



PUBLIC DISCLOSURE

August 15, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

ANB Bank
RSSD# 828651

3033 East First Avenue
Denver, Colorado 80206

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

NOTE: This document is an evaluation of this bank'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 bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Outstanding**

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

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

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

INSTITUTION

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Sturm Financial Group, Inc., Denver, Colorado.
- The bank has total assets of \$3.3 billion as of March 31, 2022.
- The bank operates 30 locations among 12 AAs in its three-state geographic footprint that includes 22 branches in Colorado, 7 branches in Wyoming, and 1 branch in Kansas.
- As shown in the table below, the bank’s primary business focus is commercial lending, which comprises 58.6 percent of its lending portfolio.
- There has been no merger or acquisition activity since the prior evaluation.

Table 1

Composition of Loan Portfolio as of March 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	118,801	7.7
Farmland	53,064	3.4
1- to 4- Family Residential Real Estate	426,289	27.6
Multifamily Residential Real Estate	67,879	4.4
Nonfarm Nonresidential Real Estate	494,691	32.1
Agricultural	5,760	0.4
Commercial and Industrial	221,596	14.4
Consumer	10,576	0.7
Other	144,471	9.4
Gross Loans	1,543,127	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its August 24, 2020 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council’s (FFIEC’s) *Interagency Examination Procedures for Large Institutions* to evaluate the bank’s CRA performance. The evaluation considered CRA performance context, including the bank’s asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was

assessed within the bank's Denver Metropolitan Statistical Area (MSA) AA, Colorado Springs MSA AA, Mountain Colorado AA in Colorado; Cheyenne MSA AA and Northern Wyoming AA in Wyoming; and the Kansas City Metropolitan AA using full-scope reviews. The Fort Collins MSA AA, Boulder MSA AA, Grand Junction MSA AA, and San Miguel County AA in Colorado; and the Casper MSA AA and Albany County AA in Wyoming were assessed using limited-scope reviews. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, multi-family, and other purpose closed/exempt loans reported on the bank's 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2020 and 2021 CRA LARs;
- CD loans originated from January 1, 2020 to December 31, 2021;
- Qualified investments that were made from January 1, 2020 to December 31, 2021, qualified investments made prior to but still outstanding during this period, and qualified grants, donations, or in-kind contributions of property made during this review period; and,
- Retail banking services and CD services from January 1, 2020 to December 31, 2021.

Table 2 illustrates the bank's presence in each AA by numbers of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2021 deposit market share, as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

When determining the overall institutional rating, more weight was placed on the Colorado state rating, based on higher lending volumes, followed by the Wyoming state rating, and finally the Kansas state rating. With respect to the lending analysis, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending. More consideration was also given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served. Additional emphasis was placed on the bank's performance in comparison to aggregate lending data, as it is considered representative of credit demand. Specifically, aggregate lending data is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons.

While other purpose and purpose not applicable loans reported on the HMDA LARs are included in the home mortgage tables, these products were not analyzed as part of the geographic and borrower distribution analyses. Furthermore, in most of the AAs subject to full-scope reviews, lending levels were frequently too low to render meaningful analyses for one or more loan products. These instances typically included home improvement and multifamily loans, while often alternating between home purchase and home refinance loans. Additionally, due to a lack of sufficient loan volume in most of the bank's markets, small farm lending was only evaluated in the Northern Wyoming AA.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ ¹		Percent of Bank's Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Colorado		22	78.7		69.0		1.0	18 of 130
Denver MSA AA	Full	3	23.0	30.2	23.9	34.6	0.6	21 of 68
Colorado Springs MSA AA	Full	4	9.7	16.9	15.4	22.3	3.9	5 of 39
Boulder MSA AA	Limited	1	5.8	6.0	2.5	3.6	0.5	19 of 33
Grand Junction MSA AA	Limited	4	5.2	11.3	10.5	15.2	8.6	6 of 13
Fort Collins MSA AA	Limited	2	8.2	8.1	2.8	4.1	0.8	18 of 25
Mountain Colorado AA	Full	7	24.7	25.2	12.5	18.2	5.2	5 of 13
San Miguel County AA	Limited	1	2.1	2.3	1.4	2.0	6.6	5 of 6
State of Wyoming		7	15.1		22.1		3.0	11 of 48
Cheyenne MSA AA	Full	2	4.3	26.4	10.0	45.1	11.9	2 of 19
Casper MSA AA	Limited	1	2.3	13.8	1.9	8.5	1.9	8 of 9
Northern Wyoming AA	Full	3	4.2	34.7	4.1	18.6	2.3	12 of 16
Albany County AA	Limited	1	4.3	25.1	6.2	27.8	24.8	2 of 7
State of Kansas		1	6.4		8.9		0.3	71 of 270
Kansas City Metropolitan AA	Full	1	6.4	100.0	8.9	100.0	0.4	30 of 94
¹ Based on the bank's HMDA and CRA data reported in 2020 and 2021. ² Based on the June 30, 2021 FDIC's Deposit Market Share Report. ³ Based on the bank's ranking among FDIC-insured financial institutions in each AA.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth analysis of the bank’s record of lending, investment, and service activities in each state and specific AAs. Lending data for AAs that received a limited-scope review are located in Appendix E. Conclusions with respect to the lending test were evaluated for 2020 and 2021 lending data and are reflected in the body of the report.

LENDING TEST

The bank’s overall lending test performance is high satisfactory. The lending test performance for Colorado, Wyoming, and Kansas also are each rated high satisfactory. The rating for Colorado was bolstered by the significant level of CD lending in that state.

Lending Activity

This performance criterion evaluates the bank’s lending volume considering the bank’s resources and business strategy and other information from the performance context. The bank’s overall lending activities reflect good responsiveness to AA credit needs. The bank’s overall loan distribution for small business lending has increased significantly since the previous evaluation, driven primarily by the bank’s participation in the U.S. Small Business Administration’s (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic).

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2020 and 2021			
	#	\$(000)	#%	\$%
Home Purchase	435	168,647	44.0	42.8
Home Improvement	49	3,819	5.0	1.0
Multi-Family Housing	57	118,203	5.8	30.0
Loan Purpose Not Applicable	0	0	0.0	0.0
Other Purpose LOC	0	0	0.0	0.0
Other Purpose Closed-End	63	8,664	6.4	2.2
Refinancing	384	94,618	38.9	24.0
Total HMDA Loans	988	393,951	14.5	48.1
Small Business Loans	5,629	411,892	82.5	50.3
Small Farms Loans	206	12,963	3.0	1.6
Total Loans	6,823	818,806	100.0	100.0

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers, and these programs are available across all of the bank's markets. The bank offers a small dollar mortgage loan program that offers features such as no minimum loan amount, a reduced origination fee of \$100 for loan amounts less than \$500.0 thousand (M), no requirement for title insurance for loans under \$100.0M, and lower appraisal fees for loans under \$250.0M. This product is tailored to LMI borrowers with competitive pricing and is generally not available through lenders on the secondary market. The bank also offers a mobile home lending product at comparable rates and fees to the bank's traditional mortgage products, apart from a 15-year term limit. The mobile home product is advantageous to borrowers located in rural communities, where demand for this product is often unmet by other lenders.

The bank continues to offer the Home Advantage Mortgage product, which combines any first mortgage product with a shorter-term, fully amortizing second mortgage at up to 90.0 percent loan-to-value. This allows a reduced down payment without the requirement for private mortgage insurance, allowing the borrower to build equity faster with a payment similar to a traditional mortgage. The bank charges no fees and pays for the borrower's appraisal. The Home Advantage suite also provides attractive terms for deed-restricted properties and home improvements.

Additionally, the bank continues to offer SBA 504 and 7(a) loan programs and originated 52 SBA 504 loans totaling \$39.8 million (MM) during the evaluation period. The bank also offers an unsecured Small Business Line of Credit with streamlined underwriting requirements, small dollar loan amounts, and recurring loans, which represent a common need for small businesses. Another program was developed in 2020 for pre-approved vehicle and equipment loans for small business owners using a line of credit structure. This product allows small businesses to acquire new vehicles or equipment over the course of a year without having to apply for each purchase separately and with knowledge that financing is in place with predetermined terms and conditions.

In 2019, a \$15MM pool of 30-year fixed rate funds was approved for use with government and nonprofit programs designed to assist LMI individuals. The initial opportunity identified was in the San Miguel County AA, providing LMI borrowers loans to purchase deed-restricted properties in this extremely high-cost area (Telluride, Colorado). Borrowers in this area fall outside the underwriting requirements of most secondary market lending programs, and this program continues to meet a critical credit need not served by other financial institutions. This pool of funds has been used to support deed-restricted employee housing programs in Telluride and Aspen, in conjunction with a down-payment assistance program utilized by a Denver nonprofit organization.

At the onset of the pandemic in 2020, the regulatory agencies called upon financial institutions to provide flexibility to their customers and borrowers in an effort to avoid a national and international recession. The bank actively participated in this effort by waiving fees, providing loan accommodations, and participating in the SBA's PPP loan program. ANB representatives also made tools and relief available for all existing

borrowers that would enable them to conserve financial resources. The relief offered to borrowers included interest rate modifications, 90-day payment deferrals, and the removal of the prime floor rate for floating-rate credits. Finally, ANB Relationship Managers reached out to all borrowers personally to ensure that they were aware of the various options available to them. In 2020, the bank originated 2,627 PPP loans totaling \$277.0MM, and 1,155 PPP loans totaling \$102.0MM were made in 2021.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. The bank originated a substantial majority of loans, by number and dollar, inside its AAs. The distribution of small farm originations inside the bank’s AAs was significantly lower than HMDA and small business lending. Minimal weight was attributed to small farm lending for this test and the overall rating given the bank’s strategic focus on commercial lending, with secondary emphasis on home mortgage loans.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase - Conventional	383	88.0	158,279	93.9	52	12.0	10,368	6.1
Home Improvement	47	95.9	3,739	97.9	2	4.1	80	2.1
Multi-Family Housing	47	82.5	108,997	92.2	10	17.5	9,206	7.8
Other Purpose Closed-End	57	90.5	4,903	56.6	6	9.5	3,761	43.3
Refinancing	348	90.6	88,215	93.2	36	9.4	6,403	6.8
Total HMDA related	882	89.3	364,133	92.4	106	10.7	29,818	7.6
Small Business	5,354	95.1	390,713	94.9	275	4.9	21,179	5.1
Small Farm	143	69.4	6,819	52.6	63	30.6	6,144	47.4
Total Loans	6,379	93.5	761,665	93.0	444	6.5	57,141	7.0

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

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

Geographic Distribution of Loans

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

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank’s lending has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. The state ratings for Colorado and Wyoming for this criterion are consistent with the overall rating, while performance in Kansas is rated excellent.

Community Development Lending

This performance criterion evaluates the bank’s level of CD lending. The bank is a leader in making CD loans. The bank is a leader in making CD loans in Colorado and makes a relatively high level in Wyoming and Kansas. The bank originated 118 CD loans totaling \$186.5MM in the 12 AAs during the evaluation period. Given the significant volume of CD lending with respect to the bank’s lending, deposits, and branching presence in each AA, this performance resulted in a positive impact to the overall lending test rating. Examples of how the bank was responsive to the needs of the AAs include:

- The bank originated 37 CD loans totaling \$124.6MM that supported various affordable housing initiatives, which is considered an essential need in many of the bank’s AAs.
- Within Colorado, the Denver MSA AA and Fort Collins MSA had the highest level of CD lending, while the Northern Wyoming AA had the highest level in that state.
- The bank originated 50 CD loans totaling \$12.6MM in support of community services that were impactful to most of its AAs, with many of the loans focused on providing food and shelter to needy individuals and families.

Table 5

Community Development Loans – All AAs		
Community Development Purpose	#	\$(000’s)
Affordable Housing	37	124,574
Community Services	50	12,627
Economic Development	17	31,733
Revitalization and Stabilization	14	17,608
Total Loans	118	186,542

In addition to loans made within the bank’s AAs, two additional loans totaling \$2.9MM were originated in the broader statewide area of Colorado in support of economic development activities.

INVESTMENT TEST

This performance criterion evaluates the bank’s level of qualified grants, donations, or in-kind contributions of property made since the last evaluation that have a primary purpose of CD.

The bank’s overall performance under the investment test is outstanding. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AAs. The majority of bank investments are government agency-issued mortgage-backed securities (MBS) pools that support affordable housing by providing home loans to LMI individuals and families. The bank made 66 CD investments totaling \$57.5MM during the evaluation period, including 29 MBS.

Twenty-six of the MBS purchased by the bank include pools of individual loans distributed throughout the bank’s AAs in Colorado, Wyoming, and Kansas. These were included at the institutional and state level and also were applied at the AA level to determine performance conclusions. The remaining three MBS were secured by underlying mortgages specific to the bank’s individual AAs. Examples of qualifying CD investments include:

- The bank purchased 29 MBS totaling \$46.3MM during the evaluation period specifically supporting mortgages for LMI individuals and families within the banks AAs.
- The bank purchased 15 bonds totaling \$6.7MM from one bond issuance to fund the construction and renovation of buildings on the campus of a two-year college that is primarily comprised of an LMI student population.
- The bank purchased 21 bonds totaling \$4.2MM from a single issuance in support of essential infrastructure to revitalize and stabilize a distressed area.

Table 6

Investments, Grants, and Donations – All AAs								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	47	40,413	29	46,281	42	81	118	86,775
Community Services	14	9,985	16	7,027	220	301	250	17,313
Economic Development	0	0	0	0	19	30	19	30
Revitalization and Stabilization	26	2,410	21	4,175	5	25	52	6,610
Total	87	52,808	66	57,483	286	437	439	110,728
¹ Book Value of Investment ² Original Market Value of Investment								

In addition to qualified investments within the bank's 12 AAs, three prior period investments with a book value of \$1.2MM supported community service activities in the broader statewide area of Colorado, and two prior period investments with a book value of \$359.1M provided affordable housing to the broader statewide area of Wyoming.

The bank also makes a significant volume of CD donations throughout its AAs. The bank's donation activity was particularly responsive to affordable housing organizations and nonprofits that provide community services targeted to LMI individuals and families. In addition to donations made within the bank's AAs, three donations totaling \$2.6M were also made in a broader statewide area of Colorado beyond the boundaries of the bank's AAs in that state. Examples of the bank's responsive philanthropic activities include:

- The bank made two community service donations totaling \$20.0M to a nonprofit organization that provides mentorship and various programs to at-risk young adults that are primarily from LMI families.
- The bank made two donations totaling \$23.0M to a medical facility in support of revitalizing and stabilizing a distressed area.

SERVICE TEST

The bank's overall performance under the service test is outstanding.

Retail Banking Services

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

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

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior examination, the bank opened one branch and closed two branches in upper-income census tracts. Additionally, the bank relocated one branch a short distance from its original location. These minor changes have not adversely affected the accessibility of bank products and services, as the remaining branches and alternative delivery systems can satisfactorily service customer needs.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours at all branches are from 9:00 a.m. to 5:00 p.m. on Monday through Friday.

Of the bank’s 21 branches that provide drive-through services, most locations offer weekday hours from 8:30 a.m. to 5:30 p.m., Monday through Friday, with no weekend hours. The bank maintains 31 automated teller machines (ATMs), full-service machines that are available at the main office and the branch in Denver, at all the branches in Colorado Springs, and at the lone Kansas Branch in Lenexa, Kansas. The remaining 23 ATMs are cash-dispensing only. The bank also offers access to the MoneyPass ATM network with no surcharge, significantly increasing ATM access across its AAs.

Table 7

Retail Banking and Community Development Services – All AAs												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.3	20.0	46.7	30.0	0.0	100.0	9.8	23.3	35.6	29.3	2.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
3.1	18.8	46.9	31.3	0.0	100.0	7.4	22.9	38.7	30.9	0.1	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	30		1	2			0	0	0	(1)	0	(1)
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	43	123	31	7	204	102						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

This performance criterion evaluates the bank’s level of CD services. The bank is a leader in providing CD services. The bank officers and staff provided 204 qualified services to 102 different organizations, donating 4,251 hours of their time. Services provided include serving on boards of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, economic development organizations that advise and cater to small business incubation and development, and local organizations that serve to revitalize and stabilize distressed and/or underserved areas. Other staff serve on committees that provide technical assistance on financial matters, financial literacy education to first-time homebuyers, or assist with marketing and fundraising efforts for a number of organizations.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of the CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE OF COLORADO

CRA rating for Colorado:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution. Full-scope reviews were conducted for the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA. The overall state rating was predominantly based on the bank's performance in these three AAs, with considerably more weight attributed to the Denver MSA AA and the Mountain Colorado AA based on the higher numbers of loans originated in each respective AA. Limited-scope reviews were conducted for the Grand Junction MSA AA, Fort Collins MSA AA, Boulder MSA AA, and the San Miguel County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates 7 of its 12 AAs and operates 22 of its 30 branches in the state of Colorado. The bank's AAs include most of the major metropolitan areas along the Front Range of Colorado, as well as the Interstate-70 corridor through the Rocky Mountains, and the largest metropolitan area on the Western Slope, the Grand Junction MSA. The AAs also include a rural county on the Western Slope in the southwestern portion of the state.

The loan and deposit products and services offered in the state mirror those discussed in the overall institution section of the report, with a primary emphasis on commercial and residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is high satisfactory. Bank performance under the lending test in the Denver MSA AA is considered good, and performance in the Colorado Springs MSA AA and Mountain Colorado AA are both considered excellent. The lending test ratings for the Denver MSA AA and the Colorado Springs MSA AA were bolstered by the bank's leadership position in originating CD loans in these two areas.

Lending Activity

The bank’s overall lending activities in the state of Colorado reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including programs targeted to LMI borrowers. Refer to the institution section of the report for a detailed description of the bank’s flexible and innovative lending programs.

Geographic Distribution of Loans

The bank’s overall geographic distribution of lending within Colorado reflects adequate distribution among the different census tracts and dispersion throughout the AAs. The distribution of loans across different geographies is adequate in the Denver MSA AA and the Mountain Colorado AA, and good in the Colorado Springs MSA AA. The Mountain Colorado AA is only comprised of middle- and upper-income census tracts, so very limited weight was applied to the geographic distribution test in this AA.

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

The bank’s lending within Colorado has an overall good penetration among individuals of different income levels and businesses of different sizes. Borrower distribution of loans is good in the Denver MSA AA and the Colorado Springs MSA AA, and excellent in the Mountain Colorado AA.

Community Development Lending

The bank is a leader in providing CD loans within the state of Colorado. The bank is a leader in providing CD loans within the Denver MSA AA and Colorado Springs MSA AA, and makes a relatively high level within the Mountain Colorado AA. The bank originated 83 CD loans totaling \$162.9MM in the Colorado AAs. The CD loans originated in Colorado include 32 in the Denver MSA AA, followed by 18 in the Colorado Springs MSA AA, and 7 in the Mountain Colorado AA. CD lending opportunities are less prevalent in the Mountain Colorado AA based on several demographic characteristics unique to this area. The remaining 26 CD loans were disbursed among the bank’s four AAs subject to limited-scope reviews.

Table 8

Community Development Loans – State of Colorado		
Community Development Purpose	#	\$(000’s)
Affordable Housing	28	122,004
Community Services	30	7,133
Economic Development	11	16,131
Revitalization and Stabilization	14	17,608
Total Loans	83	162,875

In addition to CD loans noted in Table 8, two additional loans totaling \$2.9MM were made outside of the bank’s delineated AAs in the broader statewide area of Colorado to support economic development.

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of Colorado is outstanding. Bank performance under the investment test in the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA is considered excellent.

The bank has an excellent level of qualified CD investments and grants within Colorado and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AAs. A majority of the bank’s investments are government agency-issued MBS pools that support affordable housing by providing home mortgage loans to LMI individuals. A total of \$57.6MM of the bank’s qualified investments are devoted to MBS pools across the bank’s seven Colorado AAs. Furthermore, the bank demonstrated its continued support to public school education by past investments currently held in portfolio, including eight school district bonds for \$5.5MM across the Colorado AAs. These schools are primarily comprised of LMI students.

To further demonstrate the bank’s commitment to meeting critical AA needs, donations totaling \$179M to various community service organizations were made during the evaluation period. The bank’s donations to all qualifying organizations across Colorado totaled \$257M.

Table 9

Investments, Grants, and Donations – State of Colorado								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	41	25,357	19	32,255	28	63	88	57,675
Community Services	8	5,496	1	257	115	179	124	5,932
Economic Development	0	0	0	0	9	15	9	15
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	49	30,853	20	32,512	152	257	221	63,622
¹ Book Value of Investment								
² Original Market Value of Investment								

In addition to activity within the bank’s seven Colorado AAs, the bank had three prior period school bonds with a book value totaling \$1.2MM supporting community service

activities and three affordable housing donations totaling \$2.6M that provided benefits to broader statewide areas in Colorado.

SERVICE TEST

The bank's overall performance under the service test in the state of Colorado is outstanding. Bank performance under the service test in the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA is considered excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Colorado are accessible overall to the bank's various geographies and to individuals of different income levels in each AA. The Denver MSA AA has only three branch locations, including the main office, that serve a very large geographic area and are reasonably accessible, while the Mountain Colorado and Colorado Springs AAs include seven and four branch locations, respectively, that are accessible to various geographies and individuals of different income levels.

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

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

Table 10

Retail Banking and Community Development Services – State of Colorado												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.6	22.7	36.4	36.4	0.0	100.0	6.9	24.2	36.6	31.3	1.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
4.2	20.8	37.5	37.5	0.0	100.0	6.5	23.7	38.0	31.8	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	22		1	1			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	26	99	18	0	143	69						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services within the state of Colorado. Bank officers and staff provided 143 services and donated 2,591 hours to various CD services throughout the Colorado AAs. Many of these activities included board service on various affordable housing and community service organizations, as well as serving on fundraising and marketing committees or presenting at seminars for first time homebuyers and small business entrepreneurs.

**DENVER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Denver MSA AA consists of Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties in their entirety, which comprise the entire Denver, Colorado MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 51 low-, 150 moderate-, 205 middle-, 207 upper-, and 8 unknown-income census tracts. The AA tract composition remains unchanged from the prior evaluation in 2020.
- Three of the bank's 30 branches are located in the Denver MSA AA, including its main office. The three locations have on-site ATMs, and the main office operates a drive-through.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank holds 0.6 percent market share, ranking 21st out of 68 FDIC-insured depository institutions operating from 614 offices in the AA.
- Two community contacts recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. Both contacts were affiliated with organizations focused on economic development in the Denver area.

Table 11

Population Change			
Assessment Area: Denver MSA			
Area	2010 Population	2015 Population	Percent Change
Denver MSA	2,543,482	2,703,972	6.3
Adams County, CO	441,603	471,206	6.7
Arapahoe County, CO	572,003	608,310	6.3
Broomfield County, CO	55,889	60,699	8.6
Clear Creek County, CO	9,088	9,136	0.5
Denver County, CO	600,158	649,654	8.2
Douglas County, CO	285,465	306,974	7.5
Elbert County, CO	23,086	23,855	3.3
Gilpin County, CO	5,441	5,605	3.0
Jefferson County, CO	534,543	552,344	3.3
Park County, CO	16,206	16,189	(0.1)
Colorado	5,029,196	5,278,906	5.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- As noted in table 11, the Denver MSA AA includes over half the population of the state of Colorado and experienced significant growth from 2010 to 2015, particularly in Denver County, as well as those counties that primarily surround the city of Denver and absorb much of its urban sprawl.

Table 12

Median Family Income Change Assessment Area: Denver MSA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Denver MSA	81,781	80,820	(1.2)
Adams County, CO	68,456	66,619	(2.7)
Arapahoe County, CO	78,904	76,437	(3.1)
Broomfield County, CO	102,508	97,886	(4.5)
Clear Creek County, CO	79,639	86,563	8.7
Denver County, CO	62,268	69,783	12.1
Douglas County, CO	118,274	115,309	(2.5)
Elbert County, CO	90,464	96,535	6.7
Gilpin County, CO	89,982	75,694	(15.9)
Jefferson County, CO	88,353	86,565	(2.0)
Park County, CO	80,381	69,234	(13.9)
Colorado	76,277	74,826	(1.9)
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- Median family incomes (MFIs) varied significantly among the ten AA counties, ranging from \$66,619 to \$115,309, and increasing by as much as 12.1 percent and decreasing as much as 15.9 percent from 2010 to 2015. These statistics suggest widely diverse and varying economic conditions across the AA.
- The percentage of families below the poverty level in the AA was 8.0 percent, which is comparable to the Colorado statewide figure of 8.5 percent. Denver and Adams Counties had the highest poverty rates in the AA, at 12.8 percent and 10.3 percent, respectively.

Table 13

Housing Cost Burden Assessment Area: Denver MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver MSA	80.9	60.7	46.0	69.1	46.4	21.1
Adams County, CO	83.3	57.2	49.4	69.4	44.0	23.3
Arapahoe County, CO	84.9	65.4	48.9	71.6	48.3	21.1
Broomfield County, CO	87.5	76.1	43.4	60.1	40.3	18.7
Clear Creek County, CO	82.5	21.8	40.4	57.7	14.5	21.3
Denver County, CO	75.6	56.4	43.8	67.7	44.7	22.4
Douglas County, CO	86.0	82.3	38.7	75.3	57.8	17.8
Elbert County, CO	62.9	31.1	30.5	73.9	59.6	27.1
Gilpin County, CO	87.0	21.1	25.7	79.0	45.6	26.5
Jefferson County, CO	85.2	59.3	47.3	67.8	44.7	20.1
Park County, CO	77.6	77.8	53.5	52.2	55.2	27.4
Colorado	80.3	56.4	46.4	65.8	43.6	21.5
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i> <i>Note: Cost Burden is housing cost that equals 30 percent or more of household income.</i>						

- Housing affordability for renters and homeowners is constrained throughout the ten AA counties, with the greatest cost burden to low-income renters in Broomfield and Gilpin Counties and to low-income homeowners in Douglas and Gilpin Counties.
- According to 2015 Census data, the housing affordability ratio¹ in the AA was 24.5 percent, which is identical to the ratio for the state of Colorado and indicates housing affordability is an issue throughout the state.
- A community contact noted housing shortages in the area, with very few affordable housing units available in the local market.

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

Table 14

Unemployment Rates					
Assessment Area: Denver MSA					
Area	2017	2018	2019	2020	2021
Denver MSA	2.5	2.9	2.5	7.1	5.5
Adams County, CO	2.8	3.2	2.8	7.6	6.2
Arapahoe County, CO	2.6	3.0	2.5	7.5	5.8
Broomfield County, CO	2.4	2.7	2.3	6.2	4.5
Clear Creek County, CO	2.4	2.8	2.3	8.2	5.5
Denver County, CO	2.5	2.9	2.5	7.8	5.9
Douglas County, CO	2.2	2.6	2.2	5.4	4.1
Elbert County, CO	2.2	2.6	2.1	4.4	3.8
Gilpin County, CO	1.9	2.3	2.2	10.9	6.2
Jefferson County, CO	2.4	2.8	2.4	6.8	5.0
Park County, CO	2.2	2.6	2.3	5.5	4.1
Colorado	2.6	3.0	2.6	6.9	5.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA counties began to stabilize in 2021 after the notable spikes during 2020 resulting from the pandemic.
- A community contact stated that the area is experiencing rapid growth and inflationary pressures, with businesses unable to find skilled employees or keep pace with demand.
- Major employers in the Denver MSA AA include Denver International Airport (35,000 employees), HealthONE Corporation (11,050), Lockheed Martin (14,000), CenturaHealth (8,310), SCL Health Systems (8,270), and Century Link (6,500).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DENVER MSA AA

LENDING TEST

The bank’s performance under the lending test in the Denver MSA AA is good. The lending test rating was bolstered by the bank’s leadership position in originating CD loans in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 126 home mortgage loans and 1,226 small business loans originated between January 1, 2020 and December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of innovative and flexible lending programs is discussed in the overall institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage lending is excellent, the distribution of small business loans is adequate. Home improvement, multifamily, and small farm loans were not evaluated at the individual product level based on lending levels that are too low to conduct meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2020 home mortgage loans among low-income census tracts was above the aggregate lending data and the demographic figure, which represents the percentage of owner-occupied units in each census tract income level. Lending levels in the moderate-income census tracts were also above the aggregate lending data and the demographic figure.

The bank's home mortgage lending in 2021 reflected penetration levels consistent with 2020 lending patterns. While the bank's loan dispersion among geographies of different income levels revealed significant gaps and lapses, this result was based on a relatively low number of home mortgage loans disbursed among an AA consisting of 621 census tracts. However, this did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2020 home purchase loan distribution in area low-income census tracts was comparable to aggregate lending data by number and by dollar, and to the demographic figure. Lending in moderate-income census tracts was also comparable to aggregate lending data and to the demographic figure.

Bank performance in 2021 was comparable to the 2020 distribution. When loan dispersion within the AA was evaluated, significant gaps were noted based on the relatively low number of home purchase loans originated during the evaluation period with

respect to the significant number of tracts in the AA, although this did not impact the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending in 2020 is excellent. The bank's 2020 home refinance loan distribution in the low-income census tracts was above the aggregate lending data by number and dollar, and above the demographic figure. Lending in moderate-income census tracts was similar to the distribution in low-income tracts, with bank lending above the aggregate lending data and demographic figure.

The volume of home refinance lending in 2021 was too low to conduct a meaningful analysis. When 2020 loan dispersion within the AA was evaluated, significant gaps were noted based on the relatively low number of home refinance loans originated during the evaluation period, although this did not impact the conclusion.

Table 15

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Denver MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	4.2	5.2	300	3.6	4.2	2	10.0	5.3	500	3.9	4.1	4.6
Moderate	4	16.7	18.8	942	11.4	14.6	4	20.0	19.5	1,921	15.0	15.3	18.7
Middle	9	37.5	34.2	2,683	32.5	31.1	5	25.0	34.3	3,037	23.8	31.4	34.4
Upper	10	41.7	41.8	4,340	52.5	50.1	9	45.0	40.9	7,324	57.3	49.2	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	8,265	100.0	100.0	20	100.0	100.0	12,782	100.0	100.0	100.0
Refinance Loans													
Low	4	10.8	3.5	932	8.0	2.9	3	17.6	3.8	566	9.3	3.1	4.6
Moderate	14	37.8	15.2	2,696	23.0	12.1	6	35.3	17.0	1,061	17.5	13.3	18.7
Middle	7	18.9	32.8	2,679	22.9	29.7	2	11.8	33.5	540	8.9	30.2	34.4
Upper	12	32.4	48.5	5,402	46.1	55.3	6	35.3	45.6	3,893	64.2	53.5	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	11,709	100.0	100.0	17	100.0	100.0	6,060	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	2.8	0	0.0	3.0	0	0.0	2.6	4.6
Moderate	0	0.0	12.7	0	0.0	10.6	1	25.0	12.9	60	7.5	10.2	18.7
Middle	1	50.0	29.7	40	66.7	25.2	0	0.0	29.6	0	0.0	26.0	34.4
Upper	1	50.0	54.5	20	33.3	61.4	3	75.0	54.5	742	92.5	61.2	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	60	100.0	100.0	4	100.0	100.0	802	100.0	100.0	100.0
Multifamily Loans													
Low	2	50.0	15.3	5,066	44.6	6.2	2	25.0	15.9	1,690	8.6	7.5	13.6
Moderate	2	50.0	28.0	6,287	55.4	26.9	5	62.5	29.1	13,116	66.9	23.2	29.8
Middle	0	0.0	37.3	0	0.0	46.5	1	12.5	35.2	4,800	24.5	42.2	37.4
Upper	0	0.0	19.4	0	0.0	20.4	0	0.0	19.8	0	0.0	27.2	19.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	11,353	100.0	100.0	8	100.0	100.0	19,606	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	9.2	3.9	6,298	19.6	3.4	8	16.0	4.3	2,792	7.1	3.6	4.6
Moderate	22	28.9	16.2	10,100	31.5	13.2	16	32.0	17.5	16,158	41.1	14.3	18.7
Middle	18	23.7	33.0	5,733	17.9	30.5	8	16.0	33.5	8,377	21.3	31.0	34.4
Upper	29	38.2	46.9	9,978	31.1	52.9	18	36.0	44.6	11,959	30.4	51.0	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	76	100.0	100.0	32,109	100.0	100.0	50	100.0	100.0	39,286	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of loans in 2020 among low-income census tracts was comparable to levels noted in the aggregate lending data, as well as the demographic figure. Similarly, lending in moderate-income census tracts was comparable to the aggregate lending data and demographic figure.

The distribution of small business loans in 2021 reflected consistent distribution levels to 2020 lending performance. In addition, the dispersion of loans among the various geographic income levels revealed some gaps and lapses, although they did not impact the overall conclusion.

Table 16

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Denver MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	53	6.8	7.6	5,994	9.2	10.7	30	6.7	4,385	11.5	6.9
Moderate	137	17.7	18.3	10,467	16.1	20.3	80	17.8	7,182	18.9	18.6
Middle	247	31.8	31.0	25,128	38.6	30.1	135	30.0	12,466	32.7	32.6
Upper	339	43.7	42.3	23,569	36.2	37.7	204	45.3	14,038	36.9	41.6
Unknown	0	0.0	0.4	0	0.0	0.8	1	0.2	1	0.0	0.3
Tract-Unk	0	0.0	0.4	0	0.0	0.3	0	0.0	0	0.0	0.0
Total	776	100.0	100.0	65,158	100.0	100.0	450	100.0	38,072	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of small business lending reflects good penetration levels, while home mortgage lending reflects adequate penetration. Home purchase, home improvement, and small farm loans were not evaluated at the individual product level based on lending levels that are too low to render meaningful analyses.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2020 home mortgage lending to low-income borrowers was above aggregate lending data by number, below by dollar volume, and below the demographic figure. Lending to moderate-income borrowers reflected comparable penetration to aggregate lending data and to the demographic figure.

The borrower distribution of home mortgage lending in 2021 was above the level noted in 2020 lending.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. There were no home refinance loans originated to low-income borrowers in 2020. Lending to moderate-income borrowers was comparable to the aggregate lending data and to the demographic figure.

The distribution of home refinance loans in 2021 was not evaluated due to limited lending volume.

Table 17

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Denver MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$(000)	\$ %	\$ %	#	%	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	2	8.3	5.3	235	2.8	2.8	1	5.0	5.4	200	1.6	2.8	2.13
Moderate	2	8.3	22.8	407	4.9	16.9	1	5.0	20.0	245	1.9	14.6	17.5
Middle	3	12.5	24.9	537	6.5	23.6	4	20.0	23.3	932	7.3	21.8	20.5
Upper	10	41.7	36.5	4,807	58.2	45.6	7	35.0	34.6	5,604	43.8	43.8	40.8
Unknown	7	29.2	10.5	2,279	27.6	11.1	7	35.0	16.7	5,801	45.4	17.1	0.0
Total	24	100.0	100.0	8,265	100.0	100.0	20	100.0	100.0	12,782	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.9	0	0.0	3.4	0	0.0	9.2	0	0.0	5.9	2.13
Moderate	7	18.9	17.3	1,052	9.0	13.3	9	52.9	18.6	1,583	26.1	14.6	17.5
Middle	4	10.8	22.8	787	6.7	21.4	1	5.9	21.7	203	3.3	20.6	20.5
Upper	9	24.3	37.3	5,697	48.7	43.8	4	23.5	31.2	2,805	46.3	38.9	40.8
Unknown	17	45.9	16.8	4,173	35.6	18.1	3	17.6	19.2	1,469	24.2	20.0	0.0
Total	37	100.0	100.0	11,709	100.0	100.0	17	100.0	100.0	6,060	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.3	0	0.0	4.0	1	25.0	5.7	204	25.4	5.1	2.13
Moderate	2	100.0	14.7	60	100.0	11.0	2	50.0	13.5	310	38.7	10.3	17.5
Middle	0	0.0	22.6	0	0.0	19.3	0	0.0	23.7	0	0.0	18.9	20.5
Upper	0	0.0	53.4	0	0.0	58.3	0	0.0	54.4	0	0.0	60.7	40.8
Unknown	0	0.0	4.1	0	0.0	7.3	1	25.0	2.7	288	35.9	5.0	0.0
Total	2	100.0	100.0	60	100.0	100.0	4	100.0	100.0	802	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	8.3	5.7	402	1.9	3.2	2	4.8	7.8	404	2.1	4.6	2.13
Moderate	14	19.4	18.4	2,032	9.8	14.3	13	31.0	18.6	2,174	11.0	14.4	17.5
Middle	7	9.7	23.1	1,324	6.4	21.9	5	11.9	22.3	1,135	5.8	20.9	20.5
Upper	21	29.2	37.6	10,546	50.8	44.5	11	26.2	33.8	8,409	42.7	41.5	40.8
Unknown	24	33.3	15.2	6,452	31.1	16.2	11	26.2	17.5	7,558	38.4	18.6	0.0
Total	72	100.0	100.0	20,756	100.0	100.0	42	100.0	100.0	19,680	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is good. The distribution of loans originated in 2020 to businesses with annual revenues of \$1MM or less (small businesses) reflected penetration above aggregate lending data by number and comparable by dollar volume. The bank's proportion of loans to small businesses was also comparable to the demographic figure.

The distribution of loans in 2021 reflected consistent performance to 2020 lending.

Table 18

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Denver MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020					2021*					
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	487	62.8	41.0	13,594	20.9	22.8	324	72.0	12,508	32.9	92.7
Over \$1 Million	246	31.7		47,149	72.4		119	26.4	24,693	64.9	6.3
Revenue Unknown	43	5.5		4,415	6.8		7	1.6	871	2.3	1.0
Total	776	100.0		65,158	100.0		450	100.0	38,072	100.0	100.0
By Loan Size											
\$100,000 or Less	599	77.2	87.8	11,469	17.6	32.7	353	78.4	7,154	18.8	
\$100,001 - \$250,000	102	13.1	6.8	16,494	25.3	19.4	46	10.2	7,312	19.2	
\$250,001 - \$1 Million	75	9.7	5.4	37,195	57.1	47.9	51	11.3	23,606	62.0	
Total	776	100.0	100.0	65,158	100.0	100.0	450	100.0	38,072	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	464	95.3		7,606	56.0		305	94.1	5,502	44.0	
\$100,001 - \$250,000	18	3.7		2,686	19.8		8	2.5	1,146	9.2	
\$250,001 - \$1 Million	5	1.0		3,302	24.3		11	3.4	5,860	46.9	
Total	487	100.0		13,594	100.0		324	100.0	12,508	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 32 CD loans totaling \$75.3MM in this AA, which were highly responsive to affordable housing needs. Examples of CD lending activities include:

- A CD loan totaling \$16.0MM was originated to an area nonprofit organization for the construction of a 72-unit affordable housing project that will also provide a variety of housing related services to the region’s low-income, elderly, and disabled residents. The property will be operated as permanent supportive housing for individuals or families earning no more than 30 percent of the area median income (AMI). Supportive housing is a term used to describe housing provided to persons or households comprised of disabled and low-income individuals that are currently or have previously experienced homelessness.

- A PPP loan totaling \$1.5MM to support community services was originated to an organization that provides professional healthcare services designed specifically for senior citizens, a majority of which are comprised of LMI individuals.

Table 19

Community Development Loans – Denver MSA AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	12	57,428
Community Services	9	2,992
Economic Development	4	6,462
Revitalization and Stabilization	7	8,423
Total Loans	32	75,305

INVESTMENT TEST

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

- The bank purchased six MBS investments comprised of \$14.9MM in underlying loans within the Denver AA that assisted LMI individuals in obtaining affordable housing.
- A bond totaling \$257.0M provided funding for improvements to a school in which a majority of students qualified for the national free or reduced lunch program.
- Two community service donations totaling \$4.0M supported an organization that provides access to essential services for area youth dealing with poverty and at-home challenges by supporting their success in high school with the long-term goal of graduation.

Table 20

Investments, Grants, and Donations – Denver MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	23	13,126	6	14,951	3	8	32	28,085
Community Services	3	792	1	257	23	32	27	1,081
Economic Development	0	0	0	0	3	5	3	5
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	26	13,918	7	15,208	29	45	62	29,171
¹ Book Value of Investment								
² Original Market Value of Investment								

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates three branches in the AA, including two with on-site ATMs and drive-through facilities. All three of the current offices are located in upper-income census tracts; however, the two Denver locations are near LMI census tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed one branch and opened one branch in upper-income census tracts since the prior CRA evaluation, with no change to accessibility.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday to Friday.

Table 21

Retail Banking and Community Development Services – Denver MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	100.0	0.0	100.0	8.2	24.2	33.0	33.3	1.3	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	0.0	100.0	0.0	100.0	8.1	23.5	34.7	33.8	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	3		1	1			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	5	28	6	0	39	23						
¹ Based on <year> FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 39 services to 23 organizations and donated 729 hours during the evaluation period. The following activities were considered particularly responsive to CD service needs in the AA:

- A bank officer served on the board of a community service organization that offers support and therapy to Colorado’s most neglected, abused, and traumatized children with the goal of keeping the family unit intact. The majority of children served are from LMI families.
- A bank officer served on the Loan Committee of an organization focused on providing economic development loans to small businesses.

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

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE COLORADO SPRINGS
MSA AA**

The bank’s Colorado Springs MSA AA consists of Teller and El Paso Counties in their entirety, which comprise the Colorado Springs, Colorado MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 136 tracts, including 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts. The AA tract composition remains unchanged since the prior evaluation.
- The bank operates 4 of its 30 branches in the Colorado Springs MSA AA.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank had a 3.9 percent market share of deposits in the AA, ranking 5th of 39 FDIC-insured financial institutions operating from 130 banking offices.
- A community contact recently conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact represented an economic development organization.

Table 22

Population Change Assessment Area: Colorado Springs MSA			
Area	2010 Population	2015 Population	Percent Change
Colorado Springs MSA	645,613	678,364	5.1
El Paso County, CO	622,263	655,024	5.3
Teller County, CO	23,350	23,340	0.0
Colorado	5,029,196	5,278,906	5.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- El Paso County, which includes the city of Colorado Springs, noted an appreciable growth rate from 2010 to 2015 that was similar to the growth rate in the state of Colorado. Teller County, located in the foothills of the Rocky Mountains, is more rural in nature and the area population has remained stable.
- According to 2015 Census data, the population of Colorado Springs was 442,040, which comprises 65.2 percent of the entire Colorado Springs MSA population.

Table 23

Median Family Income Change			
Assessment Area: Colorado Springs MSA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Colorado Springs MSA	74,920	71,351	(4.8)
El Paso County, CO	74,934	71,174	(5.0)
Teller County, CO	74,406	76,540	2.9
Colorado	76,277	74,826	(1.9)
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- Teller County is more affluent than El Paso County and the state of Colorado, noting a higher MFI and a positive income growth rate, although this county contains a fractional portion of the total MSA population.
- Teller County also had a smaller portion of families living below the poverty level, at 4.8 percent, compared to 8.4 percent in El Paso County and 8.5 percent in the state of Colorado.

Table 24

Housing Cost Burden						
Assessment Area: Colorado Springs MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Colorado Springs MSA	83.0	52.7	47.1	68.1	46.9	21.8
El Paso County, CO	83.2	52.5	47.1	68.5	47.0	21.6
Teller County, CO	75.0	61.2	46.0	59.7	44.3	24.8
Colorado	80.3	56.4	46.4	65.8	43.6	21.5
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i>						
<i>Note: Cost Burden is housing cost that equals 30 percent or more of household income.</i>						

- Housing affordability is constrained in the Colorado Springs MSA AA and the state of Colorado, with statistics noting a greater negative impact to low-income renters when compared to similarly situated homeowners.
- The overall affordability ratio is very low within the AA, at 26.7 percent, which is similar to the ratio for the state of Colorado, at 24.5 percent.

Table 25

Unemployment Rates					
Assessment Area: Colorado Springs MSA					
Area	2017	2018	2019	2020	2021
Colorado Springs MSA	3.0	3.6	3.1	6.9	5.6
El Paso County, CO	3.0	3.6	3.1	6.9	5.6
Teller County, CO	3.0	3.4	2.9	7.1	4.9
Colorado	2.6	3.0	2.6	6.9	5.4
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- During the evaluation period, unemployment rates in the AA remained relatively aligned with the statewide figures for Colorado, with notable spikes during 2020 as a result of the pandemic, followed by easing during 2021.
- A community contact discussed the severe economic disruption to El Paso County’s small business community that was created by the pandemic.
- The largest employers in the Colorado Springs area include Fort Carson (15,159 employees), U.S. Air Force Academy (6,410), Peterson Space Force Base/NORAD (5,542), Colorado Springs School District 11 (3,440), Memorial Hospital (3,100), Penrose-St. Francis Health Services (2,981), City of Colorado Springs (2,424), and Hewlett Packard (2,200).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO SPRINGS MSA AA

LENDING TEST

The bank’s performance under the lending test in the Colorado Springs MSA AA is excellent. The lending test rating was bolstered by the bank’s leadership position in originating CD loans in this AA.

Lending Activity

The bank’s lending activities reflect good responsiveness to AA credit needs. The evaluation of AA lending included 65 home mortgage and 695 small business loans originated between January 1, 2020 and December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of innovative and flexible lending programs is discussed in the overall institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. Home purchase, home refinance, home improvement, multifamily, and small farm loans were not evaluated at the individual product level in this AA based on lending levels that are too low to render meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The bank had no originations in the AA's low-income tracts during 2020, although the figures for aggregate lending data and demographic data were also relatively low. Lending in moderate-income census tracts was above aggregate lending data by number, comparable by dollar volume, and above the demographic figure.

The bank's lending performance for 2021 was above 2020 performance levels. The bank's loan dispersion among geographies of different income levels revealed significant gaps and lapses, as there were only 65 home mortgage loans originated among the AA's 136 census tracts during the two-year evaluation period. However, the noted gaps and lapses had no impact on the conclusion. Furthermore, the bank does not offer Veterans Administration loans, which would be the most suitable lending product for military personnel stationed at the AA's three military bases or affiliated with the United States Air Force Academy.

Table 26

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Colorado Springs MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	2.3	0	0.0	15	0	0.0	2.2	0	0.0	16	3.2
Mo d e r a t e	7	38.9	17.6	998	22.2	13.7	2	22.2	17.5	157	5.0	13.9	19.8
M i d d l e	6	33.3	45.3	2,133	47.4	42.2	3	33.3	44.7	808	25.5	41.6	42.1
U p p e r	5	27.8	34.8	1,366	30.4	42.6	4	44.4	35.7	2,200	69.5	42.9	34.9
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	18	100.0	100.0	4,497	100.0	100.0	9	100.0	100.0	3,165	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	1.8	0	0.0	1.2	2	15.4	2.2	227	12.3	1.5	3.2
Mo d e r a t e	1	7.7	14.3	87	2.3	11.0	2	15.4	16.3	281	15.2	12.6	19.8
M i d d l e	5	38.5	41.8	538	14.2	37.6	5	38.5	43.8	297	16.1	39.8	42.1
U p p e r	7	53.8	42.1	3,156	83.5	50.3	4	30.8	37.7	1,039	56.3	46.1	34.9
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	13	100.0	100.0	3,781	100.0	100.0	13	100.0	100.0	1,844	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	1.9	0	0.0	1.7	1	33.3	1.9	15	14.3	1.2	3.2
Mo d e r a t e	0	0.0	14.8	0	0.0	12.5	0	0.0	15.6	0	0.0	13.4	19.8
M i d d l e	1	50.0	38.2	30	28.6	31.7	0	0.0	36.7	0	0.0	31.4	42.1
U p p e r	1	50.0	45.1	75	71.4	54.2	2	66.7	45.9	90	85.7	54.0	34.9
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	2	100.0	100.0	105	100.0	100.0	3	100.0	100.0	105	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	12.7	0	0.0	10.4	0	0.0	12.0	0	0.0	7.1	11.6
Mo d e r a t e	0	0.0	45.6	0	0.0	40.7	1	100.0	52.8	13,206	100.0	34.0	45.3
M i d d l e	0	0.0	29.1	0	0.0	34.6	0	0.0	25.9	0	0.0	40.1	28.0
U p p e r	0	0.0	12.7	0	0.0	14.3	0	0.0	9.3	0	0.0	18.8	15.0
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	13,206	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	0	0.0	2.0	0	0.0	1.5	4	13.8	2.2	360	19	1.7	3.2
Mo d e r a t e	9	25.0	15.6	1,100	12.7	12.7	5	17.2	16.7	13,644	73.8	14.0	19.8
M i d d l e	12	33.3	42.8	2,701	31.2	39.2	9	31.0	43.7	1,115	6.0	40.4	42.1
U p p e r	15	41.7	39.6	4,861	56.1	46.6	11	37.9	37.3	3,358	18.2	43.9	34.9
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	36	100.0	100.0	8,662	100.0	100.0	29	100.0	100.0	18,477	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is good. The distribution of 2020 small business loans among low-income census tracts was above the aggregate lending data by number and dollar volume, and above the demographic data. The distribution in area moderate-income tracts was comparable to the aggregate lending data by number and dollar volume, as well as the demographic figure.

Small business lending in 2021 was significantly above 2020 performance, which impacted the overall conclusion. When loan dispersion within the AA was evaluated, some gaps and lapses in lending were identified, although they did not impact the conclusion.

Table 27

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Colorado Springs MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	50	10.9	8.3	5,721	20.2	12.5	30	12.6	3,246	17.7	7.4
Moderate	127	27.8	23.2	7,924	27.9	26.0	79	33.2	5,341	29.1	22.8
Middle	124	27.1	30.3	6,344	22.4	25.9	68	28.6	5,452	29.7	33.5
Upper	156	34.1	37.6	8,395	29.6	35.1	61	25.6	4,323	23.5	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.1
Tract-Unk	0	0.0	0.6	0	0.0	0.4	0	0.0	0	0.0	0.0
Total	457	100.0	100.0	28,384	100.0	100.0	238	100.0	18,362	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses different sizes. Home purchase, home refinance, home improvement, and small farm loans were not evaluated at the individual product level in this AA based on lending levels that are too low to render meaningful analyses.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's 2020 loan originations to low-income borrowers was above aggregate lending data by number and

dollar volume and comparable to the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data by number and dollar volume, as well as the demographic figure.

The bank's lending performance for 2021 was significantly above 2020 performance, which influenced the overall conclusion.

Table 28

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Colorado Springs MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	1	5.6	3.4	65	1.4	1.8	0	0.0	2.0	0	0.0	1.0	20.2
Moderate	1	5.6	21.3	250	5.6	16.9	2	22.2	15.8	693	21.9	12.0	18.5
Middle	2	11.1	26.3	194	4.3	24.8	3	33.3	25.0	487	15.4	23.2	20.3
Upper	11	61.1	34.4	3,400	75.6	41.3	4	44.4	35.4	1,985	62.7	41.2	41.0
Unknown	3	16.7	14.6	588	13.1	15.3	0	0.0	21.8	0	0.0	22.6	0.0
Total	18	100.0	100.0	4,497	100.0	100.0	9	100.0	100.0	3,165	100.0	100.0	100.0
Refinance Loans													
Low	4	30.8	4.1	314	8.3	2.3	5	38.5	5.6	251	13.6	3.4	20.2
Moderate	1	7.7	12.3	115	3.0	9.0	5	38.5	14.0	1,182	64.1	10.5	18.5
Middle	0	0.0	16.0	0	0.0	14.2	1	7.7	18.0	95	5.2	16.5	20.3
Upper	6	46.2	27.3	3,072	81.2	30.5	1	7.7	28.3	210	11.4	32.8	41.0
Unknown	2	15.4	40.3	280	7.4	44.0	1	7.7	34.1	106	5.7	36.8	0.0
Total	13	100.0	100.0	3,781	100.0	100.0	13	100.0	100.0	1,844	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.0	0	0.0	3.4	0	0.0	4.2	0	0.0	2.9	20.2
Moderate	0	0.0	14.2	0	0.0	11.2	0	0.0	14.3	0	0.0	11.4	18.5
Middle	1	50.0	22.3	30	28.6	18.5	1	33.3	21.7	15	14.3	18.7	20.3
Upper	1	50.0	56.8	75	71.4	61.4	1	33.3	58.2	50	47.6	64.5	41.0
Unknown	0	0.0	2.7	0	0.0	5.5	1	33.3	1.5	40	38.1	2.5	0.0
Total	2	100.0	100.0	105	100.0	100.0	3	100.0	100.0	105	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	13.9	3.8	379	4.4	2.1	6	21.4	4.2	261	5.0	2.3	20.2
Moderate	3	8.3	15.2	555	6.4	11.9	8	28.6	14.6	1,993	37.8	11.2	18.5
Middle	4	11.1	19.6	239	2.8	18.1	6	21.4	20.9	626	11.9	19.5	20.3
Upper	19	52.8	30.9	6,621	76.4	34.9	6	21.4	33.0	2,245	42.6	37.3	41.0
Unknown	5	13.9	30.5	868	10.0	33.1	2	7.1	27.4	146	2.8	29.7	0.0
Total	36	100.0	100.0	8,662	100.0	100.0	28	100.0	100.0	5,271	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is good. The bank's 2020 performance for loan originations to businesses with gross annual revenues of less than or equal to \$1MM was above the demographic data by number, comparable by dollar volume, and comparable to the demographic figure.

Performance in 2021 was comparable to 2020 lending.

Table 29

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Colorado Springs MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg		Bank		Agg		Bank		
	#	%	#%	\$(000)	\$%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	335	73.3	44.3	7,570	26.7	26.1	183	76.9	7,701	41.9	94.6
Over \$1 Million	91	19.9		19,051	67.1		50	21.0	10,199	55.5	4.6
Revenue Unknown	31	6.8		1,763	6.2		5	2.1	462	2.5	0.8
Total	457	100.0		28,384	100.0		238	100.0	18,362	100.0	100.0
By Loan Size											
\$100,000 or Less	391	85.6	90.7	8,391	29.6	38.1	196	82.4	3,560	19.4	
\$100,001 - \$250,000	42	9.2	5.6	7,126	25.1	19.9	22	9.2	3,798	20.7	
\$250,001 - \$1 Million	24	5.3	3.7	12,867	45.3	42.0	20	8.4	11,004	59.9	
Total	457	100.0	100.0	28,384	100.0	100.0	238	100.0	18,362	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	327	97.6		5,306	70.1		169	92.3	2,749	35.7	
\$100,001 - \$250,000	5	1.5		704	9.3		7	3.8	1,085	14.1	
\$250,001 - \$1 Million	3	0.9		1,560	20.6		7	3.8	3,867	50.2	
Total	335	100.0		7,570	100.0		183	100.0	7,701	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 18 CD loans totaling \$25.4MM in this AA. The majority of CD loans by number supported community services, while a substantial portion of CD lending by dollar volume was devoted to affordable housing initiatives. Examples of CD lending activities include:

- A \$13.2MM loan was made to a nonprofit affordable housing organization to construct 50 units of an AA city's first permanent supportive housing complex for families suffering from homelessness.
- A \$9.1M PPP community service loan was made to a nonprofit organization that provides free and reduced-cost legal assistance and services to LMI area residents.

Table 30

Community Development Loans – Colorado Springs MSA AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	3	17,329
Community Services	10	1,648
Economic Development	3	3,123
Revitalization and Stabilization	2	3,294
Total Loans	18	25,394

INVESTMENT TEST

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

- The bank purchased seven MBS with \$8.2MM in loans specific to the Colorado Springs AA that provided affordable housing to LMI individuals and families.
- The bank donated \$15.7M to an organization that provides employment, basic needs, and residential services for self-sufficiency to clients who are economically disadvantaged, low-income, unemployed, underemployed, disabled, elderly, or at-risk youth.

Table 31

Investments, Grants, and Donations – Colorado Springs MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	19	6,308	7	8,206	7	22	33	14,536
Community Services	1	163	0	0	35	74	36	237
Economic Development	0	0	0	0	1	2	1	2
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	20	6,471	7	8,206	43	98	70	14,775
¹ Book Value of Investment								
² Original Market Value of Investment								

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates four branches in the AA, and all the locations are equipped with ATMs and drive-through facilities.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There have been no changes to the bank’s branching footprint in this area since the prior CRA evaluation. One branch is located in a low-income census tract, two are in moderate-income tracts, and one is in an upper-income tract.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services were discussed in the institution section of this report and do not vary materially by market. Branch hours typically range from 9:00 a.m. to 5:00 p.m. from Monday through Friday.

Table 32

Retail Banking and Community Development Services – Colorado Springs MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	25.0	50.0	0.0	25.0	0.0	100.0	5.1	30.2	39.0	24.3	1.5	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
25.0	50.0	0.0	25.0	0.0	100.0	4.9	27.5	39.6	27.9	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	4	0		0		0	0	0	0	0	0	
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	5	26		2		0		33		17		
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 33 CD services and donated 704 hours to service activities during the evaluation period. The following activities were considered particularly responsive to CD needs in the AA:

- A bank officer served on the board of an organization that provides affordable housing to LMI individuals and families.
- A bank officer served on the board of an organization that provides short-term housing to families of seriously ill children receiving medical treatment nearby, a retreat inside the hospital for families to rest while remaining near their children, and a mobile clinic to provide medical and dental care to under-insured and uninsured children.

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

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN BOULDER MSA AA

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

- The AA remains unchanged since the prior evaluation and is comprised of 68 census tracts, including 5 low-, 14 moderate-, 30 middle-, and 19 upper-income census tracts.
- Of the bank's 30 branch locations, this AA includes one branch located in a moderate-income census tract that offers lobby services and an ATM.
- According to the 2015 American Community Survey (ACS), the population of the AA is 310,032.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank has 0.5 percent market share, ranking 19th out of 33 FDIC-insured depository institutions operating from 97 offices in the AA.

**GRAND JUNCTION MSA ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN GRAND JUNCTION MSA
AA**

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

- The AA remains unchanged since the prior evaluation and is comprised of 29 census tracts, including 7 moderate-, 16 middle-, and 6 upper-income census tracts; there are no low-income tracts in the AA.
- Four full-service locations are located in the AA and offer lobby and drive-through services, along with an ATM at each location.
- One branch is located in a moderate-income census tract and three are in middle-income tracts.
- According to the 2015 ACS, the AA population was 147,834.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank has 8.6 percent market share, ranking 6th out of 13 FDIC-insured depository institutions operating from 37 offices in the AA.

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

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

The bank's AA is comprised of the Fort Collins MSA, which consists of Larimer County in its entirety (refer to Appendix C for an AA map).

- The bank's AA remains unchanged since the prior evaluation, with a total of 73 census tracts, including 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tracts.
- The bank operates two full-service branches in this AA. One branch is in a middle-income tract in Fort Collins and offers an ATM, full lobby, and drive-through services. A second branch in Loveland is located in a moderate-income tract and offers lobby services and an ATM.
- Based on 2015 ACS data, the AA population was 318,227.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank held 0.8 percent market share of deposits in the AA, ranking 18th of 25 financial institutions operating from 92 offices in the AA.

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

The state of Colorado AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas do not change the rating for the state of Colorado.

Table 33

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

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

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

The bank's Mountain Colorado AA consists of Eagle, Garfield, and Pitkin Counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 9 middle- and 20 upper-income census tracts, and the AA tract composition remains unchanged since the prior evaluation.
- The bank operates 7 of its 30 banking offices in this AA, representing the highest number of branches within any of the bank's 12 delineated AAs.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank holds 5.2 percent market share in this AA, ranking 5th out of 13 FDIC-insured depository institutions operating from 64 branches.
- A community contact was conducted as part of the CRA evaluation to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact was an economic development manager representing a local government municipality.

Table 34

Population Change Assessment Area: Mountain Colorado			
Area	2010 Population	2015 Population	Percent Change
Mountain Colorado	125,734	127,072	1.1
Eagle County, CO	52,197	52,576	0.7
Garfield County, CO	56,389	57,076	1.2
Pitkin County, CO	17,148	17,420	1.6
NonMSA Colorado	687,293	688,010	0.1
Colorado	5,029,196	5,278,906	5.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- The AA is in the heart of the Rocky Mountain Range and includes the affluent ski and popular tourist resort areas surrounding the cities of Vail in Eagle County and Aspen in Pitkin County, which could account for the higher population growth in the AA when compared to nonmetropolitan areas statewide in Colorado.

Table 35

Median Family Income Change Assessment Area: Mountain Colorado			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Mountain Colorado	83,726	77,656	(7.2)
Eagle County, CO	87,792	82,465	(6.1)
Garfield County, CO	76,361	67,871	(11.1)
Pitkin County, CO	112,639	102,399	(9.1)
NonMSA Colorado	62,960	60,701	(3.6)
Colorado	76,277	74,826	(1.9)
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- The AA experienced a decline in MFI at a level that outpaced nonmetropolitan areas statewide and the state of Colorado. The decline was less pronounced in the ski resort counties of Eagle and Pitkin, when compared to Garfield County, which reported the lowest MFI in 2015.
- The AA had 7.1 percent of families living below the poverty level, compared to nonmetropolitan areas statewide and the state of Colorado, at 10.0 percent and 8.5 percent, respectively.

Table 36

Housing Cost Burden Assessment Area: Mountain Colorado						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Mountain Colorado	78.9	52.8	39.9	70.9	48.5	27.1
Eagle County, CO	86.5	62.1	45.4	78.3	48.9	28.8
Garfield County, CO	74.4	48.1	35.5	67.6	49.7	25.4
Pitkin County, CO	75.0	46.5	41.0	62.6	44.5	27.6
NonMSA Colorado	72.8	42.2	41.0	58.2	34.5	23.4
Colorado	80.3	56.4	46.4	65.8	43.6	21.5
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i>						
<i>Note: Cost Burden is housing cost that equals 30 percent or more of household income.</i>						

- Home ownership in the AA was considerably less affordable for LMI borrowers when compared to nonmetropolitan areas statewide, and slightly less affordable in comparison to the entire state, which could result in lower demand for home mortgage loans from LMI applicants in the AA.
- The housing affordability ratio in the AA was 17.8 percent, when compared to nonmetropolitan areas statewide at 22.0 percent and the state of Colorado at 24.5 percent.
- A community contact discussed the lack of affordable housing for local employees in one of the AA’s ski resort towns. New home construction is not a viable alternative based on very limited vacant land in the area, although zoning requirements specify that 10.0 percent of the square footage of any new residential construction must be devoted to deed-restricted employee housing.

Table 37

Unemployment Rates					
Assessment Area: Mountain Colorado					
Area	2017	2018	2019	2020	2021
Mountain Colorado	2.5	2.8	2.4	8.1	4.7
Eagle County, CO	2.2	2.5	2.1	9.0	4.4
Garfield County, CO	2.7	2.9	2.6	6.5	4.7
Pitkin County, CO	2.9	3.5	3.0	9.9	5.5
NonMSA Colorado	2.6	3.1	2.7	6.7	4.8
Colorado	2.6	3.0	2.6	6.9	5.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates spiked higher in the ski resort and recreational tourist areas of Eagle and Pitkin Counties in 2020, when compared to nonmetropolitan areas statewide and the state of Colorado. Unemployment rates in 2020 elevated as a result of the pandemic and impacted employment levels in the tourism and travel industries at a higher level than noted in other economic sectors.
- The key industries driving the AA economy are tourism and skiing. Major employers in the area include the ski resorts in Vail and Aspen, medical centers, and local public school districts. Local government and hospitality also represent a major source of area employment.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MOUNTAIN
COLORADO NONMETROPOLITAN AA**

LENDING TEST

The bank's performance under the lending test in the Mountain Colorado AA is excellent. Furthermore, the bank originated a relatively high level of CD loans in the AA.

As previously noted, this AA is comprised exclusively of middle- and upper-income tracts, and there are no distressed or underserved counties in the AA. Accordingly, significantly more weight was placed on the borrower distribution of AA loans based on the absence of LMI census tracts in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of AA lending included 118 home mortgage loans and 1,006 small business loans originated between January 1, 2020 and December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A detailed description of the bank's flexible lending products is discussed in the overall institution section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. Due to loan volumes too low to conduct meaningful analyses, home refinance, home improvement, multifamily, and small farm loans were not evaluated at the individual product level in this AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2020 home mortgage loans among middle-income census tracts was below the aggregate lending data and the demographic figure. Lending levels in area upper-income census tracts were comparable to the aggregate lending data and the demographic figure.

The bank's home mortgage lending in 2021 reflected penetration levels that were above the 2020 lending patterns. Furthermore, the bank's loan dispersion among geographies of different income levels revealed some gaps, although they did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2020 home purchase loans among middle-income census tracts was below the aggregate lending data and the demographic figure. In area upper-income census tracts, lending was above the aggregate lending data by number, comparable by dollar volume, and above the demographic figure. While the bank's lending in upper-income census tracts outperformed the distribution in middle-income tracts, overall performance is considered adequate based the absence of LMI census tracts, which are the core focus of the geographic distribution test.

The bank's home purchase lending in 2021 reflected penetration levels that were comparable to the bank's 2020 distribution. Furthermore, the bank's loan dispersion among geographies of different income levels revealed some gaps and lapses, although they did not impact the overall conclusion.

Table 38

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Mountain Colorado													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M i d d l e	4	12.9	30.9	1,073	2.7	19.0	7	17.5	32.1	1,896	3.9	18.5	30.9
U p p e r	27	87.1	69.1	38,643	97.3	81.0	33	82.5	67.9	47,014	96.1	81.5	69.1
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T o t a l	31	100.0	100.0	39,716	100.0	100.0	40	100.0	100.0	48,910	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M i d d l e	4	23.5	30.8	1,060	7.1	19.6	6	37.5	31.1	1,355	12.8	19.3	30.9
U p p e r	13	76.5	69.2	13,890	92.9	80.4	10	62.5	68.9	9,245	87.2	80.7	69.1
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T o t a l	17	100.0	100.0	14,950	100.0	100.0	16	100.0	100.0	10,600	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M i d d l e	1	33.3	24.0	28	18.3	13.6	0	0.0	26.1	0	0.0	21.3	30.9
U p p e r	2	66.7	76.0	125	81.7	86.4	1	100.0	73.9	278	100.0	78.7	69.1
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T o t a l	3	100.0	100.0	153	100.0	100.0	1	100.0	100.0	278	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M i d d l e	0	0.0	40.7	0	0.0	17.2	0	0.0	47.8	0	0.0	67.6	24.6
U p p e r	2	100.0	59.3	2,875	100.0	82.8	2	100.0	52.2	1,900	100.0	32.4	75.4
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T o t a l	2	100.0	100.0	2,875	100.0	100.0	2	100.0	100.0	1,900	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
M i d d l e	10	17.9	30.4	2,201	3.8	18.5	16	25.8	30.9	3,435	5.6	19.0	30.9
U p p e r	46	82.1	69.6	55,762	96.2	81.5	46	74.2	69.1	58,437	94.4	81.0	69.1
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T o t a l	56	100.0	100.0	57,963	100.0	100.0	62	100.0	100.0	61,872	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of loans in 2020 among middle-income census tracts was comparable to levels noted in the aggregate lending data, as well as the demographic figure. Performance in upper-income census tracts was also comparable to levels noted in the aggregate lending data and the demographic figure.

The distribution of small business loans in 2021 was comparable to 2020 lending performance. Additionally, the dispersion of loans among the various geographic income levels revealed no gaps or lapses.

Table 39

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Mountain Colorado											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	189	32.3	28.8	12,615	32.0	30.4	143	34.0	8,362	29.5	33.6
Upper	397	67.7	68.6	26,757	68.0	67.9	277	66.0	20,001	70.5	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	2.5	0	0.0	1.8	0	0.0	0	0.0	0.0
Total	586	100.0	100.0	39,372	100.0	100.0	420	100.0	28,363	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank’s lending has an excellent distribution among individuals of different income levels and businesses of different sizes. Due to loan volumes too low to conduct meaningful analyses, home refinance, home improvement, and small farm loans were not evaluated at the individual product level in this AA.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The bank's 2020 loan originations to low-income borrowers were above aggregate lending data by number and dollar volume and below the demographic figure. Lending to moderate-income borrowers

was above aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The bank's 2021 distribution of home mortgage lending was consistent with 2020 lending.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. The bank's 2020 home purchase originations to low-income borrowers were above aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number, below by dollar volume, and below the demographic figure.

The bank's lending performance in 2021 was above the 2020 distribution level, which impacted the overall conclusion.

Table 40

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Mountain Colorado													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	1	3.2	1.2	130	0.3	0.3	2	5.0	1.5	83	0.2	0.4	13.7
Mo d e r a t e	3	9.7	8.1	410	1.0	2.6	6	15.0	8.2	852	1.7	2.5	14.9
M i d d l e	4	12.9	16.8	403	1.0	7.3	5	12.5	15.7	711	1.5	6.2	17.9
U p p e r	15	48.4	59.7	20,181	50.8	65.0	9	22.5	56.6	4,832	9.9	60.3	53.6
U n k n o w n	8	25.8	14.2	18,592	46.8	24.8	18	45.0	18.1	42,432	86.8	30.7	0.0
T o t a l	31	100.0	100.0	39,716	100.0	100.0	40	100.0	100.0	48,910	100.0	100.0	100.0
Re finance Loans													
Lo w	1	5.9	1.4	200	1.3	0.5	2	12.5	2.5	108	1.0	1.2	13.7
Mo d e r a t e	3	17.6	7.3	528	3.5	3.1	2	12.5	8.2	217	2.0	3.5	14.9
M i d d l e	5	29.4	17.1	1,097	7.3	9.4	1	6.3	18.6	105	1.0	9.7	17.9
U p p e r	5	29.4	59.9	4,655	31.1	62.7	8	50.0	53.3	4,350	41.0	59.9	53.6
U n k n o w n	3	17.6	14.2	8,470	56.7	24.3	3	18.8	17.4	5,820	54.9	25.8	0.0
T o t a l	17	100.0	100.0	14,950	100.0	100.0	16	100.0	100.0	10,600	100.0	100.0	100.0
Home Improvement Loans													
Lo w	1	33.3	2.9	75	49.0	1.6	0	0.0	1.1	0	0.0	0.6	13.7
Mo d e r a t e	1	33.3	5.4	28	18.3	3.4	0	0.0	4.6	0	0.0	2.6	14.9
M i d d l e	1	33.3	13.4	50	32.7	7.1	0	0.0	8.8	0	0.0	3.2	17.9
U p p e r	0	0.0	67.1	0	0.0	69.5	0	0.0	74.3	0	0.0	70.3	53.6
U n k n o w n	0	0.0	11.2	0	0.0	18.5	1	100.0	11.1	278	100.0	23.3	0.0
T o t a l	3	100.0	100.0	153	100.0	100.0	1	100.0	100.0	278	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	3	5.6	1.4	405	0.7	0.4	4	6.7	2.1	191	0.3	0.9	13.7
Mo d e r a t e	8	14.8	7.3	995	1.8	2.8	10	16.7	7.8	1,113	1.9	2.8	14.9
M i d d l e	10	18.5	16.6	1,550	2.8	8.1	7	11.7	16.9	956	1.6	7.4	17.9
U p p e r	22	40.7	60.0	25,076	45.5	63.6	17	28.3	55.9	9,182	15.3	60.3	53.6
U n k n o w n	11	20.4	14.8	27,062	49.1	25.0	22	36.7	17.3	48,530	80.9	28.6	0.0
T o t a l	54	100.0	100.0	55,088	100.0	100.0	60	100.0	100.0	59,972	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of 2020 loans originated to businesses with annual revenues of \$1MM or less reflected penetration above aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The distribution of loans in 2021 was consistent with 2020 lending.

Table 41

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Mountain Colorado											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020					2021*					
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	407	69.5	34.6	8,376	21.3	21.7	351	83.6	19,714	69.5	91.2
Over \$1 Million	146	24.9		29,552	75.1		68	16.2	8,648	30.5	7.5
Revenue Unknown	33	5.6		1,444	3.7		1	0.2	1	0.0	1.2
Total	586	100.0		39,372	100.0		420	100.0	28,363	100.0	100.0
By Loan Size											
\$100,000 or Less	485	82.8	87.4	9,424	23.9	34.7	349	83.1	4,404	15.5	
\$100,001 - \$250,000	56	9.6	7.9	8,843	22.5	23.2	32	7.6	5,491	19.4	
\$250,001 - \$1 Million	45	7.7	4.7	21,105	53.6	42.1	39	9.3	18,468	65.1	
Total	586	100.0	100.0	39,372	100.0	100.0	420	100.0	28,363	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	398	97.8		6,227	74.3		303	86.3	3,758	19.1	
\$100,001 - \$250,000	7	1.7		1,138	13.6		24	6.8	3,928	19.9	
\$250,001 - \$1 Million	2	0.5		1,011	12.1		24	6.8	12,028	61.0	
Total	407	100.0		8,376	100.0		351	100.0	19,714	100.0	
Source: 2021 FFIEC Census Data											
2021 Dun & Bradstreet Data											
2011-2015 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank provides a relatively high level of CD loans. The bank originated a total of seven CD loans in the amount of \$11.6MM. As noted in Table 57, the majority of CD loan dollars were devoted to affordable housing projects. While the level of CD lending in this AA was lower than levels noted in many of the bank’s other AAs, this area is highly affluent with few industrial areas or major manufacturing facilities, and devoid of LMI or distressed and/or underserved census tracts, thereby offering limited opportunities to generate CD loans. Examples of CD loans include:

- The bank originated an affordable housing loan for \$6.8MM to construct four apartment buildings, with 19 of the units deed restricted and devoted to individuals and families earning less than 80 percent of the AMI.
- The bank made an SBA 504 loan for \$1.5MM to support an economic development project in the AA.

Table 42

Community Development Loans – Mountain Colorado AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	3	8,676
Community Services	2	171
Economic Development	2	2,784
Revitalization and Stabilization	0	0
Total Loans	7	11,631

INVESTMENT TEST

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

- The bank purchased six MBS that included \$2.1MM in securitized loans within the Mountain Colorado AA that provided affordable housing to LMI individuals and families.
- The bank donated \$7.5M to an organization that provides interest-free loans to LMI individuals and families to purchase affordable housing.

Table 43

Investments, Grants, and Donations – Mountain Colorado AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	12	915	6	2,151	2	14	20	3,080
Community Services	2	2,963	0	0	6	7	8	2,970
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	14	3,878	6	2,151	8	21	28	6,050
¹ Book Value of Investment								
² Original Market Value of Investment								

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates seven branches with ATMs in this AA, and four locations offer drive-through facilities. Three branches are located in middle-income census tracts and four are located in upper-income tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank relocated a branch from an upper-income census tract to a nearby middle-income census tract during the evaluation period, although there has been no record of branch openings or closings during the evaluation period.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary materially by market. Branch lobby hours range from 9:00 a.m. to 5:00 p.m., Monday through Friday.

Table 44

Retail Banking and Community Development Services – Mountain Colorado AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	42.9	57.1	0.0	100.0	0.0	0.0	31.0	69.0	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	42.9	57.1	0.0	100.0	0.0	0.0	34.1	65.9	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	7		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development		Revitalization & Stabilization	Total Services	Total Organizations					
	5	19	1		0	25	8					
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 25 services and donated a total of 290 hours during the evaluation period. The following service activities were considered responsive to CD needs in the AA:

- A bank officer served on the board of a local housing authority to focus on providing affordable rental housing and home ownership opportunities to qualified individuals employed in Aspen and Pitkin County.
- A bank officer taught an economics class at a school in which a majority of students qualified for the national free or reduced lunch program.

**SAN MIGUEL COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN SAN MIGUEL COUNTY AA

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

- The AA remains unchanged since the prior evaluation and is comprised of four census tracts, including two middle- and two upper-income census tracts.
- Of the bank's 30 branch locations, this AA includes one branch located in a middle-income tract that offers lobby service and an ATM, although there is no drive-through at this office.
- According to the 2015 ACS, the population of the AA is 7,676.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank has 6.6 percent market share, ranking fifth out of six FDIC-insured depository institutions operating from seven offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SAN MIGUEL COUNTY AA

The state of Colorado AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area do not change the rating for the state of Colorado.

Table 45

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

STATE OF WYOMING

CRA rating for Wyoming:	Outstanding
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

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

AA. Full-scope reviews were conducted for the Cheyenne MSA AA and Northern Wyoming AA. The state rating was based on performance in these two AAs, with more weight attributed to the Northern Wyoming AA based on a higher number of loan originations and greater branch presence.

Limited-scope reviews were conducted for the Casper MSA AA and Albany County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. The loan products used in the analysis for this state were consistent with those described in the institution section of the evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN WYOMING

The bank delineates 4 of its 12 AAs and operates 7 of its 30 branches in the state of Wyoming. The bank's Wyoming AAs include the Northern Wyoming AA, a rural area comprised of seven counties that encompasses most of the northern portion of the state. The Casper MSA AA is a one-county metropolitan area located directly in the center of the state. The Albany County AA is a nonmetropolitan area that is contiguous to the Cheyenne MSA AA, a one-county MSA located in the far southeastern corner of Wyoming.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of the report, with a primary emphasis on commercial lending, followed by residential real estate lending and farm lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING LENDING TEST

The bank's performance under the lending test in the state of Wyoming is high satisfactory. Bank performance is considered good under the lending test in the Northern Wyoming AA and Cheyenne MSA AA.

Lending Activity

The bank's overall lending activities in the state of Wyoming reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers, and the lending programs offered by the bank are generally consistent among the four Wyoming AAs. Farm lending is more prominent in the non-metropolitan AAs.

Geographic Distribution of Loans

The bank’s overall geographic distribution of lending within Wyoming reflects good distribution among the different census tracts and dispersion throughout the AAs. The distribution of lending among geographies of different income levels is good in both AAs subject to full-scope reviews.

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

The bank’s lending within Wyoming has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. Performance was consistent among both AAs subject to full-scope reviews.

Community Development Lending

The bank provides a relatively high level of CD loans within the state of Wyoming. The bank originated 25 CD loans totaling \$15.9MM in AAs within the state. Performance was relatively high in the Northern Wyoming AA and adequate in the Cheyenne MSA AA during the evaluation period. The CD loans in Wyoming include 13 originated in the Cheyenne MSA AA, followed by five in the Northern Wyoming AA, where CD lending opportunities are limited. The remaining seven CD loans were dispersed among the bank’s two Wyoming AAs subject to limited-scope reviews.

Table 46

Community Development Loans – State of Wyoming		
Community Development Purpose	#	\$(000’s)
Affordable Housing	4	138
Community Services	17	5,052
Economic Development	4	10,708
Revitalization and Stabilization	0	0
Total Loans	25	15,898

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of Wyoming is outstanding. Performance was excellent in both AA’s subject to full-scope review, and exceptionally strong in the Cheyenne MSA AA.

The bank has an excellent level of qualified CD investments and grants within Wyoming and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AAs. A total of \$16.2MM of the bank’s funds is invested in MBS among the four Wyoming AAs. Additionally, the bank purchased 15 bonds from one issuance totaling \$6.8MM to

fund the construction and renovation of buildings at a community college primarily serving students with significant financial needs. To further demonstrate the bank’s dedication to AA needs, donations to a number of organizations that target services to LMI individuals and families were made within the state. The bank’s donations to all qualifying organizations across Wyoming totaled \$151.0M.

Table 47

Investments, Grants, and Donations – State of Wyoming								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	27	8,083	15	8,158	12	13	54	16,254
Community Services	5	3,640	15	6,770	93	98	113	10,508
Economic Development	0	0	0	0	10	15	10	15
Revitalization and Stabilization	26	2,410	21	4,175	5	25	52	6,610
Total	58	14,133	51	19,103	120	151	229	33,387
¹ Book Value of Investment ² Original Market Value of Investment								

In addition to bank investments benefitting the bank’s Wyoming AAs, two prior period MBS included loans with a book value totaling \$359.1M provided affordable housing to LMI individuals and families in a broader statewide area.

SERVICE TEST

The bank’s overall performance under the service test in the state of Wyoming is outstanding. Bank performance under the service test in the Cheyenne MSA AA and Northern Wyoming AA is considered excellent.

Retail Banking Services

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

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened or closed any branches in Wyoming since the prior evaluation.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and

drive-through hours are consistent among each AA with all locations offering similar products and services.

Table 48

Retail Banking and Community Development Services – State of Wyoming												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	14.3	85.7	0.0	0.0	100.0	3.9	18.2	62.3	14.3	1.3	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	14.3	85.7	0.0	0.0	100.0	2.6	16.0	64.8	16.6	0.0	100.0	
Changes in Branch Location	Number of Branches (#)				Net Change in Branch Locations (#)							
	Total Branches	Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total		
	7	0	0		0	0	0	0	0	0		
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	12	17	13	7	49	27						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services within the state of Wyoming. Bank staff provided 49 CD services and donated 1,486 hours to 27 CD service organizations in the Wyoming AAs. Bank officers and staff served on the boards of organizations that assisted at-risk youth, provided meals to individuals and families in need, and provided guidance to aid the economically disadvantaged, disabled, and elderly in obtaining affordable housing.

**CHEYENNE MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Cheyenne MSA AA includes Laramie County in its entirety, which also comprises the Cheyenne, Wyoming MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of six moderate-, ten middle-, four upper-, and one unknown-income census tracts. The AA tract composition remains unchanged since the prior evaluation.
- Of the bank's 30 banking locations, 2 branches are located in the AA. One branch offers full lobby services, an ATM, and a drive-through facility. The second location is a limited-service branch with an ATM and no drive-through.
- Based on the June 30, 2021 FDIC Deposit Market Share Report, the bank has 11.9 percent market share, ranking 2nd of 19 FDIC-insured depository institutions operating from 30 offices in the AA.
- One community contact recently conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact represented an economic development organization.

Table 49

Population Change			
Assessment Area: Cheyenne MSA			
Area	2010 Population	2015 Population	Percent Change
Cheyenne MSA	91,738	95,431	4.0
Wyoming	563,626	579,679	2.8

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

- The city of Cheyenne represents the major population center in the AA, with a total population of 62,195 in 2015, followed by Ranchettes with 6,138 residents, and South Greeley with 4,473 residents. A community contact discussed a population influx to the area, especially from northern Colorado, due to the lower cost of living and Wyoming's low state income tax rates.

Table 50

Median Family Income Change			
Assessment Area: Cheyenne MSA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Cheyenne MSA	70,334	75,732	7.7
Wyoming	71,832	73,194	1.9

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

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

- MFI in the AA grew at an appreciable rate when compared to growth noted in the state of Wyoming from 2010 to 2015.
- Based on 2015 ACS data, there were 7.1 percent of AA families living below the poverty level, compared to 7.7 percent in the state of Wyoming.

Table 51

Housing Cost Burden						
Assessment Area: Cheyenne MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Cheyenne MSA	79.4	42.8	42.4	64.2	30.8	18.3
Wyoming	68.9	26.1	34.9	53.7	28.1	17.2

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

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

- The AA housing affordability ratio of 31.9 percent is slightly higher than the figure for the state of Wyoming, at 30.2 percent.
- A community contact indicated that the population migration into the Cheyenne MSA has created a housing shortage for both homebuyers and renters, making affordable housing a critical need in the local area.

Table 52

Unemployment Rates					
Assessment Area: Cheyenne MSA					
Area	2017	2018	2019	2020	2021
Cheyenne MSA	3.8	3.9	3.6	5.1	4.0
Wyoming	4.3	4.1	3.7	5.8	4.5

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA has historically experienced lower unemployment rates when compared to the state of Wyoming, and the rise in unemployment due to the 2020 pandemic was lower than increases noted in the bank’s other AAs.

- The largest employers in the area include F.E. Warren U.S. Air Force Base, the state of Wyoming, the U.S. Government, Laramie County School District, United Medical Center, and Union Pacific Railroad.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHEYENNE MSA AA

LENDING TEST

The bank's performance under the lending test in the Cheyenne MSA AA is good. Furthermore, the bank originated an adequate level of CD loans in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of loans in the AA included 111 home mortgage and 219 small business loans originated during a two-year period from January 1, 2020 to December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible and innovative lending products is discussed in the overall institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution for home mortgage lending was excellent, the distribution for small business lending was good. Home refinance, home improvement, multifamily, and small farm loans were not evaluated at the individual product level based on lending levels that are too low to conduct meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2020 home mortgage loans among moderate-income census tracts was above the aggregate lending data by number, comparable by dollar volume, and above the demographic figure.

The bank's home mortgage lending in 2021 reflected penetration levels that were consistent with that of 2020 lending patterns. Furthermore, the bank's loan dispersion among geographies of different income levels revealed no gaps or lapses that would impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The bank's 2020 home purchase originations in area moderate-income census tracts were above aggregate lending data and the demographic figure.

Performance in 2021 was consistent with the 2020 distribution. When loan dispersion within the AA was evaluated, there were no gaps that would impact the analysis.

Table 53

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Cheyenne MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	13	48.1	19.1	686	22.4	13.7	24	64.9	21.4	1,295	30.8	16.2	22.8
M i d d l e	5	18.5	59.0	564	18.4	59.9	11	29.7	56.8	2,578	61.3	57.0	50.7
U p p e r	9	33.3	21.9	1,818	59.3	26.4	2	5.4	21.7	335	8.0	26.7	26.5
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	27	100.0	100.0	3,068	100.0	100.0	37	100.0	100.0	4,208	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	13.0	0	0.0	10.6	6	35.3	15.8	470	20.9	12.4	22.8
M i d d l e	8	66.7	55.5	1,125	52.7	54.5	9	52.9	56.3	876	39.0	55.6	50.7
U p p e r	4	33.3	31.6	1,011	47.3	34.9	2	11.8	28.0	900	40.1	32.0	26.5
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	12	100.0	100.0	2,136	100.0	100.0	17	100.0	100.0	2,246	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	3	75.0	11.8	91	24.5	10.9	2	50.0	12.5	151	67.7	8.7	22.8
M i d d l e	1	25.0	48.7	281	75.5	55.5	2	50.0	55.1	72	32.3	53.5	50.7
U p p e r	0	0.0	39.5	0	0.0	33.5	0	0.0	32.4	0	0.0	37.8	26.5
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	4	100.0	100.0	372	100.0	100.0	4	100.0	100.0	223	100.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	50.0	0	0.0	80.4	0	0.0	22.2	0	0.0	9.8	26.7
M i d d l e	0	0.0	36.4	0	0.0	11.0	2	100.0	61.1	2,379	100.0	70.1	57.2
U p p e r	0	0.0	13.6	0	0.0	8.7	0	0.0	16.7	0	0.0	20.1	16.1
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	2,379	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	18	39.1	15.6	937	15.8	14.0	33	50.8	18.0	1,940	20.6	14.1	22.8
M i d d l e	15	32.6	56.6	2,146	36.3	55.3	27	41.5	56.7	6,150	65.3	56.6	50.7
U p p e r	13	28.3	27.8	2,829	47.9	30.7	5	7.7	25.3	1,335	14.2	29.3	26.5
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	46	100.0	100.0	5,912	100.0	100.0	65	100.0	100.0	9,425	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is good. The distribution of loans in 2020 among moderate-income census tracts was above both of the aggregate lending data figures and comparable to the demographic figure.

The distribution of small business loans in 2021 was above the distribution level noted in 2020. In addition, the dispersion of loans among the various geographic income levels revealed no gaps or lapses.

Table 54

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Cheyenne MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	19	15.2	10.4	2,101	18.6	13.2	30	31.9	1,654	28.0	14.8
Middle	83	66.4	75.9	8,345	74.0	75.4	50	53.2	3,794	64.3	68.8
Upper	22	17.6	12.9	795	7.0	10.2	14	14.9	453	7.7	16.1
Unknown	1	0.8	0.2	42	0.4	0.3	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	0.7	0	0.0	0.9	0	0.0	0	0.0	0.0
Total	125	100.0	100.0	11,283	100.0	100.0	94	100.0	5,901	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of small business lending reflected good penetration levels, while home mortgage lending reflected excellent penetration. Home refinance, home improvement, and small farm loans were not evaluated at the individual product level based on lending levels that are too low to render meaningful analyses.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The distribution of 2020 home mortgage lending to low- income borrowers was above aggregate lending data and

comparable to the demographic figure. Lending to moderate-income borrowers reflected comparable penetration to aggregate lending data and to the demographic figure.

The distribution of home mortgage lending in 2021 was consistent with the penetration levels noted in 2020 lending.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The distribution of 2020 home purchase originations to low-income borrowers was above the aggregate lending data by number and dollar volume, and comparable to the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data and to the demographic figure.

The distribution of home purchase loans in 2021 was above the level noted in 2020.

Table 55

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Cheyenne MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	4	14.8	5.5	157	5.1	2.9	6	16.2	7.3	306	7.3	4.1	19.5
Moderate	6	22.2	23.5	407	13.3	17.5	18	48.6	26.4	1,436	34.1	19.9	18.2
Middle	5	18.5	25.5	504	16.4	25.3	7	18.9	21.9	813	19.3	22.5	23.1
Upper	10	37.0	28.7	1,810	59.0	36.7	5	13.5	24.4	1,372	32.6	31.3	39.3
Unknown	2	7.4	16.7	190	6.2	17.6	1	2.7	20.1	281	6.7	22.3	0.0
Total	27	100.0	100.0	3,068	100.0	100.0	37	100.0	100.0	4,208	100.0	100.0	100.0
Refinance Loans													
Low	3	25.0	3.8	213	10.0	2.0	8	47.1	7.7	622	27.7	4.4	19.5
Moderate	2	16.7	11.7	117	5.5	8.5	4	23.5	15.4	216	9.6	12.0	18.2
Middle	5	41.7	17.1	936	43.8	15.2	2	11.8	19.6	114	5.1	18.2	23.1
Upper	1	8.3	32.3	500	23.4	35.6	2	11.8	25.5	1,079	48.0	30.1	39.3
Unknown	1	8.3	35.1	370	17.3	38.7	1	5.9	31.9	215	9.6	35.3	0.0
Total	12	100.0	100.0	2,136	100.0	100.0	17	100.0	100.0	2,246	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.3	0	0.0	2.1	3	75.0	8.0	147	65.9	3.6	19.5
Moderate	1	25.0	11.8	50	13.4	6.2	0	0.0	15.9	0	0.0	19.3	18.2
Middle	1	25.0	27.0	13	3.5	21.9	1	25.0	26.7	76	34.1	22.3	23.1
Upper	2	50.0	52.0	309	83.1	54.7	0	0.0	42.6	0	0.0	40.6	39.3
Unknown	0	0.0	5.9	0	0.0	15.0	0	0.0	6.8	0	0.0	14.1	0.0
Total	4	100.0	100.0	372	100.0	100.0	4	100.0	100.0	223	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	9	19.6	4.5	586	9.9	2.4	18	28.6	7.5	1,099	15.6	4.3	19.5
Moderate	9	19.6	16.2	574	9.7	12.1	22	34.9	20.1	1,652	23.4	15.8	18.2
Middle	12	26.1	20.3	1,573	26.6	19.2	13	20.6	20.5	1,288	18.3	20.1	23.1
Upper	13	28.3	31.2	2,619	44.3	36.0	7	11.1	25.7	2,451	34.8	30.9	39.3
Unknown	3	6.5	27.9	560	9.5	30.3	3	4.8	26.1	556	7.9	28.9	0.0
Total	46	100.0	100.0	5,912	100.0	100.0	63	100.0	100.0	7,046	100.0	100.0	100.0
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</i>													

Small Business Lending

The borrower distribution of small business lending is good. The distribution of loans originated in 2020 to small businesses reflects penetration above aggregate lending data by number and comparable by dollar volume and the demographic figure.

The distribution of loans in 2021 reflected consistent penetration to 2020 lending.

Table 56

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Cheyenne MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	90	72.0	48.2	2,695	23.9	31.9	76	80.9	1,795	30.4	91.4
Over \$1 Million	31	24.8		8,556	75.8		18	19.1	4,106	69.6	6.0
Revenue Unknown	4	3.2		32	0.3		0	0.0	0	0.0	2.6
Total	125	100.0		11,283	100.0		94	100.0	5,901	100.0	100.0
By Loan Size											
\$100,000 or Less	102	81.6	94.6	2,449	21.7	47.1	82	87.2	1,357	23.0	
\$100,001 - \$250,000	11	8.8	2.8	1,826	16.2	13.3	8	8.5	1,306	22.1	
\$250,001 - \$1 Million	12	9.6	2.6	7,008	62.1	39.6	4	4.3	3,238	54.9	
Total	125	100.0	100.0	11,283	100.0	100.0	94	100.0	5,901	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	86	95.6		1,856	68.9		71	93.4	1,114	62.1	
\$100,001 - \$250,000	3	3.3		494	18.3		5	6.6	681	37.9	
\$250,001 - \$1 Million	1	1.1		345	12.8		0	0.0	0	0.0	
Total	90	100.0		2,695	100.0		76	100.0	1,795	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank provides an adequate level of CD loans in the Cheyenne MSA AA. The bank originated a total of 13 CD loans in the amount of \$2.3MM. As noted in Table 72, the majority of CD dollars were devoted to community service endeavors. Examples of CD loans include:

- The bank originated two loans totaling \$70M to an organization that aids LMI applicants in obtaining affordable housing based on meeting HUD AMI requirements.
- The bank made two loans totaling \$1MM to an organization that educates and places low-income single mothers in careers that successfully support their families.

Table 57

Community Development Loans – Cheyenne MSA AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	2	70
Community Services	11	2,233
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	13	2,303

INVESTMENT TEST

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

- The bank purchased 12 MBS investments with \$4.0MM in underlying loans inside the Cheyenne MSA AA that enabled LMI individuals and families to obtain affordable housing.
- Two community service donations totaling \$2.0M supported an organization that allocates funding to a number of charitable agencies that primarily support LMI individuals and families in the Cheyenne community and surrounding area.

Table 58

Investments, Grants, and Donations Cheyenne MSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	17	6,446	12	3,958	3	1	32	10,405
Community Services	5	3,640	15	6,770	27	40	47	10,450
Economic Development	0	0	0	0	4	8	4	8
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	22	10,086	27	10,728	34	49	83	20,863
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates two branches in Cheyenne, including one full-service branch and one limited-service location inside a grocery store. The limited-service branch offers check cashing and deposit-related services, although loan applicants are referred to the full-service branch for credit underwriting and processing. Both locations are in middle-income tracts that are also in close proximity to Cheyenne’s six moderate-income tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened or closed any branches in this AA since the prior CRA evaluation.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary by market, with branch hours ranging from 9:00 a.m. to 5:00 p.m. from Monday through Friday.

Table 59

Retail Banking and Community Development Services – Cheyenne MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	0.0	28.6	47.6	19.1	4.8	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
0.0	0.0	100.0	0.0	0.0	100.0	0.0	27.0	50.4	22.6	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	2	0		0		0	0	0	0	0	0	
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	4	12	4	0	20	10						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 20 CD services and donated 620 hours of time during the evaluation period. The following activities were considered particularly responsive to CD needs in the AA:

- A bank officer served on the board of an organization that offers support for the area's sick and economically disadvantaged, including the disbursement of blood, medicine, food, eyeglasses and hearing aids.
- A bank officer served on the board, the Finance Committee, and the Building Committee of an organization that provides transitional housing and other vital services to LMI individuals and families.

**CASPER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CASPER MSA AA

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

- The bank's AA remains unchanged since the prior evaluation, with a total of 18 census tracts, including 1 low-, 3 moderate-, 11 middle-, and 3 upper-income census tracts.
- Based on 2015 ACS data, the AA population was 80,011.
- The bank operates one full-service branch in the AA in a middle-income census tract that offers a full lobby, a drive-through facility, and an ATM.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank held 1.9 percent market share of deposits in the AA, ranking 8th of 9 financial institutions operating from 19 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CASPER MSA AA

The state of Wyoming AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area do not change the rating for the state of Wyoming.

Table 60

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

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

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE NORTHERN WYOMING NONMETROPOLITAN AA

The bank’s Northern Wyoming AA consists of Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties in their entireties. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA has a total of 28 census tracts, including 4 moderate-, 20 middle-, and 4 upper-income census tracts. The AA tract composition remains unchanged since the prior evaluation.
- Three of the bank’s 30 branches are located in the AA. Each branch offers a full lobby, drive-through facilities, and an ATM.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank has 2.3 percent market share, ranking 12th out of 16 FDIC-insured depository institutions operating from 64 offices in the AA.
- Two previously conducted community contacts were referenced to supplement the evaluation. One individual was a representatives of an economic development organization and the other was affiliated with a rural housing program serving parts of the AA.

Table 61

Population Change Assessment Area: Northern Wyoming			
Area	2010 Population	2015 Population	Percent Change
Northern Wyoming	137,036	140,440	2.5
Big Horn County, WY	11,668	11,895	1.9
Campbell County, WY	46,133	48,013	4.1
Hot Springs County, WY	4,812	4,809	(0.1)
Johnson County, WY	8,569	8,600	0.4
Park County, WY	28,205	28,985	2.8
Sheridan County, WY	29,116	29,738	2.1
Washakie County, WY	8,533	8,400	(1.6)
NonMSA Wyoming	396,438	404,237	2.0
Wyoming	563,626	579,679	2.8

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

- The seven AA counties experienced various levels of population change from 2010 to 2015 and cumulatively outpaced growth in nonmetropolitan areas statewide. Campbell County was the most densely populated AA county and is home to Gillette, the county seat and largest city in the AA, with a population of 31,634 in 2015.

Table 62

Median Family Income Change Assessment Area: Northern Wyoming			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Northern Wyoming	72,068	73,535	2.0
Big Horn County, WY	62,838	59,519	(5.3)
Campbell County, WY	91,434	87,858	(3.9)
Hot Springs County, WY	59,575	59,787	0.4
Johnson County, WY	64,230	64,351	0.2
Park County, WY	63,483	67,122	5.7
Sheridan County, WY	67,470	71,020	5.3
Washakie County, WY	66,796	66,113	(1.0)
NonMSA Wyoming	73,003	72,833	(0.2)
Wyoming	71,832	73,194	1.9
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- The AA counties also experienced varying levels of change in MFI, although the AA outpaced nonmetropolitan areas statewide and was slightly higher than the growth rate noted for the state of Wyoming.
- The percent of families living below the poverty level varied in the AA, with the highest level in Washakie County at 10.1 percent and the lowest in Johnson County at 3.2 percent, compared to nonmetropolitan areas statewide at 7.9 percent.

Table 63

Housing Cost Burden						
Assessment Area: Northern Wyoming						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northern Wyoming	65.5	19.3	32.0	54.0	27.8	17.4
Big Horn County, WY	40.9	6.1	23.1	38.2	14.9	14.4
Campbell County, WY	68.2	17.4	33.7	63.6	28.2	17.1
Hot Springs County, WY	55.6	13.0	31.1	52.5	29.5	17.2
Johnson County, WY	69.5	7.5	28.4	64.0	32.7	23.4
Park County, WY	70.3	14.9	29.2	50.6	24.8	14.8
Sheridan County, WY	69.7	34.0	36.4	46.7	38.3	21.1
Washakie County, WY	60.9	8.0	28.9	50.0	15.5	12.5
NonMSA Wyoming	65.4	21.7	32.8	51.5	26.3	16.9
Wyoming	68.9	26.1	34.9	53.7	28.1	17.2

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The percentage of owner-occupied units in the AA was 62.5 percent, which is higher than nonmetropolitan areas statewide and the state of Wyoming, at 57.7 percent and 58.8 percent, respectively.
- The AA’s housing affordability ratio was 29.5 percent, which was comparable to the nonmetropolitan areas statewide and the state of Wyoming, at 29.0 percent and 30.2 percent, respectively.
- A community contact discussed the shortage of housing, including multifamily and affordable housing, in two of the AA counties.
- Another community contact spoke of a number of housing projects that were underway in the AA, and also noted that rent has increased due to demand for rental units in the area.

Table 64

Unemployment Rates					
Assessment Area: Northern Wyoming					
Area	2017	2018	2019	2020	2021
Northern Wyoming	4.5	4.2	3.9	5.7	4.5
Big Horn County, WY	4.4	4.7	4.5	5.0	4.4
Campbell County, WY	5.0	4.1	3.8	6.8	5.3
Hot Springs County, WY	4.0	3.7	3.6	4.9	3.9
Johnson County, WY	4.3	4.0	3.8	5.5	4.1
Park County, WY	4.4	4.4	4.2	5.4	4.1
Sheridan County, WY	4.0	4.1	3.7	4.9	4.2
Washakie County, WY	4.1	4.2	4.2	5.2	4.0
NonMSA Wyoming	4.2	4.0	3.7	5.6	4.3
Wyoming	4.3	4.1	3.7	5.8	4.5

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Wyoming is the largest coal producing state in the country and Campbell County is home to 11 of the state’s 16 major coal mines.
- Several of the largest employers in the AA include Sheridan College in Gillette (3,000 employees), Thunder Basin Coal Company, LLC (1,500), Peabody Powder River Operations, LLC (1,200), and Navajo Transitional Energy Company, LLC (600).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTHERN WYOMING NONMETROPOLITAN AA

LENDING TEST

The bank’s performance under the lending test in the Northern Wyoming AA is good. In addition, the bank originated a relatively high level of CD loans in this AA.

Lending Activity

The bank’s lending activities reflect good responsiveness to AA credit needs. The evaluation of loans in the AA included 97 home mortgage, 219 small business, and 91 small farm loans originated during a two-year period from January 1, 2020 to December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible lending products is discussed in the overall institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the distribution for total home mortgage lending and small farm lending was adequate, the distribution for small business lending was excellent. Home purchase, home improvement, and multifamily loans were not evaluated individually based on lending levels that are too low to conduct meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2020 home mortgage loans among moderate-income census tracts was below the aggregate lending data by number and dollar volume, and below the demographic figure. However, three of the AA's four moderate-income tracts are located distances ranging from 30 miles to more than 60 miles from the nearest bank branch, making it difficult for the bank to reasonably serve those areas.

The bank operates a branch in Worland, Wyoming, where one of the moderate-income tracts is located. This tract only contains 16.4 percent of the housing units located in the AA's four moderate-income tracts. Further review of the moderate-income tract in Worland noted 73 loans originated by aggregate lenders in 2020, compared to 119 loans in 2021, indicating significantly lower loan demand from this tract during 2020. The decline in demand for home mortgage loans from aggregate lenders in 2020, followed by increased demand in 2021, was consistent with the bank's lending distribution in this tract.

Furthermore, the bank's loan dispersion among geographies of different income levels revealed significant gaps and lapses based on relatively low numbers of loans dispersed over a significant geographical area. However, these gaps did not impact the conclusion.

The bank's home mortgage lending in 2021 reflected penetration levels that were above that of the 2020 lending patterns; however, performance overall was still considered adequate.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank did not originate any home refinance loans in the AA's moderate-income tracts during 2020, resulting in performance below aggregate lending data by number and by dollar volume, and below the demographic figure.

While this performance appears poor, as previously noted, the bank's ability to serve the AA's moderate-income tracts is constrained by the distance of its branches from three of the AA's four moderate-income tracts. These three tracts contain 83.6 percent of the housing units located in the AA's four moderate-income tracts. Two of the moderate-

income tracts are over 60 miles from the nearest bank branch and the third moderate-income tract is approximately 30 miles away.

When loan dispersion within the AA was evaluated, there were significant gaps in the loan distribution, although these gaps did not impact the overall conclusion.

Performance in 2021 was above the 2020 distribution; however, overall lending was still considered adequate.

Table 65

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Northern Wyoming													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	%	\$ %	#	%	#	\$ (000)	%	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	1	5.6	14.8	66	3.2	12.1	2	11.1	13.0	107	5.1	10.4	12.2
M i d d l e	13	72.2	59.3	1,464	70.0	63.0	16	88.9	60.0	2,000	94.9	64.1	68.3
U p p e r	4	22.2	25.9	562	26.9	24.8	0	0.0	27.0	0	0.0	25.5	19.6
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	18	100.0	100.0	2,092	100.0	100.0	18	100.0	100.0	2,107	100.0	100.0	100.0
Re finance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	9.5	0	0.0	7.8	3	13.0	10.5	274	8.7	8.7	12.2
M i d d l e	23	82.1	65.1	2,965	83.8	66.2	18	78.3	66.6	2,604	82.8	69.3	68.3
U p p e r	5	17.9	25.4	572	16.2	26.0	2	8.7	22.9	267	8.5	22.0	19.6
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	28	100.0	100.0	3,537	100.0	100.0	23	100.0	100.0	3,145	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	1	33.3	12.8	89	67.9	8.1	0	0.0	10.2	0	0.0	6.8	12.2
M i d d l e	1	33.3	78.9	12	9.2	83.8	1	100.0	8.1	45	100.0	86.8	68.3
U p p e r	1	33.3	8.3	30	22.9	8.2	0	0.0	8.7	0	0.0	6.3	19.6
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	3	100.0	100.0	131	100.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	0	0.0	13.3	0	0.0	12.9	0	0.0	24.1	0	0.0	45.9	8.8
M i d d l e	2	100.0	86.7	255	100.0	87.1	0	0.0	69.0	0	0.0	41.4	66.5
U p p e r	0	0.0	0.0	0	0.0	0.0	0	0.0	6.9	0	0.0	12.7	24.7
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	2	100.0	100.0	255	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo d e r a t e	2	3.8	11.5	155	2.5	9.5	5	11.4	11.7	381	7.0	9.9	12.2
M i d d l e	41	77.4	62.7	4,819	78.5	65.1	37	84.1	64.0	4,830	88.2	66.7	68.3
U p p e r	10	18.9	25.8	1,164	19.0	25.4	2	4.5	24.3	267	4.9	23.3	19.6
U n k n o w n	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
T r a c t - U n k	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
T o t a l	53	100.0	100.0	6,138	100.0	100.0	44	100.0	100.0	5,478	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is excellent. The distribution of loans in 2020 among moderate-income census tracts was above aggregate lending data by number, comparable by dollar volume, and above the demographic figure.

The distribution of small business loans in 2021 was consistent with the distribution level noted in 2020. Additionally, the dispersion of loans among the various geographic income levels revealed some gaps and lapses, although this had no impact on the conclusion.

Table 66

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Northern Wyoming											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	25	20.2	9.0	1,319	14.3	11.8	24	17.8	873	14.6	8.6
Middle	94	75.8	82.4	7,038	76.0	78.0	95	70.4	4,890	82.0	81.4
Upper	5	4.0	7.5	898	9.7	9.2	16	11.9	197	3.3	10.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	1.1	0	0.0	0	0.0	0.0
Total	124	100.0	100.0	9,255	100.0	100.0	135	100.0	5,960	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Small Farm Lending

The geographic distribution of small farm lending is adequate. There were no small farm loans originated in the AA's moderate-income tracts in 2020 or 2021. A review of Dun & Bradstreet data revealed a total of 38 farms in the AA's four moderate-income tracts, with four farms located in the moderate-income tract where the bank maintains a branch in Worland, Wyoming. The remaining three moderate-income tracts are located distances ranging from 30 miles to 60 miles from the nearest bank branch. These distances may preclude the bank from reasonably serving the farm credit demand from these outlying moderate-income tracts. Aggregate lending data was reviewed in the moderate-income census tract where the bank maintains its Worland Branch. One aggregate lender originated two farm loans in this tract during 2020 and a different lender made one farm loan in 2021. These statistics suggest not only limited demand, but also limited opportunity based on the low number of farms in this tract.

The dispersion of loans among the various geographic income levels revealed significant gaps and lapses based on the relatively small numbers of loans disbursed over a large geographic area, although this did not impact the conclusion.

Table 67

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Northern Wyoming											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	8.4	0	0.0	9.2	0	0.0	0	0.0	6.5
Middle	44	100.0	83.9	2,391	100.0	83.1	47	100.0	2,720	100.0	87.7
Upper	0	0.0	7.7	0	0.0	7.7	0	0.0	0	0.0	5.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	44	100.0	100.0	2,391	100.0	100.0	47	100.0	2,720	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of total home mortgage and small farm loans reflect excellent penetration levels, while small business lending reflects good penetration. Home purchase and home improvement loans were not evaluated individually based on lending levels that are too low to render meaningful conclusions.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The bank’s 2020 home mortgage lending to low-income borrowers was above aggregate lending data by both number and dollar volume, and comparable to the demographic figure. Lending to moderate-income borrowers was above aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The distribution of home mortgage lending in 2021 was consistent with the penetration levels noted in 2020 lending.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The distribution of 2020 loan originations to low-income borrowers was above the aggregate lending data by number and dollar volume, and comparable to the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data and the demographic figure.

The distribution of home purchase loans in 2021 was above the level noted in 2020.

Table 68

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Northern Wyoming													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	4	22.2	7.7	174	8.3	4.1	7	38.9	7.4	287	13.6	4.1	18.3
Moderate	6	33.3	20.9	449	21.5	16.7	5	27.8	18.6	349	16.6	14.7	18.4
Middle	4	22.2	20.2	830	39.7	19.9	3	16.7	20.7	919	43.6	19.9	23.5
Upper	3	16.7	23.5	521	24.9	32.0	3	16.7	23.7	552	26.2	32.3	39.8
Unknown	1	5.6	27.8	118	5.6	27.3	0	0.0	29.6	0	0.0	29.0	0.0
Total	18	100.0	100.0	2,092	100.0	100.0	18	100.0	100.0	2,107	100.0	100.0	100.0
Refinance Loans													
Low	6	21.4	4.6	473	13.4	2.5	6	26.1	7.0	505	16.1	4.0	18.3
Moderate	1	3.6	12.4	90	2.5	9.1	3	13.0	16.3	327	10.4	12.5	18.4
Middle	8	28.6	20.3	960	27.1	18.6	7	30.4	22.4	1,040	33.1	20.3	23.5
Upper	8	28.6	30.0	1,501	42.4	35.6	5	21.7	25.4	1,072	34.1	31.8	39.8
Unknown	5	17.9	32.7	513	14.5	34.1	2	8.7	28.9	201	6.4	31.5	0.0
Total	28	100.0	100.0	3,537	100.0	100.0	23	100.0	100.0	3,145	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.5	0	0.0	4.4	0	0.0	3.1	0	0.0	2.3	18.3
Moderate	2	66.7	22.9	42	32.1	15.2	0	0.0	16.5	0	0.0	10.9	18.4
Middle	0	0.0	19.3	0	0.0	16.4	1	100.0	20.5	45	100.0	16.8	23.5
Upper	1	33.3	38.5	89	67.9	33.5	0	0.0	48.0	0	0.0	55.9	39.8
Unknown	0	0.0	13.8	0	0.0	30.6	0	0.0	11.8	0	0.0	14.2	0.0
Total	3	100.0	100.0	131	100.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	10	19.6	5.7	647	11.0	3.1	14	31.8	7.1	816	14.9	4.0	18.3
Moderate	11	21.6	15.6	704	12.0	12.0	8	18.2	17.2	676	12.3	13.5	18.4
Middle	12	23.5	19.8	1,790	30.4	18.8	12	27.3	21.6	2,161	39.4	20.0	23.5
Upper	12	23.5	27.0	2,111	35.9	33.9	8	18.2	25.1	1,624	29.6	32.3	39.8
Unknown	6	11.8	31.9	631	10.7	32.2	2	4.5	29.1	201	3.7	30.2	0.0
Total	51	100.0	100.0	5,883	100.0	100.0	44	100.0	100.0	5,478	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Small Business Lending

The borrower distribution of small business lending is good. The distribution of loans originated in 2020 to small businesses reflected penetration levels above aggregate lending data by number and comparable to dollar volume and the demographic figure.

The distribution of loans in 2021 reflects consistent penetration levels to 2020 lending.

Table 69

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Northern Wyoming											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	99	79.8	51.6	2,801	30.3	37.8	113	83.7	2,219	37.2	92.6
Over \$1 Million	25	20.2		6,454	69.7		21	15.6	3,740	62.8	5.7
Revenue Unknown	0	0.0		0	0.0		1	0.7	1	0.0	1.7
Total	124	100.0		9,255	100.0		135	100.0	5,960	100.0	100.0
By Loan Size											
\$100,000 or Less	105	84.7	93.4	2,491	26.9	45.7	118	87.4	1,312	22.0	
\$100,001 - \$250,000	10	8.1	3.9	1,607	17.4	18.0	9	6.7	1,419	23.8	
\$250,001 - \$1 Million	9	7.3	2.6	5,157	55.7	36.2	8	5.9	3,229	54.2	
Total	124	100.0	100.0	9,255	100.0	100.0	135	100.0	5,960	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	95	96.0		1,915	68.4		106	93.8	1,145	51.6	
\$100,001 - \$250,000	3	3.0		413	14.7		6	5.3	799	36.0	
\$250,001 - \$1 Million	1	1.0		473	16.9		1	0.9	275	12.4	
Total	99	100.0		2,801	100.0		113	100.0	2,219	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of loans originated in 2020 to small farms reflected penetration above aggregate lending data by number and comparable to dollar volume and to the demographic figure.

The distribution of loans in 2021 reflected consistent penetration levels to 2020 lending.

Table 70

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Northern Wyoming											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	40	90.9	67.4	2,102	87.9	76.6	44	93.6	2,008	73.8	98.5
Over \$1 Million	1	2.3		250	10.5		3	6.4	712	26.2	1.4
Revenue Unknown	3	6.8		39	1.6		0	0.0	0	0.0	0.2
Total	44	100.0		2,391	100.0		47	100.0	2,720	100.0	100.0
By Loan Size											
\$100,000 or Less	37	84.1	82.1	1,160	48.5	30.5	36	76.6	703	25.8	
\$100,001 - \$250,000	7	15.9	8.4	1,231	51.5	20.5	10	21.3	1,723	63.3	
\$250,001 - \$500,000	0	0.0	9.5	0	0.0	49.0	1	2.1	294	10.8	
Total	44	100.0	100.0	2,391	100.0	100.0	47	100.0	2,720	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	34	85.0		1,121	53.3		36	81.8	703	35.0	
\$100,001 - \$250,000	6	15.0		981	46.7		8	18.2	1,305	65.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	40	100.0		2,102	100.0		44	100.0	2,008	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Community Development Lending

The bank provides a relatively high level of CD loans. The bank originated five CD loans totaling \$9.1MM in this AA. As noted in Table 86, the majority of CD loans by dollar amount were devoted to economic development. The level of CD lending in the AA was lower than performance noted in several other bank AAs, although this area is rural in nature and sparsely populated, thereby limiting opportunities to originate CD loans when compared to larger metropolitan areas. Examples of CD loans in this AA include:

- The bank originated three economic development loans totaling \$9.1MM to a small business that employs a majority of LMI individuals earning less than 80.0 percent of the area MFI.
- The bank made a community service loan for \$28.0M to an organization that provides mentoring and support to children from LMI families.

Table 71

Community Development Loans – Northern Wyoming Nonmetropolitan AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	0	0
Community Services	2	32
Economic Development	3	9,059
Revitalization and Stabilization	0	0
Total Loans	5	9,091

INVESTMENT TEST

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

- The bank purchased five MBS with \$1.9MM of underlying loans in the AA that provided affordable housing to LMI individuals and families.
- The bank made three donations totaling \$3.8M to an organization that provides affordable housing to LMI individuals and families.

Table 72

Investments, Grants, and Donations – Northern Wyoming Nonmetropolitan AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	11	792	5	1,924	5	4	21	2,720
Community Services	0	0	0	0	34	41	34	41
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	11	792	5	1,924	40	46	56	2,762

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

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

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates three branches with drive-through facilities and ATMs in this AA. One branch is located in a moderate-income census tract and two are located in middle-income tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened or closed any branches in this AA since the prior CRA evaluation.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary materially by market. Branch lobby hours are from 9:00 a.m. to 5:00 p.m. on Monday through Friday.

Table 73

Retail Banking and Community Development Services – Northern Wyoming Nonmetropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	66.7	0.0	0.0	100.0	0.0	14.3	71.4	14.3	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
0.0	33.3	66.7	0.0	0.0	100.0	0.0	12.5	68.5	19.0	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches		Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	3		0	0		0	0	0	0	0	0	
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	6	4	1	2	13	8						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 13 CD services to 8 organizations and donated 385 hours of time during the evaluation period. The following service activities were considered particularly responsive to CD needs in the AA:

- A bank officer served on the board of an economic development organization that collaborates with an affiliate to provide workshops for small businesses, as well as providing space that can be utilized as a meeting place by area small businesses.
- A bank officer served on the board of an organization that provides education, mentoring, and crisis support to LMI youth.

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

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

The bank's AA is comprised of Albany County in its entirety, which is located in the southeast corner of Wyoming (refer to Appendix C for an AA map).

- The bank's AA remains unchanged since the prior evaluation, with a total of ten census tracts, including two low-, one moderate-, and seven middle-income census tracts.
- Based on 2015 ACS data, the AA population was 37,565.
- The bank operates one branch located in a middle-income tract that offers a full lobby, a drive-through facility, and an ATM.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank held 24.8 percent market share of deposits in the AA, ranking second of seven financial institutions operating from seven offices in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALBANY COUNTY
NONMETROPOLITAN AA**

The state of Wyoming AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area do not change the rating for the state of Wyoming.

Table 74

Assessment Area	Lending Test	Investment Test	Service Test
Albany County	consistent	consistent	consistent

**STATE OF KANSAS/KANSAS CITY METROPOLITAN AA
METROPOLITAN AREA
(Full-Scope Review)**

CRA rating for Kansas: **Outstanding**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is adequate.
- The bank's distribution of loans among businesses of different sizes is excellent.
- The bank makes a relatively high level of CD loans within the AA.

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Kansas City Metropolitan AA, the only AA within the state of Kansas. The overall state rating was based on the bank's performance in the aforementioned AA and is discussed concurrently with the performance in the AA.

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

The bank delineates 1 of its 12 AAs and operates one full-service branch in the state of Kansas. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of the report, with a primary emphasis on commercial and residential real estate lending.

The bank's Kansas City Metropolitan AA is comprised of Johnson and Wyandotte Counties in Kansas and Clay, Jackson, and Platte Counties in Missouri. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 463 census tracts including 78 low-, 103 moderate-, 135 middle-, 128 upper-, and 19 unknown-income census tracts. The AA tract composition remains unchanged since the prior evaluation.
- One of the bank's 30 branches is located in the AA and is equipped with a full lobby and an ATM.
- According to the June 30, 2021 FDIC Deposit Market Share Report, the bank holds 0.4 percent market share, ranking 30th of 94 FDIC-insured depository institutions operating from 548 offices in the AA.
- Two previously conducted community contacts were leveraged to help ascertain small business needs, as well as related housing and economic development conditions in the AA. One contact was a representative of an area agency that provides an array of housing-related services for LMI individuals and families. The second contact was a member of an organization that oversees commercial and residential development opportunities in the area.

Table 75

Population Change			
Assessment Area: Kansas City Metropolitan Population			
Area	2010 Population	2015 Population	Percent Change
Kansas City Metropolitan	1,687,103	1,732,280	2.7
Johnson County, KS	544,179	566,814	4.2
Wyandotte County, KS	157,505	160,806	2.1
Clay County, MO	221,939	230,361	3.8
Jackson County, MO	674,158	680,905	1.0
Platte County, MO	89,322	93,394	4.6
Kansas City, MO-KS MSA	2,009,342	2,055,675	2.3
Kansas	2,853,118	2,892,987	1.4
Missouri	5,988,927	6,045,448	0.9

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

- The population of the two Kansas counties comprised 25.2 percent of the population for the entire state of Kansas.
- Population growth in the AA outpaced the Kansas City, Missouri-Kansas MSA, as well as the states of Kansas and Missouri.

Table 76

Median Family Income Change			
Assessment Area: Kansas City Metropolitan			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Kansas City Metropolitan	76,263	73,383	(3.8)
Johnson County, KS	98,419	94,850	(3.6)
Wyandotte County, KS	51,892	47,117	(9.2)
Clay County, MO	77,325	75,104	(2.9)
Jackson County, MO	64,064	61,076	(4.7)
Platte County, MO	86,541	84,309	(2.6)
Kansas City, MO-KS MSA	74,970	72,623	(3.1)
Kansas	67,977	66,389	(2.3)
Missouri	62,790	60,809	(3.2)

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

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

- The AA experienced a decline in MFI, which trended similarly within the states of Kansas and Missouri between 2010 and 2015.

- Wyandotte County contained a significantly larger proportion of families below the poverty level at 19.1 percent, when compared to Johnson County at 4.0 percent, and the state of Kansas at 9.1 percent. However, despite the significant decrease in Wyandotte County’s MFI, the cost of living in this county is approximately 17.0 percent less than the national average.

Table 77

Housing Cost Burden						
Assessment Area: Kansas City Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kansas City Metropolitan	75.8	36.9	40.1	63.4	33.0	17.2
Johnson County, KS	82.2	48.3	37.0	73.0	43.8	15.3
Wyandotte County, KS	68.9	29.3	43.4	59.4	23.9	22.2
Clay County, MO	79.1	29.2	37.3	67.3	28.9	15.2
Jackson County, MO	74.1	32.7	42.5	59.1	30.3	18.7
Platte County, MO	81.6	42.3	34.8	70.7	37.6	16.5
Kansas City, MO-KS MSA	75.2	35.7	39.6	62.8	32.0	17.2
Kansas	74.7	35.9	38.8	61.9	29.8	16.3
Missouri	74.4	33.9	40.1	60.3	31.0	17.4

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- Housing cost burden was greatest among LMI individuals and families in Johnson County, which applied to both renters and homeowners. Conversely, Wyandotte County noted less burdensome costs for LMI renters and homeowners and slightly more affordable housing for low-income individuals relative to statewide figures.
- The AA’s housing affordability ratio varied among the four counties, with the most affordable housing located in Wyandotte County at 45.0 percent, and the least affordable housing in Johnson County at 35.3 percent.

Table 78

Unemployment Rates					
Assessment Area: Kansas City Metropolitan					
Area	2017	2018	2019	2020	2021
Kansas City Metropolitan	3.8	3.3	3.1	6.2	4.3
Johnson County, KS	3.0	2.8	2.7	4.9	2.7
Wyandotte County, KS	5.2	4.7	4.3	7.7	4.7
Clay County, MO	3.6	2.9	2.7	6.0	4.9
Jackson County, MO	4.4	3.7	3.5	7.2	5.5
Platte County, MO	3.2	2.5	2.5	5.4	4.0
Kansas City, MO-KS MSA	3.8	3.3	3.1	6.1	4.2
Kansas	3.6	3.3	3.1	5.7	3.2
Missouri	3.7	3.2	3.1	6.1	4.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates varied among the two AA counties in Kansas, although both were trending downward prior to the pandemic. While 2021 resulted in varying degrees of employment recovery among the five AA counties, Johnson County immediately transitioned to its pre-pandemic rate of 2.7 percent.
- The AA includes a diverse job market with a relatively balanced mix of public and private enterprise that has demonstrated continued and sustainable growth. Specifically, during the 2020-2021 fiscal year, the Kansas City area approved 28 redevelopment projects, created and retained 3,569 jobs, and totaled investments from business development projects at approximately \$110 billion.
- Major employers in the Wyandotte County area include the University of Kansas Hospital (6,625 employees), Kansas City Kansas Public Schools, USD #500 (4,080), and the University of Kansas Medical Center (3,864). Within the broader Kansas City area, some of the top employers include the Federal Government (20,846), Children’s Mercy Hospital (8,382), Cerner Corporation (6,879) and Honeywell (5,000).

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

LENDING TEST

The bank’s performance under the lending test in the Kansas City Metropolitan AA is good and the state of Kansas is rated high satisfactory.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 61 home mortgage loans and 517 small business loans originated between January 1, 2020 and December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of flexible lending products is discussed in the overall institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The geographic distribution for home mortgage lending was excellent, while it was adequate for small business lending. Home purchase, home improvement, multifamily, and small farm loans were not evaluated at the individual product level based on lending levels that are too low to render meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2020 home mortgage loans among low-income census tracts was above the aggregate lending data and the demographic figure. Lending levels in the moderate-income census tracts were also above the aggregate lending data but comparable to the demographic figure.

The bank's home mortgage lending in 2021 reflected penetration levels that were consistent with 2020 lending performance. Furthermore, the bank's loan dispersion among geographies of different income levels revealed significant gaps based on a relatively low number of home mortgage loans disbursed among an AA consisting of 463 census tracts, although this did not impact the overall conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is excellent, although the volume of home refinance loans during 2020 was too low to analyze. The bank's 2021 loan origination volume in low-income census tracts was above the aggregate lending data by number and dollar volume, and above the demographic figure. Lending in moderate-income census tracts was comparable to aggregate lending data and the demographic figure. When loan dispersion within the AA was evaluated, significant gaps were noted based on a relatively low number of refinance loans dispersed among a significant number of AA census tracts, but this did not impact the overall conclusion.

Table 79

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Kansas City Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	4.2	0	0.0	2.1	1	20.0	4.9	245	16.1	2.5	6.6
Moderate	0	0.0	16.7	0	0.0	10.4	2	40.0	18.2	409	26.9	11.5	18.0
Middle	1	33.3	35.4	244	21.8	30.7	1	20.0	34.9	806	53.0	30.5	35.5
Upper	2	66.7	43.5	875	78.2	56.7	1	20.0	41.8	60	3.9	55.3	39.7
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,119	100.0	100.0	5	100.0	100.0	1,520	100.0	100.0	100.0
Refinance Loans													
Low	5	38.5	1.3	515	45.7	0.8	6	28.6	2.1	421	13.4	1.2	6.6
Moderate	3	23.1	9.1	232	20.6	5.4	3	14.3	12.5	181	5.8	7.7	18.0
Middle	2	15.4	31.7	215	19.1	25.9	1	4.8	34.5	77	2.4	28.8	35.5
Upper	3	23.1	57.8	165	14.6	67.8	11	52.4	50.7	2,465	78.4	62.2	39.7
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,127	100.0	100.0	21	100.0	100.0	3,144	100.0	100.0	100.0
Home Improvement Loans													
Low	1	33.3	2.7	98	43.9	1.6	0	0.0	3.7	0	0.0	2.5	6.6
Moderate	0	0.0	9.5	0	0.0	6.3	0	0.0	11.1	0	0.0	7.8	18.0
Middle	0	0.0	30.5	0	0.0	26.6	0	0.0	29.8	0	0.0	26.7	35.5
Upper	2	66.7	57.2	125	56.1	65.4	1	100.0	55.1	55	100.0	62.7	39.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	223	100.0	100.0	1	100.0	100.0	55	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	16.9	0	0.0	14.7	2	20.0	19.4	2,981	37.6	8.3	14.8
Moderate	1	50.0	31.4	1,850	68.4	14.7	5	50.0	37.2	1,525	19.2	22.1	26.1
Middle	1	50.0	32.9	855	31.6	49.5	2	20.0	31.9	2,167	27.4	28.1	36.6
Upper	0	0.0	18.5	0	0.0	21.0	1	10.0	9.2	1,250	15.8	36.4	20.8
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	2.2	0	0.0	5.1	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,705	100.0	100.0	10	100.0	100.0	7,923	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	26.1	2.6	613	11.7	1.9	9	23.7	3.3	3,647	28.8	2.2	6.6
Moderate	4	17.4	12.3	2,082	39.7	7.8	10	26.3	14.9	2,115	16.7	10.1	18.0
Middle	4	17.4	33.2	1,314	25.1	28.9	5	13.2	34.4	3,093	24.4	29.4	35.5
Upper	9	39.1	51.8	1,235	23.6	61.2	14	36.8	47.2	3,830	30.2	57.9	39.7
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.5	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	5,244	100.0	100.0	38	100.0	100.0	12,685	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

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

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

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of loans in 2020 among low-income census tracts was comparable to levels noted in the aggregate lending data by number, below by dollar volume, and below the demographic figure. Lending in moderate-income census tracts was below the aggregate lending data and demographic figure.

The distribution of small business loans in 2021 reflected distribution levels above those noted in the bank’s 2020 lending performance, although the overall conclusion remains adequate. Additionally, the dispersion of loans among the various geographic income levels revealed some gaps and lapses, although they did not impact the overall conclusion.

Table 80

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Kansas City Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	\$%	\$%	#	%	\$(000)	\$%	
Low	17	5.0	7.0	1,110	5.1	8.9	9	5.1	292	3.3	7.9
Moderate	38	11.1	18.2	2,475	11.3	19.1	52	29.5	1,898	21.2	19.8
Middle	83	24.3	29.5	5,140	23.6	28.1	31	17.6	1,890	21.1	32.4
Upper	161	47.2	42.3	9,335	42.8	37.6	76	43.2	3,174	35.4	37.9
Unknown	42	12.3	2.7	3,757	17.2	6.0	8	4.5	1,714	19.1	2.1
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	341	100.0	100.0	21,817	100.0	100.0	176	100.0	8,968	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Lending to Businesses of Different Sizes

The bank’s borrower distribution was based solely on its small business lending, which reflected an excellent distribution among businesses of different sizes. The bank’s home mortgage lending data included a significant number of loans originated to borrowers with unknown incomes. Accordingly, the number of home mortgage loans with borrower incomes was too low to conduct a meaningful analysis.

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of loans originated in 2020 to small businesses reflects penetration levels above aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The distribution of loans in 2021 reflected levels below 2020 lending performance, although the bank’s overall performance was excellent.

Table 81

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Kansas City Metropolitan											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	\$%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	250	73.3	36.8	7,992	36.6	20.9	132	75.0	4,115	45.9	90.4
Over \$1 Million	69	20.2		12,308	56.4		42	23.9	4,676	52.1	8.8
Revenue Unknown	22	6.5		1,517	7.0		2	1.1	177	2.0	0.8
Total	341	100.0		21,817	100.0		176	100.0	8,968	100.0	100.0
By Loan Size											
\$100,000 or Less	279	81.8	83.5	5,720	26.2	23.9	150	85.2	3,162	35.3	
\$100,001 - \$250,000	37	10.9	8.5	5,932	27.2	19.0	19	10.8	2,880	32.1	
\$250,001 - \$1 Million	25	7.3	8.0	10,165	46.6	57.1	7	4.0	2,926	32.6	
Total	341	100.0	100.0	21,817	100.0	100.0	176	100.0	8,968	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	231	92.4		3,917	49.0		121	91.7	2,073	50.4	
\$100,001 - \$250,000	15	6.0		2,468	30.9		9	6.8	1,199	29.1	
\$250,001 - \$1 Million	4	1.6		1,607	20.1		2	1.5	843	20.5	
Total	250	100.0		7,992	100.0		132	100.0	4,115	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Community Development Lending

The bank provides a relatively high level of CD loans. As noted in Table 97, the bank originated 10 CD loans totaling \$7.8MM in the Kansas City Metropolitan AA. The majority of CD loans by number supported affordable housing, while a substantial portion of lending by dollar volume was devoted to economic development projects. Examples of CD loans include:

- The bank originated a loan for \$1.9MM to purchase and renovate a 61-unit apartment building that will provide rental housing to homeless veterans.
- A loan made for \$72M will provide a variety of community services for homeless veterans.

Table 82

Community Development Loans – Kansas City Metropolitan AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	5	2,432
Community Services	3	442
Economic Development	2	4,895
Revitalization and Stabilization	0	0
Total Loans	10	7,769

INVESTMENT TEST

The bank’s performance under the investment test in the Kansas City Metropolitan AA is excellent and the state of Kansas is rated outstanding. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA. The following are specific examples of responsive investments to address AA needs:

- The bank purchased five MBS totaling approximately \$5.9MM with underlying mortgage loans in the AA that were originated to LMI individuals and families.
- The bank made a \$5.0M donation to an organization that provides home buyer education and counseling to individuals and families, of which a substantial majority are considered LMI.

Table 83

Investments, Grants, and Donations – Kansas City Metropolitan AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	10	6,973	5	5,868	2	5	17	12,846
Community Services	1	849	0	0	12	24	13	873
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	11	7,822	5	5,868	14	29	30	13,719
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

The bank’s performance under the service test in the Kansas City Metropolitan AA is excellent and the state of Kansas is rated outstanding.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates one branch in this AA that offers full lobby services, an ATM, and a drive-through facility.

The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed one branch in this AA that was located in an upper-income census tract.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday to Friday.

Table 84

Retail Banking and Community Development Services – Kansas City Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	100.0	0.0	100.0	16.9	22.3	29.2	27.6	4.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
0.0	0.0	0.0	100.0	0.0	100.0	10.5	22.3	35.1	31.6	0.4	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	1		0	1			0	0	0	(1)	0	(1)
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
	5	7	0	0		12	5					
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank employees supported five area organizations in the AA by providing 12 total CD services and donating 174 hours. The services were generally provided through board membership for area agencies that provide community services to LMI individuals and families. Examples of services performed by bank employees include:

- One bank representative served annually during the evaluation period as a board member for an affordable housing organization that provides housing and CD programs for LMI individuals.
- One bank representative served on the Finance Committee of an affordable housing organization responsible for providing LMI individuals with the resources to help them achieve homeownership.

**APPENDIX A – SCOPE OF EXAMINATION
Table A-1**

Scope of Examination			
Financial Institution ANB Bank Denver, Colorado		Products/Services Reviewed <ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business (SB) Loans • Small Farm (SF) Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 	
Time Period <u>HMDA LAR and CRA SB and SF Loans:</u> January 1, 2020 to December 31, 2021 <u>Community Development Activities:</u> January 1, 2020 to December 31, 2021			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
No affiliates were considered	Not applicable	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Colorado</u> MSA 19740 (Denver) MSA 17820 (Colorado Springs) MSA 14500 (Boulder) MSA 24300 (Grand Junction) MSA 22660 (Fort Collins) MSA 99999 (Mountain Colorado) MSA 99999 (San Miguel County)	Full Review Full Review Limited Review Limited Review Limited Review Full Review Limited Review	None None None None None None None	2 prior 1 prior none none none 1 current none
<u>Wyoming</u> MSA 16940 (Cheyenne) MSA 16220 (Casper) MSA 99999 (Northern Wyoming) MSA 99999 (Albany County)	Full Review Limited Review Full Review Limited Review	None None None None	1 prior none 2 prior none
<u>Kansas MSA 28140 (Kansas City)</u>	Full Review	None	2 prior

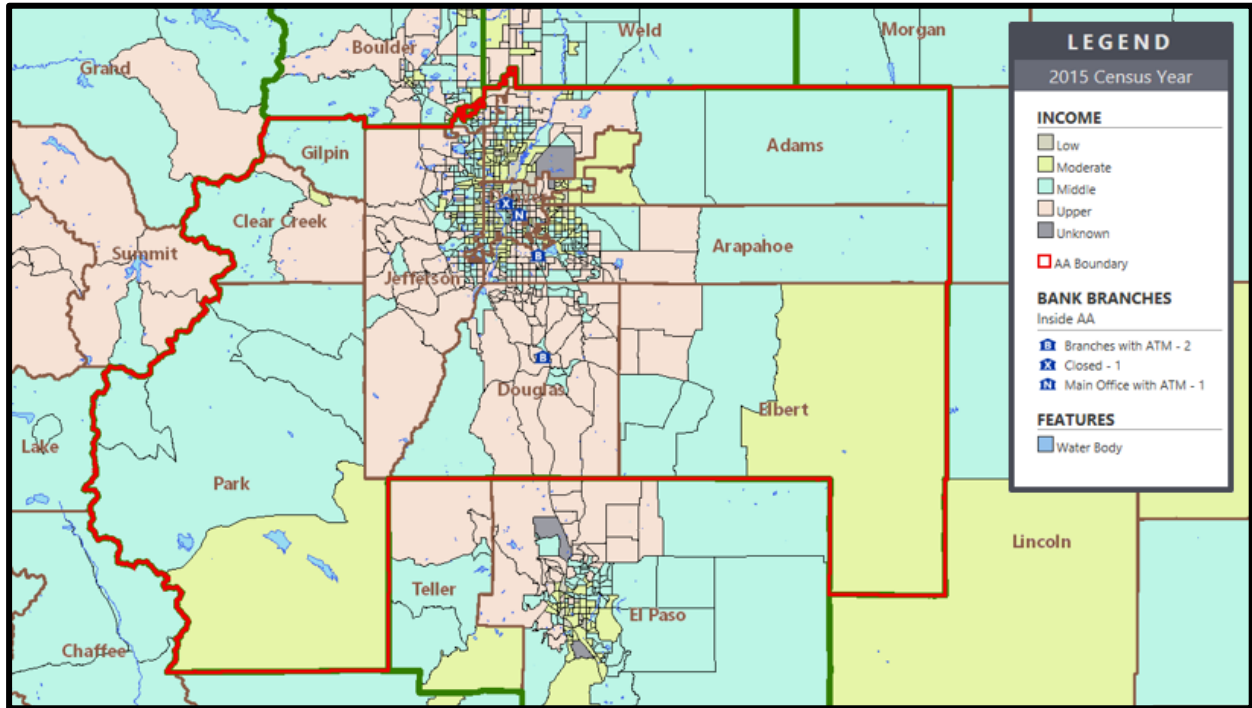
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

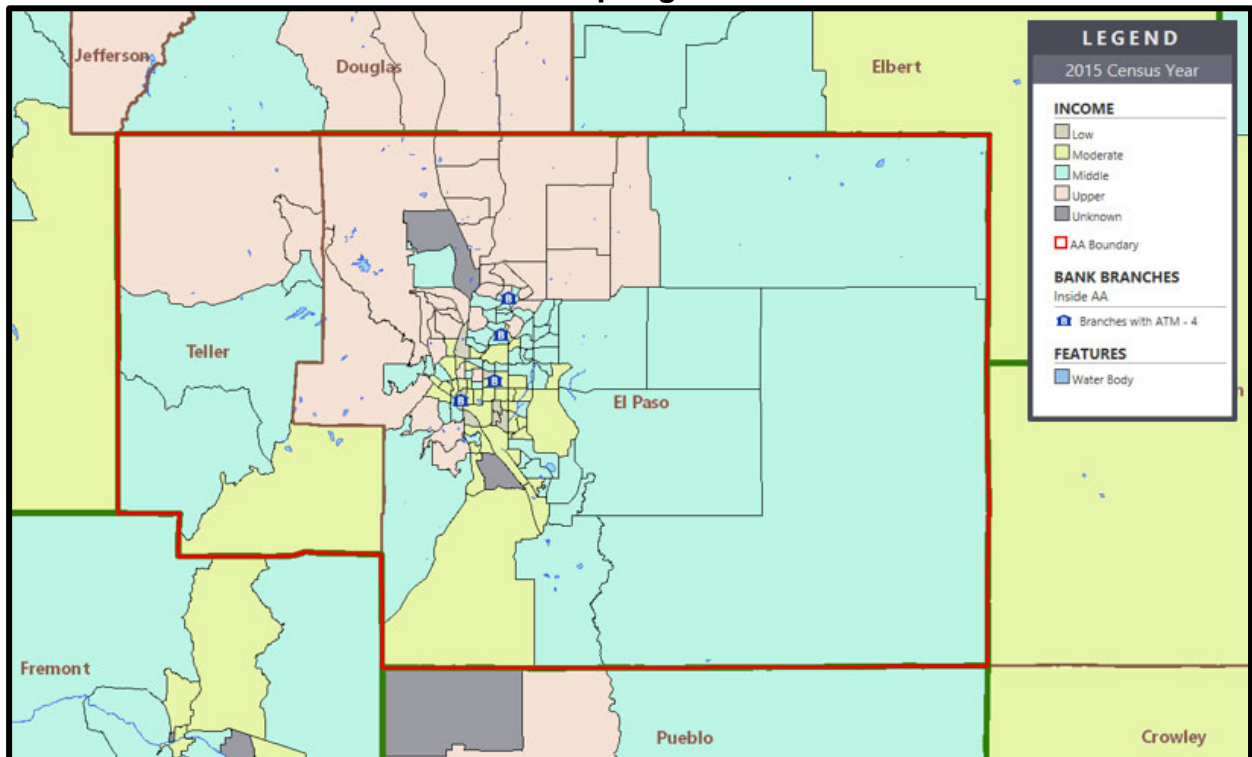
State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Wyoming	High Satisfactory	Outstanding	Outstanding	Outstanding
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

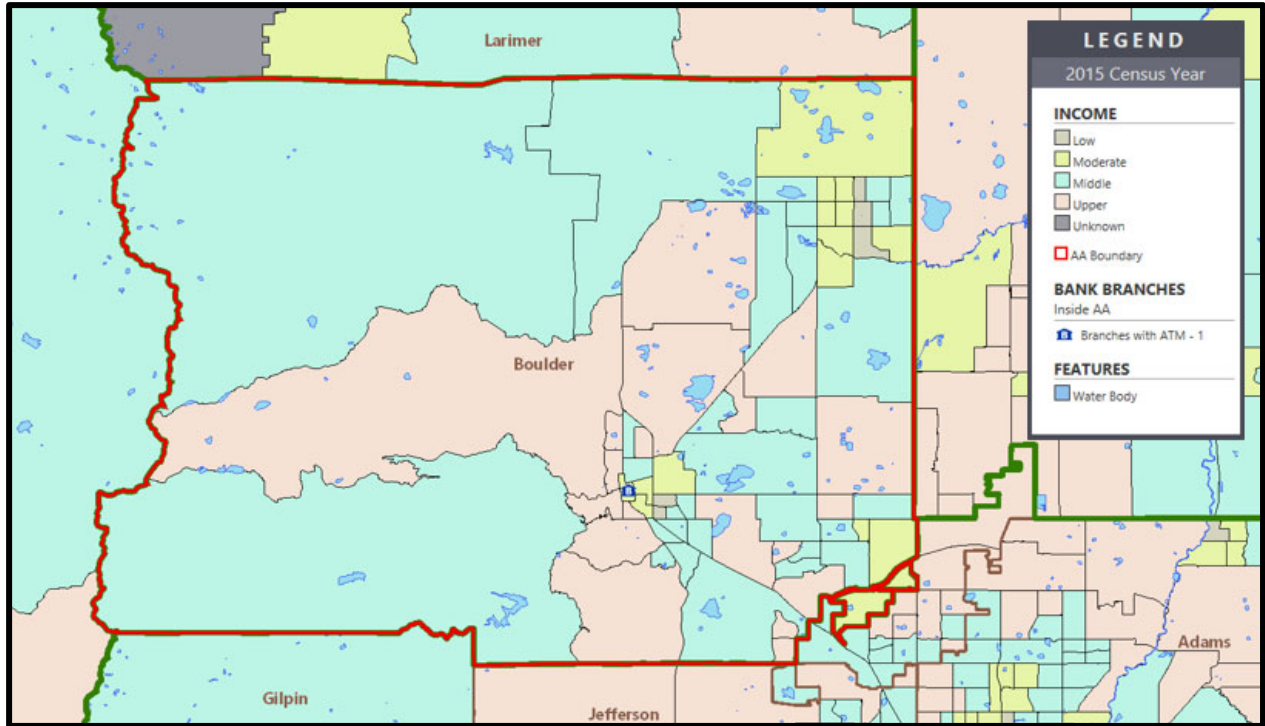
Denver MSA AA



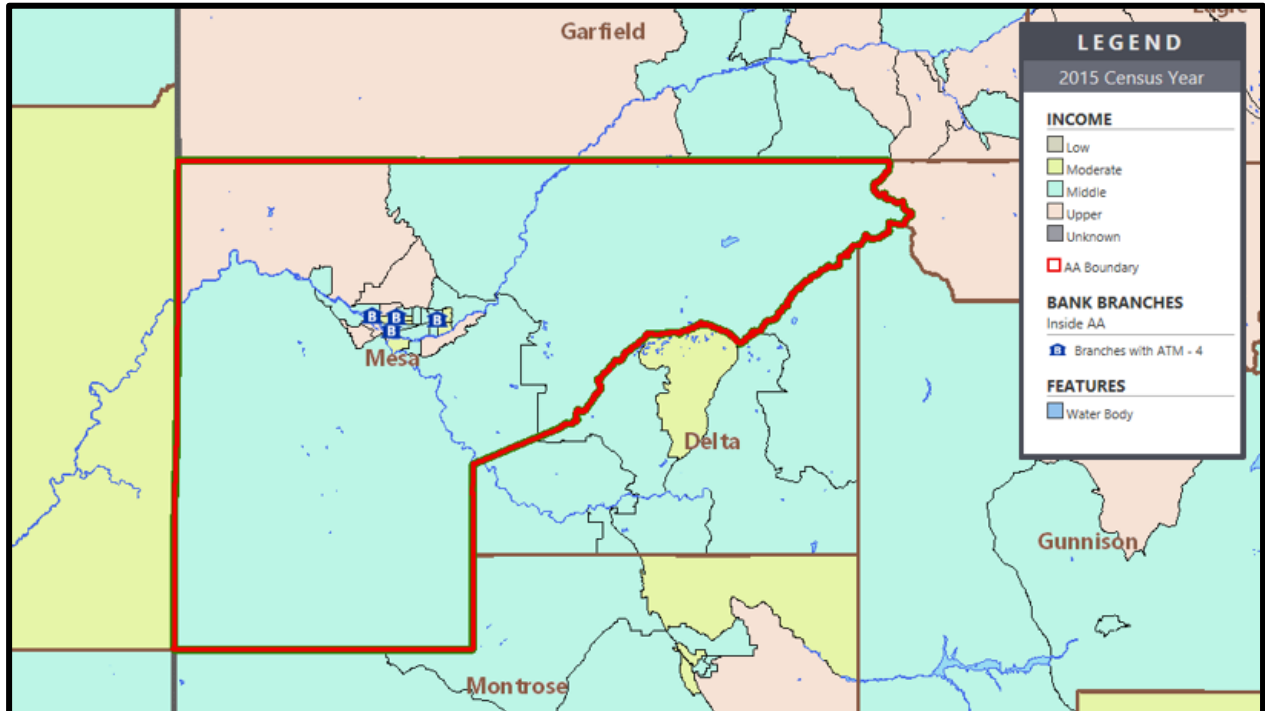
Colorado Springs MSA AA



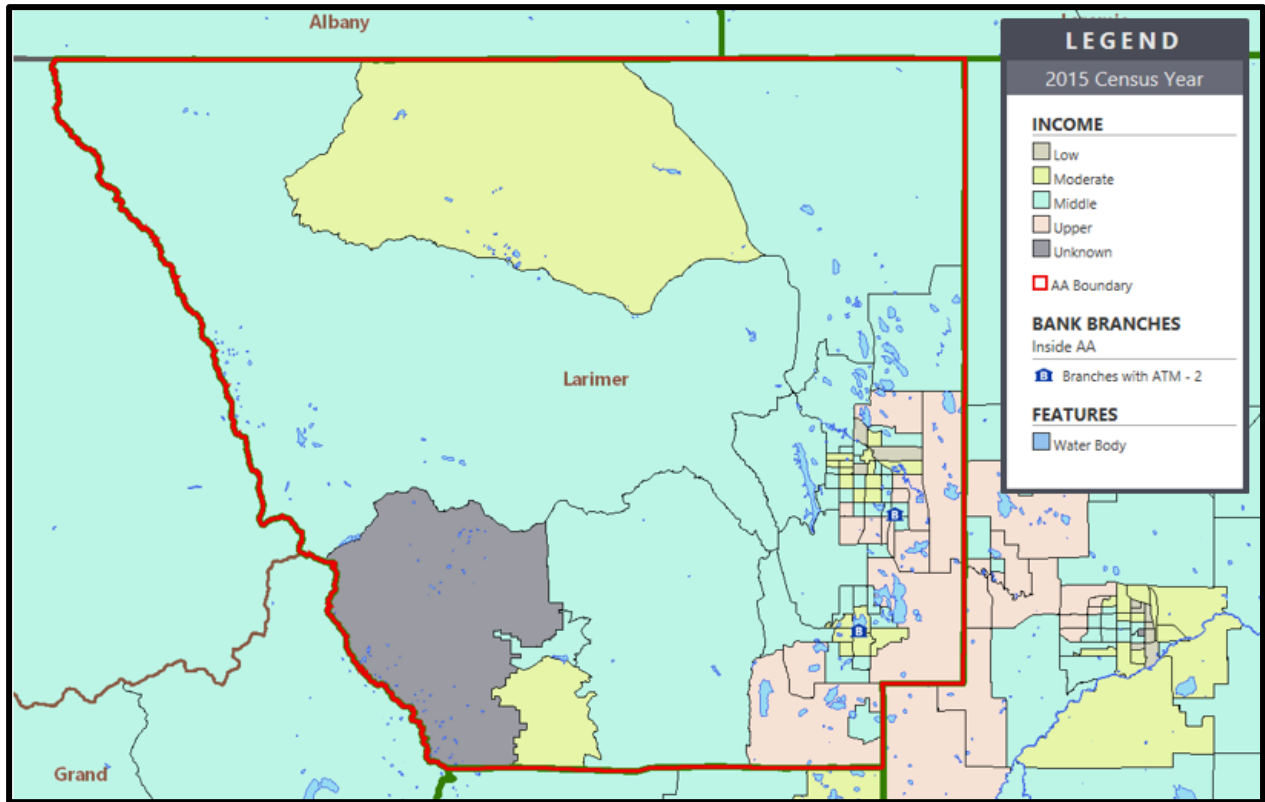
Boulder MSA AA



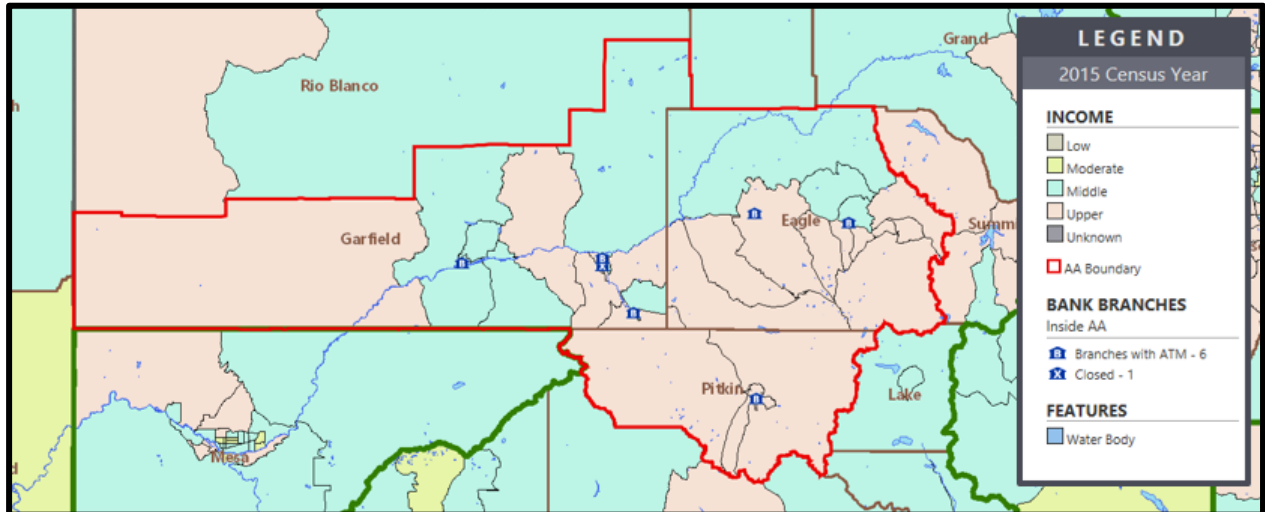
Grand Junction MSA AA



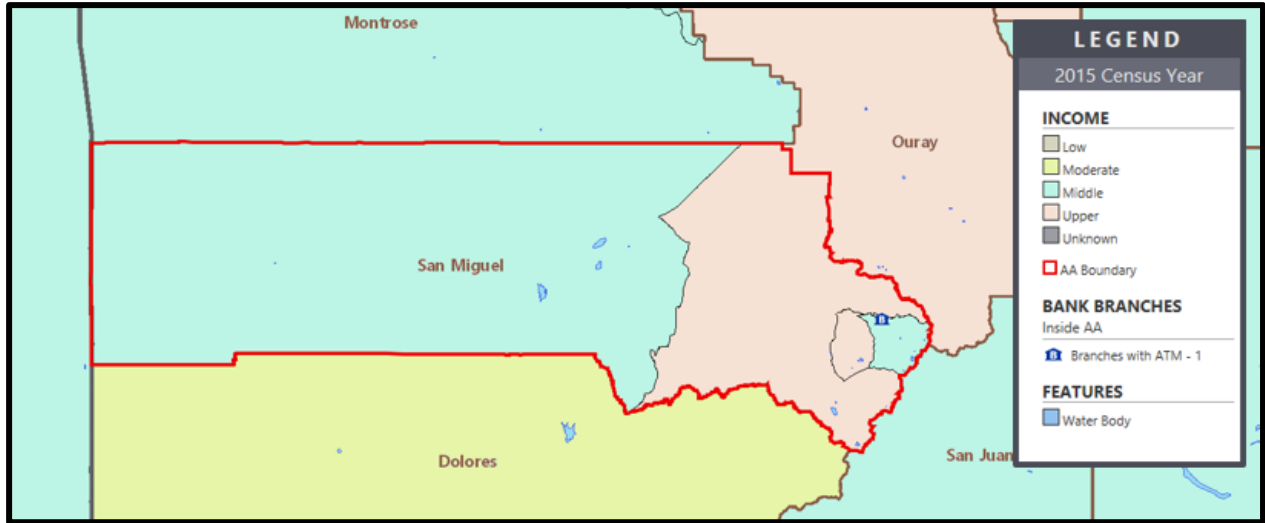
Fort Collins MSA AA



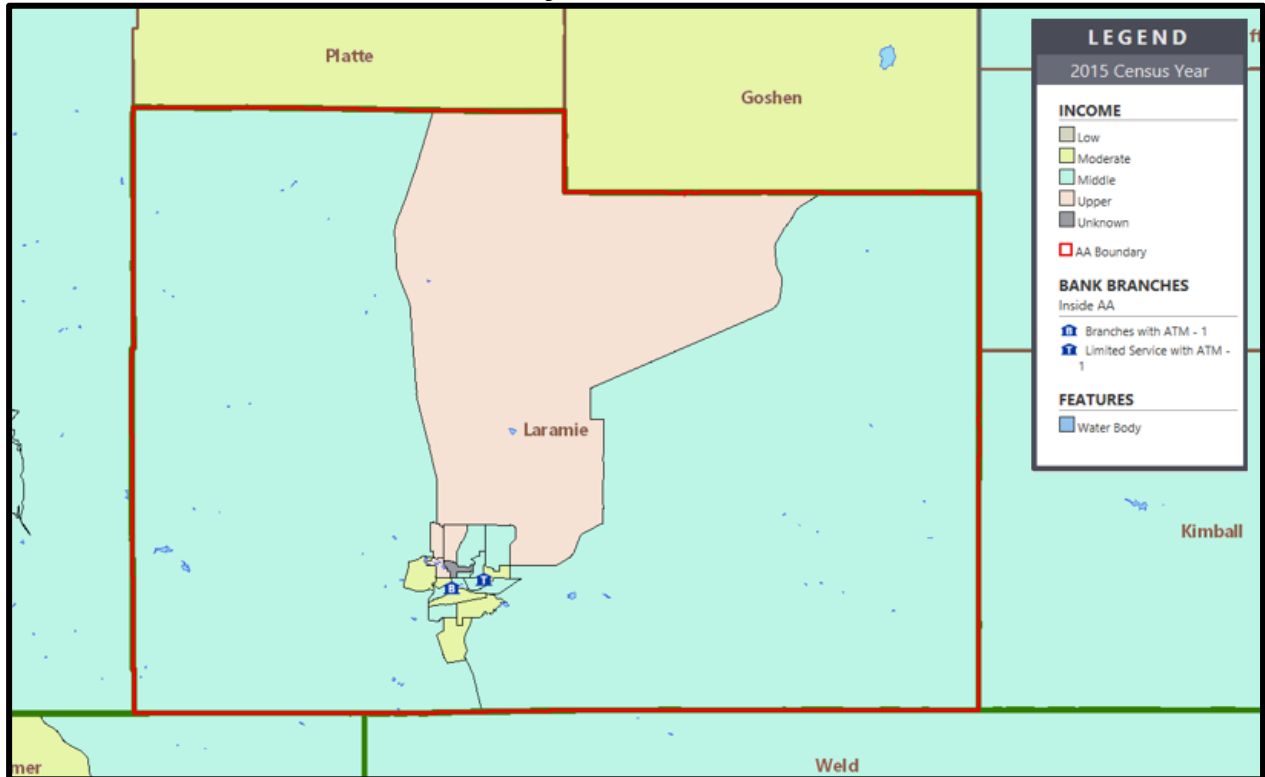
Mountain Colorado AA



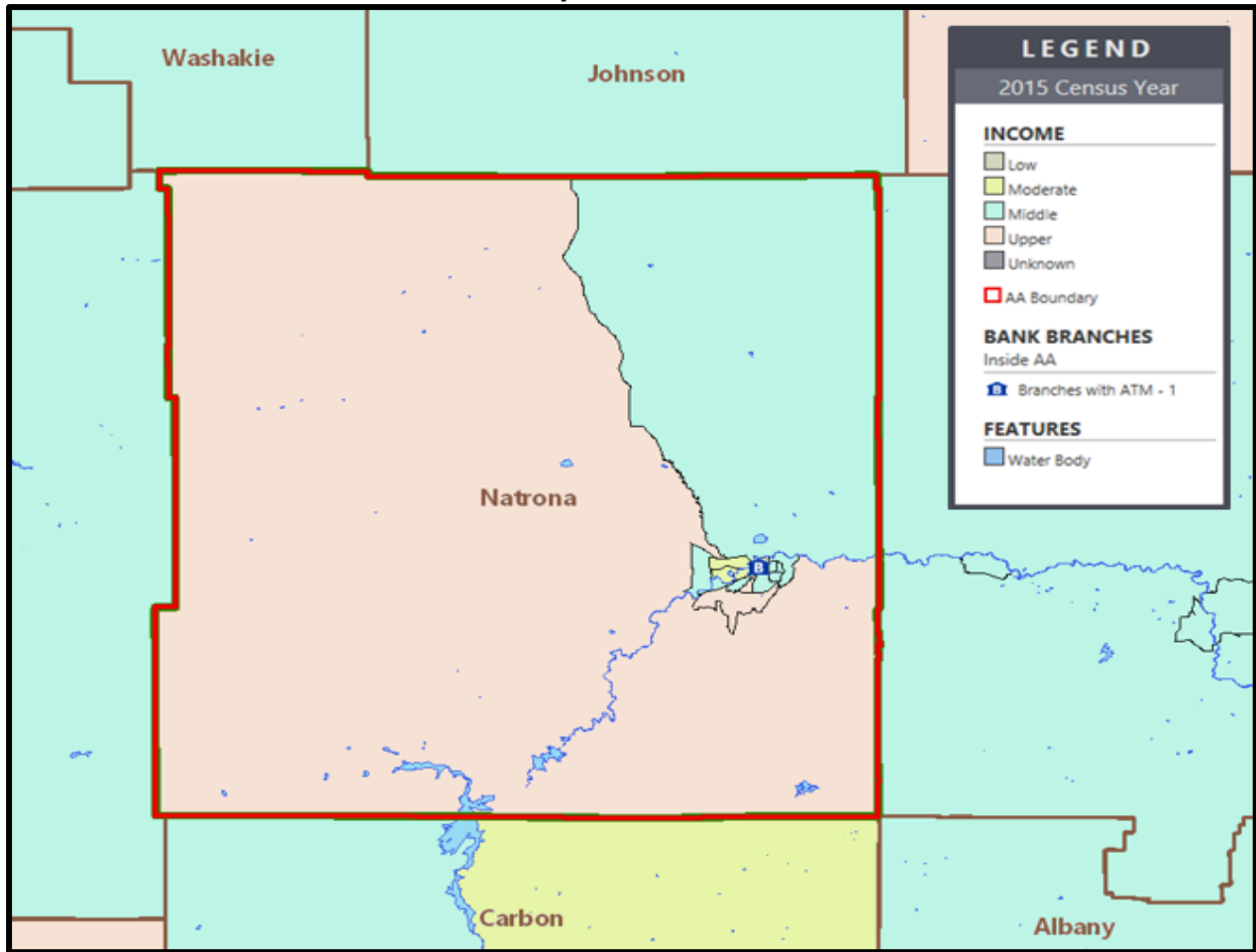
San Miguel County AA



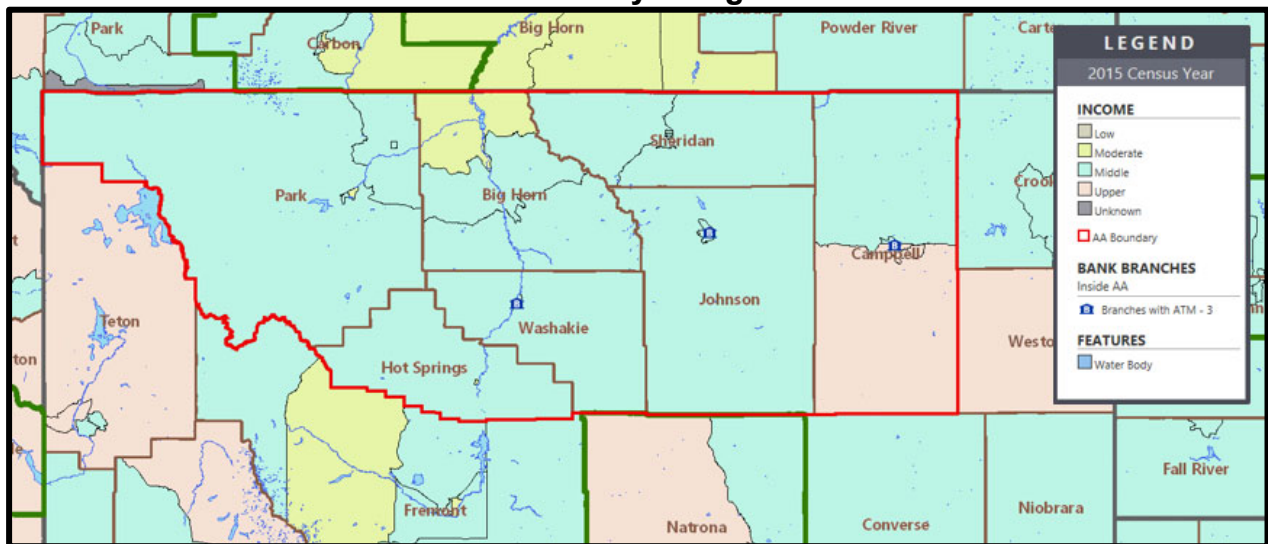
Cheyenne MSA AA



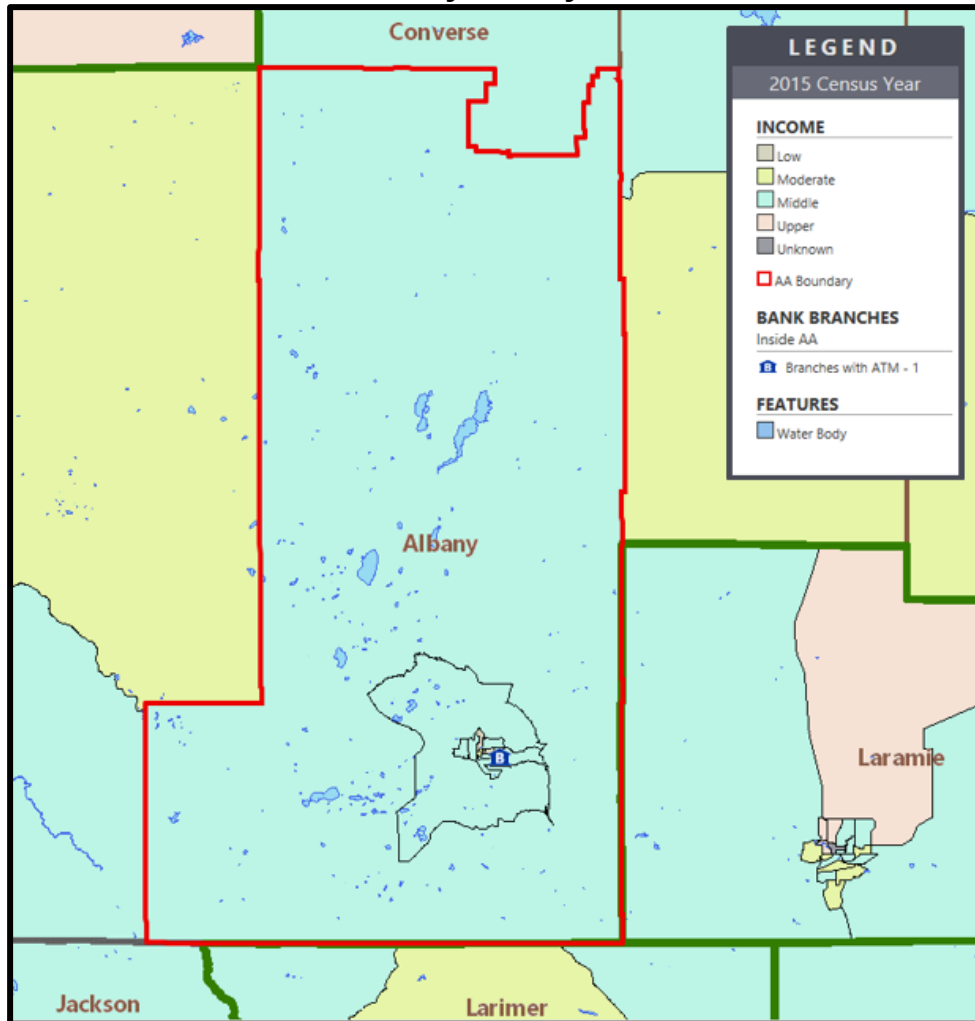
Casper MSA AA



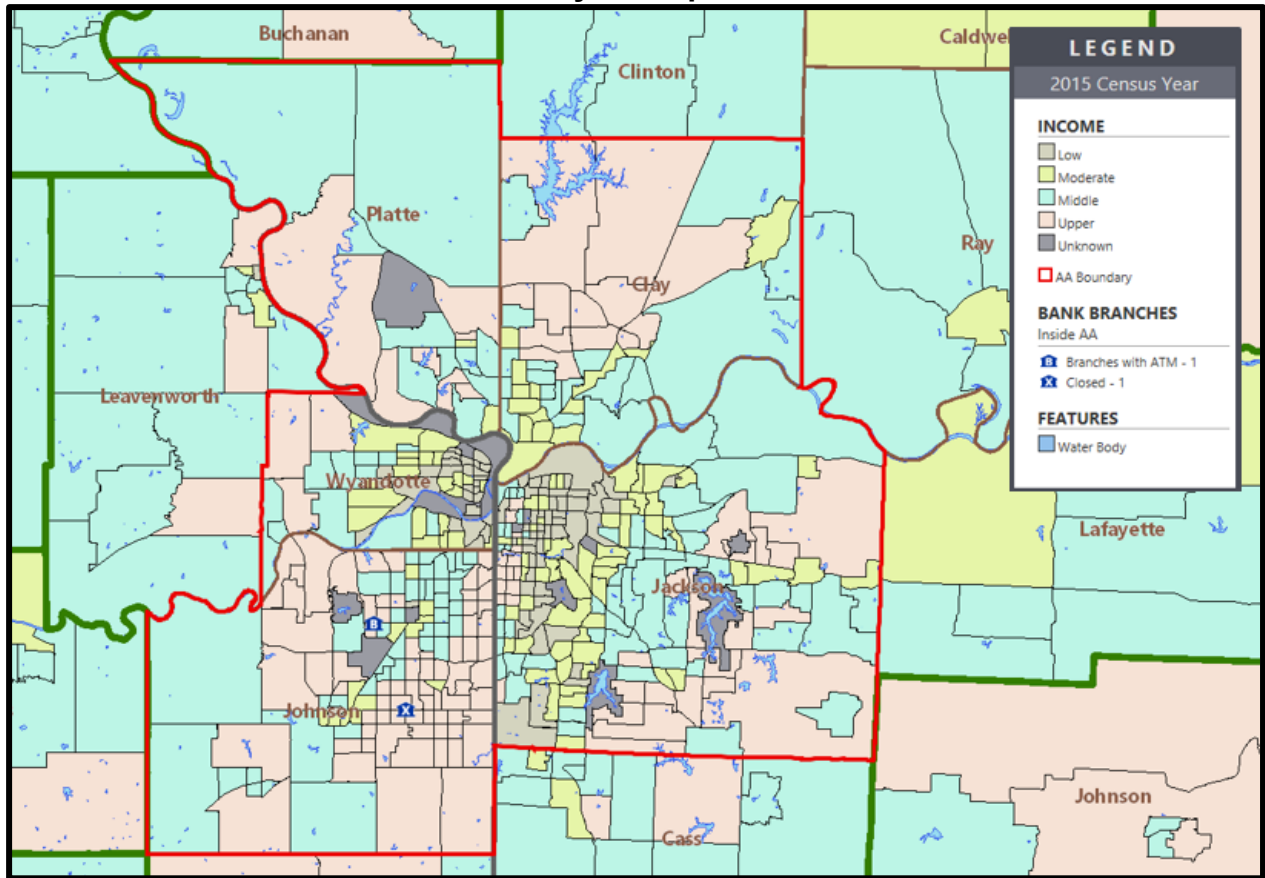
Northern Wyoming AA



Albany County AA



Kansas City Metropolitan AA



APPENDIX D – DEMOGRAPHIC INFORMATION

Table D-1

2021 Denver MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	621	100.0	658,359	100.0	52,836	8.0	658,359	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,105,423	658,882	100.0	59.6	383,221	34.7	63,320	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12,456	6.9	10,995	6.6	1,357	12.0	104	5.9
Moderate	33,468	18.6	30,928	18.5	2,325	20.5	215	12.3
Middle	58,706	32.6	54,620	32.7	3,537	31.2	549	31.3
Upper	74,821	41.6	69,997	41.9	3,948	34.8	876	49.9
Unknown	615	0.3	435	0.3	170	1.5	10	0.6
Total AA	180,066	100.0	166,975	100.0	11,337	100.0	1,754	100.0
Percentage of Total Businesses:				92.7		6.3		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	91	5.0	83	4.6	8	26.7	0	0.0
Moderate	255	13.9	251	14.0	4	13.3	0	0.0
Middle	628	34.4	621	34.5	7	23.3	0	0.0
Upper	836	45.7	826	45.9	10	33.3	0	0.0
Unknown	18	1.0	17	0.9	1	3.3	0	0.0
Total AA	1,828	100.0	1,798	100.0	30	100.0	0	0.0
Percentage of Total Farms:				98.4		1.6		0.0
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table D-2

2020 Denver MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	8.2	47,570	7.2	13,712	28.8	140,177	21.3
Moderate	150	24.2	145,045	22.0	20,420	14.1	115,077	17.5
Middle	205	33.0	217,046	33.0	11,797	5.4	134,654	20.5
Upper	207	33.3	248,681	37.8	6,907	2.8	268,451	40.8
Unknown	8	1.3	17	0.0	0	0.0	0	0.0
Total AA	621	100.0	658,359	100.0	52,836	8.0	658,359	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	4.6	33.0	54,410	60.0	6,354	7.0
Moderate	260,089	123,259	18.7	47.4	121,260	46.6	15,570	6.0
Middle	386,399	226,973	34.4	58.7	134,326	34.8	25,100	6.5
Upper	368,119	278,649	42.3	75.7	73,182	19.9	16,288	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,105,423	658,882	100.0	59.6	383,221	34.7	63,320	5.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12,372	6.9	10,901	6.6	1,378	11.9	93	5.7
Moderate	33,263	18.6	30,677	18.5	2,388	20.7	198	12.2
Middle	58,463	32.7	54,325	32.8	3,635	31.5	503	31.1
Upper	74,192	41.5	69,397	41.9	3,981	34.5	814	50.3
Unknown	579	0.3	401	0.2	168	1.5	10	0.6
Total AA	178,869	100.0	165,701	100.0	11,550	100.0	1,618	100.0
Percentage of Total Businesses:				92.6		6.5		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	99	5.3	90	4.9	9	26.5	0	0.0
Moderate	261	14.0	257	14.1	4	11.8	0	0.0
Middle	644	34.6	634	34.8	8	23.5	2	100.0
Upper	840	45.2	828	45.4	12	35.3	0	0.0
Unknown	16	0.9	15	0.8	1	2.9	0	0.0
Total AA	1,860	100.0	1,824	100.0	34	100.0	2	100.0
Percentage of Total Farms:				98.1		1.8		0.1
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table D-3

2021 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	274,475	161,082	100.0	58.7	93,786	34.2	19,607	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,832	7.4	2,547	7.0	261	14.8	24	8.2
Moderate	8,743	22.8	8,165	22.6	521	29.5	57	19.5
Middle	12,821	33.5	12,314	34.0	413	23.4	94	32.1
Upper	13,813	36.1	13,132	36.3	564	31.9	117	39.9
Unknown	55	0.1	47	0.1	7	0.4	1	0.3
Total AA	38,264	100.0	36,205	100.0	1,766	100.0	293	100.0
Percentage of Total Businesses:				94.6		4.6		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	16	3.4	16	3.5	0	0.0	0	0.0
Moderate	73	15.7	73	15.9	0	0.0	0	0.0
Middle	225	48.3	220	47.9	5	71.4	0	0.0
Upper	152	32.6	150	32.7	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	466	100.0	459	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-4

2020 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied		Rental		Vacant			
#	% by tract	% by unit	#	% by unit	#	% by unit	#	% 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	2,815	7.4	2,516	7.0	279	15.4	20	7.3
Moderate	8,648	22.9	8,072	22.6	528	29.1	48	17.6
Middle	12,669	33.5	12,143	34.0	432	23.8	94	34.4
Upper	13,639	36.1	12,959	36.3	569	31.3	111	40.7
Unknown	55	0.1	48	0.1	7	0.4	0	0.0
Total AA	37,826	100.0	35,738	100.0	1,815	100.0	273	100.0
Percentage of Total Businesses:				94.5		4.8		0.7
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
#	%	#	%	#	%	#	%	
Low	14	3.0	14	3.1	0	0.0	0	0.0
Moderate	70	15.0	69	15.0	1	14.3	0	0.0
Middle	221	47.4	217	47.3	4	57.1	0	0.0
Upper	161	34.5	159	34.6	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	466	100.0	459	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table D-5

2021 Mountain Colorado AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,097	13.7
Moderate	0	0.0	0	0.0	0	0.0	4,447	14.9
Middle	9	31.0	10,743	35.9	1,225	11.4	5,356	17.9
Upper	20	69.0	19,184	64.1	907	4.7	16,027	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	29,927	100.0	2,132	7.1	29,927	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	19,767	9,355	30.9	47.3	6,359	32.2	4,053	20.5
Upper	48,072	20,884	69.1	43.4	9,434	19.6	17,754	36.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	67,839	30,239	100.0	44.6	15,793	23.3	21,807	32.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	3,097	33.6	2,832	33.7	234	33.7	31	27.0
Upper	6,123	66.4	5,579	66.3	460	66.3	84	73.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,220	100.0	8,411	100.0	694	100.0	115	100.0
Percentage of Total Businesses:				91.2		7.5		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	102	43.6	100	43.9	1	25.0	1	50.0
Upper	132	56.4	128	56.1	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	234	100.0	228	100.0	4	100.0	2	100.0
Percentage of Total Farms:				97.4		1.7		0.9
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-6

2020 Mountain Colorado AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,097	13.7
Moderate	0	0.0	0	0.0	0	0.0	4,447	14.9
Middle	9	31.0	10,743	35.9	1,225	11.4	5,356	17.9
Upper	20	69.0	19,184	64.1	907	4.7	16,027	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	29,927	100.0	2,132	7.1	29,927	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	19,767	9,355	30.9	47.3	6,359	32.2	4,053	20.5
Upper	48,072	20,884	69.1	43.4	9,434	19.6	17,754	36.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	67,839	30,239	100.0	44.6	15,793	23.3	21,807	32.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	3,129	34.0	2,852	34.1	251	34.4	26	24.5
Upper	6,061	66.0	5,503	65.9	478	65.6	80	75.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,190	100.0	8,355	100.0	729	100.0	106	100.0
Percentage of Total Businesses:				90.9		7.9		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	104	43.9	102	44.2	1	25.0	1	50.0
Upper	133	56.1	129	55.8	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	237	100.0	231	100.0	4	100.0	2	100.0
Percentage of Total Farms:				97.5		1.7		0.8
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-7

2021 Cheyenne MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	24,950	100.0	1,781	7.1	24,950	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,256	25,632	100.0	62.1	11,662	28.3	3,962	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	876	14.8	798	14.8	61	17.1	17	11.1
Middle	4,062	68.8	3,701	68.5	249	69.9	112	73.2
Upper	951	16.1	884	16.4	44	12.4	23	15.0
Unknown	19	0.3	16	0.3	2	0.6	1	0.7
Total AA	5,908	100.0	5,399	100.0	356	100.0	153	100.0
Percentage of Total Businesses:				91.4		6.0		2.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	5.2	8	4.7	1	33.3	0	0.0
Middle	132	76.7	130	76.9	2	66.7	0	0.0
Upper	31	18.0	31	18.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	172	100.0	169	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-8

2020 Cheyenne MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	24,950	100.0	1,781	7.1	24,950	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,256	25,632	100.0	62.1	11,662	28.3	3,962	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	896	815	15.9	64	17.3	17	12.4	
Middle	3,767	3,411	67.0	260	70.1	96	70.1	
Upper	944	876	16.8	45	12.1	23	16.8	
Unknown	17	14	0.3	2	0.5	1	0.7	
Total AA	5,624	5,116	100.0	371	100.0	137	100.0	
Percentage of Total Businesses:			91.0		6.6		2.4	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	7	7	4.0	0	0.0	0	0.0	
Middle	137	135	77.4	2	100.0	0	0.0	
Upper	33	33	18.6	0	0.0	0	0.0	
Unknown	0	0	0.0	0	0.0	0	0.0	
Total AA	177	175	100.0	2	100.0	0	0.0	
Percentage of Total Farms:			98.9		1.1		0.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table D-9

2021 Northern Wyoming AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,704	18.3
Moderate	4	14.3	4,570	12.5	289	6.3	6,725	18.4
Middle	20	71.4	24,111	66.0	1,292	5.4	8,575	23.5
Upper	4	14.3	7,866	21.5	414	5.3	14,543	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	28	100.0	36,547	100.0	1,995	5.5	36,547	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,936	4,852	12.2	61.1	2,135	26.9	949	12.0
Middle	44,359	27,244	68.3	61.4	10,919	24.6	6,196	14.0
Upper	11,605	7,813	19.6	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,900	39,909	100.0	62.5	15,835	24.8	8,156	12.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	964	8.6	857	8.2	88	13.7	19	10.1
Middle	9,154	81.4	8,534	82.0	459	71.6	161	85.2
Upper	1,124	10.0	1,021	9.8	94	14.7	9	4.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11,242	100.0	10,412	100.0	641	100.0	189	100.0
Percentage of Total Businesses:				92.6		5.7		1.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	38	6.5	37	6.4	1	12.5	0	0.0
Middle	514	87.7	506	87.7	7	87.5	1	100.0
Upper	34	5.8	34	5.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	586	100.0	577	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.5		1.4		0.2
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-10

2020 Northern Wyoming AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	6,704	18.3
Moderate	4	14.3	4,570	12.5	289	6.3	6,725	18.4
Middle	20	71.4	24,111	66.0	1,292	5.4	8,575	23.5
Upper	4	14.3	7,866	21.5	414	5.3	14,543	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	28	100.0	36,547	100.0	1,995	5.5	36,547	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,936	4,852	12.2	61.1	2,135	26.9	949	12.0
Middle	44,359	27,244	68.3	61.4	10,919	24.6	6,196	14.0
Upper	11,605	7,813	19.6	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,900	39,909	100.0	62.5	15,835	24.8	8,156	12.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	981	10.0	875	9.8	90	13.6	16	9.4
Middle	7,702	78.6	7,084	79.0	473	71.5	145	85.3
Upper	1,115	11.4	1,007	11.2	99	15.0	9	5.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,798	100.0	8,966	100.0	662	100.0	170	100.0
Percentage of Total Businesses:				91.5		6.8		1.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	43	6.9	42	6.8	1	14.3	0	0.0
Middle	550	87.7	543	87.7	6	85.7	1	100.0
Upper	34	5.4	34	5.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	627	100.0	619	100.0	7	100.0	1	100.0
Percentage of Total Farms:				98.7		1.1		0.2
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-11

2021 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.8	38,810	8.9	13,572	35.0	92,640	21.4
Moderate	103	22.2	87,531	20.2	13,548	15.5	74,840	17.2
Middle	135	29.2	149,313	34.4	9,347	6.3	86,630	20.0
Upper	128	27.6	157,223	36.2	3,271	2.1	179,755	41.4
Unknown	19	4.1	988	0.2	451	45.6	0	0.0
Total AA	463	100.0	433,865	100.0	40,189	9.3	433,865	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,021	28,654	6.6	31.5	42,815	47.0	19,552	21.5
Moderate	171,048	78,377	18.0	45.8	73,191	42.8	19,480	11.4
Middle	256,687	154,854	35.5	60.3	83,371	32.5	18,462	7.2
Upper	223,791	172,920	39.7	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	746,566	435,668	100.0	58.4	242,654	32.5	68,244	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,485	7.9	5,664	7.6	780	10.8	41	6.5
Moderate	16,238	19.8	14,718	19.8	1,425	19.7	95	15.0
Middle	26,541	32.4	24,150	32.6	2,179	30.1	212	33.5
Upper	31,085	37.9	28,499	38.4	2,314	31.9	272	43.0
Unknown	1,692	2.1	1,126	1.5	553	7.6	13	2.1
Total AA	82,041	100.0	74,157	100.0	7,251	100.0	633	100.0
Percentage of Total Businesses:				90.4		8.8		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	21	2.6	19	2.4	2	10.5	0	0.0
Moderate	71	8.8	71	9.1	0	0.0	0	0.0
Middle	343	42.7	337	43.1	5	26.3	1	33.3
Upper	366	45.6	353	45.2	11	57.9	2	66.7
Unknown	2	0.2	1	0.1	1	5.3	0	0.0
Total AA	803	100.0	781	100.0	19	100.0	3	100.0
Percentage of Total Farms:				97.3		2.4		0.4
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-12

2020 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.8	38,810	8.9	13,572	35.0	92,640	21.4
Moderate	103	22.2	87,531	20.2	13,548	15.5	74,840	17.2
Middle	135	29.2	149,313	34.4	9,347	6.3	86,630	20.0
Upper	128	27.6	157,223	36.2	3,271	2.1	179,755	41.4
Unknown	19	4.1	988	0.2	451	45.6	0	0.0
Total AA	463	100.0	433,865	100.0	40,189	9.3	433,865	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,021	28,654	6.6	31.5	42,815	47.0	19,552	21.5
Moderate	171,048	78,377	18.0	45.8	73,191	42.8	19,480	11.4
Middle	256,687	154,854	35.5	60.3	83,371	32.5	18,462	7.2
Upper	223,791	172,920	39.7	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	746,566	435,668	100.0	58.4	242,654	32.5	68,244	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,376	7.6	5,521	7.3	814	10.8	41	6.7
Moderate	16,348	19.5	14,784	19.6	1,473	19.5	91	14.9
Middle	27,175	32.5	24,669	32.7	2,309	30.5	197	32.2
Upper	32,042	38.3	29,389	38.9	2,384	31.5	269	44.0
Unknown	1,724	2.1	1,119	1.5	591	7.8	14	2.3
Total AA	83,665	100.0	75,482	100.0	7,571	100.0	612	100.0
Percentage of Total Businesses:				90.2		9.0		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	19	2.3	18	2.2	1	5.3	0	0.0
Moderate	69	8.4	68	8.5	1	5.3	0	0.0
Middle	355	43.2	349	43.6	5	26.3	1	50.0
Upper	377	45.9	365	45.6	11	57.9	1	50.0
Unknown	2	0.2	1	0.1	1	5.3	0	0.0
Total AA	822	100.0	801	100.0	19	100.0	2	100.0
Percentage of Total Farms:				97.4		2.3		0.2
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

APPENDIX E – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES

BOULDER MSA ASSESSMENT AREA

Table E-1

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Boulder MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	\$ (000)	%	#	%	%	\$ (000)	%	%	
Home Purchase Loans													
Low	0	0.0	3.4	0	0.0	2.2	2	25.0	4.4	773	21.1	2.9	3.0
Moderate	0	0.0	17.2	0	0.0	13.7	1	12.5	18.5	292	8.0	14.2	18.0
Middle	2	66.7	50.0	217	63.5	47.1	4	50.0	47.0	1,411	38.6	43.7	45.6
Upper	1	33.3	29.4	125	36.5	37.1	1	12.5	30.1	1,180	32.3	39.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	342	100.0	100.0	8	100.0	100.0	3,656	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	2.6	240	11.9	1.6	0	0.0	3.1	0	0.0	2.0	3.0
Moderate	2	40.0	16.2	446	22.1	12.9	2	50.0	16.3	335	11.6	12.6	18.0
Middle	0	0.0	47.7	0	0.0	46.4	2	50.0	47.1	2,545	88.4	44.6	45.6
Upper	2	40.0	33.5	1,336	66.1	39.1	0	0.0	33.4	0	0.0	40.8	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	2,022	100.0	100.0	4	100.0	100.0	2,880	100.0	100.0	100.0
Home Improvement Loans													
Low	1	100.0	2.6	248	100.0	1.6	0	0.0	2.4	0	0.0	1.7	3.0
Moderate	0	0.0	12.9	0	0.0	9.1	0	0.0	14.1	0	0.0	11.3	18.0
Middle	0	0.0	50.1	0	0.0	48.4	0	0.0	48.2	0	0.0	42.7	45.6
Upper	0	0.0	34.5	0	0.0	40.9	0	0.0	35.3	0	0.0	44.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	248	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	14.6	0	0.0	9.2	0	0.0	18.2	0	0.0	12.1	15.1
Moderate	0	0.0	41.5	0	0.0	31.7	2	66.7	38.6	8,585	75.9	16.3	33.1
Middle	0	0.0	22.0	0	0.0	47.6	1	33.3	29.5	2,720	24.1	62.7	38.9
Upper	0	0.0	22.0	0	0.0	11.4	0	0.0	13.6	0	0.0	9.0	12.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	11,305	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	20.0	2.8	488	18.4	1.9	2	13.3	3.4	773	4.3	2.5	3.0
Moderate	2	20.0	16.2	446	16.8	13.3	5	33.3	16.8	9,212	51.6	13.2	18.0
Middle	3	30.0	48.3	252	9.5	46.5	7	46.7	47.1	6,676	37.4	44.6	45.6
Upper	3	30.0	32.7	1,461	55.2	38.3	1	6.7	32.7	1,180	6.6	39.8	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	2,647	100.0	100.0	15	100.0	100.0	17,841	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-2

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Boulder MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	13	8.7	3.5	1,052	7.8	3.1	6	6.3	840	8.5	4.1
Moderate	58	38.7	30.2	6,520	48.1	38.3	42	44.2	5,866	59.1	29.8
Middle	46	30.7	37.3	3,121	23.0	31.9	21	22.1	1,087	11.0	37.9
Upper	33	22.0	28.4	2,866	21.1	26.4	26	27.4	2,132	21.5	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.4	0	0.0	0	0.0	0.0
Total	150	100.0	100.0	13,559	100.0	100.0	95	100.0	9,925	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-3

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Boulder MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	6.3	0	0.0	3.3	0	0.0	0	0.0	2.5
Moderate	0	0.0	19.0	0	0.0	36.4	0	0.0	0	0.0	18.0
Middle	0	0.0	47.6	0	0.0	44.3	1	100.0	21	100.0	42.6
Upper	0	0.0	27.0	0	0.0	15.9	0	0.0	0	0.0	36.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	21	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-4

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Boulder MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	2	66.7	6.5	217	63.5	3.2	1	12.5	5.5	300	8.2	2.7	22.3
Mo de rate	0	0.0	18.1	0	0.0	12.8	0	0.0	16.0	0	0.0	10.5	17.0
Middle	0	0.0	22.2	0	0.0	19.7	0	0.0	20.1	0	0.0	16.4	19.9
Upp er	1	33.3	44.7	125	36.5	55.3	6	75.0	44.2	2,981	81.5	55.0	40.8
Unkno wn	0	0.0	8.5	0	0.0	9.0	1	12.5	14.3	375	10.3	15.5	0.0
To tal	3	100.0	100.0	342	100.0	100.0	8	100.0	100.0	3,656	100.0	100.0	100.0
Re finance Loans													
Lo w	0	0.0	7.9	0	0.0	4.6	0	0.0	10.2	0	0.0	6.2	22.3
Mo de rate	0	0.0	18.2	0	0.0	13.8	0	0.0	17.6	0	0.0	12.8	17.0
Middle	1	20.0	23.6	232	11.5	21.9	0	0.0	21.5	0	0.0	19.4	19.9
Upp er	2	40.0	41.1	1,262	62.4	49.8	4	100.0	37.5	2,880	100.0	47.4	40.8
Unkno wn	2	40.0	9.1	528	26.1	9.9	0	0.0	13.2	0	0.0	14.1	0.0
To tal	5	100.0	100.0	2,022	100.0	100.0	4	100.0	100.0	2,880	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	7.7	0	0.0	4.7	0	0.0	6.4	0	0.0	5.5	22.3
Mo de rate	0	0.0	14.7	0	0.0	11.1	0	0.0	13.3	0	0.0	7.8	17.0
Middle	0	0.0	21.8	0	0.0	16.9	0	0.0	19.5	0	0.0	12.7	19.9
Upp er	0	0.0	51.7	0	0.0	61.2	0	0.0	57.9	0	0.0	67.0	40.8
Unkno wn	1	100.0	4.1	248	100.0	6.1	0	0.0	3.0	0	0.0	7.1	0.0
To tal	1	100.0	100.0	248	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	3	30.0	7.6	252	9.5	4.2	1	8.3	8.6	300	4.6	4.9	22.3
Mo de rate	0	0.0	17.9	0	0.0	13.4	0	0.0	16.8	0	0.0	11.8	17.0
Middle	1	10.0	23.0	232	8.8	21.0	0	0.0	21.0	0	0.0	18.1	19.9
Upp er	3	30.0	42.5	1,387	52.4	51.7	10	83.3	40.7	5,861	89.7	50.7	40.8
Unkno wn	3	30.0	9.1	776	29.3	9.7	1	8.3	12.8	375	5.7	14.5	0.0
To tal	10	100.0	100.0	2,647	100.0	100.0	12	100.0	100.0	6,536	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Table E-5

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Boulder MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	101	67.3	41.3	3,948	29.1	24.2	68	71.6	2,644	26.6	93.2
Over \$1 Million	36	24.0		9,575	70.6		27	28.4	7,281	73.4	5.8
Revenue Unknown	13	8.7		36	0.3		0	0.0	0	0.0	0.9
Total	150	100.0		13,559	100.0		95	100.0	9,925	100.0	100.0
By Loan Size											
\$100,000 or Less	115	76.7	87.8	1,902	14.0	32.3	71	74.7	1,411	14.2	
\$100,001 - \$250,000	20	13.3	6.9	3,669	27.1	19.7	12	12.6	2,097	21.1	
\$250,001 - \$1 Million	15	10.0	5.4	7,988	58.9	48.1	12	12.6	6,417	64.7	
Total	150	100.0	100.0	13,559	100.0	100.0	95	100.0	9,925	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	95	94.1		1,588	40.2		59	86.8	916	34.6	
\$100,001 - \$250,000	3	3.0		375	9.5		6	8.8	960	36.3	
\$250,001 - \$1 Million	3	3.0		1,985	50.3		3	4.4	768	29.0	
Total	101	100.0		3,948	100.0		68	100.0	2,644	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-6

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Boulder MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	0	0.0	66.7	0	0.0	58.6	1	100.0	21	100.0	98.0
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	1.8
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.3
Total	0	0.0		0	0.0		1	100.0	21	100.0	100.0
By Loan Size											
\$100,000 or Less	0	0.0	95.2	0	0.0	62.4	1	100.0	21	100.0	
\$100,001 - \$250,000	0	0.0	1.6	0	0.0	9.1	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	3.2	0	0.0	28.4	0	0.0	0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	21	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	0	0.0		0	0.0		1	100.0	21	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	0	0.0		0	0.0		1	100.0	21	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-7

2021 Boulder MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.4	3,847	5.3	958	24.9	16,135	22.3
Moderate	14	20.6	13,721	18.9	1,392	10.1	12,332	17.0
Middle	30	44.1	32,808	45.3	1,705	5.2	14,393	19.9
Upper	19	27.9	22,042	30.4	566	2.6	29,558	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	68	100.0	72,418	100.0	4,621	6.4	72,418	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,149	2,293	3.0	25.1	6,432	70.3	424	4.6
Moderate	29,026	13,742	18.0	47.3	13,853	47.7	1,431	4.9
Middle	56,892	34,740	45.6	61.1	18,405	32.4	3,747	6.6
Upper	34,672	25,388	33.3	73.2	7,663	22.1	1,621	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	129,739	76,163	100.0	58.7	46,353	35.7	7,223	5.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,068	4.1	1,000	4.1	59	3.9	9	3.8
Moderate	7,711	29.8	6,996	29.0	658	43.6	57	24.1
Middle	9,805	37.9	9,266	38.4	452	29.9	87	36.7
Upper	7,262	28.1	6,837	28.4	341	22.6	84	35.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25,846	100.0	24,099	100.0	1,510	100.0	237	100.0
Percentage of Total Businesses:				93.2		5.8		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	10	2.5	10	2.6	0	0.0	0	0.0
Moderate	72	18.0	67	17.1	5	71.4	0	0.0
Middle	170	42.6	167	42.7	2	28.6	1	100.0
Upper	147	36.8	147	37.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	399	100.0	391	100.0	7	100.0	1	100.0
Percentage of Total Farms:				98.0		1.8		0.3
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table E-8

2020 Boulder MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	7.4	3,847	5.3	958	24.9	16,135	22.3
Moderate	14	20.6	13,721	18.9	1,392	10.1	12,332	17.0
Middle	30	44.1	32,808	45.3	1,705	5.2	14,393	19.9
Upper	19	27.9	22,042	30.4	566	2.6	29,558	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	68	100.0	72,418	100.0	4,621	6.4	72,418	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,149	2,293	3.0	25.1	6,432	70.3	424	4.6
Moderate	29,026	13,742	18.0	47.3	13,853	47.7	1,431	4.9
Middle	56,892	34,740	45.6	61.1	18,405	32.4	3,747	6.6
Upper	34,672	25,388	33.3	73.2	7,663	22.1	1,621	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	129,739	76,163	100.0	58.7	46,353	35.7	7,223	5.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,058	4.1	996	4.2	55	3.6	7	3.2
Moderate	7,782	30.2	7,042	29.4	681	44.0	59	26.6
Middle	9,731	37.8	9,174	38.3	477	30.9	80	36.0
Upper	7,171	27.9	6,762	28.2	333	21.5	76	34.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25,742	100.0	23,974	100.0	1,546	100.0	222	100.0
Percentage of Total Businesses:				93.1		6.0		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	11	2.8	11	2.8	0	0.0	0	0.0
Moderate	75	18.8	70	17.9	5	83.3	0	0.0
Middle	173	43.4	171	43.6	1	16.7	1	100.0
Upper	140	35.1	140	35.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	399	100.0	392	100.0	6	100.0	1	100.0
Percentage of Total Farms:				98.2		1.5		0.3
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**GRAND JUNCTION MSA ASSESSMENT AREA
Table E-9**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Grand Junction MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %		\$ %
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	22.2	19.1	227	13.7	14.9	2	16.7	21.4	290	11.9	16.1	19.1
Middle	5	55.6	62.6	1,179	71.2	61.1	6	50.0	60.4	604	24.9	59.6	58.3
Upper	2	22.2	18.3	250	15.1	23.9	4	33.3	18.3	1,534	63.2	24.4	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	1,656	100.0	100.0	12	100.0	100.0	2,428	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	20.7	14.5	500	16.3	10.9	3	20.0	16.8	154	13.4	12.7	19.1
Middle	20	69.0	60.9	2,063	67.4	57.7	9	60.0	61.5	582	50.5	59.7	58.3
Upper	3	10.3	24.7	499	16.3	31.4	3	20.0	21.7	417	36.2	27.6	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	3,062	100.0	100.0	15	100.0	100.0	1,153	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	11.1	15.2	25	7.0	8.1	2	50.0	16.0	279	72.1	14.2	19.1
Middle	6	66.7	54.8	231	64.9	45.8	1	25.0	54.9	90	23.3	47.1	58.3
Upper	2	22.2	30.0	100	28.1	46.2	1	25.0	29.2	18	4.7	38.8	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	356	100.0	100.0	4	100.0	100.0	387	100.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	19.0	0	0.0	18.1	0	0.0	19.0	0	0.0	5.7	39.5
Middle	1	100.0	76.2	361	100.0	78.3	0	0.0	76.2	0	0.0	90.9	42.0
Upper	0	0.0	4.8	0	0.0	3.6	0	0.0	4.8	0	0.0	3.4	18.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	361	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	18.9	16.2	767	12.2	12.4	9	24.3	18.5	1,084	23.7	14.3	19.1
Middle	35	66.0	61.3	4,604	73.4	59.1	19	51.4	60.9	1,479	32.3	59.9	58.3
Upper	8	15.1	22.5	899	14.3	28.4	9	24.3	20.7	2,009	43.9	25.8	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	53	100.0	100.0	6,270	100.0	100.0	37	100.0	100.0	4,572	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-10

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Grand Junction MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	66	26.0	17.7	5,858	33.4	19.8	35	21.6	907	8.3	19.1
Middle	143	56.3	56.4	9,226	52.7	56.8	90	55.6	5,473	49.8	57.4
Upper	45	17.7	24.6	2,430	13.9	22.4	37	22.8	4,607	41.9	23.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	1.0	0	0.0	0	0.0	0.0
Total	254	100.0	100.0	17,514	100.0	100.0	162	100.0	10,987	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-11

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Grand Junction MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	3.6	0	0.0	0.9	0	0.0	0	0.0	5.8
Middle	1	33.3	45.2	125	98.4	44.4	1	100.0	20	100.0	45.3
Upper	2	66.7	48.2	2	1.6	52.5	0	0.0	0	0.0	48.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	3.0	0	0.0	2.1	0	0.0	0	0.0	0.0
Total	3	100.0	100.0	127	100.0	100.0	1	100.0	20	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-12

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Grand Junction MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	5.4	0	0.0	2.9	0	0.0	5.7	0	0.0	2.9	2.16
Mo d e r a t e	2	22.2	23.8	284	17.1	17.4	2	16.7	21.2	129	5.3	15.7	18.0
M i d d l e	4	44.4	26.5	967	58.4	25.0	4	33.3	23.2	672	27.7	22.1	19.9
U p p e r	1	11.1	35.0	100	6.0	44.6	4	33.3	34.5	1,113	45.8	42.1	40.5
U n k n o w n	2	22.2	9.3	305	18.4	10.1	2	16.7	15.4	514	21.2	17.1	0.0
T o t a l	9	100.0	100.0	1,656	100.0	100.0	12	100.0	100.0	2,428	100.0	100.0	100.0
Re finance Loans													
Lo w	6	20.7	5.1	527	17.2	2.9	9	60.0	7.7	376	32.6	4.7	2.16
Mo d e r a t e	9	31.0	17.6	715	23.4	13.3	2	13.3	19.0	244	21.2	15.2	18.0
M i d d l e	6	20.7	20.1	722	23.6	18.0	0	0.0	20.3	0	0.0	19.0	19.9
U p p e r	6	20.7	36.8	828	27.0	43.5	4	26.7	30.1	533	46.2	36.9	40.5
U n k n o w n	2	6.9	20.3	270	8.8	22.3	0	0.0	22.9	0	0.0	24.1	0.0
T o t a l	29	100.0	100.0	3,062	100.0	100.0	15	100.0	100.0	1,153	100.0	100.0	100.0
Home Improvement Loans													
Lo w	3	33.3	6.7	115	32.3	5.0	2	50.0	7.5	108	27.9	6.2	2.16
Mo d e r a t e	2	22.2	18.4	48	13.5	12.2	1	25.0	11.9	50	12.9	11.8	18.0
M i d d l e	2	22.2	24.4	55	15.4	16.4	0	0.0	24.5	0	0.0	19.9	19.9
U p p e r	1	11.1	41.7	78	21.9	53.2	0	0.0	48.9	0	0.0	52.0	40.5
U n k n o w n	1	11.1	8.8	60	16.9	13.3	1	25.0	7.2	229	59.2	10.1	0.0
T o t a l	9	100.0	100.0	356	100.0	100.0	4	100.0	100.0	387	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	11	21.2	5.2	727	12.3	2.9	13	35.1	7.0	657	14.4	4.0	2.16
Mo d e r a t e	13	25.0	19.5	1,047	17.7	14.6	7	18.9	19.6	581	12.7	15.3	18.0
M i d d l e	14	26.9	22.1	1,809	30.6	20.3	5	13.5	21.4	712	15.6	20.1	19.9
U p p e r	9	17.3	35.9	1,691	28.6	43.6	9	24.3	32.3	1,879	41.1	39.0	40.5
U n k n o w n	5	9.6	17.3	635	10.7	18.6	3	8.1	19.8	743	16.3	21.6	0.0
T o t a l	52	100.0	100.0	5,909	100.0	100.0	37	100.0	100.0	4,572	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Table E-13

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Grand Junction MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	194	76.4	44.3	5,610	32.0	29.0	132	81.5	5,556	50.6	92.8
Over \$1 Million	43	16.9		10,613	60.6		28	17.3	5,429	49.4	6.2
Revenue Unknown	17	6.7		1,291	7.4		2	1.2	2	0.0	0.9
Total	254	100.0		17,514	100.0		162	100.0	10,987	100.0	100.0
By Loan Size											
\$100,000 or Less	217	85.4	88.8	4,761	27.2	36.8	138	85.2	2,479	22.6	
\$100,001 - \$250,000	19	7.5	6.7	3,176	18.1	21.0	13	8.0	1,941	17.7	
\$250,001 - \$1 Million	18	7.1	4.5	9,577	54.7	42.3	11	6.8	6,567	59.8	
Total	254	100.0	100.0	17,514	100.0	100.0	162	100.0	10,987	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	187	96.4		3,713	66.2		119	90.2	1,914	34.4	
\$100,001 - \$250,000	5	2.6		860	15.3		8	6.1	1,216	21.9	
\$250,001 - \$1 Million	2	1.0		1,037	18.5		5	3.8	2,426	43.7	
Total	194	100.0		5,610	100.0		132	100.0	5,556	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-14

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Grand Junction MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	2	66.7	88.1	2	1.6	88.8	0	0.0	0	0.0	98.5
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	1.5
Revenue Unknown	1	33.3		125	98.4		1	100.0	20	100.0	0.0
Total	3	100.0		127	100.0		1	100.0	20	100.0	100.0
By Loan Size											
\$100,000 or Less	2	66.7	83.3	2	1.6	41.5	1	100.0	20	100.0	
\$100,001 - \$250,000	1	33.3	11.9	125	98.4	32.0	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	4.8	0	0.0	26.5	0	0.0	0	0.0	
Total	3	100.0	100.0	127	100.0	100.0	1	100.0	20	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	2	100.0		2	100.0		0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	2	100.0		2	100.0		0	0.0	0	0.0	

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-15

2021 Grand Junction MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	38,714	100.0	4,432	11.4	38,714	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,472	40,908	100.0	64.5	18,307	28.8	4,257	6.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,550	19.1	1,463	19.4	79	15.7	8	10.4
Middle	4,658	57.4	4,290	57.0	321	63.7	47	61.0
Upper	1,904	23.5	1,778	23.6	104	20.6	22	28.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,112	100.0	7,531	100.0	504	100.0	77	100.0
Percentage of Total Businesses:				92.8		6.2		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	16	5.8	16	5.9	0	0.0	0	0.0
Middle	124	45.3	121	44.8	3	75.0	0	0.0
Upper	134	48.9	133	49.3	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	274	100.0	270	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0

Source: 2021 FFIEC Census Data
 2021 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Table E-16

2020 Grand Junction MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,377	21.6
Moderate	7	24.1	8,328	21.5	1,789	21.5	6,963	18.0
Middle	16	55.2	21,928	56.6	2,034	9.3	7,711	19.9
Upper	6	20.7	8,458	21.8	609	7.2	15,663	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	38,714	100.0	4,432	11.4	38,714	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,089	7,803	19.1	51.7	6,526	43.3	760	5.0
Middle	36,084	23,829	58.3	66.0	9,552	26.5	2,703	7.5
Upper	12,299	9,276	22.7	75.4	2,229	18.1	794	6.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	63,472	40,908	100.0	64.5	18,307	28.8	4,257	6.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,599	19.6	1,504	19.9	87	17.2	8	11.6
Middle	4,643	57.0	4,281	56.6	320	63.1	42	60.9
Upper	1,899	23.3	1,780	23.5	100	19.7	19	27.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,141	100.0	7,565	100.0	507	100.0	69	100.0
Percentage of Total Businesses:				92.9		6.2		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	16	5.8	16	5.9	0	0.0	0	0.0
Middle	124	44.9	121	44.5	3	75.0	0	0.0
Upper	136	49.3	135	49.6	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	276	100.0	272	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**FORT COLLINS MSA ASSESSMENT AREA
Table E-17**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Fort Collins MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	2.3	0	0.0	2.1	1	5.3	3.2	57	2.7	3.0	15
Mo derate	4	28.6	18.4	757	45.1	16.8	8	42.1	20.2	936	44.3	18.5	20.5
Middle	9	64.3	46.5	862	51.4	44.3	7	36.8	45.1	434	20.5	43.2	52.7
Upper	1	7.1	32.8	59	3.5	36.8	3	15.8	31.5	688	32.5	35.3	25.2
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	14	100.0	100.0	1,678	100.0	100.0	19	100.0	100.0	2,115	100.0	100.0	100.0
Refinance Loans													
Lo w	1	14.3	1.3	20	1.4	1.2	0	0.0	1.2	0	0.0	1.2	15
Mo derate	1	14.3	18.4	208	14.7	16.4	2	28.6	20.0	103	9.3	17.6	20.5
Middle	5	71.4	47.6	1,190	83.9	45.0	3	42.9	48.0	451	40.9	45.3	52.7
Upper	0	0.0	32.7	0	0.0	37.4	2	28.6	30.8	550	49.8	35.9	25.2
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	7	100.0	100.0	1,418	100.0	100.0	7	100.0	100.0	1,104	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.8	0	0.0	0.5	0	0.0	1.1	0	0.0	0.9	15
Mo derate	0	0.0	19.8	0	0.0	18.5	0	0.0	19.7	0	0.0	20.0	20.5
Middle	0	0.0	45.8	0	0.0	43.7	0	0.0	45.6	0	0.0	43.1	52.7
Upper	0	0.0	33.7	0	0.0	37.3	0	0.0	33.6	0	0.0	36.0	25.2
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	5.9	0	0.0	4.9	3.4
Mo derate	3	42.9	43.9	4,695	22.3	35.8	0	0.0	58.8	0	0.0	45.6	46.2
Middle	3	42.9	46.3	4,320	20.6	35.0	1	100.0	15.7	13,200	100.0	8.5	34.4
Upper	1	14.3	9.8	12,000	57.1	29.2	0	0.0	19.6	0	0.0	40.9	15.8
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	7	100.0	100.0	21,015	100.0	100.0	1	100.0	100.0	13,200	100.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	2	6.3	1.5	46	0.2	1.5	1	3.4	1.8	57	0.3	2.0	15
Mo derate	9	28.1	18.4	5,673	23.4	16.9	10	34.5	20.1	1,039	6.2	19.2	20.5
Middle	18	56.3	47.4	6,442	26.5	44.6	12	41.4	46.8	14,250	85.1	42.8	52.7
Upper	3	9.4	32.7	12,125	49.9	37.1	6	20.7	31.3	1,390	8.3	35.9	25.2
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	32	100.0	100.0	24,286	100.0	100.0	29	100.0	100.0	16,736	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-18

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Fort Collins MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	9	4.2	5.1	2,228	17.4	7.9	0	0.0	0	0.0	3.7
Moderate	80	37.6	28.5	3,685	28.8	31.2	41	46.1	4,470	55.4	28.8
Middle	74	34.7	37.5	3,288	25.7	30.1	32	36.0	3,152	39.1	42.3
Upper	50	23.5	28.3	3,603	28.1	30.4	16	18.0	448	5.6	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.4	0	0.0	0	0.0	0.0
Total	213	100.0	100.0	12,804	100.0	100.0	89	100.0	8,070	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-19

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Fort Collins MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	2.6	0	0.0	0.6	0	0.0	0	0.0	1.8
Moderate	0	0.0	7.3	0	0.0	8.5	0	0.0	0	0.0	15.1
Middle	0	0.0	47.7	0	0.0	48.6	1	100.0	250	100.0	49.4
Upper	0	0.0	41.7	0	0.0	42.3	0	0.0	0	0.0	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.2
Tract-Unk	0	0.0	0.7	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	250	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-20

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Fort Collins MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	3	21.4	6.1	138	8.2	3.8	7	36.8	3.9	507	24.0	2.3	20.5
Mo d e r a t e	4	28.6	22.7	353	21.0	18.9	6	31.6	17.0	308	14.6	13.1	17.2
M i d d l e	3	21.4	25.2	436	26.0	24.7	5	26.3	22.9	738	34.9	21.8	22.6
U p p e r	2	14.3	36.5	395	23.5	42.9	1	5.3	37.4	562	26.6	43.8	39.6
U n k n o w n	2	14.3	9.5	356	21.2	9.7	0	0.0	18.7	0	0.0	19.0	0.0
T o t a l	14	100.0	100.0	1,678	100.0	100.0	19	100.0	100.0	2,115	100.0	100.0	100.0
Re finance Loans													
Lo w	1	14.3	7.6	20	1.4	4.9	2	28.6	8.0	200	18.1	5.2	20.5
Mo d e r a t e	3	42.9	19.6	409	28.8	16.3	1	14.3	18.6	75	6.8	15.1	17.2
M i d d l e	0	0.0	24.6	0	0.0	23.8	2	28.6	22.1	552	50.0	21.2	22.6
U p p e r	1	14.3	33.6	208	14.7	39.0	1	14.3	31.9	57	5.2	37.9	39.6
U n k n o w n	2	28.6	14.6	781	55.1	16.1	1	14.3	19.4	220	19.9	20.6	0.0
T o t a l	7	100.0	100.0	1,418	100.0	100.0	7	100.0	100.0	1,104	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	6.3	0	0.0	5.2	0	0.0	6.0	0	0.0	5.7	20.5
Mo d e r a t e	0	0.0	18.5	0	0.0	16.2	0	0.0	14.2	0	0.0	12.6	17.2
M i d d l e	0	0.0	27.1	0	0.0	22.9	0	0.0	26.2	0	0.0	23.6	22.6
U p p e r	0	0.0	44.4	0	0.0	49.1	0	0.0	51.7	0	0.0	54.4	39.6
U n k n o w n	0	0.0	3.7	0	0.0	6.7	0	0.0	1.9	0	0.0	3.8	0.0
T o t a l	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	6	24.0	7.1	237	7.2	4.5	10	35.7	6.6	859	24.3	4.1	20.5
Mo d e r a t e	7	28.0	20.2	762	23.3	17.0	8	28.6	17.8	548	15.5	14.2	17.2
M i d d l e	4	16.0	24.7	462	14.1	23.9	7	25.0	22.6	1,290	36.5	21.4	22.6
U p p e r	4	16.0	34.8	673	20.6	40.3	2	7.1	35.0	619	17.5	40.7	39.6
U n k n o w n	4	16.0	13.2	1,137	34.8	14.2	1	3.6	18.1	220	6.2	19.7	0.0
T o t a l	25	100.0	100.0	3,271	100.0	100.0	28	100.0	100.0	3,536	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Table E-21

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Fort Collins MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	176	82.6	41.2	4,670	36.5	26.2	69	77.5	4,238	52.5	94.1
Over \$1 Million	31	14.6		7,887	61.6		16	18.0	3,828	47.4	4.9
Revenue Unknown	6	2.8		247	1.9		4	4.5	4	0.0	0.9
Total	213	100.0		12,804	100.0		89	100.0	8,070	100.0	100.0
By Loan Size											
\$100,000 or Less	184	86.4	87.9	2,584	20.2	33.4	68	76.4	1,302	16.1	
\$100,001 - \$250,000	18	8.5	6.8	2,909	22.7	19.0	10	11.2	1,560	19.3	
\$250,001 - \$1 Million	11	5.2	5.3	7,311	57.1	47.6	11	12.4	5,208	64.5	
Total	213	100.0	100.0	12,804	100.0	100.0	89	100.0	8,070	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	170	96.6		2,077	44.5		58	84.1	1,065	25.1	
\$100,001 - \$250,000	2	1.1		275	5.9		6	8.7	860	20.3	
\$250,001 - \$1 Million	4	2.3		2,318	49.6		5	7.2	2,313	54.6	
Total	176	100.0		4,670	100.0		69	100.0	4,238	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-22

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Fort Collins MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	0	0.0	55.6	0	0.0	47.8	1	100.0	250	100.0	98.0
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	1.8
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.2
Total	0	0.0		0	0.0		1	100.0	250	100.0	100.0
By Loan Size											
\$100,000 or Less	0	0.0	82.8	0	0.0	32.0	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	10.6	0	0.0	26.9	1	100.0	250	100.0	
\$250,001 - \$500,000	0	0.0	6.6	0	0.0	41.2	0	0.0	0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	250	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	0	0.0		0	0.0		0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0		0	0.0		1	100.0	250	100.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	0	0.0		0	0.0		1	100.0	250	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-23

2021 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	828	3.7	710	3.4	109	9.9	9	4.4
Moderate	6,442	28.8	6,070	28.8	320	28.9	52	25.5
Middle	9,466	42.3	9,033	42.9	355	32.1	78	38.2
Upper	5,644	25.2	5,257	24.9	322	29.1	65	31.9
Unknown	4	0.0	4	0.0	0	0.0	0	0.0
Total AA	22,384	100.0	21,074	100.0	1,106	100.0	204	100.0
Percentage of Total Businesses:				94.1	4.9	0.9		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.8	8	1.8	0	0.0	0	0.0
Moderate	68	15.1	67	15.2	0	0.0	1	100.0
Middle	223	49.4	221	50.0	2	25.0	0	0.0
Upper	151	33.5	145	32.8	6	75.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	451	100.0	442	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.0	1.8	0.2		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table E-24

2020 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	793	3.5	680	3.2	106	9.3	7	3.6
Moderate	6,471	28.9	6,085	28.9	338	29.5	48	24.7
Middle	9,511	42.5	9,056	43.1	381	33.3	74	38.1
Upper	5,584	25.0	5,200	24.7	319	27.9	65	33.5
Unknown	4	0.0	4	0.0	0	0.0	0	0.0
Total AA	22,363	100.0	21,025	100.0	1,144	100.0	194	100.0
Percentage of Total Businesses:				94.0	5.1	0.9		
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	8	1.7	8	1.8	0	0.0	0	0.0
Moderate	73	15.8	72	15.9	0	0.0	1	100.0
Middle	224	48.6	222	49.1	2	25.0	0	0.0
Upper	155	33.6	149	33.0	6	75.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	461	100.0	452	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.0	1.7	0.2		
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

**SAN MIGUEL COUNTY ASSESSMENT AREA
Table E-25**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: San Miguel County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	50.0	48.6	883	24.4	45.8	3	50.0	40.6	2,142	67.8	30.7	46.0
Upper	5	50.0	51.4	2,730	75.6	54.2	3	50.0	59.4	1,016	32.2	69.3	54.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	10	100.0	100.0	3,613	100.0	100.0	6	100.0	100.0	3,158	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	66.7	39.7	2,503	89.4	31.6	0	0.0	37.7	0	0.0	35.0	46.0
Upper	2	33.3	60.3	298	10.6	68.4	2	100.0	62.3	649	100.0	65.0	54.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	6	100.0	100.0	2,801	100.0	100.0	2	100.0	100.0	649	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	46.7	0	0.0	58.0	0	0.0	36.4	0	0.0	37.2	46.0
Upper	0	0.0	53.3	0	0.0	42.0	0	0.0	63.6	0	0.0	62.8	54.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													
													Multi-family Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	44.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	55.8
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													
													Owner Occupied Units %
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Mo derate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	56.3	43.6	3,386	52.8	40.5	3	37.5	38.7	2,142	56.3	32.0	46.0
Upper	7	43.8	56.4	3,028	47.2	59.5	5	62.5	61.3	1,665	43.7	68.0	54.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	16	100.0	100.0	6,414	100.0	100.0	8	100.0	100.0	3,807	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-26

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: San Miguel County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	32	59.3	48.8	1,617	57.8	58.1	16	59.3	1,929	73.3	47.9
Upper	22	40.7	46.1	1,180	42.2	36.4	11	40.7	703	26.7	52.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	5.0	0	0.0	5.5	0	0.0	0	0.0	0.0
Total	54	100.0	100.0	2,797	100.0	100.0	27	100.0	2,632	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-27

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: San Miguel County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	0	0.0	50.0	0	0.0	13.3	0	0.0	0	0.0	62.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	37.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	50.0	0	0.0	86.7	0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0	0.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-28

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: San Miguel County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	# %	\$ (000)	\$ %	\$ %	#	%	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	1	10.0	0.7	176	4.9	0.1	0	0.0	1.5	0	0.0	0.2	15.3
Mo de rate	2	20.0	9.2	173	4.8	1.8	0	0.0	6.1	0	0.0	1.7	13.4
Middle	0	0.0	9.6	0	0.0	3.6	1	16.7	6.9	335	10.6	2.3	21.5
Upper	6	60.0	65.2	2,803	77.6	71.8	3	50.0	68.6	981	31.1	73.0	49.8
Unkno wn	1	10.0	15.2	461	12.8	22.7	2	33.3	16.9	1,842	58.3	22.9	0.0
To tal	10	100.0	100.0	3,613	100.0	100.0	6	100.0	100.0	3,158	100.0	100.0	100.0
Re finance Loans													
Lo w	2	33.3	2.7	363	13.0	0.8	0	0.0	2.6	0	0.0	0.6	15.3
Mo de rate	2	33.3	9.1	226	8.1	3.7	1	50.0	7.2	89	13.7	2.3	13.4
Middle	1	16.7	12.8	212	7.6	4.6	0	0.0	16.0	0	0.0	7.5	21.5
Upper	1	16.7	65.3	2,000	71.4	67.2	1	50.0	59.4	560	86.3	67.5	49.8
Unkno wn	0	0.0	10.1	0	0.0	23.7	0	0.0	14.8	0	0.0	22.2	0.0
To tal	6	100.0	100.0	2,801	100.0	100.0	2	100.0	100.0	649	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	4.5	0	0.0	3.4	15.3
Mo de rate	0	0.0	13.3	0	0.0	1.0	0	0.0	9.1	0	0.0	0.7	13.4
Middle	0	0.0	26.7	0	0.0	9.8	0	0.0	13.6	0	0.0	7.8	21.5
Upper	0	0.0	46.7	0	0.0	40.8	0	0.0	63.6	0	0.0	76.9	49.8
Unkno wn	0	0.0	13.3	0	0.0	48.4	0	0.0	9.1	0	0.0	11.1	0.0
To tal	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	3	18.8	1.9	539	8.4	0.8	0	0.0	2.4	0	0.0	0.4	15.3
Mo de rate	4	25.0	8.8	399	6.2	2.5	1	12.5	6.6	89	2.3	1.8	13.4
Middle	1	6.3	11.0	212	3.3	3.9	1	12.5	12.0	335	8.8	4.3	21.5
Upper	7	43.8	65.2	4,803	74.9	69.2	4	50.0	64.0	1,541	40.5	71.0	49.8
Unkno wn	1	6.3	13.0	461	7.2	23.7	2	25.0	15.1	1,842	48.4	22.4	0.0
To tal	16	100.0	100.0	6,414	100.0	100.0	8	100.0	100.0	3,807	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Table E-29

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: San Miguel County											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	39	72.2	39.3	608	21.7	23.9	26	96.3	2,482	94.3	90.3
Over \$1 Million	15	27.8		2,189	78.3		1	3.7	150	5.7	8.1
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.5
Total	54	100.0		2,797	100.0		27	100.0	2,632	100.0	100.0
By Loan Size											
\$100,000 or Less	47	87.0	91.9	1,018	36.4	45.8	19	70.4	212	8.1	
\$100,001 - \$250,000	4	7.4	5.1	683	24.4	19.4	3	11.1	442	16.8	
\$250,001 - \$1 Million	3	5.6	2.9	1,096	39.2	34.8	5	18.5	1,978	75.2	
Total	54	100.0	100.0	2,797	100.0	100.0	27	100.0	2,632	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	39	100.0		608	100.0		19	73.1	212	8.5	
\$100,001 - \$250,000	0	0.0		0	0.0		2	7.7	292	11.8	
\$250,001 - \$1 Million	0	0.0		0	0.0		5	19.2	1,978	79.7	
Total	39	100.0		608	100.0		26	100.0	2,482	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-30

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: San Miguel County											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	0	0.0	100.0	0	0.0	100.0	0	0.0	0	0.0	100.0
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Total	0	0.0		0	0.0		0	0.0	0	0.0	100.0
By Loan Size											
\$100,000 or Less	0	0.0	100.0	0	0.0	100.0	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0	0.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	0	0.0		0	0.0		0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	0	0.0		0	0.0		0	0.0	0	0.0	

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-31

2021 San Miguel County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	260	15.3
Moderate	0	0.0	0	0.0	0	0.0	228	13.4
Middle	2	50.0	733	43.2	69	9.4	364	21.5
Upper	2	50.0	963	56.8	54	5.6	844	49.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	1,696	100.0	123	7.3	1,696	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,895	920	46.0	31.8	662	22.9	1,313	45.4
Upper	3,792	1,081	54.0	28.5	647	17.1	2,064	54.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,687	2,001	100.0	29.9	1,309	19.6	3,377	50.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	342	47.9	304	47.1	33	56.9	5	45.5
Upper	372	52.1	341	52.9	25	43.1	6	54.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	714	100.0	645	100.0	58	100.0	11	100.0
Percentage of Total Businesses:				90.3		8.1		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	5	62.5	5	62.5	0	0.0	0	0.0
Upper	3	37.5	3	37.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8	100.0	8	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table E-32

2020 San Miguel County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	260	15.3
Moderate	0	0.0	0	0.0	0	0.0	228	13.4
Middle	2	50.0	733	43.2	69	9.4	364	21.5
Upper	2	50.0	963	56.8	54	5.6	844	49.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	1,696	100.0	123	7.3	1,696	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,895	920	46.0	31.8	662	22.9	1,313	45.4
Upper	3,792	1,081	54.0	28.5	647	17.1	2,064	54.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,687	2,001	100.0	29.9	1,309	19.6	3,377	50.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	326	45.8	288	45.0	33	55.0	5	41.7
Upper	386	54.2	352	55.0	27	45.0	7	58.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	712	100.0	640	100.0	60	100.0	12	100.0
Percentage of Total Businesses:				89.9		8.4		1.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	6	66.7	6	66.7	0	0.0	0	0.0
Upper	3	33.3	3	33.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	9	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**CASPER MSA ASSESSMENT AREA
Table E-33**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Casper MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %		\$ %
Home Purchase Loans													
Lo w	0	0.0	3.0	0	0.0	1.5	2	15.4	2.4	76	6.7	12	4.0
Mo derate	1	25.0	11.9	47	11.1	10.4	7	53.8	11.4	537	47.1	9.5	10.2
Middle	3	75.0	73.2	376	88.9	71.3	4	30.8	74.3	528	46.3	72.6	68.1
Upper	0	0.0	11.9	0	0.0	16.7	0	0.0	12.0	0	0.0	16.7	17.7
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	4	100.0	100.0	423	100.0	100.0	13	100.0	100.0	1,141	100.0	100.0	100.0
Refinance Loans													
Lo w	0	0.0	1.6	0	0.0	0.8	0	0.0	1.7	0	0.0	1.0	4.0
Mo derate	0	0.0	7.7	0	0.0	6.7	1	14.3	9.2	32	1.6	7.4	10.2
Middle	2	40.0	70.2	201	22.1	66.9	4	57.1	72.1	448	23.0	69.9	68.1
Upper	3	60.0	20.5	708	77.9	25.6	2	28.6	17.0	1,470	75.4	21.7	17.7
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	5	100.0	100.0	909	100.0	100.0	7	100.0	100.0	1,950	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.0
Mo derate	0	0.0	6.1	0	0.0	5.5	0	0.0	6.3	0	0.0	2.7	10.2
Middle	0	0.0	73.5	0	0.0	69.4	0	0.0	66.7	0	0.0	58.9	68.1
Upper	0	0.0	20.4	0	0.0	25.1	0	0.0	27.0	0	0.0	38.4	17.7
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	14.3	0	0.0	2.7	0	0.0	15.8	0	0.0	3.7	15.7
Mo derate	0	0.0	9.5	0	0.0	3.6	0	0.0	10.5	0	0.0	4.1	6.4
Middle	0	0.0	61.9	0	0.0	87.6	0	0.0	63.2	0	0.0	43.2	68.8
Upper	0	0.0	14.3	0	0.0	6.1	0	0.0	10.5	0	0.0	11.4	9.1
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	0	0.0	2.3	0	0.0	1.2	2	10.0	2.1	76	2.5	12	4.0
Mo derate	1	11.1	9.9	47	3.5	8.5	8	40.0	10.3	569	18.4	9.4	10.2
Middle	5	55.6	72.1	577	43.3	69.9	8	40.0	73.1	976	31.6	70.5	68.1
Upper	3	33.3	15.6	708	53.2	20.4	2	10.0	14.5	1,470	47.6	18.9	17.7
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	9	100.0	100.0	1,332	100.0	100.0	20	100.0	100.0	3,091	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-34

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Casper MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	25	30.9	16.5	1,685	23.3	18.9	20	31.7	1,663	29.6	19.3
Moderate	8	9.9	12.1	1,803	24.9	15.1	9	14.3	786	14.0	9.1
Middle	42	51.9	46.7	3,646	50.4	44.8	27	42.9	3,028	53.9	50.1
Upper	6	7.4	23.4	102	1.4	20.0	7	11.1	145	2.6	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	1.2	0	0.0	0	0.0	0.0
Total	81	100.0	100.0	7,236	100.0	100.0	63	100.0	5,622	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-35

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Casper MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	6.2	0	0.0	1.6	0	0.0	0	0.0	4.8
Moderate	0	0.0	2.1	0	0.0	2.0	0	0.0	0	0.0	6.0
Middle	0	0.0	15.5	0	0.0	13.6	2	100.0	150	100.0	47.6
Upper	2	100.0	75.3	251	100.0	82.7	0	0.0	0	0.0	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	2	100.0	100.0	251	100.0	100.0	2	100.0	150	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-36

**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level
Assessment Area: Casper MSA**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	8.6	0	0.0	4.4	2	15.4	10.4	82	7.2	5.8	21.1
Moderate	2	50.0	25.6	176	41.6	18.6	3	23.1	23.9	248	21.7	17.3	16.4
Middle	0	0.0	20.6	0	0.0	19.9	1	7.7	22.5	131	11.5	22.5	21.7
Upper	1	25.0	23.6	200	47.3	33.3	4	30.8	23.3	166	14.5	31.8	40.7
Unknown	1	25.0	21.6	47	11.1	23.8	3	23.1	19.9	514	45.0	22.6	0.0
Total	4	100.0	100.0	423	100.0	100.0	13	100.0	100.0	1,141	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.8	0	0.0	2.6	1	14.3	5.9	127	6.5	3.6	21.1
Moderate	1	20.0	13.4	101	11.1	10.0	1	14.3	17.6	152	7.8	13.7	16.4
Middle	2	40.0	20.1	428	47.1	18.2	3	42.9	20.7	271	13.9	19.2	21.7
Upper	2	40.0	31.0	380	41.8	37.0	2	28.6	26.3	1,400	71.8	32.6	40.7
Unknown	0	0.0	30.7	0	0.0	32.3	0	0.0	29.4	0	0.0	31.1	0.0
Total	5	100.0	100.0	909	100.0	100.0	7	100.0	100.0	1,950	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.2	0	0.0	5.4	0	0.0	6.3	0	0.0	4.8	21.1
Moderate	0	0.0	12.2	0	0.0	11.1	0	0.0	20.6	0	0.0	12.3	16.4
Middle	0	0.0	22.4	0	0.0	16.3	0	0.0	20.6	0	0.0	21.0	21.7
Upper	0	0.0	49.0	0	0.0	46.6	0	0.0	47.6	0	0.0	49.3	40.7
Unknown	0	0.0	8.2	0	0.0	20.5	0	0.0	4.8	0	0.0	12.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.7	0	0.0	3.5	3	15.0	8.3	209	6.8	4.7	21.1
Moderate	3	33.3	19.5	277	20.8	14.2	4	20.0	20.8	400	12.9	15.6	16.4
Middle	2	22.2	19.6	428	32.1	18.6	4	20.0	21.5	402	13.0	20.8	21.7
Upper	3	33.3	26.3	580	43.5	34.2	6	30.0	24.9	1,566	50.7	32.2	40.7
Unknown	1	11.1	27.9	47	3.5	29.4	3	15.0	24.5	514	16.6	26.7	0.0
Total	9	100.0	100.0	1,332	100.0	100.0	20	100.0	100.0	3,091	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-37

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Casper MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
By Revenue											
\$1 Million or Less	52	64.2	54.4	1,185	16.4	41.8	47	74.6	1,517	27.0	90.3
Over \$1 Million	29	35.8		6,051	83.6		14	22.2	4,044	71.9	8.8
Revenue Unknown	0	0.0		0	0.0		2	3.2	61	1.1	0.9
Total	81	100.0		7,236	100.0		63	100.0	5,622	100.0	100.0
By Loan Size											
\$100,000 or Less	65	80.2	83.9	1,537	21.2	27.2	51	81.0	1,107	19.7	
\$100,001 - \$250,000	9	11.1	8.6	1,413	19.5	19.8	3	4.8	375	6.7	
\$250,001 - \$1 Million	7	8.6	7.5	4,286	59.2	53.0	9	14.3	4,140	73.6	
Total	81	100.0	100.0	7,236	100.0	100.0	63	100.0	5,622	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	51	98.1		995	84.0		43	91.5	685	45.2	
\$100,001 - \$250,000	1	1.9		190	16.0		2	4.3	257	16.9	
\$250,001 - \$1 Million	0	0.0		0	0.0		2	4.3	575	37.9	
Total	52	100.0		1,185	100.0		47	100.0	1,517	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-38

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Casper MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	1	50.0	73.2	1	0.4	82.6	2	100.0	150	100.0	98.8
Over \$1 Million	1	50.0		250	99.6		0	0.0	0	0.0	1.2
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Total	2	100.0		251	100.0		2	100.0	150	100.0	100.0
By Loan Size											
\$100,000 or Less	1	50.0	76.3	1	0.4	28.3	2	100.0	150	100.0	
\$100,001 - \$250,000	1	50.0	16.5	250	99.6	37.0	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	7.2	0	0.0	34.7	0	0.0	0	0.0	
Total	2	100.0	100.0	251	100.0	100.0	2	100.0	150	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	1	100.0		1	100.0		2	100.0	150	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	1	100.0		1	100.0		2	100.0	150	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-39

2021 Casper MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	20,267	100.0	1,530	7.5	20,267	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,316	21,409	100.0	60.6	10,722	30.4	3,185	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	871	19.3	753	18.5	106	26.6	12	29.3
Moderate	413	9.1	341	8.4	68	17.0	4	9.8
Middle	2,263	50.1	2,095	51.3	156	39.1	12	29.3
Upper	973	21.5	891	21.8	69	17.3	13	31.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,520	100.0	4,080	100.0	399	100.0	41	100.0
Percentage of Total Businesses:				90.3		8.8		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	4	4.8	3	3.6	1	100.0	0	0.0
Moderate	5	6.0	5	6.0	0	0.0	0	0.0
Middle	40	47.6	40	48.2	0	0.0	0	0.0
Upper	35	41.7	35	42.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	84	100.0	83	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table E-40

2020 Casper MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	20,267	100.0	1,530	7.5	20,267	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,316	21,409	100.0	60.6	10,722	30.4	3,185	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	834	19.2	718	18.3	107	26.4	9	28.1
Moderate	423	9.7	348	8.9	71	17.5	4	12.5
Middle	2,297	52.8	2,128	54.4	159	39.3	10	31.3
Upper	798	18.3	721	18.4	68	16.8	9	28.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,352	100.0	3,915	100.0	405	100.0	32	100.0
Percentage of Total Businesses:				90.0		9.3		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	4	4.7	3	3.6	1	100.0	0	0.0
Moderate	8	9.4	8	9.5	0	0.0	0	0.0
Middle	37	43.5	37	44.0	0	0.0	0	0.0
Upper	36	42.4	36	42.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	85	100.0	84	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**ALBANY COUNTY ASSESSMENT AREA
Table E-41**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Albany County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	\$ %	\$ %	#	%	%	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Lo w	1	6.3	2.8	154	6.4	1.8	3	15.8	4.5	315	7.5	3.0	3.4
Mo derate	1	6.3	5.2	154	6.4	4.2	0	0.0	5.7	0	0.0	4.9	5.5
Middle	14	87.5	92.0	2,095	87.2	94.1	16	84.2	89.9	3,902	92.5	92.1	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	16	100.0	100.0	2,403	100.0	100.0	19	100.0	100.0	4,217	100.0	100.0	100.0
Refinance Loans													
Lo w	1	4.8	2.4	53	1.3	1.6	0	0.0	2.3	0	0.0	1.8	3.4
Mo derate	1	4.8	5.2	125	3.1	3.7	1	7.7	4.9	120	6.0	3.6	5.5
Middle	19	90.5	92.5	3,822	95.6	94.7	12	92.3	92.8	1,868	94.0	94.7	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	21	100.0	100.0	4,000	100.0	100.0	13	100.0	100.0	1,988	100.0	100.0	100.0
Home Improvement Loans													
Lo w	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.4
Mo derate	0	0.0	27.3	0	0.0	23.9	0	0.0	4.0	0	0.0	2.5	5.5
Middle	1	100.0	72.7	66	100.0	76.1	1	100.0	96.0	130	100.0	97.5	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	1	100.0	100.0	66	100.0	100.0	1	100.0	100.0	130	100.0	100.0	100.0
Multifamily Loans													
Lo w	0	0.0	33.3	0	0.0	18.6	0	0.0	33.3	0	0.0	2.6	13.7
Mo derate	1	50.0	41.7	330	36.1	32.1	0	0.0	16.7	0	0.0	1.5	15.2
Middle	1	50.0	25.0	584	63.9	49.3	0	0.0	50.0	0	0.0	95.9	71.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	2	100.0	100.0	914	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Lo w	2	4.8	2.8	207	2.7	2.1	3	9.1	3.3	315	5.0	2.4	3.4
Mo derate	3	7.1	5.8	609	8.1	4.8	1	3.0	5.2	120	1.9	4.0	5.5
Middle	37	88.1	91.4	6,735	89.2	93.1	29	87.9	91.5	5,900	93.1	93.6	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unkno wn	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
To tal	42	100.0	100.0	7,551	100.0	100.0	33	100.0	100.0	6,335	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-42

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Albany County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
Low	19	12.3	11.1	1,961	19.0	15.3	6	6.7	782	9.4	11.8
Moderate	49	31.6	22.6	3,268	31.6	26.2	34	38.2	3,838	46.1	20.4
Middle	87	56.1	65.5	5,119	49.5	58.4	49	55.1	3,704	44.5	67.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	155	100.0	100.0	10,348	100.0	100.0	89	100.0	8,324	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-43

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography											
Assessment Area: Albany County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	5.7
Moderate	0	0.0	10.3	0	0.0	1.4	0	0.0	0	0.0	3.8
Middle	2	100.0	89.7	16	100.0	98.6	2	100.0	2	100.0	90.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	2	100.0	100.0	16	100.0	100.0	2	100.0	2	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-44

**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level
Assessment Area: Albany County**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	3	18.8	4.7	154	6.4	2.5	2	10.5	5.4	77	1.8	3.1	26.7
Moderate	6	37.5	21.0	830	34.5	15.9	7	36.8	18.7	963	22.8	14.6	16.5
Middle	2	12.5	25.5	225	9.4	27.1	2	10.5	27.2	429	10.2	26.5	21.1
Upper	3	18.8	37.1	869	36.2	42.9	4	21.1	38.9	2,016	47.8	45.8	35.7
Unknown	2	12.5	11.6	325	13.5	11.6	4	21.1	9.9	732	17.4	10.0	0.0
Total	16	100.0	100.0	2,403	100.0	100.0	19	100.0	100.0	4,217	100.0	100.0	100.0
Refinance Loans													
Low	2	9.5	4.0	81	2.0	2.4	1	7.7	7.3	76	3.8	4.4	26.7
Moderate	3	14.3	16.9	103	2.6	12.9	6	46.2	16.2	701	35.3	12.8	16.5
Middle	3	14.3	23.4	497	12.4	21.7	2	15.4	24.4	517	26.0	23.1	21.1
Upper	9	42.9	37.2	2,417	60.4	43.2	2	15.4	36.1	370	18.6	41.6	35.7
Unknown	4	19.0	18.5	902	22.6	19.8	2	15.4	16.0	324	16.3	18.1	0.0
Total	21	100.0	100.0	4,000	100.0	100.0	13	100.0	100.0	1,988	100.0	100.0	100.0
Home Improvement Loans													
Low	1	100.0	9.1	66	100.0	6.3	0	0.0	4.0	0	0.0	4.9	26.7
Moderate	0	0.0	27.3	0	0.0	14.3	0	0.0	16.0	0	0.0	18.7	16.5
Middle	0	0.0	0.0	0	0.0	0.0	1	100.0	20.0	130	100.0	16.3	21.1
Upper	0	0.0	45.5	0	0.0	74.1	0	0.0	52.0	0	0.0	55.0	35.7
Unknown	0	0.0	18.2	0	0.0	5.3	0	0.0	8.0	0	0.0	5.2	0.0
Total	1	100.0	100.0	66	100.0	100.0	1	100.0	100.0	130	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	15.0	4.3	301	4.5	2.4	3	9.1	6.4	153	2.4	3.8	26.7
Moderate	9	22.5	18.5	933	14.1	14.1	13	39.4	17.0	1,664	26.3	13.6	16.5
Middle	5	12.5	23.8	722	10.9	23.8	5	15.2	25.5	1,076	17.0	24.5	21.1
Upper	13	32.5	37.1	3,354	50.5	43.1	6	18.2	37.5	2,386	37.7	43.5	35.7
Unknown	7	17.5	16.2	1,327	20.0	16.6	6	18.2	13.7	1,056	16.7	14.5	0.0
Total	40	100.0	100.0	6,637	100.0	100.0	33	100.0	100.0	6,335	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table E-45

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Albany County											
	Bank And Aggregate Loans By Year										Total Businesses %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	112	72.3	53.1	4,177	40.4	42.3	79	88.8	5,844	70.2	92.2
Over \$1 Million	39	25.2		5,787	55.9		10	11.2	2,480	29.8	6.6
Revenue Unknown	4	2.6		384	3.7		0	0.0	0	0.0	1.2
Total	155	100.0		10,348	100.0		89	100.0	8,324	100.0	100.0
By Loan Size											
\$100,000 or Less	125	80.6	87.8	2,902	28.0	28.0	65	73.0	1,254	15.1	
\$100,001 - \$250,000	20	12.9	6.1	3,209	31.0	17.8	13	14.6	2,427	29.2	
\$250,001 - \$1 Million	10	6.5	6.1	4,237	40.9	54.2	11	12.4	4,643	55.8	
Total	155	100.0	100.0	10,348	100.0	100.0	89	100.0	8,324	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	103	92.0		1,789	42.8		60	75.9	1,067	18.3	
\$100,001 - \$250,000	6	5.4		967	23.2		12	15.2	2,177	37.3	
\$250,001 - \$1 Million	3	2.7		1,421	34.0		7	8.9	2,600	44.5	
Total	112	100.0		4,177	100.0		79	100.0	5,844	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-46

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Albany County											
	Bank And Aggregate Loans By Year										Total Farms %
	2020						2021*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	2	100.0	65.5	16	100.0	79.2	2	100.0	2	100.0	100.0
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Total	2	100.0		16	100.0		2	100.0	2	100.0	100.0
By Loan Size											
\$100,000 or Less	2	100.0	82.8	16	100.0	37.8	2	100.0	2	100.0	
\$100,001 - \$250,000	0	0.0	17.2	0	0.0	62.2	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	
Total	2	100.0	100.0	16	100.0	100.0	2	100.0	2	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	2	100.0		16	100.0		2	100.0	2	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	2	100.0		16	100.0		2	100.0	2	100.0	

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-47

2021 Albany County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1
Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	7,595	100.0	1,006	13.2	7,595	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	18,537	7,591	100.0	41.0	8,071	43.5	2,875	15.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	197	11.8	174	11.3	22	20.0	1	5.0
Moderate	341	20.4	314	20.3	22	20.0	5	25.0
Middle	1,137	67.9	1,057	68.4	66	60.0	14	70.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,675	100.0	1,545	100.0	110	100.0	20	100.0
Percentage of Total Businesses:					92.2		6.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	5.7	3	5.7	0	0.0	0	0.0
Moderate	2	3.8	2	3.8	0	0.0	0	0.0
Middle	48	90.6	48	90.6	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	53	100.0	53	100.0	0	0.0	0	0.0
Percentage of Total Farms:					100.0		0.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-48

2020 Albany County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1
Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	7,595	100.0	1,006	13.2	7,595	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	18,537	7,591	100.0	41.0	8,071	43.5	2,875	15.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	216	13.0	193	12.6	22	19.5	1	5.3
Moderate	328	19.7	301	19.6	21	18.6	6	31.6
Middle	1,123	67.4	1,041	67.8	70	61.9	12	63.2
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,667	100.0	1,535	100.0	113	100.0	19	100.0
Percentage of Total Businesses:				92.1		6.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	5.3	3	5.3	0	0.0	0	0.0
Moderate	2	3.5	2	3.5	0	0.0	0	0.0
Middle	52	91.2	52	91.2	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	57	100.0	57	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

APPENDIX F – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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

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

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

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

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

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

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