PUBLIC DISCLOSURE

March 23, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

High Plains Bank
RSSD# 247551

329 Main Avenue
Flagler, Colorado 80815

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 bank. 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

High Plains Bank (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and assessment areas (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, aggregate lending data, and credit needs. Lending performance was assessed within the bank's four AAs. The Boulder MSA, Greeley MSA, and Northeast Colorado AAs were assessed using full-scope reviews. The Denver Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 15-quarter average LTD ratio,
- A statistical sample of 54 small business loans selected from a universe of 74 loans originated between January 1, 2024 and December 31, 2024,
- A statistical sample of 42 agricultural loans selected from a universe of 53 loans originated between January 1, 2024 and December 31, 2024, and
- The universe of 54 home mortgage loans originated between January 1, 2023 and December 31, 2024.

In addition, greater weight in the overall ratings was placed on the bank's performance in the Northeast Colorado AA, as a significant number of loans and percentage of deposits originate from this AA. The Boulder MSA and Greeley MSA AAs were given equal weighting in the overall institutional rating. In addition, small business lending garnered greater weight over agricultural and home mortgage lending due to strategic focus and portfolio concentrations.

DESCRIPTION OF INSTITUTION

High Plains Bank is a community bank headquartered in Flagler, Colorado. The bank's characteristics include the following:

- The bank is a wholly owned subsidiary of High Plains BKG Group, Inc.
- The bank has total assets of $445.8 million as of September 30, 2025.
- In addition to its main office in Flagler, the bank has four additional offices located in Bennett, Longmont, Keenesburg, and Wiggins, Colorado. The bank also operates one loan production office (LPO) in Longmont, Colorado.
- The bank operates five cash-only automated teller machines (ATMs) throughout its branch network.
- As shown in the table below, the bank's primary business focus is commercial lending.

Table 1

Composition of Loan Portfolio as of September 30, 2025		
Loan Type	**$(000)**	**%**
Construction and Land Development	49,486	13.1
Farmland	46,795	12.4
1- to 4-Family Residential Real Estate	90,150	23.9
Multifamily Residential Real Estate	10,108	2.7
Nonfarm Nonresidential Real Estate	122,568	32.5
Agricultural	25,521	6.8
Commercial and Industrial	29,279	7.8
Consumer	2,230	0.6
Other	819	0.2
Gross Loans	376,956	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its April 25, 2022, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA[1]

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Boulder MSA, Greeley MSA, and Northeast Colorado AAs (full-scope reviews) and a brief discussion of performance in the Denver Metropolitan AA (limited-scope review).

The bank's overall lending test performance is Satisfactory.

1 The loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average LTD ratio to determine the reasonableness of lending considering performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated FDIC-insured institutions. Similarly situated institutions were selected based on asset size, product offerings, and area of operations. The bank's LTD ratio is reasonable.

Table 2

Comparative LTD Ratios March 31, 2022 – September 30, 2025			
Institution	**Location**	**Asset Size $(000)**	**LTD Ratio (%) 15-Quarter Average**
High Plains Bank	**Flagler, Colorado**	**445,815**	**91.4**
Similarly Situated Institutions			
Frontier Bank	Lamar, Colorado	418,356	48.3
Mountain Valley Bank	Walden, Colorado	558,929	82.3
Stockmens Bank	Colorado Springs, Colorado	573,536	92.7
Farmers Bank	Ault, Colorado	311,461	59.2
First Farmbank	Greeley, Colorado	377,612	89.2

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AA.

Table 3

Lending Inside and Outside the Assessment Area								
Loan Type	**Inside**				**Outside**			
	#	**#%**	**$(000)**	**$%**	**#**	**#%**	**$(000)**	**$%**
Home Purchase - Conventional	21	95.5	10,115	94.6	1	4.5	572	5.4
Home Improvement	11	91.7	1,057	59.3	1	8.3	724	40.7
Multi-Family Housing	2	100.0	251	100.0	0	0.0	0	0.0
Other Purpose Closed-End	5	100.0	684	100.0	0	0.0	0	0.0
Refinancing	11	84.6	1,650	80.2	2	15.4	408	19.8
Total HMDA related	**50**	**92.6**	**13,757**	**89.0**	**4**	**7.4**	**1,704**	**11.0**
Small Business	47	87.0	9,868	81.1	7	13.0	2,300	18.9
Small Farm	36	85.7	4,852	89.3	6	14.3	581	10.7
Total Loans	**133**	**88.7**	**28,476**	**86.1**	**17**	**11.3**	**4,585**	**13.9**
Note: Percentages may not total 100.0 percent due to rounding.								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different sizes. The bank's lending has an overall excellent distribution among individuals of different income levels and businesses and farms of different sizes. As previously noted, the bank's performance in the Northeast Colorado AA was rated as excellent and given greater weight in the analysis. The bank's performance in the Boulder and Greeley MSAs was considered reasonable.

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 this 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.

BOULDER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

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

The bank's Boulder MSA AA consists of Boulder County in its entirety and three census tracts in Larimer County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The Boulder MSA AA has changed its AA delineation from the previous examination whereby at the last examination the bank's AA contained Boulder County in its entirety, two census tracts in Larimer County, and five census tracts in Weld County.
- The Boulder MSA AA's composition is comprised of 4 low-, 13 moderate-, 33 middle-, and 28 upper-income census tracts, along with 3 unknown-income census tracts. The three unknown-income census tracts are new designations since the last examination.
- At the previous examination, the AA area was comprised of 5 low-, 15 moderate-, 31 middle-, and 24 upper-income census tracts.
- The bank operates one branch with one cash-only ATM in Longmont, Colorado. In addition, the bank also maintains a LPO located in Longmont, Colorado, which was opened in December of 2023. Furthermore, the bank closed its branch located at 17th Street, Longmont, Colorado, effective April 2023.
- According to the June 30, 2024, Summary of Deposits Market Share Report, the bank ranked 26th out of 42 FDIC-insured depository institutions, with 182 offices in the AA and a total deposit market share of 0.5 percent.
- To further augment the evaluation, examiners referenced one interview with a member of the communities within the bank's AA that was previously conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and perspectives on local economic and demographic characteristics. The community member represented an economic development agency.

Table 4

Population Change Assessment Area: Boulder MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Boulder MSA	628,259	689,824	9.8
Boulder County, CO	310,032	330,758	6.7
Larimer County, CO	318,227	359,066	12.8
Fort Collins-Loveland, CO MSA	318,227	359,066	12.8
Colorado	5,278,906	5,773,714	9.4

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census
All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.

- According to the 2020 ACS five-year average, the AA's population accounts for 11.9 percent of the statewide population.
- The county seat of Boulder County is the city of Boulder, which has a population of 106,802 according to the 2024 U.S. Census. Additionally, the University of Colorado-Boulder is located in this AA, with a student population of 38,799.

Table 5

Median Family Income Change Assessment Area: Boulder MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Boulder MSA	91,859	104,467	13.7
Boulder County, CO	105,899	118,307	11.7
Larimer County, CO	84,004	96,221	14.5
Fort Collins-Loveland, CO MSA	84,004	96,221	14.5
Colorado	81,753	92,752	13.5

Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.
All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.

- According to the 2020 ACS, 37.9 percent of families in the AA are LMI, which is comparable to the 38.1 percent statewide figure.
- The percentage of families living below poverty in the AA, at 4.1 percent, is below the statewide figure of 6.1 percent.

Table 6

Housing Cost Burden Assessment Area: Boulder MSA						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low-Income	**Moderate - Income**	**All Renters**	**Low-Income**	**Moderate - Income**	**All Owners**
Boulder MSA	81.9	56.8	50.7	63.1	42.6	20.4
Boulder County, CO	83.0	63.5	52.4	64.6	43.9	20.4
Larimer County, CO	80.8	52.0	49.0	61.7	41.8	20.4
Fort Collins-Loveland, CO MSA	80.8	52.0	49.0	61.7	41.8	20.4
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy
All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.

- According to the 2020 ACS there is a higher percentage of owner-occupied units at 60.8 percent compared to rental units at 33.4 percent. The state figures for owner-occupied and rental units at 59.9 percent and 30.6 percent are below the AA.
- The median age of housing stock in the AA, at 42 years, is above the statewide figure of 36 years.
- The community member stated that housing is a challenge in the AA. Housing availability and prices are both issues. Further, it isn't uncommon for someone to work in Larimer County but live in Weld County due to the cheaper cost of housing.

Table 7

Unemployment Rates Assessment Area: Boulder MSA					
Region	**2020**	**2021**	**2022**	**2023**	**2024**
Boulder MSA	6.1	4.8	2.8	3.1	4.1
Boulder County, CO	6.0	4.6	2.7	3.2	4.2
Larimer County, CO	6.1	5.0	2.9	3.1	4.1
Fort Collins-Loveland, CO MSA	6.1	5.0	2.9	3.1	4.1
Colorado	6.8	5.5	3.1	3.3	4.3

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics
All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.

- The major industries in the AA are professional and technical services, healthcare and social assistance, other services except public administration, retail trade, and construction.
- Some of the largest employers in the AA include Ambrosia BioSciences, BAE Systems, Battelle, Boulder Community Health, and Boulder Valley School District.
- The community member stated that the area has a large amount of tourism, so hospitality and restaurant industries have grown.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE BOULDER MSA AA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. While no loans were originated in the low-income census tracts, the distribution of home mortgage lending in low-income census tracts was comparable to aggregate lending data and comparable to the demographic figure, which represents the percentage of owner-occupied housing units by income level of census tracts. The distribution of home mortgage lending in moderate-income tracts was above aggregate lending data and above the demographic figure.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and did not impact the overall conclusion, given the considerable amount of competition from other financial institutions in the AA and distance of the branch locations.

Table 8

Distribution of 2023 to 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Boulder MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.2	0	0.0	1.9	1.6
Moderate	3	30.0	12.1	956	20.5	15.9	13.4
Middle	4	40.0	49.4	2,049	44.0	43.0	44.4
Upper	3	30.0	36.2	1,656	35.5	37.9	39.4
Unknown	0	0.0	1.1	0	0.0	1.3	1.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	4,661	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. While no loans were originated in low-income census tracts, this was comparable to aggregate lending data and comparable to the demographic figure, which represents the percentage of businesses operating in these tracts by income level of geography. The distribution of small business lending in moderate-income tracts was above aggregate lending data and above the demographic figure.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and did not impact the overall conclusion, given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 9

Distribution of 2024 Small Business Lending By Income Level of Geography
Assessment Area: Boulder MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.8	0	0.0	3.0	1.9
Moderate	4	30.8	19.1	1,596	44.0	22.5	21.0
Middle	7	53.8	38.8	1,597	44.0	37.2	37.0
Upper	2	15.4	38.2	432	11.9	35.1	38.7
Unknown	0	0.0	1.6	0	0.0	2.1	1.4
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
Total	13	100.0	100.0	3,626	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The geographic distribution of small farm lending is poor. No loans were originated in low-income census tracts, which was comparable to aggregate lending data and comparable to the demographic figure, which represents the percentage of farms operating in these tracts by income level of geography. However, the bank also did not originate any loans in the moderate-income tracts, which was below aggregate lending data and below the demographic figure.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and do not impact the overall conclusion, given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 10

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Boulder MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	20.6	0	0.0	26.0	16.5
Middle	1	50.0	41.2	19	4.0	42.1	44.0
Upper	1	50.0	38.1	457	96.0	31.9	38.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	476	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

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

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

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers is above aggregate lending data and below the demographic figure, which is the percent of families by family income. The distribution of home mortgage lending to moderate-income borrowers was above aggregate lending data and comparable to the demographic figure.

Table 11

Distribution of 2023 to 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Boulder MSA							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	1	10.0	7.4	71	1.5	3.1	20.2
Moderate	2	20.0	14.9	631	13.5	8.5	17.7
Middle	0	0.0	21.0	0	0.0	16.3	21.3
Upper	3	30.0	42.7	1,719	36.9	54.1	40.7
Unknown	4	40.0	14.1	2,240	48.1	17.9	0.0
Total	10	100.0	100.0	4,661	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Business Lending</u>

The borrower distribution of small business lending is reasonable. The distribution of small business lending to businesses with annual revenues of one million dollars or less was comparable to aggregate lending data and comparable to the demographic figure, which represents the total percentage of businesses in the AA with revenues of one million dollars or less.

Table 12

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Boulder MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	9	69.2	57.4	2,959	81.6	34.9	93.1
Over $1 Million	4	30.8		667	18.4		5.8
Revenue Unknown	0	0.0		0	0.0		1.1
Total	13	100.0		3,626	100.0		100.0
By Loan Size							
$100,000 or Less	5	38.5	96.0	233	6.4	47.8	
$100,001 - $250,000	2	15.4	2.0	299	8.2	12.4	
$250,001 - $1 Million	6	46.2	2.0	3,093	85.3	39.7	
Total	13	100.0	100.0	3,626	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	3	33.3		138	4.7		
$100,001 - $250,000	1	11.1		149	5.0		
$250,001 - $1 Million	5	55.6		2,671	90.3		
Total	9	100.0		2,958	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

<u>Small Farm Lending</u>

The borrower distribution of small farm lending is poor. The distribution of lending to small farms with annual revenues of one million dollars or less was comparable to aggregate lending data and below the demographic figure, which represents the total percentage of farms in the AA with revenues of one million dollars or less.

Table 13

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Boulder MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	1	50.0	70.1	19	4.0	60.7	98.6
Over $1 Million	1	50.0		457	96.0		1.1
Revenue Unknown	0	0.0		0	0.0		0.3
Total	2	100.0		476	100.0		100.0
By Loan Size							
$100,000 or Less	1	50.0	94.8	19	4.0	49.7	
$100,001 - $250,000	0	0.0	4.1	0	0.0	35.9	
$250,001 - $500,000	1	50.0	1.0	457	96.0	14.4	
Total	2	100.0	100.0	476	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	1	100.0		19	100.0		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		
Total	1	100.0		19	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

GREELEY MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

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

The bank's Greeley MSA AA consists of Weld County in its entirety (see Appendix A for additional demographic data).

- The Greeley MSA is a new AA for the bank which is due to a new branch opening in Keenesburg, Colorado, just prior to the last examination.
- The AA consists of 4 low-, 19 moderate-, 30 middle-, 29 upper- and 1 unknown-income census tracts.
- The bank operates one branch and cash-only ATM in Keenesburg, Colorado.
- According to the June 30, 2024, Summary of Deposits Market Share Report, the bank ranked 23rd out of 25 FDIC-insured depository institutions, with 68 branches in the AA and a total deposit market share of 0.4 percent.
- One interview with a community member was conducted to ascertain the credit needs of the communities within the bank's AA, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact is affiliated with the AA in a civic capacity.

Table 14

Population Change Assessment Area: Greeley MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Greeley MSA	270,948	328,981	21.4
Colorado	5,278,906	5,773,714	9.4
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- According to the 2020 ACS five-year average, the AA's population accounts for 5.7 percent of the statewide population.
- The county seat of Weld County is the city of Greeley, which has a population of 114,366 according to the 2024 U.S. Census. Additionally, the University of Northern Colorado is located in this AA, with a student population of 8,869.

Table 15

Median Family Income Change Assessment Area: Greeley MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Greeley MSA	76,980	85,167	10.6
Colorado	81,753	92,752	13.5

Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

- According to the 2020 ACS, 37.5 percent of families in the AA are LMI, which is below the 38.1 percent statewide figure.
- The percentage of families living below poverty in the AA at 6.8 percent is above the statewide figure of 6.1 percent.
- The community member mentioned that the overall income in the city of Greeley is below the national median income levels, which is indicative of a blue-collar community.

Table 16

Housing Cost Burden Assessment Area: Greeley MSA						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low-Income	**Moderate-Income**	**All Renters**	**Low-Income**	**Moderate-Income**	**All Owners**
Greeley MSA	76.5	45.3	46.2	65.8	46.4	23.2
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- According to the 2020 ACS there is a higher percentage of owner-occupied units at 71.7 percent compared to rental units at 24.5 percent. The state figures for owner-occupied units at 59.9 percent are below the AA, and for rental units at 30.6 percent, they are above the AA.
- The median age of housing stock in the AA, at 33 years, is below the statewide figure of 36 years.
- The community member stated that the city of Greeley does not have a housing crisis at this time and feels that the housing needs through both home ownership and rental units are good. The contact further emphasized that the low cost of housing in Greeley is one of the biggest attractions to young families relocating to raise their children where an average home is approximately $50K or less than other MSAs in Colorado.

Table 17

Unemployment Rates Assessment Area: Greeley MSA					
Region	**2020**	**2021**	**2022**	**2023**	**2024**
Greeley MSA	6.5	5.8	3.3	3.5	4.5
Colorado	6.8	5.5	3.1	3.3	4.3
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

- The major industries in the AA are professional and technical services, construction, health care and social assistance, retail trade, and other services except public administration.
- Some of the largest employers in the AA include JBS Swift Co., Banner/North Colorado Medical Center, Vestas-Americas, Greeley/Evans School District 6, and University of Northern Colorado.
- The community member stated that the Greeley MSA is a blue-collar community with good access to higher education through both a local community college and the University of Northern Colorado.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE GREELEY MSA AA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. While no loans were originated in low-income census tracts, the distribution of home mortgage lending in low-income census tracts was comparable to aggregate lending data and comparable to the demographic figure, which represents the percentage of owner-occupied housing units by income level of census tracts. The distribution of home mortgage lending in moderate-income tracts was below aggregate lending data and below the demographic figure. However, distance from the bank's sole branch in the AA to low- and moderate-income census tracts was considered, along with the presence of competition in the AA, which both support a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 18

Distribution of 2023 to 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Greeley MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.9	0	0.0	0.8	1.5
Moderate	1	6.3	14.4	152	2.8	12.0	17.5
Middle	11	68.8	41.0	2,847	51.7	38.0	47.2
Upper	4	25.0	43.7	2,512	45.6	49.2	33.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	5,511	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. While no small business loans were originated in low- and moderate-income census tracts, the distribution of small business lending in low-income census tracts was comparable to aggregate lending data and below the demographic figure, which represents the percentage of businesses operating in these tracts by income level of geography. The distribution of small business lending in moderate-income tracts was below aggregate lending data and below the demographic figure. However, distance from the bank’s sole branch in the AA to low- and moderate-income census tracts was considered, along with the presence of competition in the AA, which supports a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 19

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Greeley MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.3	0	0.0	2.7	4.4
Moderate	0	0.0	15.2	0	0.0	19.2	17.8
Middle	8	66.7	40.0	1,561	58.3	37.5	42.7
Upper	4	33.3	42.0	1,116	41.7	40.4	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
Total	12	100.0	100.0	2,677	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The geographic distribution of small farm lending is reasonable. No small farm loans were originated in either low- or moderate-income census tracts. The distribution of small farm lending in low-income census tracts was comparable to aggregate lending data and comparable to the demographic figure, which represents the percentage of farms operating in these tracts by income level of geography. The distribution of small farm lending in moderate-income tracts was comparable to aggregate lending data and below the demographic figure. However, distance from the bank's sole branch in the AA to low- and moderate-income census tracts was considered, along with the presence of competition in the AA, which supports a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 20

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Greeley MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.7	0	0.0	0.7	1.8
Moderate	0	0.0	1.9	0	0.0	0.8	8.4
Middle	5	55.6	75.1	334	28.0	80.1	67.9
Upper	4	44.4	21.2	858	72.0	18.4	21.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.2	0	0.0	0.1	
Total	9	100.0	100.0	1,192	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

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

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

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The distribution of home mortgage lending to low-income borrowers was above aggregate lending data and below the demographic figure, which is the percent of families by family income. No loans were originated to moderate-income borrowers, which was below aggregate lending data and below the demographic figure.

Table 21

Distribution of 2023 to 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Greeley MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	1	6.3	4.6	155	2.8	2.3	19.5
Moderate	0	0.0	17.5	0	0.0	12.4	18.0
Middle	4	25.0	29.0	771	14.0	26.5	22.7
Upper	6	37.5	32.1	1,702	30.9	37.6	39.8
Unknown	5	31.3	16.9	2,883	52.3	21.2	0.0
Total	16	100.0	100.0	5,511	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The distribution of small business lending to businesses with annual revenues of one million dollars or less was comparable to aggregate lending data and comparable to the demographic figure, which represents the total percentage of businesses in the AA with revenues of one million dollars or less. In addition, 87.5 percent of the loans originated to small businesses with revenues of one million dollars or less, were made in amounts of $250,000 or less, which demonstrates the bank's support of small businesses that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 22

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Greeley MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	8	66.7	54.7	976	36.5	29.8	92.9
Over $1 Million	4	33.3		1,701	63.5		6.0
Revenue Unknown	0	0.0		0	0.0		1.1
Total	12	100.0		2,677	100.0		100.0
By Loan Size							
$100,000 or Less	6	50.0	93.4	345	12.9	40.1	
$100,001 - $250,000	2	16.7	3.6	367	13.7	16.8	
$250,001 - $1 Million	4	33.3	3.0	1,965	73.4	43.2	
Total	12	100.0	100.0	2,677	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	6	75.0		345	35.3		
$100,001 - $250,000	1	12.5		176	18.0		
$250,001 - $1 Million	1	12.5		455	46.6		
Total	8	100.0		976	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of small farm lending to farms with annual revenues of one million dollars or less was above aggregate lending data and comparable to the demographic figure, which represents the total percentage of farms in the AA with revenues of one million dollars or less. In addition, 85.7 percent of the loans were made to small farms with revenues of one million dollars or less, and in amounts of $250,000 or less, which demonstrates the bank's support of small farms that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 23

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Greeley MSA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	7	77.8	54.4	916	76.8	53.2	93.9
Over $1 Million	2	22.2		276	23.2		6.1
Revenue Unknown	0	0.0		0	0.0		0.0
Total	9	100.0		1,192	100.0		100.0
By Loan Size							
$100,000 or Less	5	55.6	80.2	214	18.0	29.9	
$100,001 - $250,000	3	33.3	13.7	489	41.0	35.6	
$250,001 - $500,000	1	11.1	6.0	488	40.9	34.5	
Total	9	100.0	100.0	1,192	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	4	57.1		128	14.0		
$100,001 - $250,000	2	28.6		299	32.7		
$250,001 - $500,000	1	14.3		488	53.3		
Total	7	100.0		915	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

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

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

The bank's **Northeast Colorado** AA consists of **Logan, Morgan, Washington, Kit Carson, and Lincoln counties in their entireties** (see Appendix A for additional demographic data).

- At the last examination, the Northeast Colorado AA included the counties of Logan, Morgan, Washington, Kit Carson, and Lincoln counties in their entireties, and one census tract located in Weld County.
- The AA consists of 0 low-, 3 moderate-, 17 middle-, and 1 upper-income census tracts.
- The bank operates two branches with cash-only ATMs. One branch is located in Flagler, Colorado, and the other branch is located in Wiggins, Colorado.
- According to the June 30, 2024, Summary of Deposits Market Share Report, the bank ranked 4th out of 18 FDIC-insured depository institutions, with 37 branches in the AA and a total deposit market share of 7.2 percent.
- One interview with a community member was conducted to ascertain the credit needs of the communities within the bank's AA, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact is affiliated with the AA in an economic development capacity.

Table 24

Population Change Assessment Area: Northeast Colorado			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Northeast Colorado	68,540	68,218	(0.5)
Kit Carson County, CO	7,980	7,087	(11.2)
Lincoln County, CO	5,478	5,675	3.6
Logan County, CO	21,928	21,528	(1.8)
Morgan County, CO	28,359	29,111	2.7
Washington County, CO	4,795	4,817	0.5
NonMSA Colorado	688,010	712,118	3.5
Colorado	5,278,906	5,773,714	9.4
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- According to the 2020 ACS five-year average, the AA's population accounts for 1.2 percent of the statewide population.

- According to the 2020 ACS five-year average for population, Morgan County, Colorado has the largest population within the AA at 29,111 residents and accounts for 42.7 percent of the AA's population.

Table 25

Northeast Colorado Median Family Income Change Assessment Area: Northeast Colorado			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Northeast Colorado	$58,659	$64,543	10.0%
Kit Carson County, CO	$57,442	$65,182	13.5%
Lincoln County, CO	$60,872	$72,531	19.2%
Logan County, CO	$61,420	$66,311	8.0%
Morgan County, CO	$57,980	$64,274	10.9%
Washington County, CO	$61,939	$61,852	-0.1%
NonMSA Colorado	$66,320	$72,390	9.2%
Colorado	$81,753	$92,752	13.5%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

- According to the 2020 ACS, 41.7 percent of families in the AA are LMI, which is above the 38.1 percent statewide figure.
- The percentage of families living below poverty in the AA at 7.2 percent is above the statewide figure of 6.1 percent.

Table 26

Housing Cost Burden Assessment Area: Northeast Colorado						
	Cost Burden – Renters			**Cost Burden – Owners**		
Area	**Low-Income**	**Moderate - Income**	**All Renters**	**Low-Income**	**Moderate - Income**	**All Owners**
Northeast Colorado	55.0	40.0	33.4	53.9	32.3	21.4
Kit Carson County, CO	46.3	28.8	27.2	61.0	28.6	20.8
Lincoln County, CO	64.6	30.8	34.3	55.6	27.0	26.3
Logan County, CO	38.5	43.2	30.2	57.3	18.2	17.8
Morgan County, CO	67.1	45.5	37.8	47.9	49.3	24.4
Washington County, CO	58.8	17.4	28.8	50.8	15.9	18.2
NonMSA Colorado	69.6	41.1	41.2	56.4	31.7	22.5
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- According to the 2020 ACS there is a higher percentage of owner-occupied units, at 58.6 percent, compared to rental units at 30.8 percent in the AA. The state figures for owner-occupied units and rental units at 59.9 percent and 30.6 percent, respectively, are comparable to the AA.

- The median age of housing stock in the AA at 61 years is above the statewide figure of 36 years.

Table 27

Unemployment Rates Assessment Area: Northeast Colorado					
Region	**2020**	**2021**	**2022**	**2023**	**2024**
Northeast Colorado	4.6	5.1	3.1	3.1	3.9
Kit Carson County, CO	3.0	3.7	2.4	2.3	3.3
Lincoln County, CO	5.6	6.0	3.7	3.7	4.6
Logan County, CO	4.2	4.6	2.7	2.7	3.6
Morgan County, CO	5.5	5.9	3.7	3.5	4.2
Washington County, CO	3.4	4.1	2.8	2.8	3.5
NonMSA Colorado	6.9	5.5	3.3	3.4	4.2
Colorado	6.8	5.5	3.1	3.3	4.3
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

- The major industries in the AA are retail trade, health care and social services, construction, agriculture, forestry, fishing and hunting, and accommodation and food services.
- Some of the largest employers in the AA include Cargill, RE-1 Valley School District, City of Sterling, Colorado, Premier Farm Credit, and Marick's Waste Disposal.
- The community member stated that one of the main challenges for small businesses is the lack of overall growth opportunities in the area, mainly due to a population decline over the past several years.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE NORTHEAST COLORADO AA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. There are no low-income census tracts located within the AA. No loans were originated in moderate-income census tracts. The distribution of home mortgage lending in moderate-income tracts was below aggregate lending data and below the demographic figure, which represents the percentage of owner-occupied housing units by income level of census tracts. However, distance from the bank's two branches in the AA to the three moderate-income census tracts was considered, along with the presence of competition in the AA, which supports a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. These gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 28

Distribution of 2023 to 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Northeast Colorado							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	19.1	0	0.0	15.2	14.9
Middle	16	100.0	75.2	1,694	100.0	79.2	79.6
Upper	0	0.0	5.7	0	0.0	5.6	5.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,694	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Business Lending</u>

The geographic distribution of small business lending is reasonable. There are no low-income census tracts located within the AA. No loans were originated in moderate-income census tracts. The distribution of small business lending in moderate-income tracts was below aggregate lending data and below the demographic figure, which represents the percentage of businesses operating in these tracts by income level of geography. However, distance from the bank's two branches in the AA to the three moderate-income census tracts was considered, along with the presence of competition in the AA, which supports a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. These gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 29

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Northeast Colorado							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.3	0	0.0	17.8	19.5
Middle	9	100.0	76.8	1,049	100.0	75.4	76.4
Upper	0	0.0	6.4	0	0.0	6.3	4.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.4	
Total	9	100.0	100.0	1,049	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The geographic distribution of small farm lending is reasonable. There are no low-income census tracts located within the AA. While no loans were originated in moderate-income census tracts, the distribution of small farm lending in moderate-income tracts was comparable to aggregate lending data and comparable to the demographic figure. However, distance from the bank's two branches in the AA to the three moderate-income census tracts was considered, along with the presence of competition in the AA, which supports a reasonable rating.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, these gaps are reasonable and do not impact the overall conclusion given the considerable amount of competition from other financial institutions in the AA and the distance of the branch locations.

Table 30

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Northeast Colorado							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.9	0	0.0	2.4	2.7
Middle	21	100.0	94.0	2,990	100.0	95.6	95.0
Upper	0	0.0	2.4	0	0.0	1.9	2.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.1	
Total	21	100.0	100.0	2,990	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

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

The bank’s lending has an excellent distribution among individuals of different income levels and businesses and farms of different sizes.

<u>Home Mortgage Lending</u>

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers was above aggregate lending data and above the demographic figure, which is the percentage of families by family income. The distribution of home mortgage lending to moderate-income borrowers was below aggregate lending data and below the demographic figure.

Table 31

Distribution of 2023 to 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Northeast Colorado							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	6	40.0	8.7	191	11.8	4.6	20.6
Moderate	2	13.3	22.3	70	4.3	17.8	21.1
Middle	3	20.0	25.7	143	8.8	26.1	26.6
Upper	0	0.0	25.4	0	0.0	31.6	31.7
Unknown	4	26.7	17.8	1,213	75.0	20.0	0.0
Total	15	100.0	100.0	1,617	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of small business lending to businesses with annual revenues of one million dollars or less was above aggregate lending data and comparable to the demographic figure, which represents the total percentage of businesses in the AA with revenues of one million dollars or less. In addition, 75.0 percent of the loans made to small businesses with revenues of one million dollars or less were made in amounts of $250,000 or less, which demonstrates the bank's support of small businesses that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 32

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Colorado							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	8	88.9	51.3	793	75.6	33.2	90.2
Over $1 Million	1	11.1		256	24.4		7.5
Revenue Unknown	0	0.0		0	0.0		2.3
Total	9	100.0		1,049	100.0		100.0
By Loan Size							
$100,000 or Less	6	66.7	92.9	242	23.1	45.7	
$100,001 - $250,000	0	0.0	4.4	0	0.0	20.0	
$250,001 - $1 Million	3	33.3	2.8	807	76.9	34.4	
Total	9	100.0	100.0	1,049	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	6	75.0		242	30.5		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $1 Million	2	25.0		552	69.5		
Total	8	100.0		794	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The distribution of lending to farms with annual revenues of one million dollars or less was above aggregate lending data and comparable to the demographic figure, which represents the total percentage of farms in the AA with revenues of one million dollars or less. In addition, 93.8 percent of the loans were made to small farms with revenues of one million dollars or less in amounts of $250,000 or less, which demonstrates the bank's support of small farms that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 33

Distribution of 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Northeast Colorado

	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	16	76.2	53.3	1,614	54.0	61.7	96.5
Over $1 Million	5	23.8		1,376	46.0		3.5
Revenue Unknown	0	0.0		0	0.0		0.0
Total	21	100.0		2,990	100.0		100.0
By Loan Size							
$100,000 or Less	11	52.4	73.2	444	14.8	26.0	
$100,001 - $250,000	7	33.3	17.9	1,134	37.9	35.2	
$250,001 - $500,000	3	14.3	8.9	1,412	47.2	38.7	
Total	21	100.0	100.0	2,990	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	10	62.5		358	22.2		
$100,001 - $250,000	5	31.3		781	48.4		
$250,001 - $500,000	1	6.3		475	29.4		
Total	16	100.0		1,614	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

DENVER METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)

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

The bank's **Denver Metropolitan** AA consists of Adams and Arapahoe counties in their entireties.

- Changes in the Denver Metropolitan AA have been made since the prior exam. At the prior examination, the AA included Denver, Arapahoe, and Adams counties in their entireties.
- The bank operates one branch with one cash-only ATM located in Bennett, Colorado.
- According to the June 30, 2024, Summary of Deposits Market Share Report, the bank ranked 32nd out of 47 FDIC-insured depository institutions with 223 branches in the AA and a total deposit market share of 0.2 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE DENVER METROPOLITAN AA

The institution's lending performance in the area is consistent with the institution's lending performance overall. For more detailed information relating to the bank's lending performance in this AA, see the tables in Appendix B.

APPENDIX A – ADDITIONAL FULL-SCOPE REVIEW AA TABLES

Table A-1

2024 Boulder MSA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	4.9	1,452	1.9	98	6.7	15,706	20.2
Moderate	13	16.0	11,513	14.8	804	7.0	13,717	17.7
Middle	33	40.7	35,111	45.2	1,420	4.0	16,561	21.3
Upper	28	34.6	28,794	37.1	715	2.5	31,621	40.7
Unknown	3	3.7	735	0.9	143	19.5	0	0.0
Total AA	**81**	**100.0**	**77,605**	**100.0**	**3,180**	**4.1**	**77,605**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,335	1,370	1.6	31.6	2,702	62.3	263	6.1
Moderate	22,404	11,509	13.4	51.4	9,815	43.8	1,080	4.8
Middle	63,279	38,041	44.4	60.1	20,944	33.1	4,294	6.8
Upper	45,591	33,744	39.4	74.0	10,113	22.2	1,734	3.8
Unknown	5,305	1,054	1.2	19.9	3,512	66.2	739	13.9
Total AA	**140,914**	**85,718**	**100.0**	**60.8**	**47,086**	**33.4**	**8,110**	**5.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	428	1.9	388	1.8	36	2.7	4	1.6
Moderate	4,809	21.0	4,351	20.4	409	30.7	49	20.2
Middle	8,481	37.0	7,959	37.3	441	33.1	81	33.3
Upper	8,881	38.7	8,352	39.1	426	32.0	103	42.4
Unknown	320	1.4	294	1.4	20	1.5	6	2.5
Total AA	**22,919**	**100.0**	**21,344**	**100.0**	**1,332**	**100.0**	**243**	**100.0**
Percentage of Total Businesses:				**93.1**		**5.8**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.5	2	0.6	0	0.0	0	0.0
Moderate	60	16.5	59	16.4	1	25.0	0	0.0
Middle	160	44.0	157	43.7	2	50.0	1	100.0
Upper	140	38.5	139	38.7	1	25.0	0	0.0
Unknown	2	0.5	2	0.6	0	0.0	0	0.0
Total AA	**364**	**100.0**	**359**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.6**		**1.1**		**0.3**

Source: 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-2

2023 Boulder MSA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	4	4.9	1,452	1.9	98	6.7	15,706	20.2
Moderate	13	16.0	11,513	14.8	804	7.0	13,717	17.7
Middle	33	40.7	35,111	45.2	1,420	4.0	16,561	21.3
Upper	28	34.6	28,794	37.1	715	2.5	31,621	40.7
Unknown	3	3.7	735	0.9	143	19.5	0	0.0
Total AA	**81**	**100.0**	**77,605**	**100.0**	**3,180**	**4.1**	**77,605**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,335	1,370	1.6	31.6	2,702	62.3	263	6.1
Moderate	22,404	11,509	13.4	51.4	9,815	43.8	1,080	4.8
Middle	63,279	38,041	44.4	60.1	20,944	33.1	4,294	6.8
Upper	45,591	33,744	39.4	74.0	10,113	22.2	1,734	3.8
Unknown	5,305	1,054	1.2	19.9	3,512	66.2	739	13.9
Total AA	**140,914**	**85,718**	**100.0**	**60.8**	**47,086**	**33.4**	**8,110**	**5.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	520	2.0	475	1.9	39	2.6	6	2.1
Moderate	5,200	19.6	4,702	19.0	446	29.3	52	18.5
Middle	10,355	39.0	9,692	39.2	563	37.0	100	35.6
Upper	10,050	37.9	9,476	38.3	455	29.9	119	42.3
Unknown	413	1.6	391	1.6	18	1.2	4	1.4
Total AA	**26,538**	**100.0**	**24,736**	**100.0**	**1,521**	**100.0**	**281**	**100.0**
Percentage of Total Businesses:				**93.2**		**5.7**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	0.9	3	0.7	1	14.3	0	0.0
Moderate	63	14.7	62	14.7	1	14.3	0	0.0
Middle	182	42.3	178	42.2	3	42.9	1	100.0
Upper	178	41.4	176	41.7	2	28.6	0	0.0
Unknown	3	0.7	3	0.7	0	0.0	0	0.0
Total AA	**430**	**100.0**	**422**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.1**		**1.6**		**0.2**

Source: 2023 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-3

2024 Greeley MSA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	4.8	2,231	3.0	631	28.3	14,625	19.5
Moderate	19	22.9	15,768	21.0	2,214	14.0	13,518	18.0
Middle	30	36.1	33,719	44.9	1,746	5.2	17,066	22.7
Upper	29	34.9	23,402	31.2	540	2.3	29,911	39.8
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	**83**	**100.0**	**75,120**	**100.0**	**5,131**	**6.8**	**75,120**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,097	1,114	1.5	27.2	2,690	65.7	293	7.2
Moderate	24,837	13,300	17.5	53.5	10,433	42.0	1,104	4.4
Middle	46,841	35,864	47.2	76.6	9,064	19.4	1,913	4.1
Upper	30,262	25,771	33.9	85.2	3,803	12.6	688	2.3
Unknown	7	0	0.0	0.0	7	100.0	0	0.0
Total AA	**106,044**	**76,049**	**100.0**	**71.7**	**25,997**	**24.5**	**3,998**	**3.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	534	4.4	477	4.3	50	7.0	7	5.1
Moderate	2,140	17.8	1,987	17.8	138	19.2	15	10.9
Middle	5,140	42.7	4,796	42.9	277	38.5	67	48.6
Upper	4,212	35.0	3,910	35.0	253	35.2	49	35.5
Unknown	3	0.0	2	0.0	1	0.1	0	0.0
Total AA	**12,029**	**100.0**	**11,172**	**100.0**	**719**	**100.0**	**138**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.0**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	12	1.8	11	1.8	1	2.5	0	0.0
Moderate	55	8.4	51	8.3	4	10.0	0	0.0
Middle	446	67.9	417	67.6	29	72.5	0	0.0
Upper	144	21.9	138	22.4	6	15.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**657**	**100.0**	**617**	**100.0**	**40**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**93.9**		**6.1**		**0.0**

Source: 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-4

2023 Greeley MSA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	4.8	2,231	3.0	631	28.3	14,625	19.5
Moderate	19	22.9	15,768	21.0	2,214	14.0	13,518	18.0
Middle	30	36.1	33,719	44.9	1,746	5.2	17,066	22.7
Upper	29	34.9	23,402	31.2	540	2.3	29,911	39.8
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	**83**	**100.0**	**75,120**	**100.0**	**5,131**	**6.8**	**75,120**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,097	1,114	1.5	27.2	2,690	65.7	293	7.2
Moderate	24,837	13,300	17.5	53.5	10,433	42.0	1,104	4.4
Middle	46,841	35,864	47.2	76.6	9,064	19.4	1,913	4.1
Upper	30,262	25,771	33.9	85.2	3,803	12.6	688	2.3
Unknown	7	0	0.0	0.0	7	100.0	0	0.0
Total AA	**106,044**	**76,049**	**100.0**	**71.7**	**25,997**	**24.5**	**3,998**	**3.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	558	4.1	502	3.9	49	6.4	7	5.0
Moderate	2,388	17.5	2,221	17.5	152	19.8	15	10.6
Middle	5,759	42.3	5,405	42.5	290	37.8	64	45.4
Upper	4,913	36.1	4,582	36.0	276	35.9	55	39.0
Unknown	3	0.0	2	0.0	1	0.1	0	0.0
Total AA	**13,621**	**100.0**	**12,712**	**100.0**	**768**	**100.0**	**141**	**100.0**
Percentage of Total Businesses:				**93.3**		**5.6**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	1.5	10	1.5	1	2.3	0	0.0
Moderate	58	8.1	54	8.0	4	9.3	0	0.0
Middle	475	66.4	442	65.8	33	76.7	0	0.0
Upper	171	23.9	166	24.7	5	11.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**715**	**100.0**	**672**	**100.0**	**43**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**94.0**		**6.0**		**0.0**

Source: 2023 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-5

2024 Northeast Colorado Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,435	20.6
Moderate	3	14.3	2,539	15.2	241	9.5	3,523	21.1
Middle	17	81.0	13,410	80.4	953	7.1	4,440	26.6
Upper	1	4.8	734	4.4	10	1.4	5,285	31.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**16,683**	**100.0**	**1,204**	**7.2**	**16,683**	**100.0**
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,638	2,526	14.9	44.8	2,754	48.8	358	6.3
Middle	22,134	13,485	79.6	60.9	6,061	27.4	2,588	11.7
Upper	965	930	5.5	96.4	22	2.3	13	1.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**28,737**	**16,941**	**100.0**	**59.0**	**8,837**	**30.8**	**2,959**	**10.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	547	19.5	496	19.6	40	19.1	11	16.9
Middle	2,140	76.4	1,921	76.0	166	79.4	53	81.5
Upper	115	4.1	111	4.4	3	1.4	1	1.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,802**	**100.0**	**2,528**	**100.0**	**209**	**100.0**	**65**	**100.0**
Percentage of Total Businesses:				**90.2**		**7.5**		**2.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	18	2.7	18	2.8	0	0.0	0	0.0
Middle	632	95.0	611	95.2	21	91.3	0	0.0
Upper	15	2.3	13	2.0	2	8.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**665**	**100.0**	**642**	**100.0**	**23**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.5**		**3.5**		**0.0**

Source: 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-6

2023 Northeast Colorado Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,435	20.6
Moderate	3	14.3	2,539	15.2	241	9.5	3,523	21.1
Middle	17	81.0	13,410	80.4	953	7.1	4,440	26.6
Upper	1	4.8	734	4.4	10	1.4	5,285	31.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**16,683**	**100.0**	**1,204**	**7.2**	**16,683**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	5,638	2,526	14.9	44.8	2,754	48.8	358	6.3
Middle	22,134	13,485	79.6	60.9	6,061	27.4	2,588	11.7
Upper	965	930	5.5	96.4	22	2.3	13	1.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**28,737**	**16,941**	**100.0**	**59.0**	**8,837**	**30.8**	**2,959**	**10.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	624	20.5	572	20.8	40	18.7	12	17.4
Middle	2,279	75.0	2,053	74.5	170	79.4	56	81.2
Upper	136	4.5	131	4.8	4	1.9	1	1.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,039**	**100.0**	**2,756**	**100.0**	**214**	**100.0**	**69**	**100.0**
Percentage of Total Businesses:				**90.7**		**7.0**		**2.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	18	2.6	18	2.7	0	0.0	0	0.0
Middle	663	95.1	641	95.2	22	91.7	0	0.0
Upper	16	2.3	14	2.1	2	8.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**697**	**100.0**	**673**	**100.0**	**24**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.6**		**3.4**		**0.0**

Source: 2023 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX B – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table B-1

2024 Denver Metropolitan Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	21	7.8	18,385	6.7	3,176	17.3	63,748	23.2
Moderate	98	36.6	97,527	35.5	8,783	9.0	57,789	21.1
Middle	89	33.2	94,018	34.3	3,524	3.7	62,994	22.9
Upper	58	21.6	64,558	23.5	1,234	1.9	89,969	32.8
Unknown	2	0.7	12	0.0	0	0.0	0	0.0
Total AA	**268**	**100.0**	**274,500**	**100.0**	**16,717**	**6.1**	**274,500**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,345	12,607	4.7	36.7	20,210	58.8	1,528	4.4
Moderate	165,278	84,535	31.6	51.1	72,700	44.0	8,043	4.9
Middle	143,380	100,009	37.4	69.8	38,287	26.7	5,084	3.5
Upper	83,259	70,266	26.3	84.4	10,553	12.7	2,440	2.9
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
Total AA	**426,274**	**267,429**	**100.0**	**62.7**	**141,750**	**33.3**	**17,095**	**4.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,234	7.7	3,700	7.3	500	13.5	34	6.6
Moderate	16,911	30.6	15,654	30.7	1,157	31.2	100	19.5
Middle	18,735	33.9	17,528	34.4	1,027	27.7	180	35.0
Upper	15,311	27.7	14,091	27.6	1,024	27.6	196	38.1
Unknown	29	0.1	23	0.0	2	0.1	4	0.8
Total AA	**55,220**	**100.0**	**50,996**	**100.0**	**3,710**	**100.0**	**514**	**100.0**
Percentage of Total Businesses:				**92.4**		**6.7**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	23	4.6	17	3.5	6	42.9	0	0.0
Moderate	77	15.5	74	15.4	3	21.4	0	0.0
Middle	248	50.0	246	51.0	2	14.3	0	0.0
Upper	147	29.6	144	29.9	3	21.4	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**496**	**100.0**	**482**	**100.0**	**14**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.2**		**2.8**		**0.0**

Source: 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-2

Distribution of 2023 to 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Denver Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.8	0	0.0	3.7	4.7
Moderate	1	12.5	30.7	95	5.0	25.5	31.6
Middle	5	62.5	37.7	857	45.3	38.5	37.4
Upper	2	25.0	27.8	939	49.7	32.3	26.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,891	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-3

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Denver Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	7.7	0	0.0	11.0	7.7
Moderate	0	0.0	30.7	0	0.0	31.9	30.6
Middle	10	76.9	32.2	1,070	42.5	29.4	33.9
Upper	3	23.1	29.1	1,446	57.5	27.6	27.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.2	0	0.0	0.1	
Total	13	100.0	100.0	2,516	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Table B-4

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Denver Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	4.6
Moderate	0	0.0	19.2	0	0.0	18.0	15.5
Middle	4	100.0	43.3	193	100.0	60.4	50.0
Upper	0	0.0	36.7	0	0.0	21.5	29.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.8	0	0.0	0.2	
Total	4	100.0	100.0	193	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Table B-5

Distribution of 2023 to 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	3	42.9	6.9	177	10.3	3.1	23.2
Moderate	0	0.0	22.3	0	0.0	16.1	21.1
Middle	2	28.6	27.4	1,090	63.5	25.8	22.9
Upper	1	14.3	26.6	355	20.7	33.1	32.8
Unknown	1	14.3	16.8	95	5.5	21.9	0.0
Total	7	100.0	100.0	1,717	100.0	100.0	100.0

Source: 2023 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-6

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Denver Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	11	84.6	52.7	2,326	92.4	31.4	92.4
Over $1 Million	2	15.4		190	7.6		6.7
Revenue Unknown	0	0.0		0	0.0		0.9
Total	13	100.0		2,516	100.0		100.0
By Loan Size							
$100,000 or Less	7	53.8	94.9	278	11.0	44.9	
$100,001 - $250,000	3	23.1	3.0	563	22.4	15.9	
$250,001 - $1 Million	3	23.1	2.1	1,675	66.6	39.2	
Total	13	100.0	100.0	2,516	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	6	54.5		238	10.2		
$100,001 - $250,000	2	18.2		413	17.8		
$250,001 - $1 Million	3	27.3		1,675	72.0		
Total	11	100.0		2,326	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Table B-7

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Denver Metropolitan							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	3	75.0	62.5	93	48.2	56.1	97.2
Over $1 Million	1	25.0		100	51.8		2.8
Revenue Unknown	0	0.0		0	0.0		0.0
Total	4	100.0		193	100.0		100.0
By Loan Size							
$100,000 or Less	3	75.0	88.3	93	48.2	29.8	
$100,001 - $250,000	1	25.0	7.5	100	51.8	28.2	
$250,001 - $500,000	0	0.0	4.2	0	0.0	42.0	
Total	4	100.0	100.0	193	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	3	100.0		93	100.0		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		
Total	3	100.0		93	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

APPENDIX C – GLOSSARY

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

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

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

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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 non-relatives 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.