



## **PUBLIC DISCLOSURE**

April 17, 2006

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

**UNION COLONY BANK  
RSSD# 440352**

**1701 23RD AVENUE  
GREELEY, COLORADO 80631**

**Federal Reserve Bank of Kansas City  
925 Grand Boulevard  
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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## **GENERAL INFORMATION**

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of each examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community and rate its CRA performance consistent with provisions set forth in 12 CFR Part 228, Appendix A.

This document is an evaluation of the CRA performance of Union Colony Bank, Greeley, Colorado (UCB) as of April 17, 2006, prepared by the Federal Reserve Bank of Kansas City (Reserve Bank), the institution's supervisory agency.

Definitions for many of the terms used in this performance evaluation can be found in Section 228.12 of Regulation BB. For additional convenience, a glossary of common CRA terms is attached at the end of this performance evaluation in Appendix A.

**INSTITUTION RATING**

**INSTITUTION'S CRA RATING:** UNION COLONY BANK is rated “Satisfactory”

The following table indicates the performance level of Union Colony Bank with respect to the lending, investment, and service tests.

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

\* The lending test is weighted more heavily than the investment and service tests in determining the bank's overall CRA rating.

Major factors supporting the institution's rating include:

**Lending Test:**

- Lending levels reflect good responsiveness in meeting the credit demands of the delineated assessment areas, with a high percentage of loans made in the bank's designated assessment areas;
- A good distribution of loans among LMI geographies and borrowers and among small-revenue businesses and farms;
- The use of innovative or flexible lending practices and a good record of serving the credit needs of low- or moderate-income individuals and very small businesses and farms; and

- A good record of granting community development loans to provide affordable housing to LMI individuals and to revitalize or stabilize LMI geographies.

**Investment Test:**

- An adequate level of qualified investments and donations targeted to activities that promote community development;
- Occasional use of innovative or complex qualified investments; and
- Adequate responsiveness to credit and community development needs.

**Service Test:**

- Delivery systems are readily accessible to essentially all portions of the bank's assessment areas;
- The record of opening and closing branches has not adversely affected the accessibility of its delivery systems;
- Services and business hours are tailored to the convenience and needs of its assessment areas; and
- Excellent involvement in providing financial, managerial, and fundraising expertise to community service organizations.

**INSTITUTION**

**DESCRIPTION OF UNION COLONY BANK**

UCB is a wholly-owned subsidiary of First National of Colorado, Inc., Fort Collins, Colorado, which in turn is 100 percent owned by First National of Nebraska, Inc., Omaha, Nebraska (FNNI), of which 29 percent is owned by Lauritzen Corporation, Omaha, Nebraska. UCB is one of only two state-chartered banks owned by FNNI; its other ten banks are national charters. UCB headquartered in Greeley, Colorado, operates nine full-service locations; two in Greeley, Colorado, and one each in Brighton, Evans, Fort Lupton, Johnstown, Kersey, Platteville, and Windsor, Colorado. The bank offers a full range of deposit and credit products, a network of seven cash-dispensing and nine deposit-taking automated teller machines (ATMs), and 24-hour telephone and Internet banking services.

The assessment areas served by the bank include all of Weld County that comprises the entire Greeley, Colorado Metropolitan Statistical Area (MSA) (Greeley Assessment Area) and the northwest corner of Adams County in the Denver-Aurora, Colorado MSA (Brighton Assessment Area). Eight of the bank's offices are located within the Greeley assessment area with one office in the Brighton assessment area.

As of December 31, 2005, the bank reported total assets of \$440,793,000, total deposits of \$383,194,000, and gross loans of \$289,428,000. As shown in Exhibit 1 below, the primary lending emphasis is on real estate lending that includes commercial, construction and land development, and residential loans that account for 65 percent of gross loans. The bank also originates a significant dollar volume of consumer loans. The Greeley assessment area accounts for a significant majority of the bank's overall lending and deposit-taking activities.

<b>Exhibit 1</b>				
<b>Union Colony Bank</b>				
<b>Loan Portfolio Distribution as of December 31, 2005</b>				
<b>Loan Type</b>			<b>Amount \$('000s)</b>	<b>PERCENT</b>
Commercial Loans			30,958	10.7
Real Estate Loans			189,188	65.4
	Amount (\$000s)	Percent		
Secured by non-farm, nonresidential properties	47,211	24.9		
Construction and land development	60,577	32.0		
Secured by 1- to 4-family residential properties	74,506	39.4		
Secured by multifamily residential properties	3,537	1.9		
Farm land	3,357	1.8		
Agricultural Loans			9,617	3.3
Consumer Loans			51,889	17.9
Other Loans			7,776	2.7
<b>GROSS LOANS</b>			<b>289,428</b>	<b>100.0</b>

The evaluation of CRA performance was considered in the context of financial capacity, legal impediments, competitive and economic conditions, and demographic changes that may have affected the bank's ability to extend credit or invest in community development projects. Other than a high number of financial institutions competing for these loans and investments, the analysis did not reveal any legal impediments or financial constraints that restricted the bank's ability to lend.

The bank received an "Outstanding" rating at its prior evaluation conducted by the Reserve Bank as of March 29, 2004.

### **SCOPE OF EXAMINATION**

The bank's CRA performance was reviewed using the Federal Financial Institutions' Examination Council's (FFIEC) *Interagency CRA Procedures for Large Institutions*. Loan products evaluated included all residential real estate loans reported on the Home Mortgage Disclosure Act (HMDA) Loan/Application Register (LAR), including home purchase, refinance, home improvement, and multifamily property loans; all small business and all small farm loans reported on the CRA LAR; and all loans meeting the definition of "community development" lending under the CRA and its supplementary guidance.

The lending test evaluation included a review of the bank's 2004 and 2005 CRA and HMDA LAR loan data and did not include any lending activities of the bank's affiliated relationships. The investment and service tests considered all investments, grants, and contributions made and community service activities conducted from the prior examination of March 24, 2004 through December 31, 2005. A comparative review of the bank with other commercial banks operating within its assessment areas was performed. More specifically, the review included a comparison of the bank's lending performance to the most recently available (2004) lending performance of all other financial institutions that report HMDA and CRA loan data within the bank's assessment areas (referred to as aggregate data).

For the evaluation of the geographic distribution of loans, geographies were classified on the basis of 2000 Census data. The bank's performance was rated based on its penetration in all geographies, particularly LMI geographies. For the evaluation of borrower characteristics, borrower income levels were based on 2004 and 2005 estimated median-family income (MFI) from the U.S. Department of Housing and Urban Development (HUD). The performance was rated based on penetration to all individual income categories, particularly LMI individuals.

The Greeley assessment area accounted for a substantial majority of the bank's lending and community development activities, and significantly influenced the overall summary of CRA performance. The Brighton assessment area accounted for approximately 4 percent of mortgage, small business, and small farm loan originations, and received a limited review. Performance under the lending, investment, and service tests in the Brighton assessment area was consistent with performance in the Greeley assessment area, and did not appreciably affect overall ratings.

Interviews with members of the community within the bank's Greeley's assessment area were conducted during the examination to ascertain the credit needs of the community, the availability of community development investment opportunities, and local economic conditions. Both of the community contacts were representatives of economic development agencies.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Overall conclusions regarding the lending, investment and service tests are summarized in the following sections. Each test is evaluated for performance characteristics described in Appendix B of Regulation BB, which implements the CRA. Data used for this evaluation included the bank's performance data, aggregate lending data from each assessment area (see CRA Loan Distribution Tables in Appendix B of this evaluation), and area demographic information.

### **LENDING TEST**

The bank demonstrated **High Satisfactory** performance in meeting the credit needs of its delineated assessment areas. The bank shows good responsiveness by providing a variety of loan and deposit products while the evaluation of home mortgage, small business, and small farm loans found a high proportion of loans originated inside the assessment areas. In addition, the evaluation revealed a good penetration of loans among LMI geographies and borrowers, and among small-revenue businesses and small revenue farms. The bank also demonstrated good performance in originating community development loans to provide affordable housing for LMI individuals and to revitalize or stabilize LMI census tracts.

#### **Lending Activity:**

The bank demonstrated good responsiveness to assessment areas credit needs by offering a full range of credit products, including traditional and nontraditional residential mortgage, home equity, residential refinancing, balloon, jumbo, adjustable rate, and interim residential construction loans. Also offered are land acquisition and development loans for commercial and residential projects, consumer loans, overdraft protection lines of credit, business loans, and farm loans. Through the bank's mortgage division, the bank also offers Veterans Administration (VA) and Federal Housing Administration (FHA) loans, including those with down payment assistance programs.

The bank also participates in programs specifically targeted to meet the credit needs of LMI borrowers whose limited credit references and income do not otherwise qualify for residential mortgage loans. The bank originated 20 loans totaling \$1,860,171, under three different programs; nine of the loans were to the Colorado Housing Finance Authority (CHFA) totaling \$716,514, eight were to the First Solution program (loans to individuals without a social



security number) totaling \$1,128,657, and three down payment housing assistance loans to UCB employees totaling \$15,000.

<b>Exhibit 2 Summary of Lending Activity</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>
HMDA Home Purchase	211	39	34,498	45
HMDA Refinancing	267	49	41,384	53
HMDA Home Improvement	62	12	1,495	2
<b>Total HMDA-related</b>	<b>540</b>	<b>38</b>	<b>77,377</b>	<b>59</b>
<b>Total Small Business</b>	<b>709</b>	<b>49</b>	<b>43,601</b>	<b>33</b>
<b>Total Small Farm</b>	<b>191</b>	<b>13</b>	<b>9,657</b>	<b>8</b>
<b>TOTAL LOANS</b>	<b>1,440</b>	<b>100</b>	<b>130,635</b>	<b>100</b>

**Assessment Area Concentration:**

As shown in Exhibit 3, the bank originated a high percentage of home mortgage, small business, and small farm loans inside the bank's assessment area.

<b>Exhibit 3 Lending Inside and Outside the Assessment Area</b>								
	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>
HMDA Purchase	155	73.5	23,701	68.7	56	26.5	10,797	31.3
HMDA Refinancing	195	73.0	25,357	61.3	72	27	16,027	38.7
HMDA Home Improvement	58	93.55	1,327	88.8	4	6.5	168	11.2
<b>Total HMDA-related</b>	<b>408</b>	<b>75.6</b>	<b>50,385</b>	<b>65.1</b>	<b>132</b>	<b>24.4</b>	<b>26,992</b>	<b>34.9</b>
<b>Total Small Business</b>	<b>581</b>	<b>81.9</b>	<b>29,663</b>	<b>68.0</b>	<b>128</b>	<b>18.1</b>	<b>13,939</b>	<b>32.0</b>
<b>Total Small Farm</b>	<b>159</b>	<b>83.2</b>	<b>7,798</b>	<b>80.7</b>	<b>32</b>	<b>16.8</b>	<b>1,859</b>	<b>19.3</b>
<b>TOTAL LOANS</b>	<b>1,148</b>	<b>79.7</b>	<b>87,846</b>	<b>67.2</b>	<b>292</b>	<b>20.3</b>	<b>42,790</b>	<b>32.8</b>

**Geographic and Borrower Distribution:**

The bank demonstrated a good distribution of home mortgage, small business, and small farm loans in LMI tracts and among LMI borrowers and small-revenue businesses and farms. The distributions compared reasonably with the demographic composition of its assessment areas and the aggregate performance of other lenders. (Please refer to the Loan Distribution Tables in Appendix B of this evaluation for bank and aggregate lending data for each assessment area).

**Community Development Lending:**

Community development loans include loans that have community development as their primary purpose, and have not been reported as home mortgage loans under the HMDA or as small business and small farm loans under the CRA. An exception is granted for multifamily dwelling loans, which may qualify as both community development loans and home mortgage loans.

The bank demonstrated a good record of granting community development loans in its assessment area. In 2004 and 2005, the bank originated nine community development loans totaling \$3,401,926 or 1.2 percent of gross loans as of December 31, 2005. In addition, three community development loans made in 2002 and 2003 had remaining balances totaling \$935,122.

### **INVESTMENT TEST**

The investment performance rating of **Low Satisfactory** reflected an adequate level of qualified investments and donations targeted to activities that promote community development. Investments and donations totaled \$945,396 or 0.21 percent of total assets as of December 31, 2005. There were no new CRA-qualified investments made during this evaluation period. However, the dollar amount of donations increased from \$44,165 at the previous evaluation to \$90,441 at this evaluation.

### **SERVICE TEST**

The bank demonstrated **Outstanding** performance in delivering retail banking services and providing community development services within its assessment areas. Delivery services are readily accessible to essentially all portions of the bank's assessment areas. Within the context of the current distribution of branches, the record of opening and closing branches did not affect access to low- and moderate geographies. Services, including hours of operation, are tailored to the convenience and needs of the assessment areas, particularly LMI geographies and individuals. The bank's involvement in providing financial, managerial, and fundraising expertise to community service organizations was excellent.

## **COMPLIANCE WITH ANTIDISCRIMINATION LAWS**

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the antidiscrimination provision of the Equal Credit Opportunity Act. The FFIEC Interagency Fair Lending Examination Procedures were used for the analysis. No violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Satisfactory policies, procedures, and training programs have been developed to prevent discriminatory lending practices. Further, the bank was not engaged in any other illegal credit practices inconsistent with helping to meet community credit needs.

**METROPOLITAN ASSESSMENT AREA CONCLUSIONS  
FULL-REVIEW OF WELD COUNTY**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREELEY ASSESSMENT AREA**

UCB is headquartered in the city of Greeley, Weld County, Colorado. The county is located in the north central part of Colorado bordering the state of Wyoming to the north and the Denver-Aurora MSA to the south. The city of Greeley is located in the middle of Weld County and is approximately 50 miles north of the city of Denver. The bank's assessment area has not changed since the last examination and does not arbitrarily exclude any low- or moderate-income tracts.

The Bank has a significant deposit role in the Greeley MSA. On June 30, 2005, according to the Federal Deposit Insurance Corporation (FDIC) Market Summary of Deposits, it had the second largest deposit market share of the FDIC-insured financial institutions with offices in the area. Its seven Greeley offices, excluding the newest location, held \$350,467 of area deposits and nearly a 14 percent deposit market share.

UCB faces significant competition within Weld County from numerous mortgage lenders, regional and local banks, credit unions, and finance companies. Overall, there were a total of 445 lenders from across the country that had made at least one mortgage loan in the area. The bank competes directly against 28 other banks that offer very competitive loan and deposit rates. The bank has identified Wells Fargo Bank, New Frontier Bank, Bank of Choice, and Centennial Bank of the West as its primary competitors.

Currently, the housing market is experiencing declines in fair market values caused by an influx of newly built affordable housing units. Presently, there is an abundance of housing inventory available; however, as the population continues to grow the housing market is expected to stabilize.

Members of the community interviewed during this examination expressed cautious optimism about economic conditions, citing that employment and expanding job opportunities in the service and manufacturing industries are slowly increasing. Beginning in 2000 and continuing through 2003, Weld County was the fastest growing county in the state. Furthermore, the county supports a skilled and semi-skilled workforce of approximately 90,000 people. Community contacts also acknowledged that approximately 25 percent of the Greeley workforce commutes outside the county to work, but because housing is more affordable in Greeley than in adjacent counties, they choose to live in Weld County.

Community contacts mentioned finance for higher education, improving the public school system, and the revitalization and re-development of Greeley's downtown area as important development needs. Development opportunities to provide credit-related education and loans to the Hispanic population continue to exist due to language and geographic separation between Hispanic and non-Hispanic residents.

Additional assessment area demographics and characteristics based upon 2000 Census data are summarized in Exhibit 4.

<b>Exhibit 4 Greeley Assessment Area Demographics</b>									
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
Low-income	2	5.4	651	1.4	194	29.8	8,797	19.3	
Moderate-income	8	21.6	8,560	18.8	1,536	17.9	8,161	17.9	
Middle-income	19	51.4	23,551	51.7	1,493	6.3	10,994	24.1	
Upper-income	7	18.9	12,773	28.1	437	3.4	17,583	38.6	
Unknown-income	1	2.7	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>37</b>	<b>100.0</b>	<b>45,535</b>	<b>100.0</b>	<b>3,660</b>	<b>8.0</b>	<b>45,535</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
Low-income	1,456	306	0.7	21.0	1,083	74.4	67	4.6	
Moderate-income	14,440	6,335	14.6	43.9	7,413	51.3	692	4.8	
Middle-income	33,286	23,286	53.6	70.0	8,509	25.6	1,491	4.5	
Upper-income	17,012	13,501	31.1	79.4	2,814	16.5	697	4.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>66,194</b>	<b>43,428</b>	<b>100.0</b>	<b>65.6</b>	<b>19,819</b>	<b>29.9</b>	<b>2,947</b>	<b>4.5</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
				<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	490	6.2	432	6.1	37	6.3	21	8.7	
Moderate-income	1,163	14.8	1,035	14.7	97	16.6	31	12.9	
Middle-income	3,808	48.4	3,418	48.5	264	45.1	126	52.3	
Upper-income	2,400	30.5	2,152	30.6	187	32.0	61	25.3	
Unknown-income	7	0.1	5	0.1	0	0.0	2	0.8	
<b>Total Assessment Area</b>	<b>7,868</b>	<b>100.0</b>	<b>7,042</b>	<b>100.0</b>	<b>585</b>	<b>100.0</b>	<b>241</b>	<b>100.0</b>	
	<b>Percentage of Total Businesses:</b>			<b>89.5</b>		<b>7.4</b>		<b>3.1</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>							
				<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	7	0.9	7	1.0	0	0.0	0	0.0	
Moderate-income	41	5.5	38	5.4	3	8.3	0	0.0	
Middle-income	543	73.4	517	73.4	26	72.2	0	0.0	
Upper-income	149	20.1	142	20.2	7	19.4	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>740</b>	<b>100.0</b>	<b>704</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
	<b>Percentage of Total Farms:</b>			<b>95.1</b>		<b>4.9</b>		<b>0.0</b>	

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREELEY ASSESSMENT AREA**

**LENDING TEST**

The bank demonstrated good performance in meeting the credit needs of the community in the Greeley assessment area. The evaluation of home mortgage, small business, and small farm loans found a high proportion of loans originated inside the assessment area, with a good penetration of loans among LMI geographies and borrowers, and among small-revenue businesses and small-revenue farms. The bank demonstrated good performance in originating community development loans to provide affordable housing for LMI borrowers and to revitalize or stabilize LMI census tracts. Refer to Appendix B, CRA Loan Distribution Table 2 for additional information on the bank's lending and CRA Loan Distribution Table 3 for aggregate lending activity.

**Lending Activity:**

The bank demonstrated good responsiveness to the Greeley assessment area credit needs through small business and small farm loans and loans to consumers for home purchase, refinance, and home improvement. In 2004 and 2005, the bank originated approximately \$46,489,000 HMDA reportable loans, \$28,517,000 small business loans and \$7,798,000 small farm loans.

The bank also participated in programs specifically targeted to meet the credit needs of LMI borrowers whose limited credit references and income would not otherwise qualify for standard residential mortgage loans. As mentioned previously under the bank's overall lending activity referenced on page 7, these included nine CHFA loans, eight First Solution loans for consumers with limited credit, and three down payment housing loans for UCB employees for a grand total of 1,860,171.

**Geographic Distribution**

*HMDA Loans*

The bank demonstrated a good geographic distribution of mortgage loans in the Greeley assessment area, particularly in LMI census tracts. The bank originated 15 percent of its HMDA loans in LMI tracts compared with 15 percent of all owner-occupied homes and 10 percent of aggregate lending within these same geographies.

*Small Business Loans*

The bank demonstrated a good geographic distribution of small business loans in the assessment area, particularly in LMI tracts. The analysis revealed that 28 percent by number and dollar volume of loans were originated to small business in LMI tracts. This performance compared reasonably well to assessment area demographics, which showed that 21 percent

of assessment area businesses were located in LMI tracts. The performance also compared favorably with aggregate lenders who originated 18 percent by number and 19 percent by dollar volume to small businesses in LMI tracts.

#### *Small Farm Loans*

The bank demonstrated a good geographic distribution of small farm loans in its assessment area, particularly in LMI tracts. The proportion of small farm loans of 7 percent, both by number and dollar volume, in LMI tracts compared favorably with the assessment area demographics of 7 percent of small businesses in these tracts and with the number and dollar volume of loans originated by aggregate lenders, also at 7 percent.

### **Distribution by Borrower Income and Revenue Size of Businesses and Farms**

#### *HMDA Loans*

The bank demonstrated a good distribution of home mortgage loans among borrowers of varying income levels, including LMI borrowers, relative to peer statistics and area demographics. Over the evaluation period, 30 percent of HMDA loans and 22 percent by dollar amount were originated by the bank to LMI borrowers. In contrast, aggregate lenders originated only 20 percent of their HMDA reported loans with 15 percent based on dollar volume to LMI borrowers. However, about 17 percent of aggregate loans were made to unknown income borrowers while the bank originated around 7 percent to these same borrowers, thus, slightly skewing the comparable percentages. As a result, the percentage of aggregate loans compared to the bank's loans, in actuality, would have a smaller variance.

According to area demographics, LMI families accounted for 37 percent of assessment area families, which is higher than the percentage volume of HMDA loans reported by the bank. However, eight percent of assessment area families live below the poverty threshold that, potentially, have more difficulty qualifying for home ownership. Since rates of home ownership also tend to be lower among LMI families, the performance of the bank in making mortgage loans to low and moderate-income borrowers is considered good relative to other lenders and the demographics of the assessment area.

#### *Small Business Loans*

The bank demonstrated a good distribution of small business loans within the assessment area, particularly among businesses reporting gross annual revenues of \$1 million or less. In 2004 and 2005, small-revenue businesses received 68 percent of small business loans originated by the bank with 43 percent based on dollar amount that compared less favorably to 90 percent of small businesses that are located in this assessment area. However, when comparing the bank's penetration of loans to small businesses to other aggregate lenders, 38 percent by number and 45 percent by dollar volume, the bank's performance was significantly stronger. In addition, the bank's lending to small businesses as compared to

aggregate data is slightly stronger. Fifty seven percent of business loans originated were for amounts less than \$250,000 compared to 54 percent reported for aggregate lenders. Smaller loan amounts generally indicate that more lending to smaller businesses has occurred.

### *Small Farm Loans*

The bank demonstrated a good distribution of small farm loans within the assessment area, particularly among farms reporting gross annual revenues of \$1 million or less. During the evaluation period, small-revenue farms received 85 percent of small farm loans with 66 percent by total dollars that compared similarly with the 85 percent of small-revenue farms in the assessment area. Aggregate lenders in the assessment area also reported comparable performance, originating 85 percent of small farm loans with 75 percent by dollar volume to small-revenue farms. Furthermore, the percentage of loans originated for amounts less than \$250,000 was also comparable to aggregate lenders.

### **Community Development Lending:**

The bank demonstrated a good record of granting community development loans in the assessment area. For the evaluation period, the bank originated nine community development loans totaling about \$3,400,000. Three of the loans, totaling \$195,791, were made to businesses situated in downtown Greeley, which is designated as an enterprise zone needing revitalization and re-development. Two loans, totaling \$500,000, financed working capital for an affordable housing organization. Two loans, totaling \$481,135, financed construction and renovation projects providing affordable housing to LMI individuals and families. One loan totaling \$225,000 financed the construction of a house which was auctioned to benefit an agency that supports children of predominately LMI families. Last, the bank provided \$2,000,000 in a participated loan with the bank's affiliate that provided financing for the acquisition of multi-family rental properties. Furthermore, three community development loans made during the previous evaluation had remaining balances of \$935,122.

### **INVESTMENT TEST**

The bank had an adequate level of qualified investments that were responsive to community needs. Qualified investments consist of three investments to the Colorado Enterprise Fund, Access Capital Corporation, and First National of Nebraska Community Development Corporation (FNNCDC) totaling \$854,955. The same investments were considered during the previous two evaluation periods. The Colorado Enterprise Fund supports loan and management assistance to disadvantaged business owners including low-income individuals, minorities, and women. The Access Capital Corporation invests in credit quality debt securities through mutual funds that target LMI individuals and geographies. FNNCDC is a subsidiary of the bank's holding company that was established to promote housing, services, and jobs designed to benefit LMI individuals and geographies in the assessment areas of its subsidiary banking relationships. UCB also donated \$90,441 to community service agencies



providing affordable housing and other services primarily to LMI individuals and families within this assessment area.

## **SERVICE TEST**

The bank demonstrated strong performance in delivering banking services and providing community development services in its assessment area. Delivery systems were accessible to essentially all geographies and individuals of different income levels. Changes in branch locations did not adversely affect the accessibility of its delivery services, particularly to LMI geographies and individuals. Services, including hours of operation, are tailored to the convenience and needs of the assessment area. Last, the bank's involvement in providing financial, managerial, and fundraising expertise to community service organizations is excellent.

### **Retail Services:**

The distribution of branches and ATMs are accessible to essentially all of the bank's assessment area. Of the eight full-service branches, four are located in middle-income tracts with the other four located in upper-income tracts. UCB also has eight full-service ATMs at each bank location and seven cash-dispensing ATMs at other non-proprietary locations, two of which are in low-income geographies. The bank's hours of operation are consistent at each location and offer extended drive-through teller hours during the week and on Saturdays. Other delivery services include telephone banking in English and Spanish and extensive Internet banking services. The bank continues to offer innovative and flexible products in order to reach the LMI population, especially within the Hispanic community. These products include an Economical Transfer Account that helps defray costs associated with wiring funds to economically deprived family members in Mexico and the acceptance of the Matricula Consular identification card as a stand alone form of identification. UCB also provides business express accounts for start-up businesses. This product features reduced costs for writing and purchasing checks and free check imaging. The bank also continues to offer free escrow services for affordable housing loans to the Greeley Habitat for Humanity organization.

### **Community Development Services:**

The bank demonstrated an excellent level of community development services. This component of the evaluation considers the extent that bank employees were involved in community development services, the innovativeness of these services, and the degree to which they serve LMI individuals. At this evaluation, 16 bank employees volunteered services to 15 different agencies and organizations. Services performed that provided employee financial expertise included fundraising, financial planning, and oversight of various organizations and agencies that have community development its primary purpose. In one instance, a bank employee provided money management education classes for low-income Spanish speaking adults and children.

**METROPOLITAN AREAS  
LIMITED SCOPE REVIEW OF DENVER/AURORA MSA**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE BRIGHTON ASSESSMENT AREA**

The Brighton assessment area is located in the northwest corner of Adams County in the Denver-Aurora MSA. UCB has only one branch location in Brighton, Colorado that is approximately 20 miles north of downtown Denver, Colorado. The branch's street address is adjacent to the Weld County boundary line and, as a result, requires the bank to delineate the geographic areas of Adams County served, as a separate assessment area.

A limited review for this assessment area was conducted since the Brighton branch accounts for only 4 percent of the bank's 2004 and 2005 reported HMDA and CRA data and, according to FDIC June, 2005 Market Share data, includes less than 10 percent of the bank's total deposits and represents a 0.1 percent deposit market share of the Denver-Aurora MSA.

Due to the limited analysis of the assessment area, member of the community were not interviewed to determine credit area needs.

Assessment area demographics and characteristics based upon 2000 U.S. Census Data are summarized in Exhibit 5 on the following page.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BRIGHTON ASSESSMENT AREA**

Information reviewed, including performance information, can be found in Appendix B to this report. Conclusions for the Brighton assessment area where a limited review was conducted indicate performance under each test was consistent with performance in the Greeley assessment area.

Exhibit 5 Brighton Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,389	19.4
Moderate-income	2	25.0	1,865	26.1	191	10.2	1,392	19.5
Middle-income	4	50.0	4,106	57.5	141	3.4	1,957	27.4
Upper-income	2	25.0	1,175	16.4	20	1.7	2,408	33.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>8</b>	<b>100.0</b>	<b>7,146</b>	<b>100.0</b>	<b>352</b>	<b>4.9</b>	<b>7,146</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,599	1,444	20.5	55.6	1,060	40.8	95	3.7
Middle-income	5,597	4,322	61.4	77.2	1,041	18.6	234	4.2
Upper-income	1,386	1,270	18.1	91.6	71	5.1	45	3.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>9,582</b>	<b>7,036</b>	<b>100.0</b>	<b>73.4</b>	<b>2,172</b>	<b>22.7</b>	<b>374</b>	<b>3.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	378	28.3	352	28.2	18	26.9	8	42.1
Middle-income	668	50.1	624	50.0	35	52.2	9	47.4
Upper-income	288	21.6	272	21.8	14	20.9	2	10.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,334</b>	<b>100.0</b>	<b>1,248</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>93.6</b>		<b>5.0</b>		<b>1.4</b>

**CRA APPENDIX A  
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, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons and average about 4,000 inhabitants.

**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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI individuals.

**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 review:** Performance under the lending, investment and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

**Geography:** A census tract delineated by the U.S. 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 data such as race, gender and income of applications, amount of loan requested, and 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 review:** Performance under the lending, investment and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Metropolitan area (“MA”):** Any primary metropolitan statistical area (“PMSA”), metropolitan statistical area (“MSA”), or consolidated metropolitan statistical area (“CMSA”), as defined by the Office of Management and Budget, with a population of 250 thousand or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution’s CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

**Small loan(s) to farm(s):** A loan included in “loans to small farms” as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500 thousand 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.

**CRA APPENDIX B  
CRA LOAN DISTRIBUTION TABLES**

**Table 1  
HMDA & CRA Loan Distribution Table  
All Assessment Areas  
For Loan Years 2004 & 2005**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	3	0.7	113	0.2	36	8.8	2,604	5.2
Moderate	57	14.0	4,678	9.3	90	22.1	8,612	17.1
<i>Low/Moderate Total</i>	<i>60</i>	<i>14.7</i>	<i>4,791</i>	<i>9.5</i>	<i>126</i>	<i>30.9</i>	<i>11,216</i>	<i>22.3</i>
Middle	180	44.1	22,784	45.2	93	22.8	9,804	19.5
Upper	168	41.2	22,810	45.3	163	40.0	25,610	50.8
Unknown	0	0.0	0	0.0	26	6.4	3,755	7.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>408</i>	<i>100.0</i>	<i>50,385</i>	<i>100.0</i>	<i>408</i>	<i>100.0</i>	<i>50,385</i>	<i>100.0</i>
	<b>SMALL BUSINESS</b>				<b>SMALL FARM</b>			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	24	4.1	2,075	7.0	0	0.0	0	0.0
Moderate	141	24.3	5,932	20.0	11	6.9	525	6.7
<i>Low/Moderate Total</i>	<i>165</i>	<i>28.4</i>	<i>8,007</i>	<i>27.0</i>	<i>11</i>	<i>6.9</i>	<i>525</i>	<i>6.7</i>
Middle	229	39.4	10,732	36.2	104	65.4	6,031	77.3
Upper	187	32.2	10,922	36.8	44	27.7	1,242	15.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>581</i>	<i>100.0</i>	<i>29,661</i>	<i>0.0</i>	<i>159</i>	<i>100.0</i>	<i>7,798</i>	<i>100.0</i>
	<b>By Revenue</b>							
Total \$1 Million or Less	409	70.4	12,830	43.3	135	84.9	5,104	65.5
Over \$1 Million	172	29.6	16,833	56.7	24	15.1	2,694	34.5
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>581</i>	<i>100.0</i>	<i>29,661</i>	<i>100.0</i>	<i>159</i>	<i>100.0</i>	<i>7,798</i>	<i>100.0</i>
	<b>By Loan Size</b>							
\$100,000 or less	508	87.4	6,279	21.2	139	87.4	2,340	30.0
\$100,001 - \$250,000	44	7.6	7,717	26.0	11	6.9	1,895	24.3
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	29	5.0	15,667	52.8	9	5.7	3,564	45.7
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>581</i>	<i>100.0</i>	<i>29,663</i>	<i>100.0</i>	<i>159</i>	<i>100.0</i>	<i>7,799</i>	<i>100.0</i>
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	380	92.9	4,793	37.4	122	90.4	1,980	38.8
\$100,001 - \$250,000	21	5.1	3,665	28.6	9	6.6	1,575	30.9
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	2.0	4,371	34.0	4	3.0	1,550	30.3
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>409</i>	<i>100.0</i>	<i>12,829</i>	<i>100.0</i>	<i>135</i>	<i>100.0</i>	<i>5,105</i>	<i>100.0</i>



**Table 2  
HMDA & CRA Loan Distribution Table  
Greeley Assessment Area  
For Loan Years 2004 & 2005**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	3	0.8	113	0.2	31	8.1	2,141	4.6
Moderate	53	13.8	4,187	9.0	86	22.3	8,027	17.3
<i>Low/Moderate Total</i>	<i>56</i>	<i>14.5</i>	<i>4,300</i>	<i>9.2</i>	<i>117</i>	<i>30.4</i>	<i>10,168</i>	<i>21.9</i>
Middle	161	41.8	119,379	41.7	85	22.1	8,726	18.8
Upper	168	43.6	22,810	49.1	159	41.3	24,124	51.9
Unknown	0	0.0	0	0.0	24	6.2	3,471	7.4
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>385</i>	<i>100.0</i>	<i>46,489</i>	<i>100.0</i>	<i>385</i>	<i>100.0</i>	<i>46,489</i>	<i>100.0</i>
	<b>SMALL BUSINESS</b>				<b>SMALL FARM</b>			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	24	4.3	2,075	7.3	0	0.0	0	0.0
Moderate	133	23.8	5,905	20.7	11	7.0	525	6.7
<i>Low/Moderate Total</i>	<i>157</i>	<i>28.1</i>	<i>7,980</i>	<i>28.0</i>	<i>11</i>	<i>7.0</i>	<i>525</i>	<i>6.7</i>
Middle	218	39.1	9,943	34.9	103	60.6	6,031	77.4
Upper	183	32.8	10,592	37.1	44	32.4	1,242	15.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>558</i>	<i>100.0</i>	<i>28,515</i>	<i>0.0</i>	<i>158</i>	<i>100.0</i>	<i>7,798</i>	<i>0.0</i>
	<b>By Revenue</b>							
Total \$1 Million or Less	389	67.7	12,171	42.7	134	84.8	5,104	65.5
Over \$1 Million	169	30.3	16,345	57.3	24	15.2	2,694	34.5
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>558</i>	<i>100.0</i>	<i>28,516</i>	<i>100.0</i>	<i>158</i>	<i>100.0</i>	<i>7,798</i>	<i>0.0</i>
	<b>By Loan Size</b>							
\$100,000 or less	489	87.6	6,042	21.2	138	87.3	2,340	30.0
\$100,001 - \$250,000	41	7.3	7,296	25.6	11	7.0	1,895	24.3
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	28	5.1	15,179	53.2	9	5.7	3,564	45.7
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>558</i>	<i>100.0</i>	<i>28,517</i>	<i>100.0</i>	<i>158</i>	<i>100.0</i>	<i>7,799</i>	<i>100.0</i>
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	363	93.3	4,556	37.4	121	90.3	1,980	38.8
\$100,001 - \$250,000	18	4.6	3,244	26.7	9	6.7	1,575	30.9
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	2.1	4,371	35.9	4	3.0	1,550	30.3
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>389</i>	<i>100.0</i>	<i>12,171</i>	<i>100.0</i>	<i>134</i>	<i>100.0</i>	<i>5,105</i>	<i>100.0</i>

**Table 3  
Peer Group HMDA & CRA Loan Distribution Table  
Greeley Assessment Area  
For Loan Year 2004**

Income Categories	HMDA								
	By Tract Income				By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Low	172	0.7	23,954	0.6	846	3.4	79,630	2.1	
Moderate	2,365	9.%	257,619	6.7	3,964	16.1	472,480	12.4	
<i>Low/Moderate Total</i>	<i>2,537</i>	<i>10.3</i>	<i>281,573</i>	<i>7.4</i>	<i>4,810</i>	<i>19.5</i>	<i>552,110</i>	<i>14.5</i>	
Middle	12,441	50.4	1,899,868	49.8	6,643	26.9	938,327	24.6	
Upper	9,701	39.3	1,636,140	42.9	9,107	36.9	1,693,071	44.3	
Unknown	3	0.0	698	0.0	4,122	16.7	634,771	16.6	
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<i>Total</i>	<i>24,682</i>	<i>100.0</i>	<i>3,818,279</i>	<i>100.0</i>	<i>24,682</i>	<i>100.0</i>	<i>3,818,279</i>	<i>100.0</i>	
	SMALL BUSINESS				SMALL FARM				
	#	%	\$(000)	%	#	%	\$(000s)	%	
	By Tract Income								
	Low	286	3.8	13,557	5.3	0	0.0	0	0.0
	Moderate	1,028	13.7	35,741	14.1	49	6.4	3,578	6.1
	<i>Low/Moderate Total</i>	<i>1,314</i>	<i>17.5</i>	<i>42,298</i>	<i>19.4</i>	<i>49</i>	<i>6.4</i>	<i>3,578</i>	<i>6.1</i>
	Middle	3,414	45.4	111,491	43.9	575	74.7	43,743	74.4
	Upper	2,470	32.9	89,338	35.1	140	18.2	11,268	19.2
	Unknown	2	0.0	700	0.3	0	0.0	0	0.0
	Tract Unknown	319	4.2	3,316	1.3	6	0.7	224	0.3
	<i>Total</i>	<i>7,519</i>	<i>100.0</i>	<i>254,243</i>	<i>100.0</i>	<i>770</i>	<i>100.0</i>	<i>58,813</i>	<i>100.0</i>
	By Revenue								
	Total \$1 Million or Less	2,863	38.1	114,652	45.1	652	84.7	43,895	74.6
	By Loan Size								
	\$100,000 or Less	7,008	93.2	87,441	34.4	599	77.8	20,325	34.6
\$100,001 - \$250,000	285	3.8	49,927	19.6	122	15.8	21,021	35.7	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	226	3.0	116,875	46.0	49	6.4	17,467	29.7	
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0	
<i>Total</i>	<i>7,519</i>	<i>100.0</i>	<i>254,243</i>	<i>100.0</i>	<i>770</i>	<i>100.0</i>	<i>58,813</i>	<i>100.0</i>	

**Table 4  
HMDA & CRA Loan Distribution Table  
Brighton Assessment Area  
For Loan Years 2004 & 2005**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0	0	0.0	5	21.7	463	11.9
Moderate	4	17.4	491	12.6	4	17.4	585	15.0
<i>Low/Moderate Total</i>	<i>4</i>	<i>17.4</i>	<i>491</i>	<i>12.6</i>	<i>9</i>	<i>39.1</i>	<i>1,048</i>	<i>26.9</i>
Middle	19	82.6	3,405	87.4	8	34.8	1,078	27.7
Upper	0	0.0	0	52.2	4	14.4	1,486	38.1
Unknown	0	0.0	0	0.0	2	8.7	284	7.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>23</i>	<i>100.0</i>	<i>3,896</i>	<i>100.0</i>	<i>23</i>	<i>100.0</i>	<i>3,896</i>	<i>100.0</i>
	<b>SMALL BUSINESS</b>				<b>SMALL FARM</b>			
		%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	34.8	27	2.4	0	0.0	0	0.0
<i>Low/Moderate Total</i>	<i>8</i>	<i>34.8</i>	<i>27</i>	<i>2.4</i>	<i>0</i>	<i>0.0</i>	<i>0</i>	<i>0.0</i>
Middle	11	47.8	789	68.8	1	100.0	0	0.0
Upper	4	17.4	330	28.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>23</i>	<i>100.0</i>	<i>1,146</i>	<i>100.0</i>	<i>1</i>	<i>100.0</i>	<i>0</i>	<i>100.0</i>
	<b>By Revenue</b>							
Total \$1 Million or Less	20	87.0	659	57.5	1	100.0	0	0.0
Over \$1 Million	3	13.0	488	42.5	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>23</i>	<i>100.0</i>	<i>1,147</i>	<i>100.0</i>	<i>1</i>	<i>100.0</i>	<i>0</i>	<i>100.0</i>
	<b>By Loan Size</b>							
\$100,000 or less	19	82.6	237	20.7	1	100.0	0	0.0
\$100,001 - \$250,000	3	13.0	421	36.7	0	0.0	0	0.0
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	4.4	488	42.6	0	0.0	0	0.0
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>23</i>	<i>100.0</i>	<i>1,146</i>	<i>100.0</i>	<i>1</i>	<i>100.0</i>	<i>0</i>	<i>100.0</i>
\$100,000 or less	17	85.0	237	36.0	1	100.0	0	0.0
\$100,001 - \$250,000	3	15.0	421	64.0	0	0.0	0	0.0
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>20</i>	<i>100.0</i>	<i>658</i>	<i>100.0</i>	<i>1</i>	<i>100.0</i>	<i>0</i>	<i>100.0</i>

**Table 5  
Peer Group HMDA & CRA Loan Distribution Table  
Brighton Assessment Area  
For Loan Year 2004**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0	0	0.0	322	4.4	37,376	2.8
Moderate	738	10.1	94,266	7.0	1,365	18.8	205,726	15.4
<i>Low/Moderate Total</i>	<i>738</i>	<i>10.1</i>	<i>94,266</i>	<i>7.0</i>	<i>1,687</i>	<i>23.2</i>	<i>243,102</i>	<i>18.2</i>
Middle	4,082	56.1	694,986	51.9	2,167	29.8	383,318	28.6
Upper	2,456	33.8	549,538	41.0	2,147	29.5	471,970	35.3
Unknown	0	0.0	0	0.0	1,275	17.5	240,400	18.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>7,276</i>	<i>100.0</i>	<i>1,338,790</i>	<i>100.0</i>	<i>7,276</i>	<i>100.0</i>	<i>1,338,790</i>	<i>100.0</i>
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	233	22.4	8,082	33.4	2	12.5	25	4.0
<i>Low/Moderate Total</i>	<i>233</i>	<i>22.4</i>	<i>8,082</i>	<i>33.4</i>	<i>2</i>	<i>12.5</i>	<i>25</i>	<i>4.0</i>
Middle	527	50.7	12,144	50.2	8	50.0	319	50.8
Upper	279	26.9	3,964	16.4	6	37.5	284	45.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>1,039</i>	<i>100.0</i>	<i>24,190</i>	<i>100.0</i>	<i>16</i>	<i>100.0</i>	<i>628</i>	<i>100.0</i>
Total \$1 Million or Less	375	36.1	10,711	44.3	16	100.0	628	100.0
	By Revenue							
	By Loan Size							
\$100,000 or Less	995	95.8	10,705	44.3	14	87.5	258	41.1
\$100,001 - \$250,000	28	2.7	4,688	19.4	2	12.5	370	58.9
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	16	1.5	8,797	36.4	0	0.0	0	0.0
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
<i>Total</i>	<i>1,039</i>	<i>100.0</i>	<i>24,190</i>	<i>100.0</i>	<i>16</i>	<i>100.0</i>	<i>628</i>	<i>100.0</i>