helping to meet community credit needs was identified.

NORTH FORK VALLEY ASSESSMENT AREA
(Full Review)

DESCRIPTION OF THE BANK'S OPERATIONS IN THE NORTH FORK VALLEY AA¹

The bank's North Fork Valley AA is located in a rural and partially mountainous area of the Western Slope of Colorado and is the bank's largest AA in terms of land area. The AA includes all of Delta, Montrose, and Gunnison Counties and has not changed since the previous evaluation. In 2016, the AA consisted of zero low-, 6 moderate-, 11 middle-, and 4 upper-income census tracts. In 2017, census tract designations shifted due to population changes, and the AA is now comprised of zero low-, 4 moderate-, 15 middle-, and 2 upper-income census tracts.

The bank operates four full-service branches in the AA in the communities of Hotchkiss, Delta, Paonia, and Crawford. The Delta Branch was converted from a loan production office since the prior evaluation. All the bank's branches are in Delta County within middle-income census tracts. The branches are not located within close proximity to the AA's moderate-income census tracts, which may hinder its ability to lend in these census tracts. Three of the AA's moderate-income census tracts are located in Montrose County, and while the fourth is in Delta County, the census tract is approximately 15 miles from the nearest bank branch.

The communities within the AA are served locally by numerous financial institutions. According to the June 2018 FDIC Deposit Market Share Report, the bank holds a total of \$99.3MM in deposits and a market share of 5.3 percent, ranking 7th of 14 FDIC-insured institutions with 38 offices inside the AA.

Population Characteristics

Based on the 2015 ACS, the AA's population was 86,680 residents. Montrose County was the most populous with 40,815 residents, followed by Delta County with 30,214 residents, and Gunnison County with 13,756 residents. The largest towns located within the AA were Montrose (19,132 residents), Delta (8,915 residents), and Gunnison (5,854 residents). The population remained largely stagnant since 2010, with Gunnison County experiencing the most growth at 10.5 percent, while Montrose County grew 1.2 percent and Delta County contracted 1.2 percent. The AA had a relatively older population, with 19.3 percent of the population 65 years of age and older, compared to the figure for statewide rural areas and state of Colorado, at 15.6 percent and 12.2 percent, respectively. Community members noted that retired individuals are migrating from the Front Range into the rural mountain areas of Colorado seeking more affordable housing. The AA's population between the ages of 18 and 24, at 9.0 percent, was consistent with figures for the statewide rural areas and the state of Colorado, at 8.6 percent and 9.8 percent, respectively. However, this population range in Gunnison County was much higher, at 18.7 percent, in large part due to the presence of Western State Colorado University.

¹ The following demographic data is based on 2010 U.S. Census, 2011-2015 ACS five-year estimate data, and 2017 D&B data. Additional demographic data was also utilized based on the Bureau of Labor Statistics.

Housing Characteristics

Within the AA, approximately 54.3 percent of homes were owner-occupied units, 24.9 percent were rental units, and the remaining were vacant. Statewide rural areas had comparatively more vacant properties with fewer owner-occupied and rental units, at 46.9 percent and 22.1 percent, respectively. However, across Colorado there were fewer vacant properties compared with the AA, with more owner-occupied and rental units, at 57.6 percent and 31.9 percent, respectively. Of note, the level of vacant units in Gunnison County was even higher, at 45.5 percent, compared to the overall AA. Vacant units can be indicative of vacation properties, particularly given the presence and abundance of recreational areas in Gunnison County. Members of the community commented that individuals from other parts of Colorado and outside the state are putting upward pressure on the housing market by purchasing vacation homes. In particular, they indicated that recently there has been high demand for real estate in the northern part of Gunnison County, near Crested Butte, an upper-income area. This trend is also illustrated in Exhibit 1, as building permits for single-family structures reflect the increased real estate activity across the AA from 2015 to 2017.

EXHIBIT 1 ANNUAL PERMIT ACTIVITY (Three-Year Single-Family Structures)			
Area	2015	2016	2017
Delta County	7	14	46
Gunnison County	98	103	142
Montrose County	124	114	199
U.S. Census https://socds.huduser.gov/permits			

Median housing value in the AA was \$205,489, which is below the figure for other statewide rural areas at \$217,300 and the state of Colorado, at \$247,800. The median housing values in Gunnison County were considerably higher, at \$319,200, due to the proximity of ski resorts and tourist areas. The affordability ratio² in the AA, at 21.5 percent, was comparable to the ratios for statewide rural areas at 22.0 percent and the state of Colorado, at 24.5 percent. However, Gunnison County had a much lower affordability ratio of 15.1 percent, again indicating housing in the county is not affordable.

Income Characteristics

The AA was comprised of 23.7 percent low-income, 20.0 percent moderate-income, 21.3 percent middle-income, and 35.1 percent upper-income families. The MFI, at \$54,707, was lower than figure for both the statewide rural areas and the state of Colorado, at \$60,701 and \$74,826, respectively. Additionally, there were more families residing below the poverty level, at 12.4 percent compared to statewide rural areas and the state of Colorado at 10.0 percent and 8.5 percent, respectively.

² 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.

Economic and Employment Characteristics

As reflected in Exhibit 2, the unemployment rate within the AA varies by county, but has improved overall. According to the Bureau of Labor Statistics, the 2017 unemployment rate in Delta, Montrose, and Gunnison Counties was 3.9 percent, 3.3 percent, and 2.0 percent, respectively. The AA experienced a large loss of 800 coal mining positions between 2014 and 2016 when two of the three coal mines in Delta County closed. Although employment has improved in the area, unemployment within Delta and Montrose Counties remains higher in 2017 when compared to the state of Colorado. In Delta County, the economy has transitioned away from mining and moved toward organic agriculture, agricultural tourism and manufacturing. The county recently engaged in the installation of broadband Internet in 2017, which has drawn additional telecommuters into the economy. Major industries in the AA include retail, healthcare and social assistance, accommodation and food services, educational services, and construction.

Area	2015	2016	2017
Delta County	5.7	4.9	3.9
Gunnison County	3.0	2.3	2.0
Montrose County	5.0	4.1	3.3
State of Colorado	3.9	3.3	2.8

U.S. Bureau of Labor Statistics

Interviews with Members of the Community

Community members noted that the AA's major credit needs include financing for small business development and affordable housing. A community member further stated homeownership is likely not affordable for many LMI borrowers in the area due to high home prices and a competitive market. Although financial institutions have recently participated in economic development initiatives, there is an overall need for flexibility and responsiveness from financial institutions lending in the area.

Additional demographic data is displayed in Table 3 below.

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,422	23.7
Moderate	4	19.0	4,911	21.4	884	18.0	4,582	20.0
Middle	15	71.4	15,944	69.6	1,863	11.7	4,886	21.3
Upper	2	9.5	2,069	9.0	103	5.0	8,034	35.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	22,924	100.0	2,850	12.4	22,924	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	8,698	5,085	21.1	58.5	2,407	27.7	1,206	13.9
Middle	29,816	16,615	69.0	55.7	7,714	25.9	5,487	18.4
Upper	5,830	2,370	9.8	40.7	922	15.8	2,538	43.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	44,344	24,070	100.0	54.3	11,043	24.9	9,231	20.8
	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	1,140	22.4	1,040	21.9	83	28.7	17	35.4
Middle	3,246	63.8	3,054	64.3	166	57.4	26	54.2
Upper	702	13.8	657	13.8	40	13.8	5	10.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,088	100.0	4,751	100.0	289	100.0	48	100.0
Percentage of Total Businesses:				93.4		5.7		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	50	14.0	47	13.5	3	30.0	0	0.0
Middle	280	78.2	273	78.4	7	70.0	0	0.0
Upper	28	7.8	28	8.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	358	100.0	348	100.0	10	100.0	0	0.0
Percentage of Total Farms:				97.2		2.8		0.0

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Distribution by Income Level of Geographies

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts. The bank's distribution of loans among geographies of various income levels demonstrated a reasonable dispersion throughout the AA.

For evaluative purposes, the bank's HMDA lending was compared to the percent of owner-occupied units in each census tract income category and aggregate data reported by all HMDA reporters operating in the bank's AA. Due to the bank's overall low volume of HMDA-related loans, these products were evaluated collectively rather than by individual product to provide for a more meaningful analysis. The bank's small business lending was compared to the percent of businesses operating in each census tract income category.

Total HMDA Loans

The geographic distribution of total HMDA loans is reasonable. The bank's HMDA lending in moderate-income census tracts, at 8.3 percent by number (3.7 percent by dollar), was well below the performance of aggregate reporters, at 20.8 percent by number (16.4 percent by dollar), and the percentage of owner-occupied units in moderate-income census tracts, at 21.1 percent. Comparatively, the bank's lending in middle-income census tracts exceeded both aggregate data and the demographic figure. The bank's lending in upper-income census tracts was below both aggregate data and the demographic figure. This performance is indicative of the fact that the bank's branches are distantly located from the AA's moderate-income census tracts. Moreover, the communities in which the moderate-income census tracts are located have competitive banking markets, with both national and local financial institutions serving these areas. Finally, a total of only 12 HMDA loans were made within this AA during the sample period.

In 2016, the bank's total HMDA lending reflected higher penetration in moderate-income census tracts, with lending exceeding that of aggregate reporters and comparable to the demographic figure.

**TABLE 4
DISTRIBUTION OF 2017 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
NORTH FORK VALLEY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner-Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	53	8.3	3.7	20.8	16.4	21.1
Middle	10	1,208	83.3	84.1	65.4	60.1	69.0
Upper	1	176	8.3	12.2	13.7	23.5	9.8
Unknown ³	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	1	53	11.1	5.2	22.2	17.6	21.1
Middle	7	797	77.8	77.7	64.8	58.5	69.0
Upper	1	176	11.1	17.2	13.1	24.0	9.8
Unknown ³	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	18.3	14.2	21.1
Middle	1	192	100.0	100.0	66.7	63.3	69.0
Upper	0	0	0.0	0.0	15.0	22.4	9.8
Unknown ³	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	20.8	11.4	21.1
Middle	2	219	100.0	100.0	64.2	57.3	69.0
Upper	0	0	0.0	0.0	15.1	31.3	9.8
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	33.3	41.6	10.9
Middle	0	0	0.0	0.0	66.7	58.4	51.9
Upper	0	0	0.0	0.0	0.0	0.0	37.1
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of owner-occupied housing and multifamily units by tract are based on 2017 FFIEC census tract definitions and 2015 ACS five-year estimate data.

³ Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The geographic distribution of small business loans is reasonable. Within moderate-income census tracts, the bank originated 5.6 percent by number (4.0 percent by dollar) of its small business loans, which was well below the percentage of businesses operating in moderate-income census tracts, at 22.4 percent. Comparatively, the bank's lending in middle-income census tracts, where its branches are located, exceeded the demographic figure. The bank had no small business lending within upper-income census tracts, which was below the demographic figure.

As previously noted, the evaluation gave consideration to the distance of the bank's branches to moderate-income census tracts and competition from the financial institutions serving these areas. Additionally, the number of small business loans the bank made within this AA was only 18 for the one-year period reviewed.

**TABLE 5
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY INCOME LEVEL OF GEOGRAPHY
NORTH FORK VALLEY AA**

Census Tract Income Level	Small Business Loans				% of Businesses ¹
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	1	51	5.6	4.0	22.4
Middle	17	1,238	94.4	96.0	63.8
Upper	0	0	0.0	0.0	13.8
Unknown ²	0	0	0.0	0.0	0.0

¹ The percentage of businesses by tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.

² Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Distribution by Borrower Income and Revenue Size of Businesses

This performance criterion evaluates the bank's lending to borrowers of different income levels, with emphasis placed on lending to LMI individuals, as well as to businesses of different revenue sizes, with emphasis placed on lending to those with gross annual revenues of \$1MM or less. The bank's overall distribution of lending represents a reasonable penetration among individuals of different income levels and businesses of different revenue sizes. While the distribution of HMDA loans reflects an excellent penetration among individuals of different income levels, the distribution of small business loans reflects a reasonable penetration of businesses of different revenue sizes. More weight was given to the bank's small business lending, given the higher volume of originations and the bank's business strategy.

For evaluative purposes, the bank's HMDA lending was compared to the percent of families within the AA by income level, while the bank's small business lending was compared to the percent of businesses within the AA by revenue size. In addition, the bank's HMDA lending was compared to aggregate data reported by all HMDA reporters operating in the bank's AA. While

the bank is not required to report small business data as a small institution, aggregate data reported by all large bank CRA filers in the AA was also utilized for additional insight into the credit demand of the area.

Total HMDA Loans

The borrower distribution of total HMDA lending is excellent. The bank's lending to low-income borrowers, at 16.7 percent by number (8.5 percent by dollar), significantly exceeded that of aggregate reporters, at 7.8 percent by number (4.1 percent by dollar), but was below the percentage of low-income families, at 23.7 percent. The bank's lending to moderate-income borrowers, at 25.0 percent by number (16.8 percent by dollar), also exceeded that of aggregate reporters, at 20.7 percent by number (14.7 percent by dollar), and the demographic figure, at 20.0 percent. The bank's lending to middle-income borrowers was below that of aggregate lenders but consistent with the demographic figure, while the bank's lending to upper-income borrowers exceeded that of aggregate reporters and the demographic figure. In 2016, overall HMDA performance was slightly below performance in 2017, with comparable lending penetration of low-income borrowers and slightly lower penetration of moderate-income borrowers.

**TABLE 6
DISTRIBUTION OF 2017 HMDA LOANS
BY BORROWER INCOME LEVELS
NORTH FORK VALLEY ASSESSMENT AREA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	2	122	16.7	8.5	7.8	4.1	23.7
Moderate	3	242	25.0	16.8	20.7	14.7	20.0
Middle	1	289	8.3	20.1	21.8	20.1	21.3
Upper	5	592	41.7	41.2	34.1	45.4	35.0
Unknown	1	192	8.3	13.4	15.6	15.7	0.0
Home Purchase Loans							
Low	2	122	22.2	11.9	6.8	3.4	23.7
Moderate	3	242	33.3	23.6	22.6	15.7	20.0
Middle	1	289	11.1	28.2	21.3	19.1	21.3
Upper	3	373	33.3	36.4	35.6	47.9	35.0
Unknown	0	0	0.0	0.0	13.7	13.9	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	9.8	5.8	23.7
Moderate	0	0	0.0	0.0	17.3	12.8	20.0
Middle	0	0	0.0	0.0	22.8	22.2	21.3
Upper	0	0	0.0	0.0	31.3	40.6	35.0
Unknown	1	192	100.0	100.0	18.9	18.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.7	2.7	23.7
Moderate	0	0	0.0	0.0	22.6	15.3	20.0
Middle	0	0	0.0	0.0	22.6	23.4	21.3
Upper	2	219	100.0	100.0	37.7	46.6	35.0
Unknown	0	0	0.0	0.0	11.3	12.1	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	23.7
Moderate	0	0	0.0	0.0	0.0	0.0	20.0
Middle	0	0	0.0	0.0	0.0	0.0	21.3
Upper	0	0	0.0	0.0	0.0	0.0	35.0
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The borrower distribution of small business lending is reasonable. The bank's lending to small businesses, at 77.8 percent by number (67.4 percent by dollar), was below the percentage of businesses with revenue of \$1MM or less, at 93.4 percent. However, the bank substantially outperformed aggregate reporter lending to small businesses, at 60.1 percent by number (50.0 percent by dollar). Conversely, the bank's lending to businesses with revenues over \$1MM

was comparable to the demographic figure, at 5.7 percent, while 16.7 percent of loans were made to businesses of unknown revenue.

It is important to note that all of the bank's small business loans were originated in loan amounts of \$250,000 or less. Typically, smaller businesses do not have the need or the capacity to borrow large amounts; as such, smaller loan amounts can be used as a proxy to estimate the support of small entities. Given this, it is likely that the businesses of unknown revenue that received loans could be businesses with revenues of \$1MM or less.

**TABLE 7
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY REVENUE SIZE OF BUSINESSES
NORTH FORK VALLEY AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue ¹
	#	\$(000)	#%	\$%	
\$1MM or less	14	869	77.8	67.4	93.4
Over \$1MM	1	51	5.6	3.9	5.7
Not Known	3	369	16.7	28.6	0.9

¹ The percentage of businesses by revenue size is based on 2017 D&B data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

CUSTER COUNTY ASSESSMENT AREA
(Full Review)

DESCRIPTION OF THE BANK'S OPERATIONS IN THE CUSTER COUNTY AA³

The AA encompasses all of Custer County which is located approximately 46 miles South of Cañon City, Colorado, and 53 miles west of Pueblo, Colorado, situated in the West Mountain Valley. Custer County is a rural and rugged mountainous area that is bordered by the Sangre De Cristo Mountain Range on the west. The bank operates one full-service branch with drive-through services and a cash-only ATM in Westcliffe, Colorado.

In 2017, the AA was comprised of a single moderate-income census tract, representing a change from a middle-income designation in 2016. According to the FDIC Market Share Report, the bank holds 100.0 percent deposit market share with \$62.3M in deposits in the AA. While the bank is the only brick-and-mortar financial institution in the AA, competition exists from nationwide mortgage companies and large financial institutions that offer products and services through online delivery systems.

Population Characteristics

According to 2015 ACS data, the AA had a population of 4,303 residents. The majority of the population resides in the towns of Westcliffe and Silver Cliff, which had populations of 568 and 587, respectively. Notably, the AA population increased from 2015 to 2017 by 14.5 percent. Also, the AA had a relatively older population with 28.2 percent of residents of age 65 and older compared to statewide rural areas and the state of Colorado, at 15.6 percent and 12.2 percent, respectively. A community member stated there has been an increase in the population of seniors over the past 18 to 24 months, consisting mainly of wealthy retirees who purchase homes outright.

Housing Characteristics

The majority of AA housing units were vacant, at 53.8 percent, followed by owner-occupied units, at 36.8 percent, and rental units, at 9.4 percent. In comparison, statewide rural areas had significantly more owner-occupied and rental units, at 46.9 percent and 22.1 percent, respectively. This trend was also true for the state of Colorado, at 57.5 percent and 31.9 percent, which indicates that vacation homes were likely common within the AA (in recreational areas vacant properties are generally second homes). The median housing value in the AA was \$220,319, which was slightly above the figure for other statewide rural areas, at \$217,300, and below the average in the figure for the state of Colorado at \$247,800.

New single-family structure building permits reflect increased construction activity in the AA between 2015 and 2017, growing 72.1 percent. Additionally a community member stated there

³ The following demographic data is based on 2010 U.S. Census, 2011-2015 ACS five-year estimate data, and 2017 D&B data. Additional demographic data was also utilized based on the Bureau of Labor Statistics.

is a builder in the area that invests in repossessed properties, rehabilitating them for sale or rent. The affordability ratio in the AA, at 15.9 percent, was far below that of statewide rural areas at 22.0 percent and the state of Colorado, at 24.5 percent. Given the lower affordability, LMI families may find it difficult to afford home ownership absent special programs. While home values were higher in the AA compared to values in other statewide rural areas, the median gross rents, at \$726, were lower than those in both statewide rural areas and the state of Colorado, at \$853 and \$1,002, respectively.

Income Characteristics

The AA was comprised of 32.9 percent low-, 17.8 percent moderate-, 26.1 percent middle-, and 23.2 percent upper-income families. The AA's MFI, at \$45,336, was much lower than the figure for both the statewide rural areas and the state of Colorado, at \$60,701 and \$74,826, respectively. Additionally, there were more families falling below the poverty level, at 12.7 percent compared to statewide rural areas and the state of Colorado at 10.0 percent and 8.5 percent, respectively.

Economic and Employment Characteristics

According to the Bureau of Labor Statistics, the unemployment rate in the AA from 2015 to 2017 was 3.5 percent, 3.3 percent, and 2.0 percent, respectively, which was relatively consistent with the downward trend seen across the state of Colorado at 3.9 percent, 3.3 percent and 2.8 percent over the same years, respectively. The AA's rural economy is primarily driven through government and school jobs, while tourism for numerous recreational activities supplements the area's economy seasonally. According to a community member, the primary economic driver has historically been agriculture, but today that industry does not contribute as significantly. Currently, the county is working on an investment plan for digital infrastructure and economic development. Major industries providing employment in the AA include construction, public administration, retail trade, educational services, and accommodation and food services.

Interviews with Members of the Community

Members of the community indicated that the major credit needs within the AA are primarily for small and medium sized business development, and affordable housing. Specifically, while the area has attracted a large population of retired individuals, there is a deficit of affordable housing to accommodate LMI individuals within the community.

Additional demographic data is displayed in Table 8 below.

TABLE 8 CUSTER COUNTY AA 2017 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	426	32.9
Moderate	1	100.0	1,296	100.0	164	12.7	231	17.8
Middle	0	0.0	0	0.0	0	0.0	338	26.1
Upper	0	0.0	0	0.0	0	0.0	301	23.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1	100.0	1,296	100.0	164	12.7	1,296	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	4,323	1,591	100.0	36.8	405	9.4	2,327	53.8
Middle	0	0	0.0	0.0	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	4,323	1,591	100.0	36.8	405	9.4	2,327	53.8
	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	299	100.0	284	100.0	11	100.0	4	100.0
Middle	0	0.0	0	0.0	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	299	100.0	284	100.0	11	100.0	4	100.0
Percentage of Total Businesses:			95.0		3.7		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	35	100.0	35	100.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	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	35	100.0	35	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Distribution by Income Levels of Geographies

There is only one middle-income census tract in the Custer County AA; therefore, the distribution by income level of geography was not evaluated as it would not provide a meaningful analysis.

Distribution by Borrower Income and Revenue Size of Businesses

This performance criterion evaluates the bank's lending to borrowers of different income levels with emphasis placed on lending to LMI individuals, as well as to businesses of different revenue sizes, with emphasis placed on lending to those with gross annual revenues of \$1MM or less. The bank's overall distribution of lending represents a reasonable penetration among individuals of different income levels and businesses of different revenue sizes. While the distribution of HMDA loans reflects an excellent penetration among individuals of different income levels, the distribution of small business loans reflects a reasonable penetration of businesses of different revenue sizes. More weight was given to the bank's small business lending given the higher volume of originations and the bank's business strategy.

For evaluative purposes, the bank's HMDA lending was compared to the percent of families within the AA by income level, while the bank's small business lending was compared to the percent of businesses within the AA by revenue size. In addition, the bank's HMDA lending was compared to aggregate data reported by all HMDA reporters operating in the bank's AA. Due to the bank's overall low volume of HMDA-related loans, these products were evaluated collectively rather than by individual product to provide for a more meaningful analysis.

Total HMDA Loans

The borrower distribution of total HMDA lending is excellent. The bank's lending to low-income borrowers, at 3.8 percent by number (2.5 percent by number), was comparable to that of aggregate reporters, at 4.3 percent by number (2.6 percent by dollar). Both the bank and aggregate reporters were significantly below the percentage of low-income families, at 32.9 percent. The bank's lending to moderate-income borrowers, at 46.2 percent by number (23.3 percent by dollar), significantly exceeded both aggregate performance, at 19.2 percent by number (13.0 percent by dollar), and the demographic figure, at 17.8 percent. The bank's lending to middle-income borrowers was significantly below both aggregate data and the demographic figure, while the bank's lending to upper-income borrowers was below aggregate data and exceeded the demographic figure.

As reflected in Table 9, a significant portion of the bank's HMDA lending occurred to unknown-income borrowers, at 19.2 percent by number (30.6 percent by dollar). Lending to borrowers of unknown income is typically indicative of loans for commercial or investment purposes, which is consistent with the bank's commercial lending strategy. In 2016, the borrower distribution of total HMDA lending was similar to the excellent performance in 2017.

**TABLE 9
DISTRIBUTION OF 2017 HMDA LOANS
BY BORROWER INCOME LEVELS
CUSTER COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	1	81	3.8	2.5	4.3	2.6	32.9
Moderate	12	744	46.2	23.3	19.2	13.0	17.8
Middle	1	209	3.8	6.5	20.1	19.7	26.1
Upper	7	1,186	26.9	37.1	39.7	46.4	23.2
Unknown	5	977	19.2	30.6	16.7	18.3	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	3.9	2.4	32.9
Moderate	3	242	30.0	16.5	17.8	12.8	17.8
Middle	1	209	10.0	14.3	17.1	18.4	26.1
Upper	3	455	30.0	31.1	47.3	53.0	23.2
Unknown	3	557	30.0	38.1	14.0	13.5	0.0
Home Refinance Loans							
Low	1	81	10.0	6.2	5.5	3.2	32.9
Moderate	4	240	40.0	18.3	18.7	13.2	17.8
Middle	0	0	0.0	0.0	24.2	22.0	26.1
Upper	3	572	30.0	43.6	29.7	38.6	23.2
Unknown	2	420	20.0	32.0	22.0	22.9	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	32.9
Moderate	5	262	83.3	62.2	38.5	22.2	17.8
Middle	0	0	0.0	0.0	23.1	21.8	26.1
Upper	1	159	16.7	37.8	38.5	56.0	23.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	32.9
Moderate	0	0	0.0	0.0	0.0	0.0	17.8
Middle	0	0	0.0	0.0	0.0	0.0	26.1
Upper	0	0	0.0	0.0	0.0	0.0	23.2
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The borrower distribution of small business lending is reasonable. The bank’s lending to small businesses, at 97.0 percent by number (99.6 percent by dollar), was comparable to the percentage of businesses with revenue of \$1MM or less, at 95.0 percent. The bank’s lending to businesses with revenues over \$1MM was also comparable to the demographic figure.

Additionally, approximately 90.9 percent of the bank’s small business loans were originated in loan amounts of \$250,000 or less, indicating the bank’s willingness to meet the credit needs of small businesses.

**TABLE 10
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY REVENUE SIZE OF BUSINESSES
CUSTER COUNTY AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue ¹
	#	\$(000)	#%	\$%	
\$1MM or less	32	2,553	97.0	99.6	95.0
Over \$1MM	1	10	3.0	0.4	3.7
Not Known	0	0	0.0	0.0	1.3

¹ The percentage of businesses by revenue size is based on 2017 D&B data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**COLORADO SPRINGS
METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
(Limited Review)**

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

The bank has delineated El Paso and Teller Counties in this AA, which is the Colorado Springs MSA in its entirety. The AA has not changed since the prior evaluation. The bank's branch office is located in Fountain within a middle-income census tract. However, the branch office, drive-through and cash-only ATM are located within one mile of a moderate-income census tract. The city of Fountain is a small town located along Interstate-25 and Fountain Creek approximately ten miles south of the city of Colorado Springs, and just east of Fort Carson, Colorado. The AA in 2017 was comprised of 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts. The AA composition in 2016 was similar, consisting of 7 low-, 42 moderate-, 55 middle-, 31 upper-, and 1 unknown-income census tract.

According to 2015 ACS data, the AA had a population of 678,364 residents. The bank faces considerable competition from national and regional financial institutions within the AA. The bank ranks 33rd of 38 FDIC-insured institutions with 141 offices operating in the AA, with 0.3 percent deposit market share according to the June 2018 FDIC Deposit Market Share Report.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE LIMITED REVIEW
OF THE COLORADO SPRINGS MSA AA**

A limited review was performed for the Colorado Springs MSA AA based on its lower loan volume, when compared to the loan volumes of the bank's other AAs. The bank's performance in the AA was consistent with the results from the full-scope reviews and does not materially change the overall conclusions.

DENVER METROPOLITAN ASSESSMENT AREA
(Limited Review)

DESCRIPTION OF THE BANK'S OPERATIONS IN THE DENVER METROPOLITAN AA

The bank has delineated a portion of the Denver-Aurora-Lakewood MSA as its Denver Metropolitan AA. The AA includes six of the ten counties in the MSA: Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson Counties in their entirety. This is a change from the prior evaluation, which included the entire MSA, to better reflect areas the bank can reasonably serve from the single AA branch. The AA is comprised of 51 low-, 147 moderate-, 196 middle-, 203 upper-, and 8 unknown-income census tracts. The branch office and full-service ATM is located in Greenwood Village in a middle-income census tract. The branch has relocated since the last evaluation, within a mile of its prior location.

According to 2015 ACS data, the AA had a population of 2,649,187 residents. The bank faces considerable competition from national and regional financial institutions within the AA. The bank ranks 58th of 69 FDIC-insured institutions with a total of 640 locations operating in the AA, and holds 0.01 percent of the deposit market share according to the June 2018 FDIC Deposit Market Share Report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE LIMITED REVIEW OF THE DENVER METROPOLITAN AA

A limited review was performed for the Denver Metropolitan AA based on its lower loan volume compared to the loan volumes of the bank's other AAs. The bank's performance in the AA was consistent with the results from the full-scope reviews and does not materially impact the overall conclusions.

APPENDIX A

LENDING ANALYSIS TABLES

- A. North Fork Valley AA (Full Review) – 2016 Demographics and Lending Tables
- B. Custer County AA (Full Review) – 2016 Demographics and Lending Tables
- C. Colorado Springs MSA AA (Limited Review) – 2017 Demographics and Lending Tables
- D. Colorado Springs MSA AA (Limited Review) – 2016 Demographics and Lending Tables
- E. Denver Metropolitan AA (Limited Review) – 2017 Demographics and Lending Tables
- F. Denver Metropolitan AA (Limited Review) – 2016 Demographics and Lending Tables

A. NORTH FORK VALLEY ASSESSMENT AREA (Full Review)- 2016 Demographics and Lending Tables

TABLE A-1 NORTH FORK VALLEY AA 2016 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	4,645	19.8
Moderate	6	28.6	7,722	32.9	898	11.6	5,207	22.2
Middle	11	52.4	12,551	53.5	908	7.2	5,434	23.2
Upper	4	19.0	3,196	13.6	22	0.7	8,183	34.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	23,469	100.0	1,828	7.8	23,469	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	12,850	8,161	32.3	63.5	3,296	25.6	1,393	10.8
Middle	20,845	13,262	52.4	63.6	5,563	26.7	2,020	9.7
Upper	9,570	3,869	15.3	40.4	1,100	11.5	4,601	48.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	43,265	25,292	100.0	58.5	9,959	23.0	8,014	18.5
	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
Moderate	1,756	31.3	1,631	30.9	107	36.1	18	39.1
Middle	2,723	48.5	2,569	48.7	138	46.6	16	34.8
Upper	1,134	20.2	1,071	20.3	51	17.2	12	26.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,613	100.0	5,271	100.0	296	100.0	46	100.0
Percentage of Total Businesses:			93.9		5.3		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	143	35.5	137	34.9	6	60.0	0	0.0
Middle	191	47.4	186	47.4	4	40.0	1	100.0
Upper	69	17.1	69	17.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	403	100.0	392	100.0	10	100.0	1	100.0
Percentage of Total Farms:			97.3		2.5		0.2	

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-2
DISTRIBUTION OF 2016 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
NORTH FORK VALLEY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner- Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	113	28.6	4.6	26.4	21.2	32.3
Middle	9	1,969	64.3	80.8	51.7	43.6	52.4
Upper	1	356	7.1	14.6	21.8	35.1	15.3
Unknown ³	0	0	0.0	0.0	0.1	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	46	14.3	3.1	27.1	21.6	32.3
Middle	5	1,080	71.4	72.9	51.6	42.9	52.4
Upper	1	356	14.3	24.0	21.2	35.4	15.3
Unknown ³	0	0	0.0	0.0	0.1	0.1	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	61	50.0	58.1	25.5	20.3	32.3
Middle	1	44	50.0	41.9	51.3	44.2	52.4
Upper	0	0	0.0	0.0	23.2	35.5	15.3
Unknown ³	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	2	6	66.7	66.7	28.8	27.0	32.3
Middle	1	3	33.3	33.3	58.8	56.0	52.4
Upper	0	0	0.0	0.0	12.5	17.0	15.3
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	25.0	51.4	20.8
Middle	2	842	100.0	100.0	75.0	48.6	41.3
Upper	0	0	0.0	0.0	0.0	0.0	37.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of owner-occupied housing and multifamily units by tract are based on 2016 FFIEC Census tract definitions and 2010 ACS five-year estimate data.

³ Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-3
DISTRIBUTION OF 2016 HMDA LOANS
BY BORROWER INCOME LEVELS
NORTH FORK VALLEY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	2	7	14.3	0.3	6.8	3.3	19.8
Moderate	2	544	14.3	22.3	16.9	11.4	22.2
Middle	2	48	14.3	2.0	23.3	19.4	23.2
Upper	6	997	42.9	40.9	36.3	49.0	34.9
Unknown	2	842	14.3	34.5	16.6	16.9	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	6.8	3.3	19.8
Moderate	2	544	28.6	36.7	19.6	12.9	22.2
Middle	1	46	14.3	3.1	23.9	20.9	23.2
Upper	4	892	57.1	60.2	38.5	51.4	34.9
Unknown	0	0	0.0	0.0	11.2	11.5	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	6.7	3.3	19.8
Moderate	0	0	0.0	0.0	14.0	9.6	22.2
Middle	0	0	0.0	0.0	22.0	17.3	23.2
Upper	2	105	100.0	100.0	33.9	46.6	34.9
Unknown	0	0	0.0	0.0	23.5	23.2	0.0
Home Improvement Loans							
Low	2	7	66.7	77.8	10.0	3.2	19.8
Moderate	0	0	0.0	0.0	11.3	11.7	22.2
Middle	1	2	33.3	22.2	35.0	37.0	23.2
Upper	0	0	0.0	0.0	35.0	41.9	34.9
Unknown	0	0	0.0	0.0	8.8	6.1	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	19.8
Moderate	0	0	0.0	0.0	0.0	0.0	22.2
Middle	0	0	0.0	0.0	0.0	0.0	23.2
Upper	0	0	0.0	0.0	0.0	0.0	34.9
Unknown	2	842	100.0	100.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

B. CUSTER COUNTY ASSESSMENT AREA (Full Review) – 2016 Demographics and Lending Tables

TABLE B-1 CUSTER COUNTY AA 2016 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	294	24.7
Moderate	0	0.0	0	0.0	0	0.0	250	21.0
Middle	1	100.0	1,191	100.0	139	11.7	296	24.9
Upper	0	0.0	0	0.0	0	0.0	351	29.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1	100.0	1,191	100.0	139	11.7	1,191	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	3,705	1,489	100.0	40.2	361	9.7	1,855	50.1
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	3,705	1,489	100.0	40.2	361	9.7	1,855	50.1
	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	337	100.0	321	100.0	12	100.0	4	100.0
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	337	100.0	321	100.0	12	100.0	4	100.0
Percentage of Total Businesses:			95.3		3.6		1.2	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	36	100.0	36	100.0	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	36	100.0	36	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-2
DISTRIBUTION OF 2016 HMDA LOANS
BY BORROWER INCOME LEVELS
CUSTER COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	5	270	20.8	9.4	8.2	3.8	24.7
Moderate	4	296	16.7	10.3	12.5	8.3	21.0
Middle	8	859	33.3	29.8	19.8	19.6	24.9
Upper	5	1,094	20.8	38.0	41.6	48.2	29.5
Unknown	2	363	8.3	12.6	17.9	20.0	0.0
Home Purchase Loans							
Low	2	216	25.0	23.8	6.2	3.8	24.7
Moderate	2	159	25.0	17.5	14.0	10.2	21.0
Middle	2	374	25.0	41.2	19.4	19.8	24.9
Upper	2	158	25.0	17.4	45.0	49.0	29.5
Unknown	0	0	0.0	0.0	15.5	17.2	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	7.2	3.1	24.7
Moderate	2	137	33.3	15.4	10.8	6.8	21.0
Middle	2	320	33.3	36.0	19.8	20.1	24.9
Upper	2	432	33.3	48.6	40.5	47.0	29.5
Unknown	0	0	0.0	0.0	21.6	23.0	0.0
Home Improvement Loans							
Low	3	54	37.5	7.5	33.3	17.3	24.7
Moderate	0	0	0.0	0.0	13.3	3.3	21.0
Middle	4	165	50.0	22.8	26.7	11.7	24.9
Upper	1	504	12.5	69.7	26.7	67.8	29.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	24.7
Moderate	0	0	0.0	0.0	0.0	0.0	21.0
Middle	0	0	0.0	0.0	0.0	0.0	24.9
Upper	0	0	0.0	0.0	0.0	0.0	29.5
Unknown	2	363	100.0	100.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2010 ACS five-year estimate data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

C. COLORADO SPRINGS METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
(Limited Review) – 2017 Demographics and Lending Tables

**TABLE C-1
COLORADO SPRINGS MSA AA 2017 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	2,345	7.5	2,029	6.9	302	15.4	14	7.0
Moderate	7,008	22.3	6,406	21.9	565	28.9	37	18.6
Middle	10,481	33.4	9,942	34.0	481	24.6	58	29.1
Upper	11,528	36.7	10,840	37.1	600	30.7	88	44.2
Unknown	32	0.1	22	0.1	8	0.4	2	1.0
Total AA	31,394	100.0	29,239	100.0	1,956	100.0	199	100.0
Percentage of Total Businesses:				93.1		6.2		0.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10	3.0	10	3.0	0	0.0	0	0.0
Moderate	40	12.0	39	11.9	1	20.0	0	0.0
Middle	164	49.1	161	48.9	3	60.0	0	0.0
Upper	120	35.9	119	36.2	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	334	100.0	329	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-2
DISTRIBUTION OF 2017 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS MSA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner- Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	2.7	2.0	3.2
Moderate	0	0	0.0	0.0	18.8	15.1	19.8
Middle	1	130	100.0	100.0	46.1	41.8	42.1
Upper	0	0	0.0	0.0	32.4	41.1	34.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	2.5	1.7	3.2
Moderate	0	0	0.0	0.0	18.9	14.4	19.8
Middle	1	130	100.0	100.0	45.6	42.6	42.1
Upper	0	0	0.0	0.0	32.9	41.3	34.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	2.9	1.8	3.2
Moderate	0	0	0.0	0.0	18.3	13.4	19.8
Middle	0	0	0.0	0.0	47.5	43.5	42.1
Upper	0	0	0.0	0.0	31.3	41.2	34.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	3.1	2.2	3.2
Moderate	0	0	0.0	0.0	19.2	15.7	19.8
Middle	0	0	0.0	0.0	43.7	40.0	42.1
Upper	0	0	0.0	0.0	34.0	42.1	34.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	0	0	0.0	0.0	16.4	7.0	11.6
Moderate	0	0	0.0	0.0	45.5	32.3	45.3
Middle	0	0	0.0	0.0	27.3	23.4	28.0
Upper	0	0	0.0	0.0	10.9	37.3	15.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of owner-occupied housing and multifamily units by tract are based on 2017 FFIEC census tract definitions and 2015 ACS five-year estimate data.

³ Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-3
DISTRIBUTION OF 2017 HMDA LOANS
BY BORROWER INCOME LEVELS
COLORADO SPRINGS MSA AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	5.2	2.8	20.2
Moderate	0	0	0.0	0.0	19.6	14.6	18.5
Middle	0	0	0.0	0.0	25.1	23.0	20.3
Upper	0	0	0.0	0.0	31.0	36.0	41.0
Unknown	1	130	100.0	100.0	19.0	23.6	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	4.6	2.6	20.2
Moderate	0	0	0.0	0.0	21.1	16.6	18.5
Middle	0	0	0.0	0.0	26.7	25.8	20.3
Upper	0	0	0.0	0.0	31.5	38.4	41.0
Unknown	1	130	100.0	100.0	16.1	16.7	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	6.2	3.7	20.2
Moderate	0	0	0.0	0.0	16.8	12.8	18.5
Middle	0	0	0.0	0.0	21.8	20.5	20.3
Upper	0	0	0.0	0.0	29.4	36.4	41.0
Unknown	0	0	0.0	0.0	25.7	26.6	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	6.7	4.8	20.2
Moderate	0	0	0.0	0.0	19.7	15.7	18.5
Middle	0	0	0.0	0.0	28.9	26.6	20.3
Upper	0	0	0.0	0.0	40.0	48.6	41.0
Unknown	0	0	0.0	0.0	4.8	4.4	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	20.2
Moderate	0	0	0.0	0.0	0.0	0.0	18.5
Middle	0	0	0.0	0.0	0.0	0.0	20.3
Upper	0	0	0.0	0.0	0.0	0.0	41.0
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-4
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS MSA AA**

Census Tract Income Level	Small Business Loans				% of Businesses ¹
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	7.5
Moderate	0	15	20.0	4.6	22.3
Middle	1	50	10.0	15.1	33.4
Upper	7	2,676	70.0	80.3	36.7
Unknown ²	0	0	0.0	0.0	0.1

¹ The percentage of businesses by tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.

² Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-5
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY REVENUE SIZE OF BUSINESSES
COLORADO SPRINGS MSA AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue ¹
	#	\$(000)	#%	\$%	
\$1MM or less	10	3,331	100.0	100.0	93.1
Over \$1MM	0	0	0.0	0.0	6.2
Not Known	0	0	0.0	0.0	0.6

¹ The percentage of businesses by revenue size is based on 2017 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

D. COLORADO SPRINGS METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
(Limited Review) – 2016 Demographics and Lending Tables

**TABLE D-1
COLORADO SPRINGS MSA AA 2016 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	5,437	3.4	1,446	26.6	32,029	20.0
Moderate	42	30.9	38,280	23.9	6,180	16.1	29,340	18.3
Middle	55	40.4	70,042	43.7	4,141	5.9	34,637	21.6
Upper	31	22.8	46,431	29.0	995	2.1	64,184	40.1
Unknown	1	0.7	0	0.0	0	0.0	0	0.0
Total AA	136	100.0	160,190	100.0	12,762	8.0	160,190	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,074	3,804	2.4	29.1	7,112	54.4	2,158	16.5
Moderate	73,748	34,136	21.4	46.3	30,165	40.9	9,447	12.8
Middle	111,921	71,916	45.2	64.3	30,022	26.8	9,983	8.9
Upper	62,549	49,334	31	78.9	9,666	15.5	3,549	5.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	261,292	159,190	100.0	60.9	76,965	29.5	25,137	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,213	6.4	1,958	6.0	237	12.0	18	8.0
Moderate	7,901	22.7	7,171	22.0	682	34.6	48	21.3
Middle	13,278	38.1	12,699	38.9	505	25.6	74	32.9
Upper	11,439	32.8	10,813	33.1	541	27.5	85	37.8
Unknown	18	0.1	13	0.0	5	0.3	0	0.0
Total AA	34,849	100.0	32,654	100.0	1,970	100.0	225	100.0
Percentage of Total Businesses:				93.7		5.7		0.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	9	2.5	9	2.5	0	0.0	0	0.0
Moderate	95	26.2	92	25.8	3	60.0	0	0.0
Middle	142	39.2	141	39.5	1	20.0	0	0.0
Upper	116	32	115	32.2	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	362	100.0	357	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-2
DISTRIBUTION OF 2016 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
COLORADO SPRINGS MSA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner- Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	2.2	1.6	2.4
Moderate	2	192	50.0	44.5	15.8	12.1	21.4
Middle	2	239	50.0	55.5	47.8	42.6	45.2
Upper	0	0	0.0	0.0	34.2	43.6	31.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	2.5	1.8	2.4
Moderate	1	82	33.3	25.5	16.0	11.5	21.4
Middle	2	239	66.7	74.5	48.8	45.0	45.2
Upper	0	0	0.0	0.0	32.6	41.7	31.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	1.8	1.2	2.4
Moderate	1	110	100.0	100.0	15.4	10.5	21.4
Middle	0	0	0.0	0.0	46.5	41.7	45.2
Upper	0	0	0.0	0.0	36.3	46.6	31.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	1.7	1.1	2.4
Moderate	0	0	0.0	0.0	16.3	13.0	21.4
Middle	0	0	0.0	0.0	48.1	38.1	45.2
Upper	0	0	0.0	0.0	33.9	47.8	31.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	0	0	0.0	0.0	9.5	2.9	11.6
Moderate	0	0	0.0	0.0	48.6	33.1	42.2
Middle	0	0	0.0	0.0	27.0	24.0	35.3
Upper	0	0	0.0	0.0	14.9	40.0	10.9
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.
² The percentage of owner-occupied housing and multifamily units by tract are based on 2016 FFIEC census tract definitions and 2010 ACS five-year estimate data.
³ Includes census tracts where the income level is unknown.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-3
DISTRIBUTION OF 2016 HMDA LOANS
BY BORROWER INCOME LEVELS
COLORADO SPRINGS MSA AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	4.8	2.6	20.0
Moderate	2	241	50.0	55.9	17.3	12.8	18.3
Middle	0	0	0.0	0.0	20.9	18.9	21.6
Upper	0	0	0.0	0.0	30.9	35.9	40.1
Unknown	2	190	50.0	44.1	26.2	29.8	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	4.9	2.8	20.0
Moderate	1	131	33.3	40.8	21.6	17.1	18.3
Middle	0	0	0.0	0.0	24.9	24.1	21.6
Upper	0	0	0.0	0.0	32.5	40.6	40.1
Unknown	2	190	66.7	59.2	16.1	15.4	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	4.6	2.5	20.0
Moderate	1	110	100.0	100.0	11.8	8.2	18.3
Middle	0	0	0.0	0.0	15.4	13.7	21.6
Upper	0	0	0.0	0.0	27.7	32.9	40.1
Unknown	0	0	0.0	0.0	40.5	42.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	6.1	3.3	20.0
Moderate	0	0	0.0	0.0	17.7	13.2	18.3
Middle	0	0	0.0	0.0	26.0	21.8	21.6
Upper	0	0	0.0	0.0	45.3	54.1	40.1
Unknown	0	0	0.0	0.0	5.0	7.6	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	20.0
Moderate	0	0	0.0	0.0	0.0	0.0	18.3
Middle	0	0	0.0	0.0	0.0	0.0	21.6
Upper	0	0	0.0	0.0	0.0	0.0	40.1
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

E. DENVER METROPOLITAN ASSESSMENT AREA (Limited Review) – 2017
Demographics and Lending Tables

TABLE E-1 DENVER MSA AA 2017 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.4	47,570	7.4	13,712	28.8	137,795	21.4
Moderate	147	24.3	143,321	22.3	20,270	14.1	112,440	17.5
Middle	196	32.4	209,289	32.5	11,448	5.5	131,053	20.4
Upper	203	33.6	243,278	37.8	6,760	2.8	262,187	40.7
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	605	100.0	643,475	100.0	52,190	8.1	643,475	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	4.7	33.0	54,410	60.0	6,354	7.0
Moderate	255,389	120,985	18.9	47.4	120,634	47.2	13,770	5.4
Middle	366,723	217,005	33.9	59.2	131,825	35.9	17,893	4.9
Upper	359,995	272,093	42.5	75.6	72,564	20.2	15,338	4.3
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,072,923	640,084	100.0	59.7	379,476	35.4	53,363	5.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	9,757	6.5	8,271	6.0	1,429	11.9	57	4.7
Moderate	27,163	18.0	24,424	17.7	2,586	21.6	153	12.5
Middle	48,713	32.3	44,732	32.5	3,626	30.3	355	29.1
Upper	64,686	42.9	59,923	43.5	4,119	34.4	644	52.7
Unknown	502	0.3	281	0.2	208	1.7	13	1.1
Total AA	150,821	100.0	137,631	100.0	11,968	100.0	1,222	100.0
Percentage of Total Businesses:			91.3		7.9		0.8	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	57	4.4	51	4.0	6	20.7	0	0.0
Moderate	157	12.1	152	12.0	5	17.2	0	0.0
Middle	422	32.5	416	32.7	6	20.7	0	0.0
Upper	661	50.8	649	51.1	12	41.4	0	0.0
Unknown	3	0.2	3	0.2	0	0.0	0	0.0
Total AA	1,300	100.0	1,271	100.0	29	100.0	0	0.0
Percentage of Total Farms:			97.8		2.2		0.0	

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE E-2
DISTRIBUTION OF 2017 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
DENVER METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner- Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	1	1,100	100.0	100.0	5.3	4.8	4.7
Moderate	0	0	0.0	0.0	20.7	16.9	18.9
Middle	0	0	0.0	0.0	35.3	32.7	33.9
Upper	0	0	0.0	0.0	38.7	45.5	42.5
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	5.5	4.3	4.7
Moderate	0	0	0.0	0.0	19.6	15.4	18.9
Middle	0	0	0.0	0.0	34.5	31.7	33.9
Upper	0	0	0.0	0.0	40.4	48.6	42.5
Unknown ³	0	0	0.0	0.0	0.0	0.1	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	4.8	3.5	4.7
Moderate	0	0	0.0	0.0	22.0	16.6	18.9
Middle	0	0	0.0	0.0	36.4	33.6	33.9
Upper	0	0	0.0	0.0	36.7	46.3	42.5
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.3	4.4	4.7
Moderate	0	0	0.0	0.0	20.2	16.7	18.9
Middle	0	0	0.0	0.0	35.2	33.1	33.9
Upper	0	0	0.0	0.0	39.3	45.8	42.5
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	1	1,100	100.0	100.0	17.4	16.2	13.6
Moderate	0	0	0.0	0.0	26.2	31.9	29.9
Middle	0	0	0.0	0.0	38.1	36.4	37.3
Upper	0	0	0.0	0.0	18.3	15.4	19.2
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of owner-occupied housing and multifamily units by tract are based on 2017 FFIEC census tract definitions and 2015 ACS five-year estimate data.

³ Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE E-3
DISTRIBUTION OF 2017 HMDA LOANS
BY BORROWER INCOME LEVELS
DENVER METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	5.4	2.7	21.4
Moderate	0	0	0.0	0.0	20.0	14.0	17.5
Middle	0	0	0.0	0.0	23.0	20.2	20.4
Upper	0	0	0.0	0.0	34.7	41.1	40.7
Unknown	1	1,100	100.0	100.0	16.9	22.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	3.6	1.8	21.4
Moderate	0	0	0.0	0.0	19.9	14.3	17.5
Middle	0	0	0.0	0.0	24.0	22.2	20.4
Upper	0	0	0.0	0.0	38.3	47.4	40.7
Unknown	0	0	0.0	0.0	14.2	14.4	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	7.3	4.2	21.4
Moderate	0	0	0.0	0.0	20.1	15.7	17.5
Middle	0	0	0.0	0.0	21.8	20.6	20.4
Upper	0	0	0.0	0.0	29.9	38.5	40.7
Unknown	0	0	0.0	0.0	20.9	21.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	8.9	6.2	21.4
Moderate	0	0	0.0	0.0	21.4	18.2	17.5
Middle	0	0	0.0	0.0	25.3	24.3	20.4
Upper	0	0	0.0	0.0	39.5	46.3	40.7
Unknown	0	0	0.0	0.0	4.9	5.1	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	21.4
Moderate	0	0	0.0	0.0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	0.0	0.0	20.4
Upper	0	0	0.0	0.0	0.0	0.0	40.7
Unknown	1	1,100	100.0	100.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE E-4
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY INCOME LEVEL OF GEOGRAPHY
DENVER METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				% of Businesses ¹
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	6.5
Moderate	0	0	0.0	0.0	18.0
Middle	2	453	40.0	27.8	32.3
Upper	3	1,175	60.0	72.2	42.9
Unknown ²	0	0	0.0	0.0	0.3

¹ The percentage of businesses by tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.

² Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE E-5
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS
BY REVENUE SIZE OF BUSINESSES
DENVER METROPOLITAN AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue ¹
	#	\$(000)	#%	\$%	
\$1MM or less	0	1,225	40.0	75.2	91.3
Over \$1MM	3	403	60.0	24.7	7.9
Not Known	0	0	0.0	0.0	0.8

¹ The percentage of businesses by revenue size is based on 2017 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

F. DENVER METROPOLITAN ASSESSMENT AREA (Limited Review) – 2016
Demographics and Lending Tables

**TABLE F-1
DENVER MSA AA 2016 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	69	11.4	59,407	9.8	17,302	29.1	133,705	22.1
Moderate	137	22.6	132,205	21.8	19,977	15.1	103,547	17.1
Middle	197	32.6	196,712	32.5	10,576	5.4	122,139	20.2
Upper	195	32.2	216,904	35.8	4,979	2.3	245,837	40.6
Unknown	7	1.2	0	0.0	0	0.0	0	0.0
Total AA	605	100.0	605,228	100.0	52,834	8.7	605,228	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	119,985	41,061	6.5	34.2	65,821	54.9	13,103	10.9
Moderate	250,967	122,314	19.4	48.7	107,811	43.0	20,842	8.3
Middle	348,604	222,183	35.2	63.7	103,142	29.6	23,279	6.7
Upper	311,613	246,018	39.0	78.9	48,550	15.6	17,045	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	1,031,169	631,576	100.0	61.2	325,324	31.5	74,269	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13,720	8.3	12,042	7.9	1,581	13.1	97	7.3
Moderate	33,315	20.1	29,656	19.4	3,467	28.7	192	14.5
Middle	50,342	30.3	47,016	30.8	2,964	24.5	362	27.3
Upper	68,223	41.1	63,665	41.7	3,892	32.2	666	50.2
Unknown	418	0.3	229	0.2	178	1.5	11	0.8
Total AA	166,018	100.0	152,608	100.0	12,082	100.0	1,328	100.0
Percentage of Total Businesses:				91.9	7.3	0.8		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	61	4.4	60	4.4	1	3.1	0	0.0
Moderate	175	12.6	166	12.2	9	28.1	0	0.0
Middle	443	31.8	433	31.8	10	31.3	0	0.0
Upper	709	50.9	697	51.3	12	37.5	0	0.0
Unknown	4	0.3	4	0.3	0	0.0	0	0.0
Total AA	1,392	100.0	1,360	100.0	32	100.0	0	0.0
Percentage of Total Farms:				97.7	2.3	0.0		

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE F-2
DISTRIBUTION OF 2016 HMDA LOANS
BY INCOME LEVEL OF GEOGRAPHY
DENVER METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Owner- Occupied Units ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	5.7	4.8	6.5
Moderate	1	500	100.0	100.0	17.4	14.8	19.4
Middle	0	0	0.0	0.0	35.5	32.0	35.2
Upper	0	0	0.0	0.0	41.5	48.3	39.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	6.6	4.9	6.5
Moderate	0	0	0.0	0.0	17.6	14.6	19.4
Middle	0	0	0.0	0.0	34.3	30.9	35.2
Upper	0	0	0.0	0.0	41.5	49.7	39.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	4.9	3.6	6.5
Moderate	0	0	0.0	0.0	17.2	13.4	19.4
Middle	0	0	0.0	0.0	36.2	32.2	35.2
Upper	0	0	0.0	0.0	41.7	50.9	39.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.5	3.8	6.5
Moderate	0	0	0.0	0.0	16.7	13.3	19.4
Middle	0	0	0.0	0.0	37.0	32.6	35.2
Upper	0	0	0.0	0.0	40.8	50.3	39.0
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units²
Low	0	0	0.0	0.0	25.3	14.4	20.7
Moderate	1	500	100.0	100.0	32.8	28.0	32.1
Middle	0	0	0.0	0.0	33.4	38.4	32.6
Upper	0	0	0.0	0.0	8.6	19.3	14.6
Unknown ³	0	0	0.0	0.0	0.0	0.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of owner-occupied housing and multifamily units by tract are based on 2016 FFIEC census tract definitions and 2010 ACS five-year estimate data.

³ Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE F-3
DISTRIBUTION OF 2016 HMDA LOANS
BY BORROWER INCOME LEVELS
DENVER METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	5.0	2.5	22.1
Moderate	0	0	0.0	0.0	17.0	11.7	17.1
Middle	0	0	0.0	0.0	22.7	19.5	20.2
Upper	0	0	0.0	0.0	37.9	43.8	40.6
Unknown	1	500	100.0	100.0	17.4	22.4	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	4.2	2.1	22.1
Moderate	0	0	0.0	0.0	17.6	12.8	17.1
Middle	0	0	0.0	0.0	23.5	21.5	20.2
Upper	0	0	0.0	0.0	40.3	49.2	40.6
Unknown	0	0	0.0	0.0	14.4	14.4	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	5.5	3.1	22.1
Moderate	0	0	0.0	0.0	16.4	12.1	17.1
Middle	0	0	0.0	0.0	22.1	20.1	20.2
Upper	0	0	0.0	0.0	35.9	44.5	40.6
Unknown	0	0	0.0	0.0	20.1	20.2	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	7.6	4.5	22.1
Moderate	0	0	0.0	0.0	20.1	15.3	17.1
Middle	0	0	0.0	0.0	24.9	22.8	20.2
Upper	0	0	0.0	0.0	43.2	52.7	40.6
Unknown	0	0	0.0	0.0	4.2	4.8	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	22.1
Moderate	0	0	0.0	0.0	0.0	0.0	17.1
Middle	0	0	0.0	0.0	0.0	0.0	20.2
Upper	0	0	0.0	0.0	0.0	0.0	40.6
Unknown	1	500	100.0	100.0	100.0	100.0	0.0

¹ Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

² The percentage of families and households are based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)