

PUBLIC DISCLOSURE

May 25, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

NBH Bank
RSSD# 4210227

7800 East Orchard Road
Greenwood Village, Colorado 80111

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.

TABLE OF CONTENTS

Institution's Community Reinvestment Act Rating 5

Institution
- Description of Institution 7
- Scope of Examination 8
- Conclusions With Respect to Performance Tests 11

Fair Lending or Other Illegal Credit Practices Review 19

Kansas City, Missouri-Kansas Multistate MSA (Full-Scope Review)
- Summary
  - Multistate Metropolitan Area Rating 20
  - Scope of Examination 21
  - Description of Institution's Operations 21
  - Conclusions With Respect to Performance Tests 25

State of Colorado
- Summary
  - State Rating 36
  - Scope of Examination 37
  - Description of Institution's Operations 37
  - Conclusions With Respect to Performance Tests 38
- Colorado Springs MSA AA (Full-Scope Review)
  - Description of Institution's Operations 41
  - Conclusions With Respect to Performance Tests 43
- Denver – Aurora – Centennial, Colorado MSA AA (Full-Scope Review)
  - Description of Institution's Operations 51
  - Conclusions With Respect to Performance Tests 54
- Other Colorado Metropolitan AAs (Limited-Scope Review)
  - Description of Institution's Operations 64
  - Conclusions With Respect to Performance Tests 66
- Western Colorado AA (Full-Scope Review)
  - Description of Institution's Operations 68
  - Conclusions With Respect to Performance Tests 75

State of Utah
- Summary
  - State Rating 85
  - Scope of Examination 86
  - Description of Institution's Operations 86

Conclusions With Respect to Performance Tests 87

Salt Lake City CSA AA (Full-Scope Review)
Description of Institution's Operations 90
Conclusions With Respect to Performance Tests 94

St. George, Utah MSA AA (Limited-Scope Review)
Description of Institution's Operations 104
Conclusions With Respect to Performance Tests 104

Millard County AA (Limited-Scope Review)
Description of Institution's Operations 105
Conclusions With Respect to Performance Tests 105

State of Kansas
Summary
State Rating 106
Scope of Examination 107
Description of Institution's Operations 107
Conclusions With Respect to Performance Tests 107

Lawrence, Kansas AA (Full-Scope Review)
Description of Institution's Operations 111
Conclusions With Respect to Performance Tests 113

Franklin County, Kansas AA (Limited-Scope Review)
Description of Institution's Operations 120
Conclusions With Respect to Performance Tests 120

State of Missouri
Summary
State Rating 121
Scope of Examination 122
Description of Institution's Operations 122
Conclusions With Respect to Performance Tests 122

St. Joseph, Missouri Metropolitan AA (Full-Scope Review)
Description of Institution's Operations 126
Conclusions With Respect to Performance Tests 128

Northwest Missouri Metropolitan AA (Full-Scope Review)
Description of Institution's Operations 136
Conclusions With Respect to Performance Tests 138

Other Missouri Nonmetropolitan AAs (Limited-Scope Review)
Description of Institution's Operations 146
Conclusions With Respect to Performance Tests 147

State of New Mexico
Summary
State Rating 148
Scope of Examination 149
Description of Institution's Operations 149
Conclusions With Respect to Performance Tests 149

Taos County, New Mexico AA (Full-Scope Review)
Description of Institution's Operations 153
Conclusions With Respect to Performance Tests 155

Albuquerque, New Mexico Metropolitan AA (Limited-Scope Review)
Description of Institution's Operations 162
Conclusions With Respect to Performance Tests 162

State of Texas
Summary
State Rating 163
Scope of Examination 164
Description of Institution's Operations 164
Conclusions With Respect to Performance Tests 164

Dallas, Texas Metropolitan AA (Full-Scope Review)
Description of Institution's Operations 168
Conclusions With Respect to Performance Tests 170

Austin, Texas Metropolitan AA (Limited-Scope Review)
Description of Institution's Operations 178
Conclusions With Respect to Performance Tests 178

State of Wyoming / Western Wyoming AA (Full-Scope Review)
Summary
State Rating 179
Scope of Examination 180
Description of Institution's Operations 180
Conclusions With Respect to Performance Tests 183

State of Idaho / Boise, Idaho Metropolitan AA (Full-Scope Review)
Summary
State Rating 192
Scope of Examination 192

Description of Institution's Operations 193
Conclusions With Respect to Performance Tests 195

Appendix
Appendix A: Scope of Examination 204
Appendix B: Summary of State and Multistate Metropolitan Area Ratings 206
Appendix C: Demographic Information 207
Appendix D: Limited-Scope Review Assessment Area Tables 231
Appendix E: Glossary 315

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**

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

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory		X	
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			
* *The lending test is weighted more heavily than the investment and service tests in determining the overall rating.*			

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- An adequate percentage 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 adequate.
- The bank makes an adequate level of community development (CD) loans.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally 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 reasonablly 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 its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

INSTITUTION

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of National Bank Holdings Corporation, a two-bank holding company also located in Greenwood Village.
- The bank had total assets of $12.6 billion as of March 31, 2026.
- The bank operated 93 banking offices and 96 full-service automated teller machines (ATM) throughout an eight state footprint during the evaluation period of January 1, 2023, and December 31, 2024.
- Since the prior evaluation, the bank's total offices increased by 19 facilities due to acquisitions that occurred during the previous CRA evaluation period but were not included in that performance analysis. These acquired facilities are therefore included in the current evaluation. During the current evaluation period, the bank did not open any new branches but closed five offices.
- The bank acquired Vista Bank in January 2026 which added operations in the state of Florida (West Palm Beach) and expanded its existing operations in the state of Texas; however, there will be no analysis of lending and CD activities for the newly acquired markets in this evaluation given the acquisition occurred outside of the scope of this evaluation's review period. As such, the bank's next mandated Community Reinvestment Act (CRA) evaluation will include these new markets.
- The banking centers operate under the following unique brand names throughout its now nine state footprint: Community Banks of Colorado (Colorado), Bank MidWest (Kansas and Missouri), Bank of Jackson Hole (Wyoming), Hillcrest Bank (Idaho, New Mexico, Texas, and Utah) and Vista Bank (Florida).
- The bank's primary business focus is commercial lending to small- and medium-sized businesses, as well as residential real estate lending. Refer to Table 1 below for additional details on the bank's loan portfolio composition.

Table 1

Composition of Loan Portfolio as of March 31, 2026		
Loan Type	$(000)	%
Construction and Land Development	646,941	6.7
Farmland	82,790	0.9
1- to 4-Family Residential Real Estate	1,470,179	15.3
Multifamily Residential Real Estate	320,271	3.3
Nonfarm Nonresidential Real Estate	2,981,385	30.9
Agricultural	148,874	1.5
Commercial and Industrial	2,677,539	27.8
Consumer	14,643	0.2
Other	1,291,402	13.4
Gross Loans	**9,634,024**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its February 26, 2024 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. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2023 and 2024 CRA LARs;
- CD loans originated from January 1, 2023, to December 31, 2024.
- Qualified investments that were made from January 1, 2023, to December 31, 2024, qualified investments made prior to but still outstanding during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2023, to December 31, 2024.

Table 2 illustrates the bank's presence in each AA by number of branches including the type of performance review analysis applied in this evaluation of each AA (full-scope or limited-scope), the number of banking offices, the percentage of lending and deposits

compared to the bank-wide and the state level totals, and the bank's June 30, 2024 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

The overall CRA rating was primarily influenced by the bank's CRA performance in the full-scope reviewed state of Colorado AA's (Colorado Springs Metropolitan Statistical Area (MSA), Denver MSA, and Western Colorado), followed by the Kansas City Multistate MSA AA and Salt Lake City Combined Statistical Area (CSA) AA, as these collective AAs represent a substantial portion of loan, deposit, and branch distributions among the bank's expansive operational footprint. Among the loan products evaluated in the retail lending test, the bank's home mortgage loans generally carried greater weight in the lending test conclusions relative to small business lending due to the significant volume of loan originations, as well as the strategic emphasis at the institution-level. An evaluation of small farm lending was conducted only in the State of Missouri within its Northwest Missouri AA and had a very minimal influence on overall lending performance given limited lending volumes.

Additionally, emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is considered a representative indicator of credit demand. Lending was also compared to area demographic data to gauge performance in comparison to available opportunities, although considered to a lesser extent.

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]**
Kansas City MO-KS Multistate MSA	Full	**22**	**12.1**		**21.6**		**2.1**	**9**
State of Colorado		**37**	**48.1**		**41.5**		**2.0**	**12**
Colorado Springs MSA	Full	5	18.0	37.4	2.7	6.5	2.2	11
Denver – Aurora – Centennial MSA	Full	7	11.8	24.4	25.0	60.1	1.9	11
Western Colorado	Full	18	10.2	21.3	10.5	25.4	4.4	6
Greeley MSA	Limited	3	1.6	3.4	2.3	5.6	3.1	10
Boulder MSA	Limited	1	0.9	1.8	0.1	0.2	0.1	34
Fort Collins – Loveland MSA	Limited	1	4.7	9.8	0.6	1.4	0.5	19
Pueblo MSA	Limited	1	0.6	1.3	0.2	0.4	0.7	14
Grand Junction MSA	Limited	1	0.3	0.6	0.2	0.5	0.5	12
State of Utah		**8**	**20.0**		**6.7**		**0.1**	**34**
Salt Lake City CSA	Full	6	15.1	75.6	6.2	92.6	0.1	34
St George MSA	Limited	1	3.9	19.3	0.4	6.1	0.9	8
Millard County	Limited	1	1.0	5.1	0.1	1.3	3.0	3
State of Kansas		**2**	**3.8**		**1.4**		2.9	10
Lawrence MSA	Full	1	3.2	84.9	0.6	43.2	1.5	14
Franklin County	Limited	1	0.6	15.1	0.8	56.8	11.0	3
State of Missouri		**8**	**2.1**		**6.8**		**10.2**	**2**
St. Joseph Metropolitan	Full	3	0.6	27.2	2.3	33.6	6.9	6
Northwest Missouri	Full	3	1.0	47.5	2.0	29.0	14.3	2
Northeast Missouri	Limited	1	0.3	14.0	1.6	23.7	18.8	2
North-Central Missouri	Limited	1	0.2	11.3	0.9	13.8	8.5	6
State of New Mexico		**4**	**1.0**		**3.1**		**1.4**	**11**
Taos County	Full	3	0.5	52.0	2.5	81.7	28.0	2
Albuquerque Metropolitan	Limited	1	0.5	48.0	0.6	18.3	0.3	19
State of Texas		**2**	**2.2**		**2.9**		**0.1**	**64**
Dallas Metropolitan	Full	1	1.9	84.9	2.4	83.5	0.1	59
Austin Metropolitan	Limited	1	0.3	15.1	0.5	16.5	0.1	48
State of Wyoming		**8**	**9.6**		**15.8**		**28.2**	**1**
Western Wyoming	Full	8	9.6	100.0	15.8	100.0	28.2	1

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by $[1]		Percent of Bank's Deposits by $[2]		Deposit Market Share	
			Bank	State	Bank	State	% Market Share[2]	Market Share Rank[3]
State of Idaho		**2**	**1.1**		**0.3**		**0.2**	**20**
Boise Metropolitan	Full	2	1.1	100.0	0.3	100.0	0.2	20

1. *Based on the bank's HMDA, small business, and small farm lending used in the analysis.*
2. *Based on June 30, 2024 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 multistate metropolitan area, state, and specific AA. Conclusions with respect to the lending test for full-scope reviewed AAs are reflected in the body of the report, while lending data for AAs that received a limited-scope review are located in Appendix D.

LENDING TEST

The bank's overall lending test performance is low satisfactory. This conclusion is derived from the following aggregated state/multistate lending test ratings: High satisfactory in the states of Idaho, New Mexico, Texas, Utah and Wyoming; and low satisfactory in the Kansas City Multistate MSA and the states of Colorado, Kansas, and Missouri. As previously indicated, more weight was placed on the bank's performance in the Kansas City Multistate MSA and the states of Colorado and Utah.

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 adequate responsiveness to AA credit needs. Loan volumes were most significant in the state of Colorado, followed by the Kansas City Multistate MSA AA and state of Utah. Loan volumes were lower relative to the aforementioned areas in the states of Idaho, Kansas, Missouri, New Mexico, Texas, and Wyoming, where the bank's branch presence and deposit volumes reflect a smaller geographic footprint.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	**2023 and 2024**			
	#	**$(000)**	**#%**	**$%**
Home Purchase	2,421	901,565	50.8	57.9
Refinancing	396	95,315	8.3	6.1
Home Improvement	269	25,877	5.6	1.7
Multifamily Housing	10	109,073	0.2	7.0
Loan Purpose Not Applicable	0	0	0.0	0.0
Other Purpose LOC	69	5,448	1.4	0.4
Other Purpose Closed-End	70	8,590	1.5	0.6
Total HMDA Loans	**3,235**	**1,145,868**	**67.9**	**73.6**
Small Business Loans	**1,275**	**373,744**	**26.8**	**24.0**
Small Farms Loans	**253**	**36,774**	**5.3**	**2.4**
Total Loans	**4,763**	**1,556,386**	**100.0**	**100.0**

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank participates in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. Specific lending programs offered by the bank, and available throughout its AA network, include Federal Housing Administration (FHA), Veterans Administration (VA), and United States Department of Agriculture Farmers Home Administration (USDA FHA) loans for consumers seeking first-time residential real estate loans. Additionally, Small Business Administration (SBA) loans are available for the bank's commercial customers, including SBA Program 504 and 7a loans.

Notable flexible home loan volumes in 2023 and 2024 include 487 FHA loans totaling $121.2 million (MM), 338 VA loans totaling $143.3MM, and 15 USDA FHA loans totaling $2.6MM. The bank's flexible loan volumes responsive to the needs of small businesses include 77 SBA Program 504 loans totaling $76.4MM and 72 SBA Program 7(a) loans totaling $89.3MM.

In addition to the aforementioned flexible loan programs, the bank participates in several programs to address the challenges of obtaining home ownership. During the evaluation period, the bank developed the Blueprint for Homeownership Program which addresses credit and homeownership needs in LMI communities by providing lender credits toward closing costs ($750 initially, increased to $1,200 in 2023) and covering homebuyer education expenses. This program initially operated in the bank's Kansas City, Dallas, and Denver markets; however, the bank expanded to all CRA assessment areas and included the development of an in-house Homebuyer Course to provide financial counselling and support for prospective homebuyers. With regard to further flexible credit programs, the bank's loan underwriting standards incorporate alternative credit histories for applicants with limited or non-traditional credit files. Additionally, the bank introduced a Lender Paid Temporary 1-0 Buydown program in response to rising interest rates and housing costs, particularly in high-cost housing areas. Other initiatives include

participation in multiple Down Payment Assistance Programs through various housing authorities, the Homes for Heroes program benefiting public servants (including many LMI individuals), and Farm Service Agency Guaranteed Farm Loan Programs supporting family farmers and ranchers. These programs collectively represent the bank's approach to adapting lending practices for underserved populations within its assessment areas.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. The bank originated an adequate percentage of loans, by number and dollar, inside its AAs.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	**Inside**				**Outside**			
	#	**#%**	**(000)**	**%**	**#**	**#%**	**(000)**	**%**
Home Purchase – Conventional	1,017	62.7	469,451	72,2	604	37.3	180,322	27.8
Home Purchase – FHA	203	41.8	62,986	52.9	283	58.2	56,149	47.1
Home Purchase – VA	185	58.9	92,244	69.5	129	41.1	40,413	30.5
Home Improvement	247	91.8	23,399	90.4	22	8.2	2,478	9.6
Multifamily Housing	7	70.0	68,285	62.6	3	30.0	40,788	37.4
Other Purpose LOC	66	95.7	5,293	97.2	3	4.3	155	2.8
Other Purpose Closed-End	61	87.1	7,364	85.7	9	12.9	1,226	14.3
Refinancing	346	87.4	82,823	86.9	50	12.6	12,492	13.4
Total HMDA Related	**2,132**	**65.9**	**811,845**	**70.8**	**1.103**	**34.1**	**334,023**	**29.2**
Small Business	951	74.6	262,714	70.3	324	25.4	111,030	29.7
Total Small Business Related	**951**	**74.6**	**262,714**	**70.3**	**324**	**25.4**	**111,030**	**29.7**
Small Farm	182	71.9	23,255	63.2	71	28.1	13,519	36.8
Total Small Farm Related	**182**	**71.9**	**23,255**	**63.2**	**71**	**28.1**	**13,519**	**36.8**
Total Loans	**3265**	**68.5**	**1,097,814**	**70.5**	**1,498**	**31.5**	**458,572**	**29.5**
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 adequate distribution among the different census tracts and dispersion throughout the AAs. This performance conclusion mirrors the geographic distribution noted in each state analysis with the exception of New Mexico and Utah, which had an excellent and good geographic distributions of lending, respectively.

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 adequate penetration among individuals of different income levels and businesses and farms of different sizes. This conclusion is derived from good penetration noted in the Kansas City Multistate MSA AA and the states of Missouri and Texas, followed by adequate penetration noted in the states of Colorado, Idaho, Kansas, New Mexico, Utah, and Wyoming.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank makes an adequate level of CD loans when considering the bank's capacity, AA needs, and the availability of such opportunities. The level of CD lending performance varied across each multistate MSA and individual state, including leader-level CD lending performance in the states of Utah, Texas, Wyoming, and Idaho, followed by a relatively high level of CD lending in the state of Colorado, and adequate CD lending levels in the Kansas City Multistate MSA AA and the states of Kansas and Missouri. The bank made few, if any, CD-qualified loans in the state of New Mexico.

As illustrated in Table 5, the bank provided financing that addressed needs across all CD categories and was most responsive to the economic development needs of the bank's numerous AAs.

Examples of responsive CD lending activities among all AAs include:

- The bank originated three loans totaling $26.4MM which are responsive to the affordable housing needs of a high cost-of-living area. The proceeds provided financing for the purchase and acquisition of a multifamily housing property with rent restrictions set in place to provide workforce housing in a high-cost recreational resort area in Colorado.
- The bank provided $4.7MM in financing for the purchase and renovation of a commercial building to be converted into an educational facility that services a majority LMI student population.
- The bank originated a $3.9MM loan under the SBA 504 Program for the expansion of the borrower's network of childcare facilities. The financing supports the ongoing capital and expansion needs of an area small business.

Table 5

Community Development Loans – All		
Community Development Purpose	**#**	**(000)**
Affordable Housing	7	42,316
Community Services	15	39,349
Economic Development	88	309,290
Revitalization and Stabilization	5	4,200
Total Loans	**115**	**395,155**

INVESTMENT TEST

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

The bank's overall performance under the investment test is high satisfactory. This conclusion is derived from an outstanding investment test rating in the state of Texas, followed by high satisfactory investment test ratings in the Kansas City Multistate MSA AA, as well as the states of Colorado, Idaho, and Wyoming. Investment performance is low satisfactory in the states of Utah, Kansas, Missouri and New Mexico. The bank has a significant level of qualified CD investments and grants and is occasionally 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.

Table 6 illustrates the total volume of investment and donation activities by CD purpose, including an itemization of investments that remain on the bank's balance sheet (prior-period) and new investments made during the current evaluation period. Investment vehicles generally consisted of mortgage-backed securities (MBS) that contain residential mortgages originated to LMI borrowers and considered responsive to affordable housing needs. Other investment vehicles included a variety of investments in community development financial institution (CDFI) lending funds that provided benefit to area affordable housing needs, as well as funding for schools with a majority population of students who are eligible for free or reduced lunches. It is further illustrated in Table 6 that 8 current-period investments totaling $52.1MM occurred in areas outside of the bank's delineated AAs. These investments were comprised of Treasury-certified CDFI funds in a nationwide program intended to support students in low-income areas where local public education underperforms. The funding supports the construction or redevelopment of charter school facilities, of which the substantial majority of students are LMI. Historically, the bank has presented numerous schools within its AAs that benefited from the funding structure; however, the current investments benefit a broader statewide or regional area that includes its AAs within the footprint of the program.

Examples of responsive CD investments include:

- The bank purchased 3 pools of bundled MBS totaling $2.9MM which were comprised of loans to LMI borrowers as part of specialized loan products with varying downpayment and credit flexibility features to support affordable homeownership.
- The bank invested $4.0MM in an SBA-licensed Small Business Investment Company fund that provides start-up capital and ongoing financing needs for small businesses engaged in manufacturing, distribution, and business-to-business services.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	58	20,940	26	16,305	18	113	102	37,358
Community Services	0	0	0	0	99	364	99	364
Economic Development	0	0	1	4,000	9	42	10	4,042
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Outside Activities	0	0	8	52,080	0	0	8	52,080
Total	58	20,940	35	72,385	126	519	219	93,844

1. *Book Value of Investment*
2. *Original Market Value of Investment*

In addition to its qualified investments, the bank also makes a significant volume of CD donations throughout its geographic footprint. The bank's donation activity was particularly responsive to organizations that provide community services targeted to LMI individuals and families, including various non-profit entities and local grassroots agencies. Examples of the bank's responsive philanthropic activities include:

- The bank made a $30 thousand (M) donation to the local chapter of an organization that provides an array of housing services to LMI individuals and families, including the construction and/or renovation of affordable homes.
- A total of $51M was distributed to an area organization that provides an array of educational, rehabilitative, and advocacy services to individuals living with debilitating disabilities which prevent individuals from full independence and financial stability.

SERVICE TEST

The bank's overall performance under the service test is outstanding. This conclusion is derived from outstanding service test ratings in each of the state analyses conducted and is primarily attributed to the bank's leadership in providing CD services throughout its numerous AAs.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic census tract classification. The table below illustrates the distribution of bank offices and full-service ATMs by income level of geographies, as well as the number of branch openings/closing, and the volume of CD services provided during the evaluation period.

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. Bank offices and full-service ATM locations generally align with the total percentage of census tracts by income level throughout the bank's AAs. Additionally, several of the bank's branches located in middle- and upper-income geographies are in reasonable proximity to LMI tracts, further supporting the accessibility of the bank's branch and ATM network to all tract 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. As illustrated in Table 7, the bank's total branch count increased since the prior evaluation with a mixture of branch openings and closures, with a net increase of 14 branches in total, including a net gain of 10 branches among AA middle-income tracts and 4 among AA 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 hours and drive-through services vary by branch location, although most lobby hours operate seven-to-nine hours per day Monday through Friday, while a significant portion of branches provide Saturday morning lobby accessibility. Additionally, drive-through window services are available at a substantial portion of branches with operating hours that generally align with the branch's lobby availability.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	2.2	20.4	51.6	25.8	0.0	100.0	7.1	24.5	38.2	27.6	2.7	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.1	25.0	47.9	24.0	0.0	100.0	6.6	24.7	39.9	27.9	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	93		19		5		0	0	10	4	0	14
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	33		323		20		0		376		143	

1. *Based on 2024 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 conducted by bank representatives. The bank is a leader in providing CD services, as approximately 187 bank staff members performed 376 qualified services to 143 organizations during the evaluation period. As illustrated in the table above, the overwhelming majority of services were provided to organizations that provide community services to LMI individuals and families, as well as qualified participation on behalf of organizations that provide affordable housing access and services for the benefit of LMI individuals and families.

Examples of the types of CD services performed include:

- A total of 84 CD services were performed by staff across the bank's various AAs through a nationally recognized organization that provides resources and academic support for school-aged youth. The beneficiaries of the services were from schools with a majority student population which are eligible for free or reduced lunches under the National School Lunch Program (NSLP).
- A total of 17 CD services to area food banks by staff members in capacities which included recurring board of directors (board) membership and financial literacy resources and educational programs.

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, were 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.

KANSAS CITY, MISSOURI (MO)-KANSAS (KS) MULTISTATE MSA[1]

CRA rating for the Kansas City, MO-KS Multistate MSA:	**Satisfactory**
The Lending Test is rated:	**Low Satisfactory**
The Investment Test is rated:	**High Satisfactory**
The Service Test is rated:	**Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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 makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally 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 AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- 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 AA, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its AA and is responsive to the available service opportunities.

[1] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

SCOPE OF EXAMINATION

The scope of the review for the Kansas City, MO-KS Multistate MSA AA was consistent with the overall scope for the institution. Small farm lending was not evaluated due to insufficient volumes.

Weighting of loan products was generally based on volume by number of originations, with the greatest weight on home mortgage lending, followed by small business lending. Additionally, multifamily, other purpose closed/exempt, and purpose not applicable loans were not evaluated for this AA based on lending volumes too low to render meaningful analyses.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KANSAS CITY, MO-KS MULTISTATE MSA AA

The bank's Kansas City KS-MO Multistate MSA AA consists of the entirety of Johnson, Leavenworth, Linn, Miami, and Wyandotte Counties in Kansas, and Bates, Caldwell, Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray Counties in Missouri, which comprise the entire multistate MSA. Refer to Appendix C for additional demographic data.

- The AA delineation remains unchanged since the prior CRA evaluation.
- The AA is comprised of a total of 607 census tracts, including 58 low-, 152 moderate-, 220 middle-, 153 upper-, and 24 unknown-income tracts. The census tract distribution remains unchanged since the previous examination.
- The bank operates 22 of its 93 banking offices in the AA, including 5 offices in moderate-, 11 in middle-, and 6 in upper-income census tracts. Since the prior evaluation, the bank closed 2 branches in the AA, including one office in Kansas City, MO (upper-income tract) and one located in Olathe, KS (middle-income tract).
- The bank also operates a network of 27 full-service ATMs throughout the AA, including 1 in low-, 7 in moderate-, 11 in middle-, and 8 in upper-income tract(s).
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 2.1 percent, ranking 9th of 118 FDIC-insured financial institutions operating from 667 offices in the AA.
- Two interviews conducted recently with members of the community as part of the CRA evaluations of another financial institution with branches 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 represented area housing agencies.

Table 8

Population Change Assessment Area: Kansas City MO-KS Multistate MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Kansas City, Missouri-Kansas MSA	2,055,675	2,192,035	6.6
Johnson County, KS	566,814	609,863	7.6
Leavenworth County, KS	78,227	81,881	4.7
Linn County, KS	9,528	9,591	0.7
Miami County, KS	32,688	34,191	4.6
Wyandotte County, KS	160,806	169,245	5.2
Bates County, MO	16,643	16,042	(3.6)
Caldwell County, MO	9,083	8,815	(3.0)
Cass County, MO	100,781	107,824	7.0
Clay County, MO	230,361	253,335	10.0
Clinton County, MO	20,498	21,184	3.3
Jackson County, MO	680,905	717,204	5.3
Lafayette County, MO	32,916	32,984	0.2
Platte County, MO	93,394	106,718	14.3
Ray County, MO	23,031	23,158	0.6
Kansas	2,892,987	2,937,880	1.6
Missouri	6,045,448	6,154,913	1.8
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- AA population growth between 2015 and 2020 surpassed rates in the states of Kansas and Missouri, with notable growth in counties close to, or contiguous to, the urban core of Kansas City, Missouri. Alternatively, low or declining population growth was noted in a number of counties located on the southern and eastern extremities of the AA that are sparsely populated and rural in nature.
- A majority of the AA population resides within Johnson and Jackson Counties, which include 1,327,067 residents, or 60.5 percent of the AA population.

Table 9

Median Family Income Change Assessment Area: Kansas City MO-KS Multistate MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Kansas City, Missouri-Kansas MSA	79,346	86,562	9.1
Johnson County, KS	103,631	111,766	7.9
Leavenworth County, KS	83,668	89,588	7.1
Linn County, KS	63,534	64,986	2.3
Miami County, KS	81,671	87,341	6.9
Wyandotte County, KS	51,479	57,396	11.5
Bates County, MO	58,560	63,250	8.0
Caldwell County, MO	59,643	61,671	3.4
Cass County, MO	78,333	85,798	9.5
Clay County, MO	82,057	85,961	4.8
Clinton County, MO	70,755	73,936	4.5
Jackson County, MO	66,730	74,470	11.6
Lafayette County, MO	70,449	76,250	8.2
Platte County, MO	92,114	100,420	9.0
Ray County, MO	68,913	75,811	10.0
Kansas	72,535	77,620	7.0
Missouri	66,438	72,834	9.6
Source: *2011 – 2015 U.S. Census Bureau: American Community Survey* *2016 - 2020 U.S. Census Bureau: American Community Survey* *Note:* *Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

- Growth rates in median family income (MFI) have been positive between 2015 and 2020 in all the AA counties and in the states of Kansas and Missouri.
- MFI growth rates in both Wyandotte and Jackson Counties exceeded 10.0 percent; however, both counties still have MFIs below the MSA figure.
- Based on 2020 American Community Survey (ACS) data, the portion of AA families living below the poverty level, at 6.9 percent, was slightly below respective figures for the states of Kansas and Missouri, at 7.6 percent and 8.9 percent. The portion of families living below the poverty level in the 14 AA counties ranged from 3.0 percent in Platte County to 14.8 percent in Wyandotte County, despite their higher growth rates in MFI.

Table 10

Housing Cost Burden Assessment Area: Kansas City MO-KS Multistate MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kansas City, Missouri-Kansas MSA	77.1	35.8	40.2	62.2	28.6	16.6
Johnson County, KS	85.7	47.1	37.0	69.5	41.3	14.8
Leavenworth County, KS	72.0	25.7	36.8	59.8	33.1	15.5
Linn County, KS	53.1	0.0	28.3	64.3	22.1	23.8
Miami County, KS	78.3	30.8	36.4	72.0	35.5	19.8
Wyandotte County, KS	72.6	25.7	43.1	57.4	20.0	20.5
Bates County, MO	64.8	16.4	38.7	50.0	30.1	18.5
Caldwell County, MO	34.9	2.4	19.1	46.8	11.9	16.7
Cass County, MO	72.1	26.4	37.9	59.5	28.0	15.3
Clay County, MO	80.4	35.7	40.3	69.4	26.3	15.8
Clinton County, MO	46.3	13.0	23.3	59.9	25.2	20.7
Jackson County, MO	76.5	34.7	43.8	59.8	25.7	18.1
Lafayette County, MO	60.1	14.2	29.8	39.4	11.2	9.1
Platte County, MO	81.8	36.2	33.2	76.6	36.4	16.6
Ray County, MO	57.1	14.8	32.0	47.0	11.0	13.2
Kansas	76.5	31.1	38.9	58.1	26.8	15.5
Missouri	74.0	30.9	39.9	59.0	26.1	16.2

Source: U.S. Department of Housing and Urban Development (HUD), 2018-2022 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA cost burden for both LMI renters and homeowners was consistent with statistics for the states of Kansas and Missouri.
- The AA housing affordability ratio[2] of 35.1 percent was similar to figures for the states of Kansas and Missouri, at 38.8 percent and 35.0 percent, respectively. Housing affordability ratios within the 14 AA counties ranged from 33.0 percent in Johnson County to 46.9 percent in Caldwell County.
- The median housing value in the AA counties ranged from $107,000 in Wyandotte County to a high of $277,500 in Johnson County, compared to figures for the states of Kansas and Missouri, at $157,600 and $163,600, respectively.

[2] 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 11

Unemployment Rates Assessment Area: Kansas City MO-KS Multistate MSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Kansas City, Missouri-Kansas MSA	6.1	4.1	2.7	3.0	3.6
Johnson County, KS	5.1	2.8	2.4	2.7	3.3
Leavenworth County, KS	6.0	3.6	3.1	3.0	3.8
Linn County, KS	6.9	4.2	3.8	4.0	4.9
Miami County, KS	5.0	3.1	2.6	2.8	3.5
Wyandotte County, KS	7.5	4.7	3.5	3.6	4.3
Bates County, MO	5.6	4.2	2.9	3.4	4.0
Caldwell County, MO	5.5	5.0	2.9	3.2	3.6
Cass County, MO	5.3	3.6	2.4	2.9	3.4
Clay County, MO	6.2	4.7	2.6	2.8	3.2
Clinton County, MO	6.2	5.3	3.1	3.3	3.7
Jackson County, MO	7.1	5.0	2.9	3.4	3.9
Lafayette County, MO	5.3	4.1	2.8	3.0	3.4
Platte County, MO	5.6	4.0	2.3	2.7	3.2
Ray County, MO	6.7	6.0	3.3	3.2	3.6
Kansas	5.8	3.4	2.7	2.9	3.6
Missouri	6.1	4.2	2.6	3.1	3.7
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

- Top industries in the AA include health care and social assistance, retail trade, and accommodation and food service.
- A sample of major employers in the greater Kansas City metropolitan area include the Food and Drug Administration, Ford Motor Inc., Saint Luke's Health System, and Honeywell Manufacturing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY, MO-KS MULTISTATE MSA AA

LENDING TEST

The bank's performance under the lending test in the Kansas City MO-KS Multistate MSA AA is low satisfactory. As previously noted, the bank's home mortgage lending carried greater weight in the analysis due to the relatively higher volume of lending compared to small business lending.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs,

including LMI borrowers. Refer to the overall Institution Lending Activity section of this report for a detailed description of the bank's flexible and innovative lending programs.

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 distribution of home mortgage lending reflects adequate penetration levels, while small business lending reflects good penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage loans among low-income tracts was comparable to the aggregate lending data, as well as the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending levels in moderate-income tracts were comparable to the aggregate lending data and to the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected consistent lending performance with 2024 lending patterns.

An analysis of the dispersion of loans revealed lending gaps and lapses based on an AA comprised of 607 census tracts and the distance of the bank's branching structure from a number of LMI areas, although the dispersion of lending did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2024 home purchase loans among low-income tracts was comparable to the aggregate lending data, as well as the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data and to the demographic figure.

The geographic distribution of home purchase lending in 2023 reflected consistent lending performance with 2024 lending patterns.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2024 home refinance lending in low-income census tracts was comparable to the aggregate lending data by number and dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data and the demographic figure.

The geographic distribution of home refinance lending in 2023 reflected consistent lending performance with 2024 lending patterns.

Home Improvement Loans

The geographic distribution of home improvement lending is good. The bank did not originate any home improvement loans in the AA's low-income census tracts in 2024; however, aggregate lending data and demographic figures reflect relatively limited opportunity. Lending in moderate-income census tracts during 2024 was above aggregate lending data and comparable to the demographic figure.

The geographic distribution of home improvement lending in 2023 was above the lending performance of 2024 lending patterns.

Table 12

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Kansas City, Missouri-Kansas MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	1.9	4.9	365	0.9	2.8	7	5.8	4.3	924	2.9	2.4	4.2
Moderate	39	24.7	23.3	6,677	15.8	15.5	31	25.6	23.6	6,003	18.6	15.5	20.7
Middle	72	45.6	40.8	20,956	49.5	37.8	45	37.2	40.9	11,283	34.9	38.4	42.3
Upper	41	25.9	30.6	13,785	32.6	43.7	35	28.9	30.7	13,620	42.1	43.5	32.4
Unknown	3	1.9	0.4	563	1.3	0.3	3	2.5	0.4	507	1.6	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	158	100.0	100.0	42,346	100.0	100.0	121	100.0	100.0	32,337	100.0	100.0	100.0
Refinance Loans													
Low	3	4.8	4.4	329	6.3	2.9	2	3.3	4.2	56	0.7	2.8	4.2
Moderate	17	27.4	23.3	1,227	23.6	17.3	17	27.9	21.1	1,710	22.1	15.0	20.7
Middle	32	51.6	41.6	2,768	53.2	40.8	33	54.1	43.3	3,956	51.0	40.7	42.3
Upper	10	16.1	30.3	875	16.8	38.8	9	14.8	31.2	2,033	26.2	41.4	32.4
Unknown	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	62	100.0	100.0	5,199	100.0	100.0	61	100.0	100.0	7,755	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.8	0	0.0	1.9	0	0.0	3.1	0	0.0	1.6	4.2
Moderate	12	23.1	14.7	466	14.0	10.7	9	23.7	16.3	330	14.2	11.2	20.7
Middle	22	42.3	39.6	1,360	40.8	35.2	21	55.3	39.8	1,577	67.6	34.2	42.3
Upper	18	34.6	42.6	1,508	45.2	52.1	8	21.1	40.6	425	18.2	52.8	32.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	52	100.0	100.0	3,334	100.0	100.0	38	100.0	100.0	2,332	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	11.1	0	0.0	10.6	0	0.0	12.7	0	0.0	6.9	11.4
Moderate	0	0.0	38.9	0	0.0	35.7	0	0.0	34.4	0	0.0	38.9	28.1
Middle	0	0.0	32.9	0	0.0	26.8	0	0.0	34.7	0	0.0	29.0	34.3
Upper	0	0.0	16.8	0	0.0	26.4	0	0.0	16.6	0	0.0	22.5	23.3
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	1.5	0	0.0	2.6	2.9
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	6	2.0	4.4	694	1.3	3.7	10	4.1	4.0	1,045	2.4	2.8	4.2
Moderate	73	24.9	22.1	8,575	16.4	18.0	62	25.7	22.1	8,263	18.7	17.3	20.7
Middle	136	46.4	40.8	25,656	49.2	36.6	107	44.4	41.5	17,542	39.7	37.8	42.3
Upper	75	25.6	32.2	16,642	31.9	41.4	59	24.5	32.0	16,798	38.0	41.6	32.4
Unknown	3	1.0	0.4	563	1.1	0.3	3	1.2	0.4	507	1.1	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	293	100.0	100.0	52,130	100.0	100.0	241	100.0	100.0	44,155	100.0	100.0	100.0

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.
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 geographic distribution of small business lending is good. The distribution of small business lending in 2024 among low-income tracts was comparable to the aggregate lending data and comparable to the demographic figure. Lending in the AA's moderate-income tracts was above aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The geographic distribution of small business lending in 2023 reflected performance consistent with 2024 lending patterns.

The bank's loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI tracts. These gaps were frequently the result of concentrations of lending in close proximity to the bank's branching footprint as well as the significant number of AA census tracts in relationship to the number of loan originations. The gaps and lapses did not impact the overall conclusion.

Table 13

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Kansas City, Missouri-Kansas MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	6	6.8	5.3	1,060	5.7	6.4	3	3.8	4.7	830	5.1	6.2	5.9
Moderate	21	23.9	18.5	3,717	19.9	18.2	21	26.3	18.0	3,716	22.7	18.2	22.2
Middle	29	33.0	34.4	5,343	28.6	29.1	28	35.0	33.7	5,833	35.6	30.0	36.3
Upper	24	27.3	39.1	5,041	27.0	40.2	23	28.8	41.0	4,715	28.8	39.6	33.2
Unknown	8	9.1	2.3	3,536	18.9	6.0	5	6.3	2.3	1,275	7.8	5.9	2.4
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	88	100.0	100.0	18,697	100.0	100.0	80	100.0	100.0	16,369	100.0	100.0	100.0

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

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 home mortgage lending reflects good performance, while small business lending reflects adequate lending performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The distribution of 2024 loans to low-income borrowers was significantly above the aggregate lending data and below the demographic figure of the percentage of families by family income. Lending to moderate-income borrowers was above the aggregate data, as well as the demographic figure.

The borrower distribution of home mortgage lending in 2023 was consistent with the performance noted in 2024 lending levels.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The distribution of 2024 home purchase loans to low-income borrowers was above aggregate lending data and below the demographic figure. Lending to moderate-income borrowers was also above the aggregate lending data and significantly above the demographic figure.

The borrower distribution of home purchase lending in 2023 was consistent with the performance noted in 2024 lending levels.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The distribution of 2024 home refinance loans to low-income borrowers was significantly above the aggregate lending data and comparable to the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data and the demographic figure.

The borrower distribution of home refinance lending in 2023 reflected performance below that of 2024 performance, although lending patterns were generally above the aggregate lending data.

Home Improvement Loans

The borrower distribution of home improvement lending is excellent The distribution of 2024 home improvement loans to low-income borrowers was significantly above the aggregate lending data but below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data by number, significantly above by dollar, and comparable to the demographic figure.

The borrower distribution of home improvement lending in 2023 reflected consistent performance with 2024 levels.

Table 14

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Kansas City, Missouri-Kansas MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	24	15.2	9.0	2,817	6.7	4.4	12	9.9	7.3	1,632	5.0	3.5	20.5
Moderate	43	27.2	20.7	9,188	21.7	14.6	32	26.4	19.8	6,021	18.6	13.4	17.6
Middle	39	24.7	19.9	10,255	24.2	18.6	34	28.1	19.2	7,468	23.1	17.3	21.9
Upper	45	28.5	29.8	18,333	43.3	43.1	41	33.9	30.1	16,856	52.1	42.5	40.0
Unknown	7	4.4	20.6	1,753	4.1	19.3	2	1.7	23.6	360	1.1	23.3	0.0
Total	158	100.0	100.0	42,346	100.0	100.0	121	100.0	100.0	32,337	100.0	100.0	100.0
Refinance Loans													
Low	14	22.6	12.4	566	10.9	7.1	14	23.0	7.7	445	5.7	3.6	20.5
Moderate	16	25.8	20.9	987	19.0	16.7	11	18.0	17.7	1,048	13.5	12.1	17.6
Middle	10	16.1	20.4	1,252	24.1	19.1	12	19.7	17.7	1,473	19.0	14.8	21.9
Upper	22	35.5	29.5	2,394	46.0	38.4	22	36.1	29.6	4,569	58.9	37.6	40.0
Unknown	0	0.0	16.8	0	0.0	18.6	2	3.3	27.3	220	2.8	31.8	0.0
Total	62	100.0	100.0	5,199	100.0	100.0	61	100.0	100.0	7,755	100.0	100.0	100.0
Home Improvement Loans													
Low	8	15.4	8.3	334	10.0	5.0	4	10.5	6.2	140	6.0	3.2	20.5
Moderate	12	23.1	17.1	375	11.2	11.9	8	21.1	14.4	445	19.1	9.1	17.6
Middle	11	21.2	23.3	755	22.6	18.3	14	36.8	21.3	937	40.2	16.3	21.9
Upper	19	36.5	45.5	1,693	50.8	58.4	11	28.9	49.2	710	30.4	60.8	40.0
Unknown	2	3.8	5.8	177	5.3	6.3	1	2.6	8.9	100	4.3	10.6	0.0
Total	52	100.0	100.0	3,334	100.0	100.0	38	100.0	100.0	2,332	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	51	17.4	9.5	3,906	7.5	4.8	33	13.7	7.4	2,410	5.5	3.5	20.5
Moderate	77	26.3	20.2	10,886	20.9	14.7	59	24.5	18.8	8,106	18.4	13.0	17.6
Middle	64	21.8	20.6	12,532	24.0	18.7	64	26.6	19.4	10,303	23.3	16.8	21.9
Upper	91	31.1	32.0	22,816	43.8	43.2	80	33.2	32.3	22,656	51.3	42.3	40.0
Unknown	10	3.4	17.8	1,990	3.8	18.6	5	2.1	22.1	680	1.5	24.4	0.0
Total	293	100.0	100.0	52,130	100.0	100.0	241	100.0	100.0	44,155	100.0	100.0	100.0

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.*
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 adequate. The distribution of lending to small businesses in 2024 was comparable to aggregate lending data and below the demographic figure of the percentage of total businesses.

The distribution of loans originated in 2023 was consistent with the performance noted in 2024.

Table 15

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Kansas City, Missouri-Kansas MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	36	40.9	53.8	3,982	21.3	29.9	31	38.8	52.6	4,085	25.0	30.9	90.9
Over $1 Million	49	55.7		14,642	78.3		49	61.3		12,284	75.0		8.1
Revenue Unknown	3	3.4		73	0.4		0	0.0		0	0.0		1.0
Total	88	100.0		18,697	100.0		80	100.0		16,369	100.0		100.0
By Loan Size													
$100,000 or Less	51	58.0	92.9	2,671	14.3	32.6	44	55.0	93.1	2,574	15.7	33.8	
$100,001 - $250,000	12	13.6	3.3	2,335	12.5	14.3	12	15.0	3.3	2,237	13.7	14.1	
$250,001 - $1 Million	25	28.4	3.8	13,691	73.2	53.1	24	30.0	3.6	11,558	70.6	52.1	
Total	88	100.0	100.0	18,697	100.0	100.0	80	100.0	100.0	16,369	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	28	77.8		1,301	32.7		22	71.0		1,017	24.9		
$100,001 - $250,000	2	5.6		348	8.7		3	9.7		476	11.7		
$250,001 - $1 Million	6	16.7		2,333	58.6		6	19.4		2,592	63.5		
Total	36	100.0		3,982	100.0		31	100.0		4,085	100.0		

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

Community Development Lending

The bank makes an adequate level of CD loans in the AA. The bank's CD lending was primarily responsive to the community services needs of LMI individuals and families, as well as economic development needs within the AA. Examples of the bank's CD lending activities that were considered responsive to credit needs in the AA include:

- The bank provided a total of $13.5MM in CD financing to a local non-profit organization that provides financial education, employment and rehabilitative services for medically disabled individuals who face barriers to living full independent and financially stable lives.
- The bank provided a total of $8.0MM in working capital financing that benefited an area small business that provides stable employment for LMI individuals.

Table 16

Community Development Loans – Kansas City MO-KS Multistate MSA		
Community Development Purpose	**#**	**(000)**
Affordable Housing	0	0
Community Services	7	27,500
Economic Development	6	14,135
Revitalization and Stabilization	1	1,500
Total Loans	**14**	**43,134**

INVESTMENT TEST

The bank's performance under the investment test in the Kansas City MO-KS Multistate MSA AA is rated high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally 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 bank's investment activity consists of MBS that support affordable housing, as well as philanthropic donations to area organizations that primarily provide community services to LMI individuals and families.

Table 17 illustrates the breakdown of the bank's CD investments within the AA, including prior period investments that remain in the bank's securities portfolio, investments purchased during the current evaluation period, and CD donations made since the prior evaluation.

Examples of responsive CD donations include:

- The bank distributed a $10M donation to an area non-profit organization whose mission is to end homelessness in the greater Kansas City area. The organization offers housing programs, supportive services, community-wide services, as well as coordinated exit and placement services for individuals as they transition out of homelessness.
- Donations totaling $51.3M were made to a multi-faceted organization that provides vision rehabilitation, education, advocacy, and adaptive living skills for those experiencing vision loss, which inhibits employment and financial stability.

Table 17

Investments, Grants, and Donations – Kansas City MO-KS Multistate MSA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	16	6,167	3	4,968	4	21	23	11,155
Community Services	0	0	0	0	24	133	24	133
Economic Development	0	0	0	0	2	5	2	5
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**16**	**6,167**	**3**	**4,968**	**30**	**159**	**49**	**11,293**

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, MO-KS Multistate MSA AA is Outstanding.

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 distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI tracts within the AA. Moreover, a number of the bank's branch and ATM locations in the AA's middle- and upper-income census tracts abut large concentrations of LMI census tracts, making these facilities accessible to populations residing in these areas.

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 closed two branches in the Kansas City area, including an office in Olathe, KS (middle-income tract) and Kansas City, MO (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. Bank operations and product offerings in the AA generally mirror those in other bank markets, which are described in the Institution Retail Banking Services section of this evaluation.

Table 18

Retail Banking and Community Development Services – Kansas City MO-KS Multistate MSA												
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	22.7	50.0	27.3	0.0	100.0	9.6	25.0	36.2	25.2	4.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.7	25.9	40.7	29.6	0.0	100.0	7.1	24.9	40.4	26.9	0.7	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	0	2	0	0	(1)	(1)	0	(2)

Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations
	9	74	1	0	84	17

1. *Based on 2024 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. As illustrated in the table above, bank employees supported 17 organizations throughout the AA, providing 84 CD services.

Examples of services provided by bank employees include:

- A total of 31 bank employees committed over 200 hours and 43 services to an area organization that provides financial literacy instruction programs intended to foster entrepreneurship and budget skills for life. The students attended from schools that contain a majority population eligible for free or reduced lunches.
- Six bank employees provided ten CD services to the local chapter of an organization that provides an array of services to individuals seeking affordable housing, including access to affordable housing and homeownership education. Capacities served by the bank staff included fundraising on behalf of the organization, financial literacy instruction to individuals seeking to purchase their first home, as well as board membership for the organization.

STATE OF COLORADO

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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 adequate.
- The bank makes a relatively high level of CD loans within its Colorado AAs.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally 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 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 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, Colorado Springs MSA, and Western Colorado AAs. The bank's Denver MSA, Colorado Springs MSA, and Western Colorado AAs received generally similar weighting in the determination of State performance based on the highest volumes of lending, deposits, and branching of the bank's eight Colorado AAs occurring within these three AAs. Limited-scope reviews were conducted for the Greeley MSA, Fort Collins MSA, Boulder MSA, Pueblo MSA, and Grand Junction MSA AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

During the evaluation period, the bank originated a total of 1,330 loans in the state of Colorado, including 1,033 home mortgage, 241 small business, and 56 small farm loans. More weight was placed on the bank's home mortgage lending, followed by small business lending. Small farm lending was not evaluated due to minimal loan volumes across the AAs.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates 8 of its 24 AAs and operates 37 of its 93 branches in the state of Colorado. The bank's AA footprint captures 47 of Colorado's 64 counties and encompasses a diverse cross-section of Colorado, extending from the densely populated Front Range urban corridor westward through the Rocky Mountains and Continental Divide region into the Western Slope. The coverage includes numerous high-elevation mountain resort communities, historic mining areas, mountain valley agricultural regions and portions of the southeastern plains. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on home mortgage and small business lending. However, the bank's AAs had a varying mix of lending products based on the needs of the bank's populated urban markets and lessor populated rural markets. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis. Additionally, information obtained as part of the CRA public evaluations of other area financial institutions that contained the perspectives of five community members who reside in the state were reviewed for information relevant to the bank's CRA performance criterion and to gain perspectives of local economic conditions, possible credit needs in their respective areas, and the responsiveness of area banks in meeting such needs. Three community members represented housing and home service agencies, while two members represented economic development organizations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is low satisfactory. The lending test conclusion was derived from good performance noted in the Denver MSA followed by adequate performance in the Colorado Springs MSA and Western Colorado AAs.

Lending Activity

The bank's overall lending activities in the state of Colorado reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the Institution Lending Activity section of this report.

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. This performance is consistent with the bank's Denver MSA and Colorado Springs MSA AAs while the Western Colorado AA reflected good distribution.

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

The bank's lending within Colorado has an overall adequate penetration among individuals of different income levels and businesses of different sizes. This performance is consistent across the Denver MSA, Colorado Springs MSA, and Western Colorado AAs.

Community Development Lending

The bank provides a relatively high level CD loans within the state of Colorado. As illustrated in the table, the bank originated 44 CD loans totaling $153.8MM in AAs within the state, which comprises 38.3 percent of overall bank-wide CD loan volume by number and 38.9 percent by dollar volume. The bank is a leader in CD lending in the Denver MSA AA, and it originated an adequate level of CD loans in the Western Colorado and Colorado Springs MSA AAs. As the table further illustrates, the bank was most responsive to the economic development needs of its Colorado AAs.

Table 19

Community Development Loans – State of Colorado		
Community Development Purpose	#	**(000)**
Affordable Housing	4	34,406
Community Services	4	7,580
Economic Development	36	111,796
Revitalization and Stabilization	0	0
Total Loans	**44**	**153,781**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Colorado is high satisfactory. The conclusion is derived from good investment test performance in each of the Colorado Springs MSA, Denver MSA, and Western Colorado AAs.

The bank has a significant level of qualified CD investments and grants within Colorado and is occasionally in a leadership position. While the bank makes occasional use of innovative and/or complex investments, the bank exhibits good responsiveness to the credit and CD needs of its AAs. As illustrated in the following table, the bank's investments are primarily responsive to area affordable housing needs, while donations are particularly responsive to area organizations that support community services for LMI individuals.

Table 20

Investments, Grants, and Donations – State of Colorado								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	26	11,340	12	4,775	6	36	44	16,150
Community Services	0	0	0	0	30	85	30	85
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**26**	**11,340**	**12**	**4,775**	**36**	**121**	**74**	**16,235**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Colorado is outstanding. The service test conclusions in the Colorado Springs MSA and Denver MSA AAs each reflect excellent service test performance, primarily influenced by significant CD service volumes performed by bank representatives, while performance in the Western Colorado AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Colorado are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the bank's 37 full-service offices, 12 are located in LMI tracts. Additionally, the bank operates 14 of its 42 full-service ATMs in LMI 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 Colorado banking office during the evaluation period, which was located in its Denver MSA AA in a middle-income tract.

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. The bank's operations and product and service offerings in the state generally mirror those of the overall institution, which is described in the Institution Retail Banking Services section of this evaluation.

Table 21

Retail Banking and Community Development Services – State of Colorado												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	5.4	27.0	43.2	24.3	0.0	100.0	4.0	23.8	40.2	29.6	2.4	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
	4.8	28.6	45.2	21.4	0.0	100.0	3.7	24.4	41.5	29.4	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	37		0		1		0	0	(1)	0	0	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	13		110		10		0		133		60	

[1] *Based on 2024 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. The bank was a leader in providing services in the Colorado Springs MSA and Denver MSA AAs, with a relatively high level performance in the Western Colorado AA. As illustrated in the table, the bankers were most responsive in providing qualified CD services to organizations that provide community services to LMI individuals and families.

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

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

The bank's Colorado Springs, Colorado MSA AA (Colorado Springs MSA AA) consists of the entirety of El Paso and Teller Counties, which comprise the Colorado Springs, Colorado MSA. Refer to Appendix C for additional demographic data.

- The AA remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 175 census tracts, including 4 low-, 48 moderate-, 72 middle-, 49 upper-, and 2 unknown-income census tracts. The census tract distribution remains unchanged since the previous examination.
- The bank operates 5 of its 93 banking offices in the AA. Two offices are located in moderate-, 2 in middle-, and 1 in upper-income census tract(s). In addition to the branch footprint in the AA, the bank also operates 1 loan production office in Colorado Springs that generated loans included in this evaluation. The bank closed two additional loan production offices in Colorado Springs in August 2024.
- The bank operates full-service ATMs at each of its branch locations.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 2.2 percent, ranking 11th of 41 FDIC-insured financial institutions operating from 129 offices in the AA.
- A community contact recently conducted as part of the CRA evaluation of another financial institution with branches 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 community member represented a local economic development organization.

Table 22

Population Change Assessment Area: Colorado Springs, Colorado MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Colorado Springs, Colorado MSA	678,364	755,105	11.3
El Paso County, CO	655,024	730,395	11.5
Teller County, CO	23,340	24,710	5.9
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*			

- The AA population reflected growth that outpaced the state of Colorado between 2015 and 2020, with AA population growth driven by the increase in densely populated El Paso County.
- The AA includes 13.1 percent of the population of the state of Colorado, and El Paso County contains 96.7 percent of the MSA population based on 2020 Census data.
- A majority of AA residents reside in Colorado Springs, with a population of 478,961 based on 2020 Census data.

Table 23

Median Family Income Change Assessment Area: Colorado Springs, Colorado MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Colorado Springs, Colorado MSA	77,956	83,751	7.4
El Paso County, CO	77,763	84,078	8.1
Teller County, CO	83,626	78,439	(6.2)
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.

- The 2020 MFI in the AA lagged the statewide figure and was primarily weighted by the significantly larger population and higher MFI in El Paso County when compared to Teller County.
- Based on 2020 ACS data, the percentage of AA families living below the poverty level, at 6.5 percent, was slightly above the statewide figure of 6.1 percent.

Table 24

Housing Cost Burden Assessment Area: Colorado Springs, Colorado MSA						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Colorado Springs, Colorado MSA	86.1	65.9	50.1	66.6	47.0	22.0
El Paso County, CO	86.4	65.2	50.2	67.2	46.3	21.8
Teller County, CO	71.1	87.9	48.5	54.1	56.0	26.1
Colorado	80.7	56.1	47.3	64.8	41.2	22.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- The housing affordability ratio of 23.5 percent in the AA denotes relatively low affordability and is similar to the statewide Colorado ratio of 20.3 percent.

Table 25

Unemployment Rates Assessment Area: Colorado Springs, Colorado MSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Colorado Springs, Colorado MSA	6.6	5.6	3.2	3.4	4.3
El Paso County, CO	6.6	5.6	3.2	3.4	4.3
Teller County, CO	7.2	5.2	3.1	3.3	4.2
Colorado	6.8	5.5	3.1	3.3	4.3
Source: BLS, Local Area Unemployment Statistics					

- The U.S military is the largest employer in the Colorado Springs area, including Peterson Air Force Base, Schriever Air Force Base, the United States Air Force Academy, the Fort Carson Army Base, and the North American Air Defense Command (NORAD).
- Aside from the military, other major industries in the Colorado Springs area include health care and social assistance, accommodation and food services, retail services, and professional and technical services.

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

LENDING TEST

The bank's performance under the lending test in the Colorado Springs MSA AA is adequate. An evaluation of small business lending and small farm lending was not conducted due to insufficient loan volumes to conduct meaningful analyses. Additionally, only an evaluation of total home mortgage lending and the home purchase sub-product were evaluated given sufficient lending volumes for a conclusion to be rendered.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 461 loans in the AA during the evaluation period, including 450 home mortgage and 11 small business loans.

The Colorado Springs MSA is a relatively small geographic area when compared to a number of the bank's other primary markets and includes a limited number of the bank's branches. However, this AA had the highest volume of bank lending within the state by number of loans, representing 34.7 percent of statewide lending.

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 Lending Activity section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of home mortgage lending reflects adequate distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage lending among low-income tracts was comparable to the aggregate lending data and the demographic figure. Lending among moderate-income tracts was below the aggregate lending data and the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected performance which was above the performance noted in 2024, with penetration levels which were comparable to the aggregate lending data and demographic figures. The overall conclusion of performance was influenced by the level of lending in 2023 given it contained a much larger volume of lending.

An analysis of the dispersion of lending among the various geographic income levels, with emphasis on LMI penetration, revealed some gaps in penetration across the AA's moderate-income tracts, specifically in the western portion of the AA (census tracts 0101.12 and 0102.03). These tracts are situated in sparsely populated, mountainous areas that possess geographic constraints for routine lending penetration and accessibility and, as such, did not impact the conclusion of performance.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2024 lending among low-income tracts was comparable to the aggregate lending data and the demographic figure. Lending among moderate-income tracts was below the aggregate lending data and the demographic figure.

The geographic distribution of home purchase lending in 2023 reflected performance which was above the performance noted in 2024 with penetration levels which were comparable to the aggregate lending data and demographic figures. The overall conclusion of performance was influenced by the level of lending in 2023 given it contained a larger volume of lending.

Table 26

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	0.9	1.7	520	0.5	1.1	3	1.9	1.5	918	1.2	1.0	1.2
Moderate	36	16.2	19.0	12,633	12.6	14.8	13	8.2	18.0	4,373	5.8	13.6	20.0
Middle	80	36.0	41.3	32,836	32.6	38.1	56	35.4	40.6	23,405	31.3	37.6	43.4
Upper	104	46.8	37.9	54,626	54.3	46.0	86	54.4	39.7	46,185	61.7	47.7	35.2
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	222	100.0	100.0	100,615	100.0	100.0	158	100.0	100.0	74,881	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	1.3	0	0.0	0.9	1.2
Moderate	3	17.6	21.5	515	9.8	15.9	2	8.0	19.9	490	4.5	15.7	20.0
Middle	3	17.6	42.6	813	15.5	36.7	9	36.0	42.5	2,710	25.1	39.7	43.4
Upper	11	64.7	34.3	3,915	74.7	46.2	14	56.0	36.2	7,593	70.4	43.4	35.2
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	5,243	100.0	100.0	25	100.0	100.0	10,793	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.4	0	0.0	0.8	0	0.0	1.2	0	0.0	0.7	1.2
Moderate	1	6.7	16.7	300	24.5	13.9	1	20.0	18.0	100	19.7	14.1	20.0
Middle	6	40.0	42.7	275	22.4	38.4	2	40.0	40.5	317	62.5	35.3	43.4
Upper	8	53.3	38.9	650	53.1	46.6	2	40.0	40.2	90	17.8	49.8	35.2
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	1,225	100.0	100.0	5	100.0	100.0	507	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	1.4	0	0.0	0.1	0	0.0	3.8	0	0.0	5.6	4.3
Moderate	0	0.0	43.1	0	0.0	53.3	0	0.0	39.7	0	0.0	24.3	45.1
Middle	0	0.0	36.1	0	0.0	10.3	0	0.0	41.0	0	0.0	24.0	33.1
Upper	0	0.0	19.4	0	0.0	36.3	0	0.0	12.8	0	0.0	41.8	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.6	0	0.0	4.2	0.4
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	2	0.8	1.6	520	0.5	1.0	3	1.6	1.4	918	1.0	1.2	1.2
Moderate	40	15.5	19.0	13,448	12.5	16.3	16	8.3	18.4	4,963	5.7	14.7	20.0
Middle	91	35.3	41.7	33,974	31.6	37.0	68	35.4	41.0	27,011	30.9	37.1	43.4
Upper	125	48.4	37.5	59,462	55.4	45.7	105	54.7	39.0	54,662	62.4	46.5	35.2
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.4	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	258	100.0	100.0	107,404	100.0	100.0	192	100.0	100.0	87,554	100.0	100.0	100.0

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.*
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.

Lending to Borrowers of Different Income Levels

The bank's home mortgage lending has an adequate distribution among individuals of different income levels

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage loans to low-income borrowers was comparable to the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data and comparable to the demographic figure.

The borrower distribution of home mortgage lending in 2023 was consistent with the level noted in 2024.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2024 home mortgage purchases to low-income borrowers was comparable to the aggregate lending data but significantly below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data and comparable to the demographic figure.

The borrower distribution of home purchase lending in 2023 was consistent with the level noted in 2024.

Table 27

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Colorado Springs, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	1.4	2.5	569	0.6	1.1	1	0.6	1.9	160	0.2	0.8	18.8
Moderate	37	16.7	16.0	11,662	11.6	11.4	24	15.2	13.5	7,705	10.3	9.3	18.8
Middle	67	30.2	27.4	27,287	27.1	24.4	34	21.5	24.2	13,785	18.4	21.1	21.9
Upper	113	50.9	35.4	59,590	59.2	43.8	98	62.0	38.5	53,005	70.8	46.2	40.5
Unknown	2	0.9	18.8	1,507	1.5	19.3	1	0.6	21.9	226	0.3	22.6	0.0
Total	222	100.0	100.0	100,615	100.0	100.0	158	100.0	100.0	74,881	100.0	100.0	100.0
Refinance Loans													
Low	1	5.9	9.8	100	1.9	5.1	0	0.0	5.0	0	0.0	2.5	18.8
Moderate	2	11.8	19.4	612	11.7	13.6	7	28.0	11.9	1,577	14.6	6.9	18.8
Middle	6	35.3	24.4	1,400	26.7	21.2	3	12.0	17.0	1,118	10.4	12.8	21.9
Upper	8	47.1	29.1	3,131	59.7	33.1	8	32.0	27.0	4,055	37.6	26.8	40.5
Unknown	0	0.0	17.4	0	0.0	27.1	7	28.0	39.0	4,043	37.5	51.1	0.0
Total	17	100.0	100.0	5,243	100.0	100.0	25	100.0	100.0	10,793	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.7	0	0.0	4.0	1	20.0	6.2	192	37.9	3.1	18.8
Moderate	2	13.3	17.5	105	8.6	12.1	1	20.0	17.4	100	19.7	11.8	18.8
Middle	5	33.3	26.7	209	17.1	23.5	1	20.0	25.4	50	9.9	20.9	21.9
Upper	6	40.0	46.2	816	66.6	55.7	1	20.0	48.6	125	24.7	59.4	40.5
Unknown	2	13.3	2.9	95	7.8	4.7	1	20.0	2.4	40	7.9	4.8	0.0
Total	15	100.0	100.0	1,225	100.0	100.0	5	100.0	100.0	507	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	1.6	4.4	669	0.6	1.8	2	1.0	3.4	352	0.4	1.3	18.8
Moderate	42	16.3	17.0	12,399	11.5	11.8	32	16.7	14.0	9,382	10.7	8.9	18.8
Middle	78	30.2	26.9	28,896	26.9	23.9	40	20.8	22.9	15,287	17.5	19.3	21.9
Upper	130	50.4	36.4	63,838	59.4	43.0	109	56.8	37.1	58,224	66.5	42.4	40.5
Unknown	4	1.6	15.2	1,602	1.5	19.5	9	4.7	22.5	4,309	4.9	28.1	0.0
Total	258	100.0	100.0	107,404	100.0	100.0	192	100.0	100.0	87,554	100.0	100.0	100.0

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.
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.

Community Development Lending

The bank provides an adequate level of CD loans in the AA. As illustrated in the table, the bank's volume of qualified CD loans was most responsive to AA economic development needs. Examples of qualified CD loans include:

- A $6.7MM loan was originated under the SBA Program 504 loan program to a small business that provided financing for the creation of approximately 60 permanent jobs.

- The bank provided $4.7MM in financing for the purchase and renovation of an area educational facility that provides services to economically disadvantaged students in underserved communities.

Table 28

Community Development Loans – Colorado Springs, Colorado MSA AA		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	1	4,667
Economic Development	6	25,890
Revitalization and Stabilization	0	0
Total Loans	**7**	**30,558**

INVESTMENT TEST

The bank's performance under the investment test in the Colorado Springs MSA AA is good. The bank makes a significant level of qualified CD investments and grants and is occasionally 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. Consistent with many of the bank's other AAs, the investment activities in this AA consist almost entirely of MBS that support affordable housing, as well as philanthropic donations to area organizations that provide community services to LMI individuals and families.

The following table illustrates the breakdown of the bank's CD investments within the AA, including prior period investments that remain in the bank's securities portfolio, investments purchased during the current evaluation period, and CD donations made since the prior evaluation. Responsive CD donations consisted of:

- A $5,000 donation was made to an organization that provides an array of community services to LMI individuals and families, including food, clothing, and financial assistance, among other services.
- A donation of $2,500 was made to an area organization that provides housing resources to families facing crisis and homelessness.

Table 29

Investments, Grants, and Donations – Colorado Springs, Colorado MSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	5	1,466	3	1,227	1	3	9	2,696
Community Services	0	0	0	0	3	8	3	8
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**5**	**1,466**	**3**	**1,227**	**4**	**11**	**12**	**2,704**

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 reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. Two of the bank's five AA branches and two of the bank's five full-service ATMs are located in moderate-income census tracts, which is higher than the percentage of LMI census tracts by income level, although there is a significant number of LMI census tracts in the AA that are not in proximity to the bank's branching footprint.

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

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly to LMI geographies and/or LMI individuals. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are discussed in the Institution Retail Banking Services section of this report.

Table 30

Retail Banking and Community Development Services – Colorado Springs, Colorado 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	40.0	40.0	20.0	0.0	100.0	2.3	27.4	41.1	28.0	1.1	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	40.0	40.0	20.0	0.0	100.0	2.0	27.4	41.7	28.6	0.3	100.0

Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)					
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total
	5	0	0	0	0	0	0	0	0

Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations
	2	27	0	0	29	7

[1] *Based on 2024 FFIEC census tract definitions.*

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provided an excellent level of CD services. Bank officers and staff provided 29 CD services to 7 organizations throughout the AA. As illustrated in the table, these activities were focused on community service and affordable housing organizations. Examples of CD services provided by bank employees include:

- A total of 8 bank employees provided 13 qualified CD services teaching financial literacy classes to students from schools that contain a majority student population eligible for free or reduced lunches.
- A bank employee served both years of the evaluation period totaling 104 hours providing financial expertise on the board for an organization that provides behavioral health services, preventative classes and programs to at-risk youth, of which more than 70 percent of youth come from low-income backgrounds.

DENVER – AURORA – CENTENNIAL, COLORADO MSA ASSESSMENT AREA METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DENVER – AURORA – CENTENNIAL, COLORADO MSA AA

The bank's Denver–Aurora-Centennial, CO MSA AA (Denver MSA AA) consists of the entireties of Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties, which all comprise the total MSA. Refer to Appendix C for additional demographic data.

- The AA delineation remains unchanged since the prior CRA evaluation.
- In 2024, the MSA's name changed from Denver–Aurora-Lakewood, CO MSA to Denver–Aurora-Centennial, CO MSA.
- The AA is comprised of a total of 707 census tracts, including 37 low-, 179 moderate-, 258 middle-, 214 upper-, and 19 unknown-income census tracts. The census tract distribution remains unchanged since the previous examination.
- The bank operates 7 of its 93 banking offices in the AA. One office is located in a low-, two in moderate-, two in middle-, and two in upper-income census tract(s). In addition to the branch footprint in the AA, the bank also operates 1 loan production office in Greenwood Village that generated loans included in this evaluation. Since the last exam, the bank closed 1 branch in the AA, which was located in Aurora, Colorado.
- The bank operates full-service ATMs at each of its seven branch locations.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 1.9 percent, ranking 11th of 68 FDIC-insured financial institutions operating from 585 offices in the AA.
- Two interviews with members of the community recently conducted as part of the CRA evaluations of two financial institutions with branches 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. Each community member represented a respective local area housing agency which, among other services, provides access to affordable housing within the AA.

Table 31

Population Change Assessment Area: Denver – Aurora – Centennial, Colorado MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Denver–Aurora–Centennial, CO MSA	2,703,972	2,963,821	9.6
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Broomfield County, CO	60,699	74,112	22.1
Clear Creek County, CO	9,136	9,397	2.9
Denver County, CO	649,654	715,522	10.1
Douglas County, CO	306,974	357,978	16.6
Elbert County, CO	23,855	26,062	9.3
Gilpin County, CO	5,605	5,808	3.6
Jefferson County, CO	552,344	582,910	5.5
Park County, CO	16,189	17,390	7.4
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

- Population trends reflect growth throughout each county in the AA.
- The population of the AA accounts for approximately 51.3 percent of the state of Colorado population.

Table 32

Median Family Income Change Assessment Area: Denver – Aurora – Centennial, Colorado MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Denver–Aurora–Centennial, CO MSA	88,302	103,157	16.8
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Broomfield County, CO	106,948	129,207	20.8
Clear Creek County, CO	94,577	109,327	15.6
Denver County, CO	76,243	93,236	22.3
Douglas County, CO	125,984	137,589	9.2
Elbert County, CO	105,472	115,382	9.4
Gilpin County, CO	82,701	111,832	35.2
Jefferson County, CO	94,579	108,867	15.1
Park County, CO	75,643	90,338	19.4
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
Noe: Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

- The change in the AA's MFI has outpaced the entire state and reflected significant growth throughout all AA counties. The highest growth rates occurred in Gilpin, Denver, and Broomfield Counties, with increases exceeding 20.0 percent.
- The percentage of AA families living below the poverty level was 5.3 percent, which is below the Colorado statewide figure of 6.1 percent. Within the AA, Denver County had the highest percentage of families living below the poverty level, at 8.4 percent, while Clear Creek County had the lowest, at 1.2 percent.

Table 33

Housing Cost Burden Assessment Area: Denver – Aurora – Centennial, Colorado MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver–Aurora–Centennial, CO MSA	82.3	58.1	46.9	67.3	42.1	21.6
Adams County, CO	84.0	50.6	51.7	66.6	40.7	25.1
Arapahoe County, CO	86.8	58.7	50.8	70.9	42.6	22.9
Broomfield County, CO	84.0	73.3	40.7	62.3	37.8	15.9
Clear Creek County, CO	79.1	55.6	57.8	54.5	44.9	22.3
Denver County, CO	77.2	54.5	42.8	69.7	41.3	23.5
Douglas County, CO	91.3	77.8	46.5	71.4	55.3	18.3
Elbert County, CO	60.0	26.7	32.9	71.4	35.7	23.5
Gilpin County, CO	86.0	44.4	52.5	80.7	50.8	26.7
Jefferson County, CO	84.9	62.6	48.6	60.7	39.7	18.5
Park County, CO	44.6	61.5	34.5	54.8	31.2	21.8
Colorado	80.7	56.1	47.3	64.8	41.2	22.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- Housing affordability reflected similar circumstances throughout the AA counties with the greatest cost burden to low-income renters in Douglas County and to low-income homeowners in Elbert and Douglas Counties.
- The housing affordability ratio in the AA, at 20.0 percent, indicates a low-level of affordability in the AA, which is consistent with the state of Colorado figure of 20.3 percent. Housing affordability ratios within the 10 AA counties ranged from 17.0 percent in Denver County to 24.6 percent in Douglas County.

Table 34

Unemployment Rates Assessment Area: Denver – Aurora – Centennial, Colorado MSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Denver–Aurora–Centennial, CO MSA	6.9	5.5	3.0	3.2	4.2
Adams County, CO	7.2	6.0	3.3	3.4	4.5
Arapahoe County, CO	7.4	5.8	3.1	3.3	4.2
Broomfield County, CO	6.0	4.5	2.6	3.1	4.1
Clear Creek County, CO	8.4	5.8	3.1	3.1	4.0
Denver County, CO	7.5	5.8	3.0	3.4	4.4
Douglas County, CO	5.3	4.1	2.5	2.9	3.9
Elbert County, CO	4.6	4.1	2.5	2.8	3.7
Gilpin County, CO	11.5	6.4	2.9	2.9	3.7
Jefferson County, CO	6.7	5.2	2.9	3.1	4.1
Park County, CO	6.6	5.1	3.1	3.5	4.2
Colorado	6.8	5.5	3.1	3.3	4.3

Source: BLS, Local Area Unemployment Statistics

- Recent unemployment figures suggest a stable job market within the AA, as well as throughout the state of Colorado, with a slight uptick in unemployment figures in every county in 2024.
- Examples of major public- and private-sector employers in the AA include: State of Colorado (59,200), U.S. Government (45,200), University of Colorado (37,000), UC Health (13,190), Amazon (12,360), and HealthONE Corporation (12,160).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER – AURORA – CENTENNIAL MSA AA

LENDING TEST

The bank's performance under the lending test in the Denver MSA AA is good and was bolstered by the bank's leadership in originating CD loans. The bank's home mortgage lending carried greater weight in the analysis due to the larger volume of lending compared to small business lending. An evaluation of small farm lending was not conducted due to insufficient loan volumes to conduct meaningful analyses. Additionally, only an evaluation of total home mortgage lending and the home purchase sub-product was evaluated given sufficient lending volumes for a conclusion to be rendered.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The bank originated a total of 346 loans in the AA during the evaluation period, including 248 home mortgage, 94 small business, and 4 small farm loans.

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 Institution Lending Activity 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. This conclusion is derived from an adequate level of penetration noted in home mortgage lending and small business lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage loans among low-income tracts was comparable to the aggregate lending data and the demographic figure. Lending among moderate-income tracts was also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected consistent performance with 2024 lending patterns.

An analysis of the dispersion of loans revealed lending gaps and lapses based on the AA's composition of 707 census tracts and the distance of the bank's branching structure from a number of LMI areas, although the dispersion of lending did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2024 loans among low-income tracts was comparable to the aggregate lending data and the demographic figure. Lending among moderate-income tracts was also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home purchase lending in 2023 reflected consistent performance with 2024 lending patterns.

Table 35

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver - Aurora - Centennial, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	1.0	2.8	262	0.5	1.9	0	0.0	2.7	0	0.0	1.8	2.8
Moderate	26	25.5	23.3	11,673	23.7	17.9	16	22.5	21.8	6,885	18.7	16.3	21.2
Middle	35	34.3	36.6	16,166	32.8	34.7	28	39.4	37.2	13,049	35.5	35.5	37.6
Upper	40	39.2	36.7	21,116	42.9	44.9	27	38.0	37.9	16,812	45.8	46.0	37.9
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0	0.0	0.5	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	102	100.0	100.0	49,217	100.0	100.0	71	100.0	100.0	36,746	100.0	100.0	100.0
Refinance Loans													
Low	1	7.1	2.7	250	5.5	1.4	1	5.6	2.6	90	1.3	1.9	2.8
Moderate	1	7.1	22.6	97	2.1	17.2	6	33.3	21.9	2,659	37.5	17.2	21.2
Middle	7	50.0	36.4	3,032	67.1	40.3	6	33.3	36.8	1,625	22.9	34.8	37.6
Upper	5	35.7	37.9	1,138	25.2	40.8	4	22.2	38.3	2,570	36.2	45.5	37.9
Unknown	0	0.0	0.4	0	0.0	0.3	1	5.6	0.4	150	2.1	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	4,517	100.0	100.0	18	100.0	100.0	7,094	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.2	0	0.0	1.8	0	0.0	1.4	2.8
Moderate	3	13.0	16.5	185	7.6	11.9	1	12.5	17.0	100	7.9	12.2	21.2
Middle	10	43.5	37.9	938	38.4	33.1	4	50.0	37.3	615	48.7	32.9	37.6
Upper	10	43.5	43.3	1,320	54.0	53.1	3	37.5	43.5	549	43.4	52.7	37.9
Unknown	0	0.0	0.4	0	0.0	0.6	0	0.0	0.4	0	0.0	0.9	0.5
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	2,443	100.0	100.0	8	100.0	100.0	1,264	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	14.7	0	0.0	8.3	0	0.0	10.3	0	0.0	8.3	8.1
Moderate	0	0.0	29.8	0	0.0	24.9	0	0.0	39.9	0	0.0	34.4	35.1
Middle	0	0.0	37.2	0	0.0	47.6	0	0.0	26.6	0	0.0	43.3	33.8
Upper	0	0.0	16.5	0	0.0	14.2	0	0.0	19.2	0	0.0	10.8	20.4
Unknown	0	0.0	1.8	0	0.0	4.9	0	0.0	3.9	0	0.0	3.1	2.7
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	3	2.0	2.7	612	1.1	2.3	1	1.0	2.6	90	0.2	2.3	2.8
Moderate	30	20.1	22.0	11,955	21.0	18.0	23	23.2	21.2	9,644	21.2	17.7	21.2
Middle	55	36.9	36.7	20,365	35.7	36.4	39	39.4	37.1	15,537	34.2	35.8	37.6
Upper	61	40.9	38.2	24,079	42.2	42.4	35	35.4	38.8	19,981	44.0	43.4	37.9
Unknown	0	0.0	0.5	0	0.0	0.9	1	1.0	0.4	150	0.3	0.8	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	57,011	100.0	100.0	99	100.0	100.0	45,402	100.0	100.0	100.0

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.
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 small business lending in 2024 among low-income tracts was significantly above the aggregate lending data and the demographic figure. Lending among moderate-income tracts was below the aggregate lending data and the demographic figure.

The geographic distribution of small business lending in 2023 reflected consistent performance with 2024 lending patterns.

The bank's loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI tracts. These gaps were frequently the result of concentrations of lending in close proximity to the bank's branching footprint as well as the significant number of AA census tracts in relationship to the number of loan originations. The gaps and lapses did not impact the overall conclusion.

Table 36

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Denver - Aurora - Centennial, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	3.4	4.4	950	6.6	5.4	6	16.7	4.1	3,230	28.4	5.5	4.2
Moderate	13	22.4	21.4	3,808	26.3	24.0	5	13.9	21.0	1,655	14.5	23.7	21.9
Middle	17	29.3	33.1	2,352	16.3	28.9	8	22.2	32.5	1,032	9.1	30.0	35.0
Upper	26	44.8	38.3	7,343	50.8	37.3	17	47.2	39.7	5,474	48.1	36.7	36.9
Unknown	0	0.0	2.4	0	0.0	4.3	0	0.0	2.4	0	0.0	3.9	2.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	58	100.0	100.0	14,453	100.0	100.0	36	100.0	100.0	11,391	100.0	100.0	100.0

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

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage lending reflects adequate performance, while small business lending reflects poor performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 loans to low-income borrowers was comparable to the aggregate lending data and below

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

The borrower distribution of home mortgage lending in 2023 was consistent with the bank's 2024 lending patterns.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2024 home purchase loans to low-income borrowers was comparable to the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data, and comparable to the demographic figure.

The borrower distribution of home purchase lending in 2023 was generally comparable to the aggregate lending data, which reflects performance below that of 2024 lending patterns. Further, the performance noted in 2023 supported the overall conclusion due to larger lending volumes.

Table 37

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Denver - Aurora - Centennial, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	2.0	3.7	444	0.9	1.5	4	5.6	4.1	857	2.3	1.9	20.2
Moderate	18	17.6	16.8	6,339	12.9	11.1	15	21.1	16.5	5,101	13.9	10.7	18.2
Middle	32	31.4	25.1	13,601	27.6	22.2	14	19.7	23.8	6,192	16.9	20.8	21.9
Upper	46	45.1	36.3	27,094	55.1	46.7	37	52.1	34.8	24,011	65.3	44.4	39.7
Unknown	4	3.9	18.1	1,739	3.5	18.4	1	1.4	20.9	585	1.6	22.2	0.0
Total	102	100.0	100.0	49,217	100.0	100.0	71	100.0	100.0	36,746	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	11.5	0	0.0	4.8	3	16.7	9.6	313	4.4	4.9	20.2
Moderate	2	14.3	20.9	402	8.9	10.7	3	16.7	18.0	745	10.5	11.9	18.2
Middle	4	28.6	22.1	1,115	24.7	13.4	4	22.2	20.4	1,190	16.8	16.6	21.9
Upper	6	42.9	31.6	2,454	54.3	27.9	7	38.9	31.5	4,239	59.8	39.0	39.7
Unknown	2	14.3	13.9	546	12.1	43.3	1	5.6	20.5	607	8.6	27.6	0.0
Total	14	100.0	100.0	4,517	100.0	100.0	18	100.0	100.0	7,094	100.0	100.0	100.0
Home Improvement Loans													
Low	2	8.7	6.5	64	2.6	3.5	0	0.0	7.6	0	0.0	4.7	20.2
Moderate	1	4.3	18.4	75	3.1	11.5	0	0.0	18.1	0	0.0	11.6	18.2
Middle	2	8.7	25.6	28	1.1	20.8	3	37.5	25.6	300	23.7	20.3	21.9
Upper	17	73.9	45.8	2,266	92.8	60.0	5	62.5	43.9	964	76.3	56.9	39.7
Unknown	1	4.3	3.7	10	0.4	4.2	0	0.0	4.8	0	0.0	6.5	0.0
Total	23	100.0	100.0	2,443	100.0	100.0	8	100.0	100.0	1,264	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	2.7	5.7	508	0.9	2.2	7	7.1	6.1	1,170	2.6	2.6	20.2
Moderate	24	16.1	18.0	7,020	12.3	11.1	18	18.2	17.5	5,846	12.9	11.0	18.2
Middle	40	26.8	24.7	14,919	26.2	20.6	22	22.2	23.5	7,930	17.5	20.0	21.9
Upper	73	49.0	36.9	32,169	56.4	44.4	50	50.5	35.1	29,264	64.5	44.0	39.7
Unknown	8	5.4	14.6	2,395	4.2	21.6	2	2.0	17.9	1,192	2.6	22.4	0.0
Total	149	100.0	100.0	57,011	100.0	100.0	99	100.0	100.0	45,402	100.0	100.0	100.0

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.
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 poor. As illustrated in the following table, the distribution of 2024 lending to small businesses was below the aggregate lending data and significantly below the demographic figure.

Similarly, the distribution of loans originated in 2023 was consistent with the penetration levels noted in 2024, reflecting concentrations of lending to small businesses that were below the aggregate lending data and demographic figures.

Table 38

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Denver - Aurora - Centennial, Colorado MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	19	32.8	56.6	3,103	21.5	32.5	10	27.8	55.4	1,877	16.5	34.2	92.9
Over $1 Million	37	63.8		10,960	75.8		25	69.4		9,180	80.6		6.2
Revenue Unknown	2	3.4		390	2.7		1	2.8		334	2.9		0.9
Total	58	100.0		14,453	100.0		36	100.0		11,391	100.0		100.0
By Loan Size													
$100,000 or Less	24	41.4	95.0	1,384	9.6	43.4	14	38.9	95.4	784	6.9	46.5	
$100,001 - $250,000	11	19.0	2.6	2,119	14.7	14.6	5	13.9	2.6	1,029	9.0	14.5	
$250,001 - $1 Million	23	39.7	2.3	10,950	75.8	42.0	17	47.2	2.0	9,578	84.1	39.0	
Total	58	100.0	100.0	14,453	100.0	100.0	36	100.0	100.0	11,391	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	11	57.9		527	17.0		6	60.0		265	14.1		
$100,001 - $250,000	5	26.3		954	30.7		2	20.0		382	20.4		
$250,001 - $1 Million	3	15.8		1,622	52.3		2	20.0		1,230	65.5		
Total	19	100.0		3,103	100.0		10	100.0		1,877	100.0		

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

Community Development Lending

The bank is a leader in providing CD loans in the AA. The bank originated 22 CD loans totaling $63.5MM in the AA, which was generally responsive to the economic development needs within the AA, along with lending to area organizations that provide various community services to LMI individuals and families. Examples of the bank's CD lending activities that were considered responsive to credit needs in the AA include:

- The bank provided $6.0MM in financing under the SBA 504 loan program for the expansion of a childcare facility in the AA.
- The bank provided emergency interim working capital financing for an area health provider that serves low-income and uninsured individuals and families with medical and dental services that they otherwise may be unable to receive.

Table 39

Community Development Loans – Denver – Aurora – Centennial, Colorado MSA AA		
Community Development Purpose	**#**	**(000)**
Affordable Housing	0	0
Community Services	3	2,913
Economic Development	19	60,614
Revitalization and Stabilization	0	0
Total Loans	**22**	**63,527**

INVESTMENT TEST

The bank's performance under the investment test in the Denver MSA AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally 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. Overall investment activities were primarily comprised of MBS that support area affordable housing needs, as well as philanthropic donations to area organizations that provide community services to LMI individuals and families, as well as support affordable housing needs.

Examples of responsive CD donations include:

- Three donations totaling $33M were made to an area organization that is responsive to affordable housing needs by providing affordable housing procurement for LMI individuals and families, as well as an array of other services that address critical housing needs.
- A total of $20M in philanthropic donations were made to an area organization that provides various educational resources to youth, of which a majority of participants were from schools with a majority student population eligible for free or reduced lunches.

Table 40

Investments, Grants, and Donations – Denver – Aurora – Centennial, Colorado MSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	10	5,576	1	445	3	33	14	6,054
Community Services	0	0	0	0	9	37	9	37
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**10**	**5,576**	**1**	**445**	**12**	**69**	**23**	**6,090**

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 accessible to the bank's various geographies and to individuals of different income levels in the AA. Three of the bank's seven AA branches and ATMs are located in LMI census tracts. The distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI tracts within the AA. Moreover, a number of the bank's branch and ATM locations in the AA's middle- and upper-income census tracts are in reasonable proximity to LMI census tracts, making these facilities accessible to populations residing in these areas.

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 closed a full-service office in Aurora, located in a middle-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. Bank operations and product offerings in the AA generally mirror those in all of the bank's markets, which are described in the Institution Retail Banking Services section of this evaluation.

Table 41

Retail Banking and Community Development Services – Denver – Aurora – Centennial, Colorado 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
	14.3	28.6	28.6	28.6	0.0	100.0	5.2	25.3	36.5	30.3	2.7	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
	14.3	28.6	28.6	28.6	0.0	100.0	5.0	26.6	36.3	31.1	1.1	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	7		0		1		0	0	(1)	0	0	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	3		38		6		0		47		20	

1. *Based on 2024 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. As illustrated in the table above, bank representatives supported 20 organizations throughout the AA, providing 47 CD services.

Examples of services provided by bank employees include:

- Three employees provided six CD services by teaching financial literacy courses to individuals served by an organization that helps LMI individuals transition from homelessness to self-sufficient independent living.
- Seven CD services were performed by bank staff by sharing their expertise through financial literacy instruction sessions or board service capacity for an impactful area youth organization that provides multiple educational resources for students. The CD services performed benefited student populations from area schools that were comprised of a majority student body that was eligible for free or reduced lunches.

OTHER COLORADO METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

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

The bank's Greeley MSA AA consists of the entirety of Weld County, which comprises the MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 83 census tracts, including 4 low-, 19 moderate-, 30 middle-, 29 upper-, and 1 unknown-income census tract(s).
- The census tract composition remains unchanged since the previous examination.
- The bank operates 3 of its 93 banking offices in the AA. Two offices are located in middle-, and one in an upper-income census tract(s).
- The bank operates full-service ATMs at each of its three branch locations.
- Based on the 2020 ACS data, the AA population is 328,981, which reflects a 21.4 percent increase from the 2015 ACS data.
- The AA is home to 75,120 total families. According to 2020 ACS data, 19.5 percent of families are low-, 18.0 percent are moderate-, 22.7 percent are middle-, and 39.8 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 3.1 percent, ranking 10th of 25 FDIC-insured financial institutions operating from 68 offices in the AA.

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

The bank's Fort Collins-Loveland MSA AA consists of the entirety of Larimer County, which also comprises the MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- In 2024, the MSA's name changed from Fort Collins MSA to Fort Collins-Loveland MSA.
- The AA is comprised of a total of 86 census tracts, including 1 low-, 16 moderate-, 52 middle-, 16 upper-, and 1 unknown-income census tract(s).
- The bank operates 1 of its 93 banking offices in the AA, which is located in a middle-income census tract.
- The bank operates one full-service ATM at the branch location.
- Based on the 2020 ACS data, the AA population is 359,066, which reflects a 12.8 percent increase from the 2015 ACS data.

- The AA is home to 83,921 total families. According to 2020 ACS data, 19.2 percent of families are low-, 18.3 percent are moderate-, 23.6 percent are middle-, and 38.9 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.5 percent, ranking 19th of 26 FDIC-insured financial institutions operating from 89 offices in the AA.

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

- The bank's Boulder MSA AA consists of the entirety of Boulder County, which also comprises the MSA. Refer to Appendix D for additional demographic data.
- The AA delineation remains unchanged from the previous CRA evaluation; however, it is noted that the bank closed its sole Boulder MSA AA banking office on February 21, 2025. For purposes of this evaluation, and since the review period considered 2023 and 2024 CRA activities, this AA was evaluated, albeit a limited-scope review.
- The AA is comprised of a total of 78 census tracts, including 4 low-, 13 moderate-, 32 middle-, 26 upper-, and 3 unknown-income census tracts.
- The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA, which is located in a moderate-income census tract. In addition to the branch footprint in the AA, the bank also operates one loan production office in Longmont, Colorado that generated loans included in this evaluation.
- The bank operates one full-service ATM at the branch location.
- Based on the 2020 ACS data, the AA population is 330,758, which reflects a 6.7 percent increase from the 2015 ACS data.
- The AA is home to 73,244 total families. According to 2020 ACS data, 20.5 percent of families are low-, 17.8 percent are moderate-, 21.3 percent are middle-, and 40.5 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.1 percent, ranking 34th of 34 FDIC-insured financial institutions operating from 93 offices in the AA.

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

The bank's Pueblo MSA AA consists of the entirety of Pueblo County, which also comprises the MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 58 census tracts, including 3 low-, 14 moderate-, 20 middle-, 18 upper-, and 3 unknown-income census tracts.

- The bank operates 1 of its 93 banking offices in the AA, which is located in a moderate-income census tract.
- The bank operates 1 full-service ATM at the branch location.
- Based on the 2020 ACS data, the AA population is 168,162, which reflects a 4.1 percent increase from the 2015 ACS data.
- The AA is home to 40,227 total families. According to 2020 ACS data, 22.4 percent of families are low-, 16.7 percent are moderate-, 19.3 percent are middle-, and 41.6 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.7 percent, ranking 14th of 14 FDIC-insured financial institutions operating from 36 offices in the AA.

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

The bank's Grand Junction MSA AA consists of the entirety of Mesa County, which also comprises the MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 33 census tracts, including 1 low-, 10 moderate-, 14 middle-, and 8 upper-income census tract(s). The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA, which is located in a moderate-income census tract.
- The bank operates 1 full-service ATM at the branch location.
- Based on the 2020 ACS data, the AA population is 155,703, which reflects a 5.3 percent increase from the 2015 ACS data.
- The AA is home to 37,528 total families. According to 2020 ACS data, 19.4 percent of families are low-, 18.8 percent are moderate-, 22.3 percent are middle-, and 39.5 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.5 percent, ranking 12th of 13 FDIC-insured financial institutions operating from 35 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OTHER COLORADO METROPOLITAN AAS

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 42

Assessment Area	Lending Test	Investment Test	Service Test
Greeley, Colorado MSA	Consistent	Consistent	Consistent
Fort Collins–Loveland, Colorado MSA	Exceeds	Consistent	Consistent
Boulder, Colorado MSA	Consistent	Consistent	Consistent
Pueblo, Colorado MSA	Below	Below	Consistent
Grand Junction, Colorado MSA	Consistent	Consistent	Consistent

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

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

The bank's Western Colorado AA consists of the entireties of the following 30 counties: Alamosa, Archuleta, Chaffee, Conejos, Costilla, Crowley, Custer, Delta, Dolores, Eagle, Fremont, Garfield, Grand, Gunnison, Hinsdale, Huerfano, Lake, La Plata, Las Animas, Mineral, Montezuma, Montrose, Otero, Ouray, Pitkin, Rio Grande, Saguache, San Juan, San Miguel, and Summit. Refer to Appendix C for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA comprises a total of 173 census tracts, including 2 low-, 33 moderate-, 82 middle-, 52 upper-, and 4 unknown-income census tracts. The census tract composition remains unchanged since the previous examination.
- Given the size of the AA's footprint, which encompasses a significant volume of rural areas of Colorado, a number of middle-income census tracts in counties in the AA were designated by the FFIEC as distressed and/or underserved during the evaluation period. Counties in the AA containing distressed and/or underserved tracts include Alamosa, Archuleta, Chaffee, Custer, Dolores, Gunnison, Hinsdale, Huerfano, Las Animas, Mineral, Otero, Ouray, Rio Grande, San Juan, and San Miguel.
- The bank operates 18 of its 93 banking offices in the AA, including 1 in low-, 3 in moderate-, 9 in middle-, and 5 in upper-income tract(s). In addition to the branch footprint in the AA, the bank also operates 1 loan production office in Avon, Colorado that generated loans included in this evaluation.
- The bank also operates a network of 23 full-service ATMs throughout the AA, including 1 in low-, 5 in moderate-, 12 in middle-, and 5 in upper-income tract(s).
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 4.4 percent, ranking 6th of 47 FDIC-insured financial institutions operating from 232 offices in the AA.
- Two interviews with members of the community recently conducted as part of the CRA evaluations of two financial institutions with branches 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. The community members represented organizations that serve their communities with small business, economic development services or housing and real estate services, respectively.

Table 43

Population Change Assessment Area: Western Colorado			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Western Colorado	532,483	556,600	4.5
Alamosa County, CO	16,269	16,376	0.7
Archuleta County, CO	12,174	13,359	9.7
Chaffee County, CO	18,309	19,476	6.4
Conejos County, CO	8,249	7,461	(9.6)
Costilla County, CO	3,581	3,499	(2.3)
Crowley County, CO	5,551	5,922	6.7
Custer County, CO	4,303	4,704	9.3
Delta County, CO	30,214	31,196	3.3
Dolores County, CO	1,862	2,326	24.9
Eagle County, CO	52,576	55,731	6.0
Fremont County, CO	46,809	48,939	4.6
Garfield County, CO	57,076	61,685	8.1
Grand County, CO	14,411	15,717	9.1
Gunnison County, CO	15,651	16,918	8.1
Hinsdale County, CO	874	788	(9.8)
Huerfano County, CO	6,502	6,820	4.9
Lake County, CO	7,362	7,436	1.0
La Plata County, CO	53,182	55,638	4.6
Las Animas County, CO	14,503	14,555	0.4
Mineral County, CO	733	865	18.0
Montezuma County, CO	25,700	25,849	0.6
Montrose County, CO	40,815	42,679	4.6
Otero County, CO	18,572	18,690	0.6
Ouray County, CO	4,580	4,874	6.4
Pitkin County, CO	17,420	17,358	(0.4)
Rio Grande County, CO	11,745	11,539	(1.8)
Saguache County, CO	6,238	6,368	2.1
San Juan County, CO	606	705	16.3
San Miguel County, CO	7,676	8,072	5.2
Summit County, CO	28,940	31,055	7.3
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

- Western Colorado counties grew modestly at 4.5 percent overall, but with significant variation. Growth was concentrated in economically active and amenity-rich areas, while rural counties stagnated or declined—driven by migration to job centers and recreation communities, and aging populations in rural areas.

- The AA contains approximately 78.2 percent of Colorado's total nonmetropolitan population.

Table 44

Median Family Income Change Assessment Area: Western Colorado			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Western Colorado	66,719	74,293	11.4
Alamosa County, CO	53,432	51,810	(3.0)
Archuleta County, CO	65,373	66,429	1.6
Chaffee County, CO	68,107	70,603	3.7
Conejos County, CO	53,117	50,906	(4.2)
Costilla County, CO	44,503	45,032	1.2
Crowley County, CO	45,459	53,438	17.6
Custer County, CO	50,076	66,436	32.7
Delta County, CO	56,721	62,003	9.3
Dolores County, CO	42,508	68,750	61.7
Eagle County, CO	90,099	98,427	9.2
Fremont County, CO	53,506	67,029	25.3
Garfield County, CO	74,154	86,677	16.9
Grand County, CO	78,728	91,273	15.9
Gunnison County, CO	71,700	84,627	18.0
Hinsdale County, CO	73,237	59,219	(19.1)
Huerfano County, CO	47,974	50,991	6.3
Lake County, CO	69,652	83,773	20.3
La Plata County, CO	81,417	89,737	10.2
Las Animas County, CO	59,951	55,489	(7.4)
Mineral County, CO	71,473	65,000	(9.1)
Montezuma County, CO	56,811	61,099	7.5
Montrose County, CO	59,362	67,827	14.3
Otero County, CO	45,984	58,457	27.1
Ouray County, CO	82,216	79,048	(3.9)
Pitkin County, CO	111,879	97,643	(12.7)
Rio Grande County, CO	54,629	65,676	20.2
Saguache County, CO	48,516	54,044	11.4
San Juan County, CO	56,677	67,750	19.5
San Miguel County, CO	79,793	84,078	5.4
Summit County, CO	93,941	92,436	(1.6)
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.

- Median family income across Western Colorado increased overall by 11.4 percent from 2015 to 2020, though changes varied significantly by county, with strong gains in areas like Dolores, Custer, and Fremont Counties and declines in smaller counties including Hinsdale and Pitkin. These patterns align with broader economic trends where income growth is uneven across rural regions, driven by factors like job concentration, migration to higher-opportunity areas, and differences in industry mix.
- The level of AA families below the poverty level, at 7.7 percent, was comparable to the figure for other nonmetropolitan areas, at 8.0 percent.
- At the individual AA county level, the highest concentration of families below poverty occurred in Costilla County where 20.6 percent of families were below poverty, reflective of limited employment opportunities and an aging population in a rural economy with constrained income growth. In contrast, Pitkin County's low poverty rate, at 1.6 percent, is supported by a tourism-based economy and high-income residents, though significant cost-of-living pressures may affect household affordability despite low poverty levels.

Table 45

Housing Cost Burden Assessment Area: Western Colorado						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Western Colorado	72.8	46.1	44.4	56.4	32.4	23.1
Alamosa County, CO	72.7	16.7	40.3	43.7	17.6	14.7
Archuleta County, CO	84.1	76.2	50.7	64.2	49.5	30.7
Chaffee County, CO	78.7	66.0	49.9	70.9	30.1	26.4
Conejos County, CO	46.2	14.3	28.5	47.6	9.6	18.2
Costilla County, CO	50.0	5.0	35.4	40.7	12.3	22.1
Crowley County, CO	36.2	57.1	36.8	46.0	17.6	21.0
Custer County, CO	53.3	5.3	30.0	53.3	18.2	18.4
Delta County, CO	73.6	25.5	45.7	53.6	20.8	21.3
Dolores County, CO	50.0	13.3	17.6	34.5	10.8	12.3
Eagle County, CO	78.0	62.5	52.6	71.9	55.9	31.0
Fremont County, CO	64.8	38.6	45.6	53.5	27.6	21.3
Garfield County, CO	70.9	58.6	41.8	69.8	38.0	26.8
Grand County, CO	86.8	55.7	41.6	55.5	29.9	23.8
Gunnison County, CO	89.3	36.0	39.3	63.0	33.6	20.5
Hinsdale County, CO	72.0	7.3	21.0	61.3	47.1	30.1
Huerfano County, CO	56.6	63.3	49.3	46.8	25.6	21.5
Lake County, CO	81.8	77.8	60.9	31.4	50.0	11.8
La Plata County, CO	80.7	45.8	46.7	52.8	37.0	21.0
Las Animas County, CO	62.6	31.9	40.5	57.7	29.1	27.1
Mineral County, CO	88.6	16.0	43.5	73.3	54.5	28.1
Montezuma County, CO	82.8	16.7	47.0	48.7	17.6	16.0
Montrose County, CO	69.6	66.3	47.5	52.0	27.0	19.6
Otero County, CO	65.8	23.5	42.4	55.1	19.0	20.6
Ouray County, CO	100.0	60.0	41.1	41.6	36.1	20.6
Pitkin County, CO	73.0	61.7	44.6	64.6	71.5	31.3
Rio Grande County, CO	46.8	20.5	26.5	43.3	29.4	15.8
Saguache County, CO	62.1	10.3	38.6	41.2	10.4	19.4
San Juan County, CO	100.0	25.0	40.3	28.6	50.0	17.3
San Miguel County, CO	93.0	21.4	40.8	59.3	42.2	25.9
Summit County, CO	78.2	57.9	41.0	70.1	51.5	27.2
NonMSA Colorado	71.3	43.7	43.0	56.2	32.7	23.0
Colorado	80.7	56.1	47.3	64.8	41.2	22.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- The overall AA housing affordability ratio of 20.1 percent was similar to the statewide nonmetropolitan figure of 22.0 percent.
- Housing affordability in the 30 counties in the AA ranged from 49.2 percent in Crowley County to 12.0 percent in Hinsdale County. The major drivers of housing unaffordability are high demand for second homes and vacation properties, income mismatch as a result of local wages in service and tourism not aligning with real estate prices, and limited inventory of appropriately sized, affordable units for local workers.

Table 46

Unemployment Rates Assessment Area: Western Colorado					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Western Colorado	7.4	5.7	3.4	3.5	4.3
Alamosa County, CO	6.1	6.2	3.9	4.0	4.9
Archuleta County, CO	7.5	5.6	3.4	3.6	4.2
Chaffee County, CO	6.0	4.4	2.8	3.1	4.0
Conejos County, CO	5.6	5.5	3.5	3.7	4.4
Costilla County, CO	8.9	8.5	5.5	6.0	7.1
Crowley County, CO	4.0	4.5	2.9	3.5	4.1
Custer County, CO	4.9	4.6	3.2	3.5	4.3
Delta County, CO	7.2	6.8	4.3	4.5	5.4
Dolores County, CO	6.8	5.6	3.5	3.5	4.5
Eagle County, CO	9.1	5.0	2.8	2.8	3.5
Fremont County, CO	6.9	7.2	4.7	4.9	6.0
Garfield County, CO	6.0	4.9	3.0	3.0	3.6
Grand County, CO	8.1	4.7	2.8	2.9	3.5
Gunnison County, CO	6.6	4.3	2.7	2.9	3.4
Hinsdale County, CO	4.4	4.4	3.0	3.2	3.7
Huerfano County, CO	9.0	8.9	6.5	6.3	7.1
Lake County, CO	8.3	5.2	2.8	2.8	3.5
La Plata County, CO	6.9	5.9	3.3	3.3	4.1
Las Animas County, CO	7.0	7.2	4.7	5.2	6.3
Mineral County, CO	6.5	6.4	3.5	3.2	5.0
Montezuma County, CO	7.2	6.6	4.2	4.4	5.2
Montrose County, CO	6.7	6.0	3.8	3.8	4.6
Otero County, CO	6.1	7.1	4.5	4.5	5.5
Ouray County, CO	7.7	5.1	3.3	3.3	4.4
Pitkin County, CO	9.2	5.5	3.0	3.0	3.7
Rio Grande County, CO	6.7	7.1	4.4	4.1	5.3
Saguache County, CO	7.2	6.8	3.7	3.9	4.5
San Juan County, CO	8.2	5.0	3.5	3.6	3.6
San Miguel County, CO	10.4	5.7	3.3	3.4	4.0
Summit County, CO	9.9	4.8	2.5	2.6	3.2
NonMSA Colorado	6.9	5.5	3.3	3.4	4.2
Colorado	6.8	5.5	3.1	3.3	4.3

Source: BLS, Local Area Unemployment Statistics

- The expansive AA encapsulates several state-recognized regions of Colorado, including the Southwest Region, Northwest Region, Rocky Mountain Resort Region, Central Western Slope Region, and San Luis Valley Region. Each area contains varying economic and industry-related characteristics, such as tourist and outdoor recreational destinations, agriculture and food industry, and

energy and natural resources sectors, among local government, education, and health sectors.
- Higher unemployment rates in Costillo and Huerfano counties reflect structural economic constraints, including rural isolation, limited industrial diversity, and seasonal employment, which are not prevalent in counties with more diversified economies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN COLORADO AA

LENDING TEST

The bank's performance under the lending test in the Western Colorado AA is adequate. The bank's home mortgage lending was given greater weight in the evaluation relative to small business lending due to higher origination volumes. There was no performance analysis conducted for the bank's small farm lending due to insufficient volumes to conduct a reasonable analysis. Additionally, only an evaluation of total home mortgage lending and the home purchase sub-product was conducted due to insufficient lending volumes in the remaining home mortgage sub-products to conduct meaningful analyses.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 344 loans during the evaluation period, including 211 home mortgage, 89 small business, and 44 small farm loans.

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 Institution Lending Activity section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage and small business lending reflects good penetration.

Home Mortgage Lending

The geographic distribution of total home mortgage lending is good. The distribution of 2024 home mortgage loans among low-income tracts was comparable to the aggregate lending data and the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data by number volume, significantly above by dollar volume, and comparable to the demographic figure.

The geographic distribution of 2023 home mortgage lending reflected penetration levels which were above that of 2024 lending performance, with lending among LMI tracts that was above the aggregate lending data by number volume, significantly above by dollar, and comparable to the demographic figure.

An analysis of the dispersion of loans revealed some lending gaps and lapses that include LMI tracts; however, this did not impact the overall conclusion given the vast geographic makeup of the AA. The expansive AA is comprised of 173 census tracts spread across 30 counties and is served by 18 offices. Additionally, a review of loan patterns and branch proximities to AA LMI tracts did not reveal arbitrary exclusions of LMI areas.

Home Purchase Loans

The geographic distribution of home purchase lending is good**.** The bank did not originate a home purchase loan in a low-income tract in 2024; however, aggregate lending data and the demographic figure reflected very limited penetration and opportunity in such tracts. Lending among moderate-income tracts was comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home purchase lending in 2023 reflected performance above that of 2024 lending patterns.

Table 47

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Western Colorado

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.1	0	0.0	2.1	0	0.0	2.5	0	0.0	16.1	0.5
Moderate	17	21.0	11.6	4,677	12.9	5.9	7	11.5	11.4	3,625	8.7	5.1	16.6
Middle	33	40.7	48.5	15,798	43.5	38.8	23	37.7	48.5	13,217	31.7	32.7	53.5
Upper	31	38.3	37.2	15,801	43.6	53.0	31	50.8	37.3	24,881	59.6	46.0	29.2
Unknown	0	0.0	0.6	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	81	100.0	100.0	36,276	100.0	100.0	61	100.0	100.0	41,723	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.6	1	7.1	1.6	86	2.9	1.2	0.5
Moderate	0	0.0	12.7	0	0.0	4.5	2	14.3	13.0	410	14.0	4.3	16.6
Middle	10	66.7	51.6	1,548	55.9	27.7	7	50.0	49.7	1,244	42.3	27.1	53.5
Upper	5	33.3	34.1	1,219	44.1	67.2	4	28.6	35.4	1,198	40.8	67.3	29.2
Unknown	0	0.0	0.5	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	2,767	100.0	100.0	14	100.0	100.0	2,938	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.7	0	0.0	0.5	0	0.0	0.7	0	0.0	0.5	0.5
Moderate	2	20.0	8.6	195	9.7	4.0	3	16.7	7.1	210	10.3	3.6	16.6
Middle	1	10.0	44.5	100	5.0	37.3	6	33.3	47.9	1,058	51.8	40.2	53.5
Upper	7	70.0	45.8	1,715	85.3	58.0	9	50.0	44.1	775	37.9	55.6	29.2
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.3
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	2,010	100.0	100.0	18	100.0	100.0	2,043	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	2.9	0	0.0	2.1	2.8
Moderate	0	0.0	13.3	0	0.0	1.4	0	0.0	14.7	0	0.0	6.2	9.3
Middle	0	0.0	56.7	0	0.0	68.4	0	0.0	44.1	0	0.0	39.1	32.0
Upper	0	0.0	23.3	0	0.0	28.7	0	0.0	38.2	0	0.0	52.6	55.7
Unknown	0	0.0	6.7	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	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	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													**Owner Occupied Units %**
Low	0	0.0	1.6	0	0.0	1.6	1	1.0	2.0	86	0.2	10.5	0.5
Moderate	22	19.5	11.4	5,007	12.1	5.1	14	14.3	11.6	4,377	9.3	4.8	16.6
Middle	46	40.7	48.4	17,611	42.5	35.0	37	37.8	48.9	15,583	32.9	31.1	53.5
Upper	45	39.8	38.0	18,857	45.5	58.1	46	46.9	37.3	27,254	57.6	53.5	29.2
Unknown	0	0.0	0.5	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	113	100.0	100.0	41,475	100.0	100.0	98	100.0	100.0	47,300	100.0	100.0	100.0

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.*
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 bank did not originate a small business loan in a low-income tract in 2024, which did not impact the conclusion due to a very limited volume of businesses operating in the AA's low-income tracts, as well as minimal variance between the bank's penetration and the aggregate lending data. Lending in moderate-income tracts was above the aggregate lending data by both number and dollar volume, while penetration was comparable in relation to the demographic figure.

The geographic distribution of small business lending in 2023 reflected performance above that of 2024 lending patterns.

While some dispersion gaps have been identified, these may be attributable to the exceptionally large and geographically dispersed nature of the assessment area, which encompasses 173 census tracts across 30 counties and is served by 18 offices.

Table 48

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Western Colorado

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.5	0	0.0	0.7	0	0.0	0.5	0	0.0	0.7	0.7
Moderate	7	16.7	8.9	1,083	11.0	7.6	6	12.8	8.7	1,107	9.9	7.7	13.4
Middle	19	45.2	43.1	3,615	36.7	39.3	14	29.8	42.2	4,475	40.2	40.4	43.4
Upper	16	38.1	43.6	5,142	52.3	50.4	27	57.4	44.3	5,546	49.8	49.5	41.9
Unknown	0	0.0	0.5	0	0.0	0.8	0	0.0	0.6	0	0.0	0.7	0.6
Tract-Unk	0	0.0	3.4	0	0.0	1.2	0	0.0	3.7	0	0.0	1.0	
Total	42	100.0	100.0	9,840	100.0	100.0	47	100.0	100.0	11,128	100.0	100.0	100.0

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

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

The bank’s lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage and small business lending reflects adequate performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage loans to low-income borrowers was above the aggregate lending data by

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

The distribution of home mortgage loans by borrower income in 2023 reflected performance above 2024 lending patterns.

Home Purchase Loans

The borrower distribution of home purchase lending is poor. The bank did not originate a home purchase loan to a low-income borrower in 2024, and lending to moderate-income borrowers was significantly below both the aggregate lending data and the demographic figure.

The distribution of home purchase loans by borrower income in 2023 reflected performance above 2024 lending patterns with penetration among LMI borrowers that was above the aggregate lending data, although below the demographic figure.

Table 49

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Western Colorado

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	1.2	3.0	170	0.5	0.9	0	0.0	3.3	0	0.0	0.8	19.8
Moderate	14	17.3	11.3	2,424	6.7	4.1	1	1.6	10.7	150	0.4	3.3	17.2
Middle	10	12.3	17.4	2,687	7.4	8.5	7	11.5	16.4	2,407	5.8	7.1	21.1
Upper	54	66.7	52.1	30,269	83.4	61.5	51	83.6	52.7	37,310	89.4	52.8	42.0
Unknown	2	2.5	16.2	726	2.0	25.1	2	3.3	16.9	1,856	4.4	36.0	0.0
Total	81	100.0	100.0	36,276	100.0	100.0	61	100.0	100.0	41,723	100.0	100.0	100.0
Refinance Loans													
Low	5	33.3	8.3	198	7.2	1.9	4	28.6	7.7	314	10.7	1.9	19.8
Moderate	2	13.3	15.1	95	3.4	4.5	3	21.4	12.6	66	2.2	3.4	17.2
Middle	3	20.0	19.0	857	31.0	6.9	2	14.3	16.0	601	20.5	5.8	21.1
Upper	5	33.3	40.7	1,617	58.4	33.3	4	28.6	41.2	1,844	62.8	34.9	42.0
Unknown	0	0.0	16.9	0	0.0	53.3	1	7.1	22.6	113	3.8	54.0	0.0
Total	15	100.0	100.0	2,767	100.0	100.0	14	100.0	100.0	2,938	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.8	0	0.0	5.5	2	11.1	4.7	60	2.9	2.1	19.8
Moderate	0	0.0	10.6	0	0.0	4.2	0	0.0	10.9	0	0.0	5.2	17.2
Middle	3	30.0	18.3	155	7.7	8.5	6	33.3	18.4	595	29.1	11.4	21.1
Upper	6	60.0	59.8	1,755	87.3	67.9	10	55.6	57.9	1,388	67.9	65.2	42.0
Unknown	1	10.0	6.6	100	5.0	13.8	0	0.0	8.1	0	0.0	16.1	0.0
Total	10	100.0	100.0	2,010	100.0	100.0	18	100.0	100.0	2,043	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	7.1	4.6	453	1.1	1.4	7	7.1	4.9	476	1.0	1.3	19.8
Moderate	18	15.9	12.1	2,644	6.4	4.0	5	5.1	11.5	280	0.6	3.4	17.2
Middle	17	15.0	17.9	3,721	9.0	7.6	16	16.3	16.8	3,633	7.7	6.7	21.1
Upper	67	59.3	50.1	33,831	81.6	53.4	67	68.4	49.9	40,942	86.6	47.8	42.0
Unknown	3	2.7	15.3	826	2.0	33.6	3	3.1	16.9	1,969	4.2	40.8	0.0
Total	113	100.0	100.0	41,475	100.0	100.0	98	100.0	100.0	47,300	100.0	100.0	100.0

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.*
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

Small Business Lending

The borrower distribution of small business lending is adequate**.** The distribution of 2024 lending to small businesses with gross annual revenues of $1 million or less was comparable to the aggregate lending data by number volume and significantly above by dollar volume, but below the demographic figure.

The distribution of loans originated in 2023 was comparable to the level noted in 2024, as penetration to small businesses with gross annual revenues of $1 million or less remained comparable to the aggregate lending data and below the demographic figure.

Table 50

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Western Colorado													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	21	50.0	54.5	3,989	40.5	36.6	25	53.2	52.7	6,934	62.3	36.7	92.3
Over $1 Million	18	42.9		5,123	52.1		18	38.3		3,772	33.9		6.3
Revenue Unknown	3	7.1		728	7.4		4	8.5		422	3.8		1.4
Total	42	100.0		9,840	100.0		47	100.0		11,128	100.0		100.0
By Loan Size													
$100,000 or Less	24	57.1	95.1	1,034	10.5	44.9	25	53.2	94.7	1,211	10.9	43.8	
$100,001 - $250,000	6	14.3	2.8	948	9.6	16.6	8	17.0	2.9	1,499	13.5	15.8	
$250,001 - $1 Million	12	28.6	2.1	7,858	79.9	38.5	14	29.8	2.4	8,418	75.6	40.4	
Total	42	100.0	100.0	9,840	100.0	100.0	47	100.0	100.0	11,128	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	15	71.4		564	14.1		14	56.0		594	8.6		
$100,001 - $250,000	3	14.3		425	10.7		3	12.0		622	9.0		
$250,001 - $1 Million	3	14.3		3,000	75.2		8	32.0		5,718	82.5		
Total	21	100.0		3,989	100.0		25	100.0		6,934	100.0		

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

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated 8 CD loans totaling $21.2MM in this AA, which was primarily comprised of CD loans that were responsive to area economic development needs throughout the AA, as well as financing that benefited area affordable housing needs. Examples of CD loans originated in the AA include:

- The bank originated an $8.0MM loan for the construction of an affordable housing project in a high cost-of-living ski resort area within the AA.
- A total of $5.3MM in financing was extended to an area small business that operates multiple offices within designated enterprise zones throughout the AA.

Table 51

Community Development Loans – Western Colorado AA		
Community Development Purpose	#	**(000)**
Affordable Housing	1	7,985
Community Services	0	0
Economic Development	7	13,206
Revitalization and Stabilization	0	0
Total Loans	**8**	**21,191**

INVESTMENT TEST

The bank's performance under the investment test in the Western Colorado AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally 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. As noted in the Institution Investment Test section of this evaluation, the bank's investment activity consists almost entirely of MBS that support affordable housing, as well as philanthropic donations to area organizations that primarily provide community services to LMI individuals and families.

Examples of responsive CD donations include:

- The bank made a donation of $1M to an area food bank to support ongoing community services to LMI individuals.
- A donation of $7,500 to an area organization that provides an array of community services for LMI individuals and families, including financial assistance and scholarship monies for students from LMI homes, financial assistance for medical services, and varying crisis resources, among others.

Table 51

Investments, Grants, and Donations – Western Colorado AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	4	1,068	5	2,469	1	0[3]	10	3,537
Community Services	0	0	0	0	10	21	10	21
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**4**	**1,068**	**5**	**2,469**	**11**	**21**	**20**	**3,558**

1. *Book Value of Investment*
2. *Original Market Value of Investment*
3. *$142.50 Donation*

SERVICE TEST

The bank's performance under the service test in the Western Colorado AA is good.

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 4 of its

18 branches and 6 of its 23 ATMs in LMI tracts throughout the expansive AA, which aligns similarly with the distribution of the various income tracts within the 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 did not open or close any branches within the AA 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. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are discussed in the Institution Retail Banking Services section of this report.

Table 53

Retail Banking and Community Development Services – Western Colorado AA												
Branch Accessibility	**Location of Branches by Tract (%)**						**Percent of Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	5.6	16.7	50.0	27.8	0.0	100.0	1.2	19.1	47.4	30.1	2.3	100.0
	Location of Full-Service ATMs by Tract (%)						**Percent of Households by Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	4.3	21.7	52.2	21.7	0.0	100.0	0.7	17.9	51.1	29.7	0.5	100.0
Changes in Branch Location	**Number of Branches (#)**						**Net Change in Branch Locations (#)**					
	Total Branches		**Openings (#)**		**Closings (#)**		**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	18		0		0		0	0	0	0	0	0
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	3		25		4		0		32		20	

[1] *Based on 2024 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides a relatively high level of CD services, as bank staff provided 32 CD services to 20 area organizations throughout the AA. As noted in the table, the activities were primarily comprised of community services to LMI individuals, as well as a mixture of qualified CD services for the remaining CD purposes. Examples of CD services provided by bank employees include:

- Two bank representatives taught first-time homebuyer/financial literacy sessions in each year of the evaluation for a local organization that provides an array of services that support affordable home ownership or access to affordable housing.

- A bank representative performed two CD services in a recurring board membership capacity for an area organization which is responsive to affordable housing needs.
- A bank representative served in a board membership capacity in each year of the evaluation for an area food bank.

STATE OF UTAH

CRA rating for Utah:	**Satisfactory**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Low Satisfactory**
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 of different sizes is adequate.
- The bank is a leader in making CD loans within its Utah AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to the credit and CD needs throughout its Utah 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 Utah AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Utah was consistent with the overall scope for the institution. A full-scope review was conducted for the Salt Lake City CSA, while limited-scope reviews were conducted for the bank's St. George MSA and Millard County AAs.

A total of 485 loans were reviewed in the state of Utah, including 346 small business, 96 home mortgage, and 43 small farm loans originated during the evaluation period. More weight was applied to the bank's small business lending in the state of Utah, followed by home mortgage lending based on the loan volume for each product. An analysis of small farm lending was not conducted due to insufficient loan volume to conduct meaningful performance analysis. Additionally, there was no evaluation of the individual home mortgage lending purpose categories throughout the AA analyses given insufficient lending volumes within each category.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN UTAH

The bank delineates 3 of its 24 AAs and operates 8 of its 93 branches in the state of Utah. An acquisition shortly before the prior examination (September 2022) expanded the bank's operations in Utah by adding five branches in its Salt Lake City CSA AA and adding two new AAs (St. George MSA and Millard County AAs) with one branch each. Due to the timing, the impact of the acquisition was not considered in the prior examination's analysis. The three statewide AA's include varying compositions with the core metropolitan region from Ogden through Salt Lake City to Provo, along with adjacent valleys and the Great Salt Lake basin extending westward and southwestward into more rural desert territory. The Millard County and St. George MSA AAs, respectively, also represent two geographically distinct rural, lessor populated counties relative to the Salt Lake City CSA AA.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business and home mortgage lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis. Additionally, the perspective of a community member obtained as part of the CRA evaluation of an area financial institution was reviewed for information relevant to the bank's CRA performance criterion and to gain the perspective of local economic conditions, possible credit needs in their respective areas, and the responsiveness of area banks in meeting such needs. The community member represented an area housing agency.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN UTAH

LENDING TEST

The bank's performance under the lending test in the state of Utah is high satisfactory. This overall performance rating was supported by good performance noted in the Salt Lake City CSA AA.

Lending Activity

The bank's overall lending activities in the state of Utah 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. The lending programs offered in the state generally mirror those outlined in the Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Utah reflects a good distribution of lending among the different census tracts and dispersion throughout the AAs. This performance conclusion was derived from a good geographic distribution of loans noted in the Salt Lake City CSA AA.

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

The bank's lending within Utah has an overall adequate level of penetration among individuals of different income levels and businesses of different sizes based on adequate penetration noted in the Salt Lake City CSA AA.

Community Development Lending

The bank is a leader in providing CD loans within the state of Utah. The bank originated 28 CD loans totaling $97.7MM in AAs within the state. As the table illustrates, the bank's CD financing was most responsive to the economic development needs of its statewide AAs.

Table 52

Community Development Loans – State of Utah		
Community Development Purpose	#	(000)
Affordable Housing	0	0
Community Services	2	500
Economic Development	26	97,221
Revitalization and Stabilization	0	0
Total Loans	**28**	**97,721**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Utah is low satisfactory, which is primarily derived from an adequate investment test conclusion in the Salt Lake City CSA AA.

The bank has an adequate level of qualified CD investments and grants within Utah but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs. As the table illustrates, the composition of qualified investments in Utah were a mixture of MBS which support area affordable housing needs, as well as philanthropic donations that were most responsive to organizations that provide community services to LMI individuals and families.

Table 55

Investments, Grants, and Donations – State of Utah								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	1	413	2	4,230	1	5	4	4,648
Community Services	0	0	0	0	9	40	9	40
Economic Development	0	0	0	0	1	15	1	15
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**1**	**413**	**2**	**4,230**	**11**	**60**	**14**	**4,703**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Utah is outstanding. This conclusion is derived from excellent service test performance in the Salt Lake City CSA AA and was influenced by the bank's leadership in providing qualified CD services throughout its Utah AAs.

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 Utah. The bank operates eight branches and three full-service ATMs throughout the Utah AAs. The bank does not maintain a branch or ATM location in any of the AAs' LMI tracts, although the AAs cover a vast area in the state of Utah. Six of the eight branches are located in census tracts that are contiguous to 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 opened seven branches within its Utah AAs shortly before the evaluation period of this examination. While none were located in LMI census tracts, five were located in geographies contiguous to LMI census 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. The bank's hours of operation and product and service offerings in the AAs generally mirror that of the overall institution, which are described in the Institution Retail Banking Services section of this evaluation.

Table 53

Retail Banking and Community Development Services – State of Utah												
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	87.5	12.5	0.0	100.0	2.9	19.3	50.3	26.1	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**
	0.0	0.0	100.0	0.0	0.0	100.0	2.4	20.5	51.5	25.5	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**
	8		7		0		0	0	6	1	0	7
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	2		38		2		0		42		10	

[1] *Based on 2024 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 Utah. Bank representatives performed 42 qualified CD services from its eight branches in the state and was primarily responsive to organizations that provide community services to LMI individuals and families.

SALT LAKE CITY CSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SALT LAKE CITY CSA AA

The bank's Salt Lake City CSA AA consists of the Salt Lake City-Murray, Utah MSA, which is comprised of Salt Lake and Tooele Counties in their entireties; the Provo-Orem-Lehi, Utah MSA, which is comprised of Juab and Utah Counties in their entireties; and, the Ogden, Utah MSA, which is comprised of Davis, Morgan, and Weber Counties in their entireties. Refer to Appendix C for additional demographic data.

- Beginning in 2024, Box Elder County is no longer part of the Ogden, Utah MSA and thus was removed from the AA.
- The 2024 AA is comprised of 553 census tracts, including 17 low-, 109 moderate-, 270 middle-, 148 upper-, and 9 unknown-income census tracts based on 2016-2020 ACS data.
- The 2023 AA was comprised of 565 census tracts, including 17 low-, 114 moderate-, 277 middle-, 148 upper-, and 9 unknown-income census tracts based on the 2016-2020 ACS data.
- The bank operates 6 of its 93 offices in the AA, including five in middle- and one in an upper-income census tract(s). The bank operates two full-service ATMs in the AA.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank ranked 34th of 57 FDIC-insured depository institutions operating from 368 locations in the AA, with a total deposit market share of 0.1 percent.
- An interview recently conducted as part of the CRA evaluation of another financial institution with branches 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 organization with knowledge of area housing conditions and affordable housing programs.

Table 54

Population Change Assessment Area: Salt Lake City CSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Salt Lake City-Provo-Ogden, UT CSA	2,274,540	2,566,318	12.8
Davis County, UT	323,374	362,679	12.2
Juab County, UT	10,400	11,786	13.3
Morgan County, UT	10,276	12,295	19.6
Salt Lake County, UT	1,078,958	1,185,238	9.9
Tooele County, UT	60,893	72,698	19.4
Utah County, UT	551,957	659,399	19.5
Weber County, UT	238,682	262,223	9.9
Provo-Orem-Lehi, UT MSA	562,357	671,185	19.4
Ogden, UT MSA	572,332	637,197	11.3
Salt Lake City-Murray, UT MSA	1,139,851	1,257,936	10.4
Utah	2,903,379	3,271,616	12.7
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- Demographic statistics in the AA generally mirror those of the state, as the AA comprised 78.4 percent of the Utah state population in 2020.
- Salt Lake County is the most populous county in the state and includes 46.2 percent of the AA population.
- Salt Lake City, the county seat of Salt Lake County and the state capital of Utah, had a population of 199,723 in 2020, ranking as the largest city in the state.

Table 58

Median Family Income Change Assessment Area: Salt Lake City CSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Salt Lake City-Provo-Ogden, UT CSA	77,288	87,165	12.8
Davis County, UT	85,622	96,482	12.7
Juab County, UT	63,794	76,736	20.3
Morgan County, UT	98,332	101,572	3.3
Salt Lake County, UT	78,719	90,815	15.4
Tooele County, UT	75,714	83,730	10.6
Utah County, UT	73,745	83,938	13.8
Weber County, UT	71,089	80,961	13.9
Provo-Orem-Lehi, UT MSA	73,474	83,669	13.9
Ogden, UT MSA	78,903	87,985	11.5
Salt Lake City-Murray, UT MSA	78,501	90,360	15.1
Utah	75,188	84,590	12.5

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.

- The change in AA MFI from 2015 to 2020 reflected positive and widely varying growth throughout all the AA counties. The highest growth rates occurred in Juab, Salt Lake, and Weber Counties, while Morgan County had relatively low growth at 3.3 percent.
- Based on 2020 ACS data, 5.7 percent of AA families lived below the poverty level. Morgan County had the lowest percentage of families living below the poverty level, at 1.0 percent, while Juab County had the highest level, at 9.9 percent.

Table 59

Housing Cost Burden Assessment Area: Salt Lake City CSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Salt Lake City-Provo-Ogden, UT CSA	79.9	42.4	41.8	64.2	36.8	18.0
Davis County, UT	81.8	39.9	39.3	62.2	32.4	15.6
Juab County, UT	45.5	3.0	21.1	44.6	15.7	12.6
Morgan County, UT	28.6	0.0	6.5	51.1	34.3	16.7
Salt Lake County, UT	81.4	45.4	42.9	66.5	37.4	18.9
Tooele County, UT	63.3	36.1	35.5	61.1	34.6	14.9
Utah County, UT	80.2	43.4	42.2	65.6	39.8	17.9
Weber County, UT	74.4	27.9	40.0	58.3	36.5	18.8
Provo-Orem-Lehi, UT MSA	79.7	43.0	41.9	64.9	39.2	17.8
Ogden, UT MSA	77.5	34.1	39.3	60.1	34.5	17.0
Salt Lake City-Murray, UT MSA	80.9	45.1	42.7	66.2	37.2	18.6
Utah	78.1	40.8	41.3	61.9	35.6	18.1

Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- Housing affordability varied substantially throughout the AA counties, with the greatest cost burden to LMI renters in Salt Lake, Davis, and Utah Counties and to LMI homeowners in Salt Lake and Utah Counties.
- The housing affordability ratio in the AA was low, at 24.2 percent, with ratios within the eight AA counties ranging from 22.9 percent in Utah County to 32.4 percent in Tooele County.
- The median housing value in the AA counties ranged from a low of $236,600 in Tooele County to a high of $417,600 in Morgan County, compared to the figure of $319,969 for the entire AA.

Table 60

Unemployment Rates Assessment Area: Salt Lake City CSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Salt Lake City-Provo-Ogden, UT CSA	4.7	2.7	2.3	2.7	3.2
Davis County, UT	4.1	2.4	2.2	2.4	2.9
Juab County, UT	3.3	2.2	2.2	2.6	3.1
Morgan County, UT	3.5	2.2	2.1	2.2	2.7
Salt Lake County, UT	5.3	2.9	2.4	2.7	3.2
Tooele County, UT	4.7	2.8	2.4	2.6	3.2
Utah County, UT	3.9	2.4	2.2	2.7	3.3
Weber County, UT	4.8	2.8	2.4	2.7	3.2
Provo-Orem-Lehi, UT MSA	3.9	2.4	2.2	2.7	3.3
Ogden, UT MSA	4.4	2.6	2.3	2.5	3.0
Salt Lake City-Murray, UT MSA	5.3	2.9	2.4	2.7	3.2
Utah	4.8	2.8	2.4	2.7	3.2
Source: BLS, Local Area Unemployment Statistics					

- Unemployment rates were relatively low and stable in the seven AA counties from 2020 to 2024 with the highest rates being in 2020, which was during the height of the COVID-19 pandemic.
- Major employers in the AA include Intermountain Healthcare, University of Utah, State of Utah, Wal-Mart, Brigham Young University, Hill Air Force Base (civilian employment), and Davis County School District.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SALT LAKE CITY CSA AA

LENDING TEST

The bank's performance under the lending test in the Salt Lake City CSA AA is good and was bolstered by the bank's leadership in originating CD loans.

Lending Activity

The bank's lending activities 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. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in a number of industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. A description of the bank's flexible lending products is discussed in the Institution Lending Activity section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The conclusion is supported by good penetration noted in the distribution of small business loans, followed by adequate penetration noted in the distribution of home mortgage loans.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate, which is based on the bank's distribution of 2023 home mortgage loans as 2024 lending volumes were insufficient for a meaningful performance conclusion. The bank's distribution of 2023 home mortgage lending among low-income tracts reflected a concentration of lending that was significantly above the aggregate lending data by number volume, comparable by dollar volume, and comparable to the demographic figure. Conversely, lending among moderate-income tracts was below the aggregate lending data by number volume and significantly below by dollar volume, as well as below the demographic figure.

The bank's loan dispersion among geographies of different income levels revealed gaps that included LMI census tracts. The dispersion of lending was partially impacted by the distance of the bank's branches to a number of the AA's LMI census tracts. Area dispersion was also impacted by an AA covering a large geographic area comprised of 565 census tracts. Based on the aforementioned factors, the bank's dispersion did not impact the overall conclusion.

Table 61

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Salt Lake City CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	16.0	1.1	839	4.4	0.8	0	0.0	1.1	0	0.0	0.8	0.7
Moderate	2	8.0	15.3	786	4.1	11.5	1	6.7	14.5	370	1.7	10.9	15.2
Middle	8	32.0	53.0	6,515	34.3	50.7	3	20.0	53.6	1,626	7.4	51.1	52.2
Upper	11	44.0	30.5	10,849	57.1	37.0	11	73.3	30.7	20,045	90.9	37.2	31.9
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	25	100.0	100.0	18,989	100.0	100.0	15	100.0	100.0	22,041	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.9	0	0.0	0.7	1	33.3	0.9	450	21.1	0.8	0.7
Moderate	1	25.0	15.2	220	13.0	17.6	0	0.0	13.3	0	0.0	10.2	15.2
Middle	2	50.0	53.5	577	34.1	49.2	2	66.7	53.5	1,680	78.9	50.0	52.2
Upper	1	25.0	30.4	896	52.9	32.5	0	0.0	32.3	0	0.0	39.0	31.9
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	1,693	100.0	100.0	3	100.0	100.0	2,130	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.6	0	0.0	0.5	0.7
Moderate	0	0.0	11.2	0	0.0	8.0	1	33.3	11.6	30	5.0	8.2	15.2
Middle	3	37.5	54.1	650	44.5	47.0	1	33.3	53.0	75	12.4	47.3	52.2
Upper	5	62.5	34.1	810	55.5	44.6	1	33.3	34.8	500	82.6	44.0	31.9
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	8	100.0	100.0	1,460	100.0	100.0	3	100.0	100.0	605	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	4.4	0	0.0	3.4	0	0.0	9.5	0	0.0	6.1	9.4
Moderate	0	0.0	29.2	0	0.0	20.2	0	0.0	36.8	0	0.0	44.3	35.4
Middle	0	0.0	51.3	0	0.0	55.9	0	0.0	41.1	0	0.0	37.7	43.2
Upper	1	100.0	15.0	14,100	100.0	20.5	0	0.0	12.6	0	0.0	11.9	11.7
Unknown	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	
Total	1	100.0	100.0	14,100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	4	9.5	0.9	839	2.3	0.9	1	4.3	1.0	450	1.8	1.0	0.7
Moderate	3	7.1	14.3	1,006	2.7	12.9	2	8.7	13.7	400	1.6	11.8	15.2
Middle	15	35.7	53.6	7,842	21.3	50.5	6	26.1	53.7	3,381	13.2	50.2	52.2
Upper	20	47.6	31.2	27,065	73.6	35.7	14	60.9	31.6	21,287	83.4	37.0	31.9
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	42	100.0	100.0	36,752	100.0	100.0	23	100.0	100.0	25,518	100.0	100.0	100.0

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.*
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 2024 small business loans among low-income census tracts was comparable to the aggregate lending data and the demographic figure. Lending in moderate-income census tracts was also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of small business lending in 2023 reflected performance above that of 2024 lending patterns and supported the overall rating based on higher lending volumes.

An analysis of loan dispersion revealed conspicuous gaps and lapses that included LMI census tracts. Similar to home mortgage lending, the bank's small business loans were generally concentrated near its branch locations, and there was a low number of small business loans dispersed among the AAs 565 census tracts. Based on these factors, the dispersion of lending in the AA had no impact on the overall rating.

Table 62

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Salt Lake City CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	3	1.8	2.1	528	1.0	2.8	2	1.5	2.2	672	1.5	2.5	2.6
Moderate	32	19.6	13.9	10,097	18.6	16.2	21	16.0	13.1	6,404	14.4	15.5	16.3
Middle	88	54.0	49.0	34,654	64.0	53.4	79	60.3	48.2	27,109	61.1	52.1	50.1
Upper	40	24.5	34.1	8,886	16.4	26.2	29	22.1	35.7	10,212	23.0	28.8	30.2
Unknown	0	0.0	0.4	0	0.0	1.0	0	0.0	0.6	0	0.0	1.0	0.7
Tract-Unk	0	0.0	0.5	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	
Total	163	100.0	100.0	54,165	100.0	100.0	131	100.0	100.0	44,397	100.0	100.0	100.0

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

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage and small business lending each reflect adequate performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. Consistent with the geographic distribution analysis, the evaluation of home mortgage lending considered 2023 lending data due to insufficient loan volumes reported in 2024. As such, the distribution of 2023 loans to low-income borrowers was significantly above the aggregate lending data by number volume, comparable by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data, as well as the demographic figure.

Table 63

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Salt Lake City CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.3	0	0.0	1.0	0	0.0	2.2	0	0.0	1.0	17.4
Moderate	3	12.0	17.0	1,008	5.3	11.8	1	6.7	17.9	305	1.4	12.3	19.2
Middle	3	12.0	28.7	865	4.6	25.3	0	0.0	27.5	0	0.0	24.0	24.1
Upper	19	76.0	32.3	17,116	90.1	41.4	12	80.0	31.5	20,702	93.9	40.2	39.3
Unknown	0	0.0	19.7	0	0.0	20.4	2	13.3	20.9	1,034	4.7	22.5	0.0
Total	25	100.0	100.0	18,989	100.0	100.0	15	100.0	100.0	22,041	100.0	100.0	100.0
Refinance Loans													
Low	1	25.0	8.8	220	13.0	4.6	0	0.0	6.9	0	0.0	3.8	17.4
Moderate	0	0.0	19.8	0	0.0	11.7	0	0.0	18.0	0	0.0	11.9	19.2
Middle	1	25.0	25.2	149	8.8	17.2	0	0.0	23.6	0	0.0	18.4	24.1
Upper	2	50.0	35.0	1,324	78.2	39.2	2	66.7	33.9	1,935	90.8	40.8	39.3
Unknown	0	0.0	11.2	0	0.0	27.4	1	33.3	17.5	195	9.2	25.1	0.0
Total	4	100.0	100.0	1,693	100.0	100.0	3	100.0	100.0	2,130	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.8	0	0.0	3.3	1	33.3	6.2	30	5.0	3.6	17.4
Moderate	1	12.5	19.4	75	5.1	12.5	0	0.0	19.2	0	0.0	12.3	19.2
Middle	1	12.5	30.2	160	11.0	25.1	1	33.3	29.2	75	12.4	23.3	24.1
Upper	6	75.0	42.3	1,225	83.9	56.6	1	33.3	42.0	500	82.6	56.0	39.3
Unknown	0	0.0	2.2	0	0.0	2.6	0	0.0	3.4	0	0.0	4.8	0.0
Total	8	100.0	100.0	1,460	100.0	100.0	3	100.0	100.0	605	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	7.3	4.7	320	1.4	1.9	1	4.3	4.4	30	0.1	1.8	17.4
Moderate	5	12.2	18.5	1,243	5.5	11.9	1	4.3	18.6	305	1.2	12.2	19.2
Middle	5	12.2	28.4	1,174	5.2	23.7	1	4.3	26.9	75	0.3	22.8	24.1
Upper	28	68.3	34.9	19,915	87.9	42.3	17	73.9	33.9	23,879	93.6	41.4	39.3
Unknown	0	0.0	13.6	0	0.0	20.3	3	13.0	16.3	1,229	4.8	21.8	0.0
Total	41	100.0	100.0	22,652	100.0	100.0	23	100.0	100.0	25,518	100.0	100.0	100.0

Source:2024 FFIEC Census Dataa
2016 - 2020 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 adequate. The distribution of 2024 lending among businesses with annual revenues of $1MM or less reflected penetration levels which were below the aggregate lending data by number, comparable by dollar volume, and significantly below the demographic figure.

The distribution of small business loans originated in 2023 reflected lending levels which were above that of 2024, as the concentration of lending was comparable to the aggregate lending data by number volume, above by dollar volume, and below the demographic figure. The overall conclusion was influenced by the performance of 2023 lending due to larger origination volumes.

Table 64

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Salt Lake City CSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	71	43.6	47.4	20,348	37.6	27.9	40	30.5	46.8	9,499	21.4	27.0	91.6
Over $1 Million	73	44.8		28,330	52.3		84	64.1		32,894	74.1		7.2
Revenue Unknown	19	11.7		5,487	10.1		7	5.3		2,004	4.5		1.2
Total	163	100.0		54,165	100.0		131	100.0		44,397	100.0		100.0
By Loan Size													
$100,000 or Less	42	25.8	94.4	2,896	5.3	44.6	35	26.7	94.7	2,072	4.7	47.2	
$100,001 - $250,000	38	23.3	3.2	6,529	12.1	16.3	23	17.6	3.2	4,280	9.6	17.1	
$250,001 - $1 Million	83	50.9	2.4	44,740	82.6	39.0	73	55.7	2.1	38,045	85.7	35.7	
Total	163	100.0	100.0	54,165	100.0	100.0	131	100.0	100.0	44,397	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	24	33.8		1,574	7.7		15	37.5		999	10.5		
$100,001 - $250,000	14	19.7		2,541	12.5		8	20.0		1,516	16.0		
$250,001 - $1 Million	33	46.5		16,233	79.8		17	42.5		6,984	73.5		
Total	71	100.0		20,348	100.0		40	100.0		9,499	100.0		

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

Community Development Lending

The bank is a leader in providing CD loans. The bank's CD lending was most responsive to economic development needs. Examples of CD loans include:

- A total of $9.0MM in SBA 504 loan financing was extended to a small restaurant business that expanded its operations within the AA.
- The bank originated a SBA 504 loan for $1.3MM to a small manufacturing company within the AA.

Table 65

Community Development Loans – Salt Lake City CSA AA		
Community Development Purpose	#	(000)
Affordable Housing	0	0
Community Services	2	500
Economic Development	21	75,072
Revitalization and Stabilization	0	0
Total Loans	**23**	**75,572**

INVESTMENT TEST

The bank's performance under the investment test in the Salt Lake City CSA AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. The bank's securities investments in this AA were limited to three affordable housing MBS that provided living quarters to LMI individuals and families. Examples of the bank's qualified philanthropic donations include:

- The bank donated a total of $26.5M to the local chapter of a non-profit educational youth organization that provides financial literacy education, work readiness, and entrepreneurship programs. The sponsored events benefited area schools with a majority student population eligible for free or reduced lunches.
- The bank made a $5M donation to an organization that provides affordable/sustainable housing, education, and homeownership counseling services to LMI individuals.

Table 66

Investments, Grants, and Donations – Salt Lake City CSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	1	413	2	4,230	1	5	4	4,648
Community Services	0	0	0	0	7	39	7	39
Economic Development	0	0	0	0	1	15	1	15
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**1**	**413**	**2**	**4,230**	**9**	**59**	**12**	**4,702**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Salt Lake City CSA 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 six branches and two full-service ATMs in the AA. The bank does not maintain a branch or ATM location in any of the AA's LMI tracts, although the AA covers a vast area in the state of Utah and five of the six branches are located in census tracts that are contiguous to 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. As a result of the acquisition in late 2022, the bank opened five branches in this AA that are considered in the analysis for this examination. While none of the acquired branches are located in LMI tracts, four are located in tracts adjacent to LMI tracts.

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. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are described in the Institution Retail Banking Services section of this evaluation.

Table 67

Retail Banking and Community Development Services – Salt Lake City CSA 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	83.3	16.7	0.0	100.0	3.1	19.7	48.8	26.8	1.6	100.0
	Location of Full-Service 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	2.6	21.0	50.0	26.3	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**
	6		5		0		0	0	4	1	0	5
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	2		35		2		0		39		8	

[1] *Based on 2024 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 8 area organizations in the AA by providing 39 total CD services. The services primarily supported agencies that provide community services to LMI individuals and families, as well as organizations that support area economic development and affordable housing efforts. Examples of CD services performed by the bank include:

- Six bank employees performed 13 qualified CD services by providing their financial expertise through financial literacy sessions for the local chapter of a known charitable organization that provides an array of community services to LMI individuals and families.
- Two bank employees performed 3 qualified CD services through board leadership of an area organization that addresses critical food insecurity services.

ST. GEORGE MSA ASSESSMENT AREA

(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ST. GEORGE MSA AA

The bank's St. George MSA AA consists of the entirety of Washington County, which comprises the MSA. Refer to Appendix D for additional demographic data.

- This AA was added in October 2022 due to the Rock Canyon Bank acquisition. Since the acquisition occurred late in the prior examination's review period, it was not considered in the analysis for that examination.
- The AA is comprised of a total of 35 census tracts, including 5 moderate-, 24 middle-, and 6 upper-income census tracts.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in a middle-income census tract.
- The bank operates one full-service ATM at its sole branch location.
- Based on the 2020 ACS data, the AA population was 180,279, which reflects a 21.6 percent increase from the 2015 ACS data.
- The AA is home to 44,865 total families. According to 2020 ACS data, 18.1 percent are low-, 20.3 percent are moderate-, 21.2 percent are middle-, and 40.3 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.9 percent, ranking 8th of 10 FDIC-insured financial institutions operating from 33 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. GEORGE MSA AA

The St. George MSA AA 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 the AA do not change the rating for the state of Utah.

Table 68

Assessment Area	Lending Test	Investment Test	Service Test
St. George, Utah MSA	Below	Below	Below

MILLARD COUNTY ASSESSMENT AREA
(Limited-Scope Review)

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

The bank's Millard County AA consists of the entirety of Millard County. Refer to Appendix D for additional demographic data.

- This AA was added in October 2022 due to the Rock Canyon Bank acquisition. Since the acquisition occurred late in the prior examination's review period, it was not considered in the analysis for that examination. The AA is comprised of a total of three middle-income census tracts. All three tracts are considered by the FFIEC to be underserved middle-income tracts.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in a middle-income census tract.
- The bank operates one cash-only ATM at its sole branch location.
- Based on the 2020 ACS data, the AA population was 12,975, which reflects a 3.1 percent increase from the 2015 ACS data.
- The AA is home to 3,482 total families. According to 2020 ACS data, 18.4 percent are low-, 18.6 percent are moderate-, 29.8 percent are middle-, and 33.2 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 3.0 percent, ranking 3rd of 3 FDIC-insured financial institutions operating from five offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MILLARD COUNTY, UTAH NONMETROPOLITAN AA

The Millard County AA 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 the AA do not change the rating for the state of Utah.

Table 69

Assessment Area	Lending Test	Investment Test	Service Test
Millard County, Utah	Below	Below	Consistent

STATE OF KANSAS

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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, is adequate.
- The bank makes an adequate level of CD loans within its Kansas AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to the credit and CD needs throughout its Kansas 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 the AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Kansas AAs 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. A full-scope review was conducted for the Lawrence MSA AA, followed by a limited-scope review conducted for the Franklin County AA to ascertain if the bank's performance in this area was generally consistent with its performance in the overall state evaluation.

The bank originated a total of 163 loans in Kansas during the evaluation period, including 144 home mortgage loans, 18 small business loans, and 1 small farm loan. The evaluation of lending in the state considered only the bank's home mortgage loans, as small business and small farm loans contained insufficient volumes to render meaningful performance conclusions.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS

The bank delineates 2 of its 24 AAs and operates 2 of its 93 total branches in the state of Kansas. The two AAs abut each other in the northeastern portion of Kansas and include the City of Lawrence (Lawrence MSA AA), home to the University of Kansas, and the lessor-populated Franklin County AA, with a collection of much smaller towns and communities scattered throughout. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on home mortgage and small business lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

Additionally, the perspective of a community member obtained as part of the CRA evaluation of an area financial institution was reviewed for information relevant to the bank's CRA performance criterion and to gain the perspective of local economic conditions, possible credit needs in their respective areas, and the responsiveness of area banks in meeting such needs. The community member represented an area economic development organization.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the lending test in the state of Kansas is low satisfactory, which was derived from adequate lending test performance noted in the Lawrence MSA AA.

Lending Activity

The bank's overall lending activities in the state of Kansas reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Kansas reflects adequate distribution among the different census tracts and dispersion throughout the AAs based on an adequate distribution of lending in the Lawrence MSA AA.

Lending to Borrowers of Different Income Levels

The bank's lending within Kansas has an overall adequate level of penetration to individuals of different income levels based on adequate penetration noted in the Lawrence MSA AA.

Community Development Lending

The bank made an adequate level of CD loans within the state of Kansas when considering its two-branch presence in the state and available CD opportunities within its two AAs. The bank originated one CD loan in its Lawrence MSA AA which was a $4.7MM SBA Program 504 loan for the construction of a medical and care services facility which will have positive impact on LMI healthcare needs.

Table 70

Community Development Loans – State of Kansas		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	1	4,722
Revitalization and Stabilization	0	0
Total Loans	**1**	**4,722**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Kansas is low satisfactory, which is derived from an adequate investment test conclusion in the Lawrence MSA AA.

The bank has an adequate level of qualified CD investments and grants within Kansas but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs. The bank's securities investments were entirely comprised of MBS that address affordable housing needs. The remaining investments were comprised of donations made to area organizations that provide community services to LMI individuals and families.

Table 71

Investments, Grants, and Donations – State of Kansas								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	0	0	4	699	0	0	4	699
Community Services	0	0	0	0	6	12	6	12
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**4**	**699**	**6**	**12**	**10**	**711**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Kansas is outstanding, which is based on an excellent service test in the Lawrence MSA AA and consistent performance noted in the Franklin County AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Kansas are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates two full-service branches in a middle- and upper-income tract, respectively. Additionally, the bank operates three full-service ATMs, one of which is located in a moderate-income tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank has not opened or closed any branch facilities in its two AAs.

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. The bank's operations and product and service offerings in the state generally mirror those of the overall institution, which is described in the Institution Retail Banking Services section of this evaluation.

Table 72

Retail Banking and Community Development Services – State of Kansas												
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	50.0	50.0	0.0	100.0	0.0	21.2	54.5	18.2	6.1	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**
	0.0	33.3	33.3	33.3	0.0	100.0	0.0	20.2	55.5	21.4	2.9	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**	
	1		8		0		0		9		4	

[1] *Based on 2024 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 Kansas. Four bank employees performed nine qualified CD services from its two-branch footprint in the state, which was responsive to organizations that provide community services to LMI individuals and agencies that benefit area affordable housing needs.

LAWRENCE, KANSAS MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE LAWRENCE, KANSAS MSA AA

The bank's Lawrence MSA AA consists of the entirety of Douglas County, KS, which is the single county that comprises the Lawrence, Kansas MSA. Refer to Appendix C for additional demographic data.

- The AA remains unchanged since the prior CRA evaluation.
- The AA is comprised of 27 census tracts, including 7 moderate-, 13 middle-, 5 upper-, and 2 unknown-income tracts based on 2020 ACS data, which is unchanged since the prior examination.
- The bank operates one branch in the AA, located in an upper-income tract in the northwestern portion of the city of Lawrence. The bank operates two full-service ATMs in the AA, including one at the branch location and the additional unit as a stand-alone ATM located in a moderate-income tract in downtown Lawrence.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 1.5 percent market share of deposits in the AA, ranking 14th of 22 FDIC-insured financial institutions operating from 45 banking offices in the AA.
- An interview recently conducted as part of the CRA evaluation of another financial institution with branches 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 area economic development organization.

Table 73

Population Change Assessment Area: Lawrence, Kansas MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Lawrence, Kansas MSA	114,967	118,785	3.3
Kansas	2,892,987	2,937,880	1.6
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- As the table above illustrates, the population between 2015 and 2020 reflects growth at a rate which was more than double that of the overall state of Kansas.
- The AA contains a unique population characteristic with a significant concentration of its 118,785 people represented in the 18 to 24 years age range, at 23.8 percent, which is more than double the statewide average of 10.0 percent. This is attributed to the presence of the University of Kansas,

located within the city of Lawrence, which factors into other demographic components in the remaining discussion.

Table 74

Median Family Income Change Assessment Area: Lawrence, Kansas MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Lawrence, Kansas MSA	79,490	90,062	13.3
Kansas	72,535	77,620	7.0

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.

- The AA's MFI reflected a substantial growth between 2015 and 2020, outpacing the overall statewide figure.
- The AA's families below poverty figure, at 6.8 percent, is slightly lower than the overall statewide figure of 7.6 percent; however, the concentration of households below poverty, at 16.1 percent, represents a notable deviation from the statewide figure of 11.6 percent.

Table 75

Housing Cost Burden Assessment Area: Lawrence, Kansas MSA						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Lawrence, Kansas MSA	87.8	27.9	48.9	69.0	31.9	16.0
Kansas	76.5	31.1	38.9	58.1	26.8	15.5

Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- Housing affordability reflected greater challenges for all renters and, particularly, low-income renters relative to statewide figures. Additionally, homeownership was less affordable for LMI owners relative to the statewide figures.
- The housing affordability ratio in the AA was 28.6 percent, which was significantly lower than the statewide figure of 38.8 percent.
- Median housing values in the AA were notably higher than statewide at $212,420 and $157,600, respectively, further demonstrating affordability challenges in the AA.
- Consistent with a large university presence and student-housing needs, the AA contained a larger composition of rental units, at 46.3 percent of total housing units, relative to the statewide figure of 30.1 percent.

Table 76

Unemployment Rates Assessment Area: Lawrence, Kansas MSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Lawrence, Kansas MSA	5.7	3.1	2.5	2.6	3.3
Kansas	5.8	3.4	2.7	2.9	3.6
Source: BLS, Local Area Unemployment Statistics					

- Unemployment rates in the AA remained relatively aligned with the statewide figures year-over-year.
- Major employers in the AA include University of Kansas, Lawrence Memorial Hospital, Lawrence Public Schools, Amcor, and Hallmark Cards.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAWRENCE MSA AA

LENDING TEST

The bank's performance under the lending test in the Lawrence MSA AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The analysis of lending in this AA included 120 home mortgage loans originated during the evaluation period. As discussed in the overall state lending activity section, the bank's small business and small farm lending was not evaluated due to insufficient lending volumes to perform meaningful analyses.

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 Institution Lending Activity 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. The conclusion is derived from an adequate level of penetration noted in home mortgage lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As previously noted, the AA did not contain low-income census tracts during the evaluation period. The distribution of 2024 home mortgage loans among moderate-income tracts was above the

aggregate lending data by number volume, comparable by dollar volume, and significantly above the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected performance below that of 2024 lending patterns and supported the overall rating due to a larger volume of lending in 2023.

An analysis of the dispersion of loans revealed no lending gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2024 loans among moderate-income tracts was above the aggregate lending data by number volume and significantly above by dollar volume, as well as significantly above the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected performance below that of 2024 lending, with penetration levels that were comparable to the aggregate lending data and demographic figures. This performance supported the overall conclusion with a larger volume of lending originations.

Table 77

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Lawrence, Kansas MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	13	20.3	25.3	2,337	12.7	17.6	12	33.3	24.3	3,031	26.0	16.6	17.9
Middle	36	56.3	47.6	10,300	56.2	48.2	16	44.4	50.7	5,618	48.3	50.8	54.0
Upper	15	23.4	26.8	5,699	31.1	34.0	8	22.2	24.1	2,993	25.7	31.5	27.9
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.8	0	0.0	1.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	18,336	100.0	100.0	36	100.0	100.0	11,642	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	2	33.3	15.4	372	29.5	13.7	0	0.0	15.7	0	0.0	11.2	17.9
Middle	1	16.7	60.8	496	39.3	56.0	0	0.0	59.3	0	0.0	56.2	54.0
Upper	2	33.3	23.0	248	19.7	28.0	1	100.0	23.5	163	100.0	29.3	27.9
Unknown	1	16.7	0.8	146	11.6	2.3	0	0.0	1.5	0	0.0	3.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	1,262	100.0	100.0	1	100.0	100.0	163	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	3	50.0	17.3	111	39.5	15.3	0	0.0	15.3	0	0.0	20.5	17.9
Middle	3	50.0	57.8	170	60.5	57.0	1	50.0	54.6	19	38.8	46.9	54.0
Upper	0	0.0	23.8	0	0.0	25.0	1	50.0	28.4	30	61.2	28.9	27.9
Unknown	0	0.0	1.1	0	0.0	2.7	0	0.0	1.6	0	0.0	3.7	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	281	100.0	100.0	2	100.0	100.0	49	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	21.7	0	0.0	25.4	0	0.0	43.3	0	0.0	47.1	28.2
Middle	0	0.0	52.2	0	0.0	32.9	0	0.0	33.3	0	0.0	6.0	40.9
Upper	0	0.0	21.7	0	0.0	39.6	0	0.0	6.7	0	0.0	14.6	24.1
Unknown	0	0.0	4.3	0	0.0	2.1	0	0.0	16.7	0	0.0	32.3	6.8
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	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	18	22.5	21.8	2,820	14.0	16.7	12	30.0	21.2	3,031	25.3	21.9	17.9
Middle	40	50.0	51.5	10,966	54.2	50.5	18	45.0	53.0	5,762	48.1	42.7	54.0
Upper	21	26.3	26.1	6,282	31.1	31.8	10	25.0	24.4	3,186	26.6	27.7	27.9
Unknown	1	1.3	0.7	146	0.7	1.1	0	0.0	1.4	0	0.0	7.8	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	80	100.0	100.0	20,214	100.0	100.0	40	100.0	100.0	11,979	100.0	100.0	100.0

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.
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.

Lending to Borrowers of Different Income Levels

The bank's lending has an adequate distribution among individuals of different income levels.

Home Mortgage Loans

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage loans to low-income borrowers was comparable to the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data by number volume and above by dollar volume, as well as comparable to the demographic figure.

The distribution of home mortgage lending in 2023 reflected penetration levels that were consistent with 2024 lending patterns.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank did not originate a home purchase loan to a low-income borrower in 2024; however, lending to moderate-income borrowers was above the aggregate lending data, as well as above the demographic figure.

The distribution of home purchase lending in 2023 reflected penetration levels that were above 2024 lending patterns.

Table 78

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Lawrence, Kansas MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	7	10.9	6.4	1,014	5.5	2.7	0	0.0	6.7	0	0.0	2.9	19.6
Moderate	12	18.8	16.3	2,326	12.7	11.1	9	25.0	17.0	1,898	16.3	11.7	18.8
Middle	13	20.3	21.2	3,796	20.7	19.2	8	22.2	18.8	2,207	19.0	17.1	22.6
Upper	31	48.4	40.5	10,875	59.3	51.2	19	52.8	39.5	7,537	64.7	49.7	38.9
Unknown	1	1.6	15.5	325	1.8	15.9	0	0.0	18.1	0	0.0	18.5	0.0
Total	64	100.0	100.0	18,336	100.0	100.0	36	100.0	100.0	11,642	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.7	0	0.0	3.6	0	0.0	7.4	0	0.0	3.2	19.6
Moderate	0	0.0	21.8	0	0.0	16.6	0	0.0	19.7	0	0.0	12.5	18.8
Middle	0	0.0	22.4	0	0.0	19.1	0	0.0	19.9	0	0.0	16.8	22.6
Upper	6	100.0	33.9	1,262	100.0	41.9	1	100.0	33.7	163	100.0	42.2	38.9
Unknown	0	0.0	15.1	0	0.0	18.7	0	0.0	19.3	0	0.0	25.3	0.0
Total	6	100.0	100.0	1,262	100.0	100.0	1	100.0	100.0	163	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.3	0	0.0	3.4	2	100.0	4.9	49	100.0	1.9	19.6
Moderate	2	33.3	18.9	65	23.1	12.2	0	0.0	19.7	0	0.0	16.6	18.8
Middle	3	50.0	21.6	181	64.4	17.1	0	0.0	18.6	0	0.0	11.7	22.6
Upper	1	16.7	48.6	35	12.5	52.9	0	0.0	48.6	0	0.0	50.6	38.9
Unknown	0	0.0	6.5	0	0.0	14.4	0	0.0	8.2	0	0.0	19.2	0.0
Total	6	100.0	100.0	281	100.0	100.0	2	100.0	100.0	49	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	8.8	6.3	1,014	5.0	2.8	2	5.0	6.7	49	0.4	3.0	19.6
Moderate	16	20.0	17.7	2,601	12.9	11.4	9	22.5	18.3	1,898	15.8	12.1	18.8
Middle	16	20.0	21.5	3,977	19.7	18.1	8	20.0	19.3	2,207	18.4	16.8	22.6
Upper	39	48.8	40.0	12,247	60.6	47.2	21	52.5	38.6	7,825	65.3	47.8	38.9
Unknown	2	2.5	14.5	375	1.9	20.5	0	0.0	17.1	0	0.0	20.2	0.0
Total	80	100.0	100.0	20,214	100.0	100.0	40	100.0	100.0	11,979	100.0	100.0	100.0

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.
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.

Community Development Lending

The bank provides an adequate level of CD loans in the AA. As illustrated in the table, the bank originated one CD loan totaling $4.7MM, which was a SBA Program 504 loan to a small business for the construction of a medical and care services facility which will have positive impact on LMI healthcare needs.

Table 79

Community Development Loans – Lawrence, Kansas MSA AA		
Community Development Purpose	**#**	**(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	1	4,722
Revitalization and Stabilization	0	0
Total Loans	**1**	**4,722**

INVESTMENT TEST

The bank's performance under the investment test in the Lawrence MSA AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. The bank's securities investments were entirely comprised of MBS that address affordable housing needs in the AA, while the bank's remaining investments were comprised of philanthropic donations to area organizations that provide community services to LMI individuals and families. Examples of the bank's CD investments include:

- A donation of $5M was made to the local chapter of an organization that provides legal advocacy services for LMI individuals, particularly youth.
- A donation of $2,500 was distributed to a local homeless shelter to support its ongoing operations and impact on LMI individuals and families.

Table 80

Investments, Grants, and Donations – Lawrence, Kansas MSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	0	0	3	578	0	0	3	578
Community Services	0	0	0	0	3	10	3	10
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**3**	**578**	**3**	**10**	**6**	**588**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Lawrence 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's sole AA branch, with a full-service ATM unit on its premises, is located in an upper-income tract in the northwest portion of the city of Lawrence, located approximately 2.5 miles from the AA's collection of moderate-income tracts. Additionally, the bank operates a stand-alone full-service ATM in a moderate-income tract located in the downtown portion of Lawrence.

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 not opened or closed any branches in the AA.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operation and product and service offerings in the AA generally mirror those discussed in the Institution Retail Banking Services section of this report.

Table 81

Retail Banking and Community Development Services – Lawrence, Kansas 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	0.0	100.0	0.0	100.0	0.0	25.9	48.1	18.5	7.4	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	50.0	0.0	50.0	0.0	100.0	0.0	24.5	48.3	23.7	3.5	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	1		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	0		6		0		0		6		1	

1. *Based on 2024 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 given the bank's limited presence in the market. During the evaluation period two bank representatives provided six CD services comprised of six separate financial literacy sessions taught at Lawrence-area schools that contain a majority free or reduced lunch student population.

FRANKLIN COUNTY, KANSAS NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

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

The bank's Franklin County, Kansas AA consists of the entirety of Franklin County. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of six census tracts, including five middle- and one upper-income census tract(s). The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in a middle-income census tract.
- The bank operates one full-service ATM at its sole branch location.
- Based on the 2020 ACS data, the AA population was 25,996, which reflects a 0.9 percent increase from the 2015 ACS data.
- The AA is home to 6,815 total families. According to 2020 ACS data, 15.7 percent are low-, 20.2 percent are moderate-, 23.4 percent are middle-, and 40.6 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 11.0 percent, ranking 3rd of 10 FDIC-insured financial institutions operating from 13 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FRANKLIN COUNTY AA

The Frankling County AA 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 the AA do not change the rating for the state of Kansas.

Table 82

Assessment Area	Lending Test	Investment Test	Service Test
Franklin County	Consistent	Consistent	Consistent

STATE OF MISSOURI

CRA rating for Missouri:	**Satisfactory**
The Lending Test is rated:	**Low Satisfactory**
The Investment Test is rated:	**Low Satisfactory**
The Service Test is rated:	**Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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 farms of different sizes (borrower distribution) is good.
- The bank makes an adequate level of CD loans within its Missouri AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to credit and CD needs throughout its Missouri 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 Missouri AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Missouri was consistent with the overall scope for the institution. Full-scope reviews were conducted for the St. Joseph Metropolitan and Northwest Missouri AAs. Limited-scope reviews were conducted for the Northeast Missouri and North Central Missouri AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. Weighting among AAs in determination of state performance was slightly greater for the Northwest Missouri AA relative to the St. Joseph Metropolitan AA given a larger volume of lending in the AA, while branch presence and deposit volumes were equally weighted between the two AAs.

During the evaluation period, the bank originated a total of 207 loans in the state of Missouri, including 128 home mortgage, 60 small farm, and 19 small business loans. An evaluation of small business lending and small farm lending for AAs other than the Northwest Missouri AA was not conducted in the state evaluation due to insufficient volumes of lending to conduct meaningful performance evaluations in the individual AAs.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MISSOURI

The bank delineates 4 of its 24 AAs and operates 8 of its 93 banking offices in the state of Missouri. With the exception of the relatively more populated city of St. Joseph (St. Joseph Metropolitan AA), the bank's remaining AA footprint in Missouri is primarily comprised of lessor populated communities, such as Maryville (Northwest Missouri AA), Chillicothe (North Central Missouri AA), and Kirksville (Northeast Missouri AA). Loan and deposit products and services offered throughout state AAs generally mirror those discussed in the overall Institution section of this report. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

Additionally, information obtained as part of the CRA public evaluations of other area financial institutions that contained the perspectives of two community members who reside in the state were reviewed for information relevant to the bank's CRA performance criterion and to gain perspectives of local economic conditions, possible credit needs in their respective areas, and the responsiveness of area banks in meeting such needs. Each community member represented economic development organizations in their respective areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

The bank's performance under the lending test in Missouri is low satisfactory. This conclusion is derived from good lending test performance in the Northwest Missouri AA and adequate performance in the St. Joseph Metropolitan AA.

Lending Activity

The bank's overall lending activities in the state reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the overall Lending Activity section of this report, although it is noted small farm lending was evaluated in the Northwest Missouri AA, which stands as the only full-scope AA review to include small farm lending in the bank-wide evaluation.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state reflects adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion is supported by adequate penetration noted in the Northwest Missouri AA, although penetration in the St. Joseph Metropolitan AA reflected poor penetration and dispersion, particularly among LMI tracts.

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

The bank's lending within the state has an overall good penetration among individuals of different income levels and farms of different sizes. This conclusion is derived from excellent performance noted in the Northwest Missouri AA, while adequate penetration is noted in St. Joseph Metropolitan AA.

Community Development Lending

The bank provides an adequate level of CD loans within the state of Missouri. The bank originated 4 CD loans totaling $2.7MM within its Northwest Missouri AA, all supporting the revitalization and stabilization of areas within the AA.

Table 83

Community Development Loans – State of Missouri		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	4	2,700
Total Loans	**4**	**2,700**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Missouri is low satisfactory. This conclusion is derived from adequate investment test performance in the Northwest Missouri AA followed by good investment test performance in the St. Joseph Metropolitan AA.

The bank has an adequate level of qualified CD investments and grants within Missouri but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs. Similar to its bank-wide strategy, the bank's security investments were primarily comprised of MBS which were responsive to area affordable housing needs, while donations were primarily responsive to area organizations that support community services for LMI individuals as well as the economic development needs of its statewide AAs.

Table 84

Investments, Grants, and Donations – State of Missouri								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	4	400	1	148	2	6	7	553
Community Services	0	0	0	0	11	30	11	30
Economic Development	0	0	0	0	1	5	1	5
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**4**	**400**	**1**	**148**	**14**	**41**	**19**	**588**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Missouri is outstanding. This conclusion is derived from an excellent service test conclusion in the St. Joseph Metropolitan AA, followed by adequate service test performance in the Northwest Missouri AA. Service test performance in the limited-scope reviewed AAs exceeded the statewide performance.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Missouri are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates eight full-service facilities in Missouri, including two branches in moderate-, five in middle-, and one in an upper-income tract(s). Additionally, 10 full-service ATMs are

distributed among its AA footprint, including 2 in moderate-, 6 in middle-, and 2 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 has not opened or closed any branches in Missouri since the prior examination.

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. The bank's operations and product and service offerings in the state generally mirror those of the overall institution, which is described in the Institution Retail Banking Services section of this evaluation.

Table 85

Retail Banking and Community Development Services – State of Missouri												
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	25.0	62.5	12.5	0.0	100.0	3.3	13.1	62.3	19.7	1.6	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	20.0	60.0	20.0	0.0	100.0	2.8	11.2	63.1	22.9	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**
	8		0		0		0	0	0	0	0	0
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	0		27		3		0		30		14	

[1] *Based on 2024 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 Missouri. The bank is a leader in providing CD services in the St. Joseph Metropolitan AA, while an adequate level of CD services was performed in the Northwest Missouri AA. It is noted that the bank's CD performance in its limited-scope AAs reflected consistent performance with the overall state rating, further supporting the overall statewide service test conclusion. As the table illustrates, bank representatives provided 30 services to 14 area organizations throughout Missouri, a substantial majority of which were to organizations that provide community services to LMI individuals and families.

ST. JOSEPH, MISSOURI METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ST. JOSEPH, MISSOURI METROPOLITAN AA

The bank's St. Joseph Metropolitan AA consists of entireties of Andrew, Buchanan, and Dekalb Counties, which represent three of the four counties (Doniphan County, Kansas excluded) that comprise the St. Joseph, Missouri-Kansas MSA. Refer to Appendix C for additional demographic data.

- There were no changes to the AA delineation since the prior evaluation.
- The AA is comprised of 34 census tracts, including 2 low-, 6 moderate-, 22 middle-, and 4 upper-income tracts, based on 2016-2020 ACS data and is unchanged since the prior examination.
- The bank operates three branches in the AA, each operating in their own county within the three-county AA. One branch is located within the St. Joseph city limits in a middle-income tract, the second branch is located in rural Savanah in a middle-income tract, and the third branch is located in rural Cameron in an upper-income tract. Each branch operates a full-service ATM on its premises.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 6.9 percent market share of deposits, ranking 6th of 19 financial institutions operating from 39 banking offices in the AA.
- An interview with a member of the community recently conducted as part of the CRA evaluation of another financial institution with branches 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 community member represented an area economic development organization within the AA.

Table 86

Population Change Assessment Area: St. Joseph, Missouri Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
St Joseph, Missouri Metropolitan	119,671	113,957	(4.8)
Andrew County, MO	17,328	18,135	4.7
Buchanan County, MO	89,561	84,793	(5.3)
DeKalb County, MO	12,782	11,029	(13.7)
St. Joseph, MO-KS MSA	127,530	121,467	(4.8)
Missouri	6,045,448	6,154,913	1.8
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- The AA population experienced a decline between 2015 and 2020, particularly in the lessor-populated DeKalb County, but realized at the overall MSA-level as well.

Table 87

Median Family Income Change Assessment Area: St. Joseph, Missouri Metropolitan			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
St Joseph, Missouri Metropolitan	65,464	66,270	1.2
Andrew County, MO	76,523	76,775	0.3
Buchanan County, MO	63,757	63,176	(0.9)
DeKalb County, MO	60,187	74,327	23.5
St. Joseph, MO-KS MSA	65,358	66,409	1.6
Missouri	66,438	72,834	9.6

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.

- As the table illustrates, MFI growth was stagnant in the AA between 2015 and 2020, although DeKalb County reflected a substantial growth in MFI during the same time period.

Table 88

Housing Cost Burden Assessment Area: St. Joseph, Missouri Metropolitan						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
St Joseph, Missouri Metropolitan	75.7	27.2	39.3	57.3	22.8	14.4
Andrew County, MO	74.5	19.4	33.3	55.8	20.1	12.8
Buchanan County, MO	78.5	31.5	42.0	60.4	24.9	15.3
DeKalb County, MO	41.4	2.8	18.6	32.3	9.2	11.0
St. Joseph, MO-KS MSA	75.0	26.6	39.0	58.4	23.1	14.8
Missouri	74.0	30.9	39.9	59.0	26.1	16.2

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- The housing cost burden for LMI AA renters and LMI homeowners was generally consistent with the statewide affordability figures, with variations among individual counties that comprise the AA. DeKalb County reflected the greatest level of affordability among AA counties.
- The overall AA housing affordability ratio of 40.7 percent reflects greater affordability in the AA relative to the overall statewide figure of 35.0 percent.

Table 89

Unemployment Rates Assessment Area: St. Joseph, Missouri Metropolitan					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
St Joseph, Missouri Metropolitan	5.2	3.8	2.7	3.2	3.7
Andrew County, MO	4.4	3.2	2.4	2.9	3.4
Buchanan County, MO	5.4	4.0	2.7	3.2	3.8
DeKalb County, MO	4.6	4.0	2.9	3.1	3.5
St. Joseph, MO-KS MSA	5.2	3.8	2.7	3.2	3.7
Missouri	6.1	4.2	2.6	3.1	3.7
Source:BLS, Local Area Unemployment Statistics					

- Unemployment rates in the AA remained consistent with the statewide figures between 2022 and 2024.
- Major employers in the AA include Mosaic Life Care, Triumph Foods, St Joseph School District, 139th Airlift Wing of Missouri Air National Guard, and Boehringer Ingelheim Animal Health.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. JOSEPH, MISSOURI METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the St. Joseph Metropolitan AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 62 loans within the AA, including 43 home mortgage, 13 small business, and 6 small farm loans during the review period. The evaluation of lending only considered the bank's total home mortgage lending product line in 2023, as home mortgage lending in 2024, as well as small business and small farm lending volumes in both years of the analysis, were insufficient to render meaningful performance conclusions.

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 Institution Lending Activity section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of home mortgage loans reflects a poor distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. As discussed, the evaluation of home mortgage lending considered only the bank's 2023 lending performance, which did not contain an origination in a low-income tract. Lending among moderate-income tracts was below the aggregate lending data by number volume, significantly below by dollar volume, and below the demographic figure.

An analysis of the dispersion of lending among the AA's various geographies noted gaps in lending which included LMI census tracts; however, given the limited volume of overall home mortgage lending relative to the volume of income census tracts in the AA, there was no additional impact to the conclusion of lending performance.

Table 90

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: St Joseph, Missouri Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.7	0	0.0	2.2	0	0.0	4.6	0	0.0	2.5	2.7
Moderate	0	0.0	18.6	0	0.0	11.8	1	25.0	17.7	211	35.2	10.6	12.5
Middle	6	66.7	63.9	722	53.8	64.0	3	75.0	64.0	389	64.8	66.0	67.6
Upper	3	33.3	13.7	620	46.2	21.8	0	0.0	13.7	0	0.0	21.0	17.2
Unknown	0	0.0	0.1	0	0.0	0.3	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	1,342	100.0	100.0	4	100.0	100.0	600	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.0	0	0.0	2.0	0	0.0	4.0	0	0.0	2.6	2.7
Moderate	1	16.7	14.0	42	6.2	9.0	0	0.0	12.7	0	0.0	9.2	12.5
Middle	3	50.0	65.7	256	38.0	67.1	6	66.7	65.4	383	48.7	65.7	67.6
Upper	2	33.3	17.3	375	55.7	21.9	3	33.3	17.9	404	51.3	22.5	17.2
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	6	100.0	100.0	673	100.0	100.0	9	100.0	100.0	787	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.7	0	0.0	0.7	0	0.0	0.9	2.7
Moderate	1	16.7	15.9	30	12.7	15.2	0	0.0	16.3	0	0.0	12.6	12.5
Middle	2	33.3	61.1	65	27.4	62.7	1	33.3	65.9	40	32.0	67.0	67.6
Upper	3	50.0	21.2	142	59.9	20.4	2	66.7	17.0	85	68.0	19.5	17.2
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	6	100.0	100.0	237	100.0	100.0	3	100.0	100.0	125	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	14.8	0	0.0	61.2	0	0.0	12.5	0	0.0	1.9	4.4
Moderate	0	0.0	18.5	0	0.0	3.7	0	0.0	25.0	0	0.0	12.0	13.0
Middle	0	0.0	55.6	0	0.0	20.0	0	0.0	62.5	0	0.0	86.1	71.2
Upper	0	0.0	11.1	0	0.0	15.1	0	0.0	0.0	0	0.0	0.0	11.4
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	3.5	0	0.0	7.5	0	0.0	4.3	0	0.0	2.4	2.7
Moderate	2	8.0	17.3	72	3.0	10.6	1	5.6	16.1	211	13.4	10.4	12.5
Middle	13	52.0	64.0	1,144	47.7	60.5	11	61.1	64.4	837	53.1	67.2	67.6
Upper	10	40.0	15.2	1,183	49.3	21.1	6	33.3	15.2	528	33.5	20.0	17.2
Unknown	0	0.0	0.1	0	0.0	0.2	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	25	100.0	100.0	2,399	100.0	100.0	18	100.0	100.0	1,576	100.0	100.0	100.0

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.*
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.

Lending to Borrowers of Different Income Levels

The bank's lending has an adequate distribution of home mortgage loans among individuals of different income levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2023 home mortgage loans to low-income borrowers was significantly above the aggregate lending data and comparable to the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data and above the demographic figure.

Table 91

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: St Joseph, Missouri Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	33.3	11.0	300	22.4	6.0	1	25.0	8.1	33	5.5	4.2	19.4
Moderate	2	22.2	27.6	345	25.7	21.2	0	0.0	29.8	0	0.0	20.8	18.9
Middle	2	22.2	20.0	205	15.3	21.2	3	75.0	20.7	567	94.5	20.0	20.7
Upper	1	11.1	20.6	332	24.7	31.9	0	0.0	23.8	0	0.0	36.8	41.0
Unknown	1	11.1	20.8	160	11.9	19.7	0	0.0	17.6	0	0.0	18.2	0.0
Total	9	100.0	100.0	1,342	100.0	100.0	4	100.0	100.0	600	100.0	100.0	100.0
Refinance Loans													
Low	1	16.7	9.6	55	8.2	5.7	3	33.3	9.3	208	26.4	4.6	19.4
Moderate	2	33.3	22.0	193	28.7	17.7	2	22.2	17.8	75	9.5	12.4	18.9
Middle	2	33.3	19.6	375	55.7	19.9	2	22.2	17.8	125	15.9	15.3	20.7
Upper	1	16.7	29.2	50	7.4	37.6	1	11.1	28.6	40	5.1	35.7	41.0
Unknown	0	0.0	19.6	0	0.0	19.1	1	11.1	26.6	339	43.1	32.1	0.0
Total	6	100.0	100.0	673	100.0	100.0	9	100.0	100.0	787	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.1	0	0.0	6.9	1	33.3	6.7	40	32.0	4.2	19.4
Moderate	1	16.7	10.6	30	12.7	9.3	0	0.0	15.6	0	0.0	13.1	18.9
Middle	3	50.0	23.9	131	55.3	18.8	1	33.3	24.4	35	28.0	21.3	20.7
Upper	1	16.7	44.2	61	25.7	48.3	1	33.3	40.0	50	40.0	45.9	41.0
Unknown	1	16.7	14.2	15	6.3	16.6	0	0.0	13.3	0	0.0	15.5	0.0
Total	6	100.0	100.0	237	100.0	100.0	3	100.0	100.0	125	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	16.0	10.4	355	14.8	6.0	5	27.8	8.4	281	17.8	4.3	19.4
Moderate	6	24.0	25.0	589	24.6	20.2	3	16.7	25.9	100	6.3	18.7	18.9
Middle	7	28.0	20.0	711	29.6	20.8	6	33.3	20.5	727	46.1	19.0	20.7
Upper	6	24.0	24.7	569	23.7	33.5	2	11.1	26.1	90	5.7	36.9	41.0
Unknown	2	8.0	19.9	175	7.3	19.4	2	11.1	19.1	378	24.0	21.1	0.0
Total	25	100.0	100.0	2,399	100.0	100.0	18	100.0	100.0	1,576	100.0	100.0	100.0

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.*
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.

Community Development Lending

The bank makes few, if any loans, in the AA, as it did not originate a qualified CD loan in the AA during the evaluation period; however, it is noted that the St. Joseph Metropolitan AA reflects the third lowest volume of overall loan originations relative to other full-scope analyzed AAs, ranking 10th out of 12 full-scope reviewed areas with a total of 62 loan originations over the two-year evaluation. Given the overall limited volume of lending, there was no negative impact to the bank's lending test performance.

INVESTMENT TEST

The bank's performance under the investment test in the St. Joseph Metropolitan AA is good. The bank has a significant level of qualified CD investments and grants but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. Consistent with the bank's predominate investment strategies, the largest dollar composition of investments is comprised of MBS that is responsive to area affordable housing needs. The bank's philanthropic donation activities include:

- A total of $5.5M was donated to an area organization that provides affordable housing resources and services for LMI individuals.
- A donation of $2.5M was made to an area food pantry, which provides services to individuals facing food insecurity.

Table 92

Investments, Grants, and Donations – St. Joseph, Missouri Metropolitan AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	2	197	1	148	2	6	5	350
Community Services	0	0	0	0	1	3	1	3
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**2**	**197**	**1**	**148**	**3**	**8**	**6**	**353**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the St. Joseph, Missouri Metropolitan 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's branches are distributed among middle- (2), and upper-income (1) tracts throughout the AA; however, the bank operates an office in the east-central portion of St. Joseph, located less than two miles from the AA's collection of LMI census tracts. Additionally, the bank's Cameron branch is situated on the county line of DeKalb (within the bank's AA) and is located less than a quarter of a mile from a large contingent of moderate-income census tracts located in

Clinton County, which is not within the bank's AA. It is still noted that the bank possesses accessibility to these areas.

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 not opened or closed any branches in the AA.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are discussed in the Institution Retail Banking Services section of this report.

Table 93

Retail Banking and Community Development Services – St. Joseph, Missouri Metropolitan AA												
Branch Accessibility	**Location of Branches by Tract (%)**						**Percent of Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	0.0	0.0	66.7	33.3	0.0	100.0	5.9	17.6	64.7	11.8	0.0	100.0
	Location of Full-Service 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	66.7	33.3	0.0	100.0	4.8	14.4	65.9	14.9	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**
	3		0		0		0	0	0	0	0	0
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	0		15		0		0		15		6	

[1] *Based on 2024 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 in the AA. Bank employees provided 15 services to 6 area organizations throughout the AA to organizations that provide community services to LMI individuals.

Examples of CD services include:

- Five bank employees provided their financial expertise at an area educational event attended by students from a school district which contains a majority population eligible for free or reduced lunches under the NSLP.

- A bank employee provided financial literacy instruction and professional development coaching at a school which contained 100.0 percent free or reduced lunch-eligible student population.

NORTHWEST MISSOURI ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHWEST MISSOURI AA

The bank's Northwest Missouri AA consists of Atchison, Holt, and Nodaway Counties in their entireties. Refer to Appendix C for additional demographic data.

- There have been no changes to the AA since the prior evaluation.
- The AA is comprised of 11 census tracts, including 8 middle- and 3 upper-income tracts, which is unchanged from the previous examination. Census tracts in Atchison County were designated as distressed and underserved middle-income tracts by the FFIEC, and tracts in Holt County also were designated as underserved.
- The bank operates three branches in the AA, all located in middle-income tracts. Two of three branches contain a full-service ATM on the premises, while an additional stand-alone full-service ATM operates in an upper-income tract.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank ranked 2nd of 8 FDIC-insured depository institutions operating from 16 locations in the AA, with a total deposit market share of 14.3 percent.
- An interview with a member of the community recently conducted as part of the CRA evaluation of another financial institution with branches 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 community member represented an area economic and workforce development organization within the AA.

Table 94

Population Change Assessment Area: Northwest Missouri			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Northwest Missouri	33,241	30,769	(7.4)
Atchison County, MO	5,440	5,305	(2.5)
Holt County, MO	4,615	4,223	(8.5)
Nodaway County, MO	23,186	21,241	(8.4)
NonMSA Missouri	1,550,288	1,505,909	(2.9)
Missouri	6,045,448	6,154,913	1.8%
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- The AA experienced a population decline based on 2015 and 2020 data. The declining trend fares similarly to other nonmetropolitan areas of Missouri, although the AA's pace of decline was much higher.
- Nodaway County contains the largest population of the three AA counties, which includes the city of Maryville (population 10,622) and the location of Northwest Missouri State University (student population 8,747).

Table 95

Median Family Income Change Assessment Area: Northwest Missouri			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Northwest Missouri	58,074	64,101	10.4
Atchison County, MO	62,852	57,734	(8.1)
Holt County, MO	59,512	58,625	(1.5)
Nodaway County, MO	57,400	67,279	17.2
NonMSA Missouri	52,816	56,957	7.8
Missouri	66,438	72,834	9.6

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.

- MFI within the AA experienced growth, which is driven primarily by notable MFI growth in Nodaway County; however, MFI decline was noted in the remaining two counties that comprise the AA.
- AA families below poverty, at 9.0 percent, reflected a figure consistent with the overall state of Missouri figure, at 8.9 percent, and was lower than the figure for other nonmetropolitan statewide areas, at 12.1 percent.

Table 96

Housing Cost Burden Assessment Area: Northwest Missouri						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Northwest Missouri	63.4	22.3	34.1	57.3	24.0	15.0
Atchison County, MO	47.8	8.0	18.9	51.9	29.0	15.0
Holt County, MO	37.1	4.7	12.9	63.6	15.4	17.7
Nodaway County, MO	67.7	26.7	39.9	57.4	25.4	14.2
NonMSA Missouri	65.5	29.9	35.8	54.5	25.3	16.4
Missouri	74.0	30.9	39.9	59.0	26.1	16.2

Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- As illustrated in the table above, the AA reflected generally more affordable housing compared to other nonmetropolitan statewide areas and the statewide figures, particularly for moderate-income renters and homeowners.
- The overall AA housing affordability ratio of 42.6 percent compared to the statewide nonmetropolitan figure and statewide figure of 38.0 percent and 35.0 percent, respectively, further demonstrates an affordability advantage in the AA relative to other areas of the state.

Table 97

Unemployment Rates Assessment Area: Northwest Missouri					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Northwest Missouri	4.0	2.6	2.0	2.4	3.0
Atchison County, MO	3.8	2.9	2.3	2.5	3.3
Holt County, MO	4.2	3.5	2.4	3.0	3.7
Nodaway County, MO	4.0	2.4	1.9	2.3	2.8
NonMSA Missouri	6.2	4.2	2.9	3.5	4.2
Missouri	6.1	4.2	2.6	3.1	3.7
Source: BLS, Local Area Unemployment Statistics					

- Unemployment in the AA remained lower than statewide figures, and nearly a percentage lower than other nonmetropolitan statewide areas in the year-over-year data.
- The AA is comprised primarily of rural, agricultural-centric and manufacturing business sectors, as well as local government- and education-related sectors.
- Major employers in the AA include Kawasaki Motors Manufacturing, Mosaic Medical Center, and Northwest Missouri State University.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHWEST MISSOURI AA

LENDING TEST

The bank's performance under the lending test in the Northwest Missouri AA is good. The bank's small farm lending and home mortgage lending were equally weighted in the consideration of lending test performance conclusions given their strategic emphasis, as well as similar lending volumes within the rural AA.

Lending Activity

The bank's lending activities reflect good responsive responsiveness to AA credit needs. The bank originated a total of 92 loans in the AA, including 47 small farm, 42 home mortgage, and 3 small business loans during the review period. As discussed, an analysis

of the bank's small business lending was not conducted due to the limited volume of lending over the evaluation period. Additionally, given limited lending volumes in 2023, the bank's home mortgage lending was only evaluated based on its 2024 lending performance.

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

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects an adequate distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage and small farm loans reflected adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As referenced in the description of the institution's operations section, the AA did not contain LMI tracts during the evaluation period. As such, the analysis evaluated the distribution of lending among the AA's middle- and upper-income tracts.

The distribution of 2024 home mortgage loans in middle-income and upper-income tracts was comparable to the aggregate lending data and demographic figures in each respective income census tract.

An analysis of the dispersion of lending among the various income tracts revealed no gaps or lapses in lending.

Table 98

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Northwest Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	100.0	69.2	732	100.0	64.5	7	63.6	62.0	1,510	64.0	56.9	65.6
Upper	0	0.0	30.8	0	0.0	35.5	4	36.4	38.0	849	36.0	43.1	34.4
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	7	100.0	100.0	732	100.0	100.0	11	100.0	100.0	2,359	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	100.0	72.6	209	100.0	63.3	5	62.5	66.4	200	64.5	61.3	65.6
Upper	0	0.0	27.4	0	0.0	36.7	3	37.5	33.6	110	35.5	38.7	34.4
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	6	100.0	100.0	209	100.0	100.0	8	100.0	100.0	310	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	50.0	57.1	50	25.8	35.1	3	60.0	63.0	157	72.4	74.7	65.6
Upper	1	50.0	38.1	144	74.2	55.0	2	40.0	37.0	60	27.6	25.3	34.4
Unknown	0	0.0	4.8	0	0.0	9.9	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	194	100.0	100.0	5	100.0	100.0	217	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	0.0	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	86.9	0	0.0	70.0	0	0.0	76.3	39.7
Upper	0	0.0	50.0	0	0.0	13.1	0	0.0	30.0	0	0.0	23.7	60.3
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	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													**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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	15	88.2	68.4	1,018	86.5	64.2	16	64.0	63.1	1,933	65.5	58.8	65.6
Upper	2	11.8	31.4	159	13.5	35.6	9	36.0	36.9	1,019	34.5	41.2	34.4
Unknown	0	0.0	0.2	0	0.0	0.2	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	17	100.0	100.0	1,177	100.0	100.0	25	100.0	100.0	2,952	100.0	100.0	100.0

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.*
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 Farm Lending

The geographic distribution of small farm lending is adequate. The distribution of 2024 small farm loans in middle-income tracts was comparable to the aggregate lending data by number volume, above by dollar volume, and above the demographic figure of the percentage of total farms. The bank did not originate a small farm loan in an upper-income census tract in 2024.

The geographic distribution of 2023 small farm lending reflected consistent performance and circumstances as 2024 lending patterns.

An analysis of the dispersion of lending among the various income tracts revealed no gaps or lapses in lending.

Table 99

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Northwest Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	22	95.7	83.1	3,293	99.5	87.2	24	100.0	80.7	3,404	100.0	79.1	79.7
Upper	1	4.3	16.9	15	0.5	12.8	0	0.0	19.3	0	0.0	20.9	20.3
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	23	100.0	100.0	3,308	100.0	100.0	24	100.0	100.0	3,404	100.0	100.0	100.0

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

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

The bank's lending has an excellent distribution among individuals of different income levels and farms of different sizes, which is consistent with the performance noted in both small farm lending and home mortgage lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The distribution of 2024 home mortgage loans to low-income borrowers was significantly above the aggregate lending data and comparable to the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data and significantly above the demographic figure.

Table 100

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Northwest Missouri

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	5.8	0	0.0	2.7	2	18.2	2.7	254	10.8	1.5	16.0
Moderate	4	57.1	18.2	290	39.6	13.6	3	27.3	17.9	341	14.5	12.4	13.7
Middle	1	14.3	23.3	136	18.6	23.0	2	18.2	20.9	337	14.3	19.0	23.0
Upper	1	14.3	39.0	95	13.0	47.2	4	36.4	39.6	1,427	60.5	48.9	47.2
Unknown	1	14.3	13.7	211	28.8	13.5	0	0.0	19.0	0	0.0	18.1	0.0
Total	7	100.0	100.0	732	100.0	100.0	11	100.0	100.0	2,359	100.0	100.0	100.0
Refinance Loans													
Low	2	33.3	11.9	40	19.1	5.4	1	12.5	5.6	30	9.7	1.9	16.0
Moderate	0	0.0	15.5	0	0.0	12.5	2	25.0	16.8	88	28.4	8.2	13.7
Middle	1	16.7	23.8	48	23.0	28.3	1	12.5	25.6	30	9.7	24.8	23.0
Upper	3	50.0	39.3	121	57.9	44.5	4	50.0	40.8	162	52.3	52.2	47.2
Unknown	0	0.0	9.5	0	0.0	9.2	0	0.0	11.2	0	0.0	12.9	0.0
Total	6	100.0	100.0	209	100.0	100.0	8	100.0	100.0	310	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	9.5	0	0.0	6.2	0	0.0	3.7	0	0.0	2.4	16.0
Moderate	0	0.0	9.5	0	0.0	2.8	1	20.0	29.6	15	6.9	18.2	13.7
Middle	0	0.0	19.0	0	0.0	11.3	2	40.0	22.2	135	62.2	17.9	23.0
Upper	2	100.0	52.4	194	100.0	55.7	2	40.0	37.0	67	30.9	56.6	47.2
Unknown	0	0.0	9.5	0	0.0	24.1	0	0.0	7.4	0	0.0	5.0	0.0
Total	2	100.0	100.0	194	100.0	100.0	5	100.0	100.0	217	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	11.8	7.4	40	3.4	3.4	3	12.0	4.0	284	9.6	1.7	16.0
Moderate	4	23.5	16.4	290	24.6	13.0	6	24.0	18.2	444	15.0	11.7	13.7
Middle	4	23.5	23.0	226	19.2	23.4	6	24.0	22.7	568	19.2	20.4	23.0
Upper	6	35.3	40.9	410	34.8	47.4	10	40.0	39.2	1,656	56.1	49.8	47.2
Unknown	1	5.9	12.4	211	17.9	12.8	0	0.0	16.0	0	0.0	16.5	0.0
Total	17	100.0	100.0	1,177	100.0	100.0	25	100.0	100.0	2,952	100.0	100.0	100.0

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.
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 Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of 2024 loans to small farms reflected a concentration of lending that was significantly above the aggregate lending data and comparable to the demographic figure of the percentage of total farms.

The distribution of 2023 small farm loans reflected consistent performance with 2024 lending patterns.

Table 101

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Northwest Missouri

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	22	95.7	38.6	3,108	94.0	65.1	20	83.3	41.2	3,244	95.3	60.5	99.2
Over $1 Million	1	4.3		200	6.0		4	16.7		160	4.7		0.8
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	23	100.0		3,308	100.0		24	100.0		3,404	100.0		100.0
By Loan Size													
$100,000 or Less	12	52.2	86.0	569	17.2	29.5	12	50.0	78.6	604	17.7	26.1	
$100,001 - $250,000	7	30.4	8.9	1,133	34.3	30.9	8	33.3	13.4	1,125	33.0	31.2	
$250,001 - $500,000	4	17.4	5.1	1,606	48.5	39.6	4	16.7	8.0	1,675	49.2	42.6	
Total	23	100.0	100.0	3,308	100.0	100.0	24	100.0	100.0	3,404	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	12	54.5		569	18.3		8	40.0		444	13.7		
$100,001 - $250,000	6	27.3		933	30.0		8	40.0		1,125	34.7		
$250,001 - $500,000	4	18.2		1,606	51.7		4	20.0		1,675	51.6		
Total	22	100.0		3,108	100.0		20	100.0		3,244	100.0		

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

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated four CD loans totaling $2.7MM in this AA, which were comprised entirely of loans which were responsive to the revitalization and stabilization needs of the area by providing financing to two area businesses in a distressed and underserved area which provided ongoing capital for job retention and creation for area residents, including LMI individuals.

Table 102

Community Development Loans – Northwest Missouri AA		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	4	2,700
Total Loans	**4**	**2,700**

INVESTMENT TEST

The bank's performance under the investment test in the Northwest Missouri AA is adequate. The bank makes an adequate volume of qualified CD investments and grants but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. Consistent with the bank's predominate investment strategies, the largest dollar composition of investments is a MBS that is responsive to area affordable housing needs. Examples of the bank's philanthropic donations include:

- A total of $1.5M was donated to the local chapter of an organization that provides an array of services to at-risk youth, including mentoring, education, and counseling programs.
- The bank donated $2.5M to a local food bank, which provides critical nutritional services to individuals facing food insecurity.

Table 103

Investments, Grants, and Donations – Northwest Missouri AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	1	55	0	0	0	0	1	55
Community Services	0	0	0	0	3	4	3	4
Economic Development	0	0	0	0	1	5	1	5
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**1**	**55**	**0**	**0**	**4**	**9**	**5**	**64**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Northwest Missouri AA is adequate.

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 its three branches and full-service ATMs in middle-income tracts throughout the AA which are distributed in a way that reasonably services its three-county AA footprint.

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 branches opened or closed since the prior 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. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are discussed in the Institution Retail Banking Services section of this report.

Table 104

Retail Banking and Community Development Services – Northwest Missouri 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	0.0	72.7	27.3	0.0	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	66.7	33.3	0.0	100.0	0.0	0.0	64.0	36.0	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**	
	0		0		2		0		2		1	

[1] *Based on 2024 FFIEC census tract definitions.*

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides an adequate level of CD services. A bank representative served as a board member in each year of the evaluation for a local economic development corporation which provides services in support of area small businesses.

OTHER MISSOURI NONMETROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

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

The bank's Northeast Missouri AA consists of the entirety of Adair County. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of eight census tracts, including one moderate-, four middle-, two upper-, and one unknown-income census tract(s). All of the middle-income tracts were designated by the FFIEC as distressed middle-income tracts. The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in a moderate-income census tract.
- The bank operates three full-service ATMs with one at the branch location and two in middle-income census tracts.
- Based on the 2020 ACS data, the AA population was 25,314, which reflects a 1.0 percent decrease from the 2015 ACS data.
- The AA is home to 4,893 total families. According to 2020 ACS data, 16.5 percent are low-, 14.7 percent are moderate-, 22.4 percent are middle-, and 46.4 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 18.8 percent, ranking 2nd of 7 FDIC-insured financial institutions operating from ten offices in the AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTH-CENTRAL MISSOURI AA

The bank's North-Central Missouri AA consists of the entirety of Carroll County and Livingston County. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of eight census tracts, including one moderate-, four middle-, and three upper-income census tract(s). Two tracts in Carroll County were designated as distressed middle-income tracts by the FFIEC. The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in a moderate-income census tract.

- The bank operates one full-service ATM at its sole branch location.
- Based on the 2020 ACS data, the AA population was 23,052, which reflects a 4.5 percent decrease from the 2015 ACS data.
- The AA is home to 6,206 total families. According to 2020 ACS data, 18.3 percent are low-, 14.9 percent are moderate-, 21.1 percent are middle-, and 45.7 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 8.5 percent, ranking 6th of 9 FDIC-insured financial institutions operating from 16 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OTHER MISSOURI NONMETROPOLITAN AAS

The state of Missouri 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 Missouri.

Table 105

Assessment Area	Lending Test	Investment Test	Service Test
Northeast Missouri	Consistent	Consistent	Exceeds
North-Central Missouri	Exceeds	Exceeds	Consistent

STATE OF NEW MEXICO

CRA rating for New Mexico:	**Satisfactory**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Low Satisfactory**
The Service Test is rated:	**Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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 excellent.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes few, if any, CD loans within its New Mexico AAs.

Investment Test

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

Service Test

- The bank's delivery systems are readily 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 New Mexico AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of New Mexico was consistent with the overall scope for the institution. A full-scope review was conducted for the Taos County AA, while a limited-scope review was conducted for the Albuquerque Metropolitan AA to ascertain if the bank's performance in the AA was generally consistent with its performance in the overall state evaluation.

During the evaluation period, the bank originated a total of 40 loans in New Mexico, including 21 home mortgage and 19 small business loans. The evaluation of lending in the state AAs only included an analysis of home mortgage lending as the volume of small business loans was insufficient to conduct a meaningful performance analysis.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NEW MEXICO

The bank delineates 2 of its 24 AAs and operates 4 of its 93 branches in the state of New Mexico. The two AAs share contrasting population characteristics, as the Albuquerque Metropolitan AA represents the population center of the state, whereas the Taos County AA contains a substantially smaller population set in a rural portion of the Sangre de Cristo Mountains. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business lending, followed by home mortgage lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

Additionally, an interview recently conducted as part of the CRA evaluation of another financial institution with branches 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 community member represented an area economic development organization.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

The bank's performance under the lending test in the state of New Mexico is high satisfactory. This conclusion is derived from good lending test performance in the Taos County AA.

Lending Activity

The bank's overall lending activities in the state of New Mexico reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible

lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within New Mexico reflects an excellent distribution among the different census tracts and dispersion throughout the AAs. This conclusion is supported by excellent penetration noted in the Taos County AA.

Lending to Borrowers of Different Income Levels

The bank's lending within New Mexico has an overall adequate penetration among individuals of different income levels, which is supported by adequate penetration noted in the Taos County AA.

Community Development Lending

The bank provides few, if any, CD loans within the state of New Mexico. The bank did not originate a qualified CD loan during the evaluation period; however, it is noted that a very limited volume of lending occurred in the State of New Mexico, at 40 total loans over the two-year evaluation period, which ranked eighth of nine among state or multi-state analyses. As such, the lack of CD loan originations had a neutral impact on the conclusion of lending test performance.

INVESTMENT TEST

The bank's overall performance under the investment test in the state of New Mexico is low satisfactory. The bank's Taos County AA reflected poor investment test performance, which was attributed to a total of five donations made totaling $4,900 to three area organizations. The bank's investment test performance in the limited-scope reviewed Albuquerque Metropolitan AA reflected a significant volume of investments and bolstered the bank's overall investment volumes at the statewide level and supports the rating.

The bank has an adequate volume of qualified CD investments and grants within New Mexico but is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs. Consistent with the investment strategy in its other states, the composition of qualified investments in New Mexico by dollar volume is predominately MBS that support affordable housing, in addition to philanthropic donations to organizations that provide community services to LMI individuals.

Table 106

Investments, Grants, and Donations – State of New Mexico								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	3	448	0	0	3	11	6	459
Community Services	0	0	0	0	4	4	4	4
Economic Development	0	0	0	0	1	2	1	2
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**3**	**448**	**0**	**0**	**8**	**16**	**11**	**464**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of New Mexico is outstanding. The conclusion is derived from an excellent service test conclusion in the Taos County AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within New Mexico are readily accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates four branches in the state. Two of the four branches are located in moderate-income tracts in the Taos County AA. Additionally, four full-service ATMs are situated throughout the state's two AAs, including two in 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. There have been no branch openings or closures in the state 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. The bank's operational hours and product and service offerings in the state generally mirror those of the overall institution, which is described in the Institution Retail Banking Services section of this evaluation.

Table 107

Retail Banking and Community Development Services – State of New Mexico												
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	50.0	25.0	25.0	0.0	100.0	7.5	23.7	35.5	29.0	4.3	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	50.0	50.0	0.0	0.0	100.0	6.4	24.0	39.5	28.3	1.7	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**	
	0		8		0		0		8		5	

[1] *Based on 2024 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 New Mexico, which mirrors the bank's performance in the Taos County AA. As illustrated in the table, the bank's CD services were entirely comprised of activities that were responsive to the community services needs of LMI individuals and families throughout its two New Mexico AAs.

TAOS COUNTY, NEW MEXICO ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

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

The bank's Taos County AA consists of the entirety of Taos County, New Mexico. Refer to Appendix C for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 10 census tracts, including 2 moderate-, 5 middle-, 2 upper-, and 1 unknown-income census tract(s). The census tract composition remains unchanged since the previous examination.
- The bank operates 3 of its 93 banking offices in the AA with 2 offices located in moderate- and 1 in middle-income census tract(s).
- The bank operates full-service ATMs at each of its 3 branch locations, as well as 1 standalone ATM in a middle-income census tract in the AA.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 28.0 percent, ranking 2nd of 3 FDIC-insured financial institutions operating from 6 offices in the AA.
- An interview recently conducted as part of the CRA evaluation of another financial institution with branches 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 community member represented an area economic development organization.

Table 108

Population Change Assessment Area: Taos County, New Mexico			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Taos County, New Mexico	32,943	34,489	4.7
NonMSA New Mexico	695,182	704,949	1.4
New Mexico	2,084,117	2,117,522	1.6
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- Taos County's population growth outpaced the broader growth rate of New Mexico despite it having a relatively small population.
- The AA has a somewhat older population, with 25.1 percent of individuals being 65 years and older, compared to only 17.2 percent of the statewide population.
- The town of Taos, the county seat of Taos County, is the most densely populated town in the AA, with a population of 6,458. Other population centers include the unincorporated communities of Ranchos de Taos, Questa, and

even more rural, agricultural communities like Arroyo Seco, Taos Pueblo, and El Prado.

Table 109

Median Family Income Change Assessment Area: Taos County, New Mexico			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Taos County, New Mexico	49,646	57,614	16.1
NonMSA New Mexico	53,925	57,380	6.4
New Mexico	60,145	62,611	4.1

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.

- The concentration of AA families below poverty, at 14.5 percent, was comparable to the overall statewide figure of 14.2 percent.
- Between 2015 and 2020, median family income within the AA demonstrated substantial growth, reducing the disparity between the AA and statewide MFI levels.

Table 110

Housing Cost Burden Assessment Area: Taos County, New Mexico						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Taos County, New Mexico	77.5	60.8	40.1	52.9	29.0	20.4
NonMSA New Mexico	65.0	36.8	34.7	45.3	22.2	16.0
New Mexico	73.3	45.9	42.1	53.9	31.6	19.1

Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA contains less affordable rent costs relative to other nonmetropolitan statewide areas; however, homeowner costs are generally comparable.
- The AA's affordability ratio of 16.6 percent further confirms the housing cost challenges when compared to the statewide and statewide nonmetropolitan figures of 29.2 and 34.0 percent, respectively.

Table 111

Unemployment Rates Assessment Area: Taos County, New Mexico					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Taos County, New Mexico	10.7	9.1	4.9	4.3	4.7
NonMSA New Mexico	8.1	7.8	4.5	3.8	4.4
New Mexico	7.9	7.1	4.1	3.7	4.1
Source: BLS, Local Area Unemployment Statistics					

- The Taos area is primarily driven by tourism due to recreational ski resorts and other art and cultural attractions.
- Major industries in the AA include accommodation and food service, health care and social services, and retail trade.
- Top employers in the AA include Taos Ski Valley, Taos Municipal Schools, and Holy Cross Medical Center.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TAOS COUNTY AA

LENDING TEST

The bank's performance under the lending test in the Taos County AA is good. For this evaluation, only the bank's 2023 home mortgage loans were evaluated due to lending volumes in the other product lines too minimal to render reasonable analyses.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 27 loans in the AA during the evaluation period, including 19 home mortgage and 8 small business loans.

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

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans among moderate-income tracts was significantly above both the aggregate lending data and the demographic figure. As discussed in the AA demographic section, there were no low-income tracts in the AA during the evaluation period.

Additionally, there were no gaps or lapses in the dispersion of loans noted among the various income tracts.

Table 112

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Taos County, New Mexico

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	3	60.0	22.5	909	56.2	19.0	3	37.5	20.3	1,163	53.8	19.7	18.0
Middle	1	20.0	42.9	316	19.5	41.1	3	37.5	41.3	526	24.4	43.2	46.8
Upper	1	20.0	22.9	392	24.2	23.4	1	12.5	26.4	221	10.2	22.5	24.1
Unknown	0	0.0	11.6	0	0.0	16.5	1	12.5	12.0	250	11.6	14.6	11.1
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	1,617	100.0	100.0	8	100.0	100.0	2,160	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	1	100.0	22.2	123	100.0	17.0	0	0.0	14.6	0	0.0	10.1	18.0
Middle	0	0.0	46.0	0	0.0	53.2	0	0.0	43.8	0	0.0	37.9	46.8
Upper	0	0.0	30.2	0	0.0	29.2	0	0.0	27.1	0	0.0	34.6	24.1
Unknown	0	0.0	1.6	0	0.0	0.5	0	0.0	14.6	0	0.0	17.3	11.1
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	123	100.0	100.0	0	0.0	100.0	0	0.0	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	0	0.0	13.0	0	0.0	9.9	1	100.0	33.3	15	100.0	36.3	18.0
Middle	2	66.7	43.5	280	35.9	30.8	0	0.0	43.3	0	0.0	36.3	46.8
Upper	0	0.0	26.1	0	0.0	27.6	0	0.0	20.0	0	0.0	20.0	24.1
Unknown	1	33.3	17.4	500	64.1	31.7	0	0.0	3.3	0	0.0	7.4	11.1
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	780	100.0	100.0	1	100.0	100.0	15	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	75.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
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	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 %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	40.0	21.1	1,032	37.3	17.7	4	44.4	19.0	1,178	54.2	17.9	18.0
Middle	3	30.0	43.8	596	21.5	42.4	3	33.3	42.7	526	24.2	42.0	46.8
Upper	2	20.0	24.5	642	23.2	24.4	1	11.1	26.1	221	10.2	24.7	24.1
Unknown	1	10.0	10.6	500	18.1	15.4	1	11.1	12.2	250	11.5	15.4	11.1
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	2,770	100.0	100.0	9	100.0	100.0	2,175	100.0	100.0	100.0

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.*
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.

Lending to Borrowers of Different Income Levels

The bank's lending has an adequate distribution among individuals of different income levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank did not originate a loan to a low-income borrower during 2023, which was comparable to the concentration of aggregate lending performance, although significantly below the demographic figure. Lending to moderate-income borrowers, albeit one loan origination, reflects a concentration of loans that is also comparable to the aggregate lending data, although also below the demographic figure.

Table 113

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Taos County, New Mexico

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.1	0	0.0	0.5	0	0.0	1.8	0	0.0	0.8	24.9
Moderate	0	0.0	10.9	0	0.0	5.1	0	0.0	5.1	0	0.0	2.5	18.5
Middle	1	20.0	16.4	250	15.5	10.0	3	37.5	10.9	523	24.2	7.1	13.9
Upper	4	80.0	57.1	1,367	84.5	66.8	5	62.5	69.6	1,637	75.8	75.5	42.7
Unknown	0	0.0	14.5	0	0.0	17.7	0	0.0	12.7	0	0.0	14.0	0.0
Total	5	100.0	100.0	1,617	100.0	100.0	8	100.0	100.0	2,160	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.3	0	0.0	2.9	0	0.0	3.1	0	0.0	1.1	24.9
Moderate	0	0.0	9.5	0	0.0	8.3	0	0.0	13.5	0	0.0	9.4	18.5
Middle	0	0.0	19.0	0	0.0	15.2	0	0.0	20.8	0	0.0	15.1	13.9
Upper	1	100.0	46.0	123	100.0	40.4	0	0.0	45.8	0	0.0	49.5	42.7
Unknown	0	0.0	19.0	0	0.0	33.2	0	0.0	16.7	0	0.0	24.9	0.0
Total	1	100.0	100.0	123	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.7	0	0.0	1.7	24.9
Moderate	1	33.3	21.7	30	3.8	17.9	0	0.0	13.3	0	0.0	12.7	18.5
Middle	0	0.0	34.8	0	0.0	20.5	1	100.0	26.7	15	100.0	17.0	13.9
Upper	2	66.7	43.5	750	96.2	61.6	0	0.0	46.7	0	0.0	57.3	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	6.7	0	0.0	11.3	0.0
Total	3	100.0	100.0	780	100.0	100.0	1	100.0	100.0	15	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.8	0	0.0	0.8	0	0.0	2.5	0	0.0	0.9	24.9
Moderate	1	10.0	11.3	30	1.1	5.8	0	0.0	8.9	0	0.0	4.7	18.5
Middle	1	10.0	17.3	250	9.0	10.5	4	44.4	14.7	538	24.7	9.0	13.9
Upper	8	80.0	54.9	2,490	89.9	64.0	5	55.6	61.0	1,637	75.3	69.6	42.7
Unknown	0	0.0	14.7	0	0.0	19.0	0	0.0	12.8	0	0.0	15.8	0.0
Total	10	100.0	100.0	2,770	100.0	100.0	9	100.0	100.0	2,175	100.0	100.0	100.0

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.
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.

Community Development Lending

The bank provides few, if any, CD loans in the AA. As discussed in the statewide CD lending section, the bank did not originate a qualified CD loan in the AA during the evaluation period. There was no negative impact to the lending test conclusion given the very limited volume of lending that occurred in the AA during the evaluation period, as well as the rural nature of the AA and reasonably limited opportunities for CD lending in such areas.

INVESTMENT TEST

The bank's performance under the investment test in the Taos County AA is poor. The bank has a poor level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AA.

The bank's investment activities in the AA are entirely comprised of philanthropic donations, including five donations totaling $4.9M to three area organizations that provide community services to LMI individuals and families, as well as an organization that is responsive to area affordable housing needs. These donations include:

- A total of $3.4M to an area agency that provides an array of community services for LMI individuals, including emergency shelter, counseling, and transitional housing.
- A donation of $1M to an area organization that provides resources to address area homelessness and affordable housing needs.
- A $500 donation to a local food pantry which provides critical nutritional support for individuals facing food insecurity.

Table 114

Investments, Grants, and Donations – Taos County, New Mexico AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	0	0	0	0	1	1	1	1
Community Services	0	0	0	0	4	4	4	4
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**5**	**5**	**5**	**5**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Taos County AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in the AA. As discussed in the institution's operations in the AA, the bank operates two of its three branches in moderate-income tracts with ATMs on each premises.

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 branch openings or closures in the AA since the prior 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. The bank's hours of operation and product and service offerings in the AA generally mirror that of the overall institution, which are discussed in the Institution Retail Banking Services section of this report.

Table 115

Retail Banking and Community Development Services – Taos County, New Mexico 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	66.7	33.3	0.0	0.0	100.0	0.0	20.0	50.0	20.0	10.0	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	50.0	50.0	0.0	0.0	100.0	0.0	17.9	49.0	24.2	9.0	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	
	0		8		0		0		8		5	

[1] *Based on 2024 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 in the AA given its branch presence and the availability of such opportunities. The CD services provided include:

- Two bank employees provided their financial expertise teaching financial literacy education sessions for a school that contains a 100 percent free or reduced lunch-eligible student population.
- A bank employee provided their financial expertise with board membership service in each year of the evaluation for an area nonprofit organization that provides an array of services for the benefit of a school district that contains a majority student population eligible for free or reduced lunches.

ALBUQUERQUE, NEW MEXICO METROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE ALBUQUERQUE METROPOLITIAN AA

The bank's Albuquerque Metropolitan AA is comprised of Bernalillo County in its entirety, which is one of four counties that comprise the Albuquerque, New Mexico MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 176 census tracts, including 14 low-, 42 moderate-, 61 middle-, 52 upper-, and 7 unknown-income tracts. The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA, which is located in an upper-income census tract.
- The bank does not operate any ATMs in the AA.
- Based on the 2020 ACS data, the AA population was 676,444, which is a 0.4 percent increase from the 2015 ACS data.
- The AA is home to 159,218 total families. According to 2020 ACS data, 23.2 percent of families are low-, 16.0 percent are moderate-, 18.9 percent are middle-, and 41.9 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.3 percent, ranking 19th of 23 FDIC-insured financial institutions operating from 108 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ALBUQUERQUE METROPOLITAN AA

The Albuquerque Metropolitan AA 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 New Mexico.

Table 116

Assessment Area	Lending Test	Investment Test	Service Test
Albuquerque, New Mexico Metropolitan	Below	Exceeds	Consistent

STATE OF TEXAS

CRA rating for Texas	**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 adequate 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, is good.
- The bank is a leader in making CD loans within its Texas AAs.

Investment Test

- The bank makes an excellent level 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 excellent responsiveness to the credit and CD needs throughout its Texas 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 the AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Texas AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Texas was consistent with the overall scope for the institution. A full-scope review was conducted for the Dallas Metropolitan AA. A limited-scope review was conducted for the Austin Metropolitan AA to ascertain if the bank's performance was generally consistent with its performance in the overall state evaluation.

The bank originated a total of 77 loans in the state of Texas during the evaluation period, including 57 home mortgage and 20 small business loans. The bank's home mortgage lending was the only product evaluated due to an insufficient volume of small business lending distributed among the two AAs to conduct meaningful analyses.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS

The bank delineates 2 of its 24 AAs and operates 2 of its 93 branches in the state of Texas. The branch offices operate in the city of Dallas and Austin, respectively, which are two of the largest cities in the state. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

An interview with two members of the community as part of the CRA evaluation of another financial institution with branches 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 two members interviewed represented an area community development organization.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the lending test in the state of Texas is high satisfactory. The conclusion is derived from good lending test performance in the Dallas Metropolitan AA, which was bolstered by leader-level CD lending performance.

Lending Activity

The bank's overall lending activities in the state of Texas reflect adequate responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the

state generally mirror those outlined in the Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within its Texas AAs reflects an adequate distribution of loans among the different census tracts and dispersion throughout the AAs. This conclusion is consistent with the performance noted in the Dallas Metropolitan AA.

Lending to Borrowers of Different Income Levels

The bank's lending within its Texas AAs has an overall good penetration among individuals of different income levels, which is consistent with the performance noted in the Dallas Metropolitan AA.

Community Development Lending

The bank is a leader in making CD loans within the state of Texas, which influenced the overall state conclusion based on the significant CD lending volumes relative to its two-branch footprint in the state. The bank originated 7 CD loans totaling $30.6MM in AAs within the state, which places the performance in Texas as the fifth largest volume of CD lending among the bank's nine multistate/state evaluations both by number and dollar volume of CD lending. As the table illustrates, the bank's lending was responsive to area economic development needs, as well as responsive to the community services needs of LMI individuals.

Table 117

Community Development Loans – State of Texas		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	1	270
Economic Development	6	30,300
Revitalization and Stabilization	0	0
Total Loans	**7**	**30,570**

INVESTMENT TEST

The bank's overall performance under the investment test in the state is outstanding. The conclusion is supported by excellent investment test performance noted in the Dallas Metropolitan AA.

The bank has an excellent level of qualified CD investments and grants within Texas and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs. Consistent with other state evaluations, the bank's investments contained MBS that were responsive to area affordable housing needs, as well as philanthropic donations diversified among organizations that were responsive to the community services needs of LMI individuals and the economic development needs of small businesses.

Table 118

Investments, Grants, and Donations – State of Texas								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	8	2,172	1	423	0	0	9	2,595
Community Services	0	0	0	0	3	8	3	8
Economic Development	0	0	1	4,000	4	15	5	4,015
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**8**	**2,172**	**2**	**4,423**	**7**	**23**	**17**	**6,617**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Texas is outstanding, which is supported by excellent service test performance in the Dallas Metropolitan AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Texas AAs are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates two full-service branches with full-service ATMs in Texas, including its Dallas branch in a middle-income tract and its Austin branch in an upper-income tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There have been no branch closures or openings in Texas 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. The bank's operations and product and service offerings in the state generally mirror those of the overall institution, which is described in the Institution Retail Banking Services section of this evaluation.

Table 119

Retail Banking and Community Development Services – State of Texas												
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	50.0	50.0	0.0	100.0	14.0	31.4	25.6	26.1	2.9	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	50.0	50.0	0.0	100.0	14.1	30.5	27.4	26.6	1.5	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**
	0	8	2	0	10	7

[1] *Based on 2024 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 Texas, particularly given its limited branch presence in the state. As the table illustrates, the CD services were predominately responsive to the community services needs of LMI individuals and families, as well as organizations that support the economic development needs of small businesses.

DALLAS, TEXAS METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS, TEXAS METROPOLITAN AA

The bank's Dallas Metropolitan AA consists of Dallas County in its entirety, which is one of seven counties that comprise the Dallas-Plano-Irving, Texas Metropolitan Division (MD). Refer to Appendix C for additional demographic data.

- There have been no changes to the AA delineation since the prior evaluation.
- The bank's AA is comprised of 645 census tracts, including 107 low-, 223 moderate-, 160 middle-, 144 upper-, and 11 unknown-income tracts based on 2020 ACS data, which is unchanged since the prior examination.
- The bank operates one branch in downtown Dallas with a full-service ATM on the premises and located in a middle-income tract.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank ranked 59th of 113 FDIC-insured depository institutions operating from 576 locations in the AA, with a total deposit market share of 0.1 percent.
- An interview with two members of the community as part of the CRA evaluation of another financial institution with branches 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 two members interviewed represented an area community development organization.

Table 120

Population Change Assessment Area: Dallas, Texas Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Dallas, Texas Metropolitan	2,485,003	2,613,539	5.2
Dallas-Plano-Irving, TX MD	4,519,004	5,129,966	13.5
Texas	26,538,614	29,145,505	9.8
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 . Census Bureau Decennial Census*			

- The Dallas Metropolitan AA includes approximately 50.9 percent of the overall Dallas-Plano-Irving, Texas MD population.
- The population of the AA, and the surrounding MD, experienced growth between 2015 and 2020, although the greater MD that includes the AA noted a significant population surge during the same time-period.

Table 121

Median Family Income Change Assessment Area: Dallas, Texas Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Dallas, Texas Metropolitan	61,072	69,689	14.1
Dallas-Plano-Irving, TX MD	77,736	88,315	13.6
Texas	68,523	76,073	11.0

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.

- The AA has 11.4 percent of families living below poverty, which is higher than both the overall MD at 8.2 percent and statewide figure at 10.9 percent.

Table 122

Housing Cost Burden Assessment Area: Dallas, Texas Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Dallas, Texas Metropolitan	82.8	48.3	45.0	64.0	32.1	23.3
Dallas-Plano-Irving, TX MD	83.8	53.5	44.3	65.3	38.5	21.5
Texas	80.2	51.9	44.5	59.6	33.4	19.9

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- Housing costs in the AA are disproportionally more burdensome on low-income renters and homeowners across the AA, MD, and statewide figures.
- The housing affordability ratio in the AA was 31.8 percent, which is slightly higher than the greater MD, at 29.2 percent, and reflects less affordability than the statewide average of 34.1 percent.

Table 123

Unemployment Rates Assessment Area: Dallas, Texas Metropolitan					
Area	2020	2021	2022	2023	2024
Dallas, Texas Metropolitan	7.8	5.6	3.8	4.0	4.1
Dallas-Plano-Irving, TX MD	7.1	5.0	3.6	3.8	3.9
Texas	7.7	5.6	3.9	4.0	4.1

Source: BLS, Local Area Unemployment Statistics

- Unemployment in the AA trended similarly to the greater MD and statewide figures and is generally consistent with the comparison data.

- The AA's largest employers include University of Texas Southwestern Medical Center, Dallas Independent School District, Southwest Airlines, City of Dallas, Parkland Health & Hospital System, and AT&T.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS, TEXAS METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Dallas Metropolitan AA is good, which was bolstered by the bank's leadership in originating CD loans. The evaluation of lending in the AA considered only the bank's 2023 home mortgage lending activities due to insufficient lending volumes in 2024 to render meaningful performance conclusions. Additionally, only an analysis of total home mortgage lending and home purchase lending was conducted due to insufficient lending volumes in the individual home mortgage sub-products to conduct meaningful analyses. An evaluation of small business lending was also not conducted due to insufficient lending volumes.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 64 loans in this AA, including 51 home mortgage loans and 13 small business loans during the evaluation period.

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 Lending Activity section of this evaluation.

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The geographic distribution of 2023 home mortgage lending in low-income tracts was significantly above the aggregate lending data, as well as the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data as well as the demographic figure.

There were gaps/lapses in the dispersion of lending that include LMI tracts; however, given the very limited volume of lending within the AA relative to the substantial volume of overall tracts in the AA, it is reasonable to observe gaps in lending and, as such, there was no impact to the performance conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2023 loans among low-income tracts was significantly above the aggregate lending data, as well as the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data and below the demographic figure.

Table 124

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Dallas, Texas Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	6	20.0	12.8	1,581	17.4	7.5	1	9.1	12.0	211	7.0	7.2	10.5
Moderate	6	20.0	29.3	1,668	18.4	21.3	3	27.3	28.6	813	26.8	20.5	32.6
Middle	14	46.7	30.7	4,748	52.4	26.8	4	36.4	32.4	1,159	38.2	28.2	29.1
Upper	4	13.3	26.3	1,066	11.8	43.3	3	27.3	26.2	849	28.0	43.0	27.4
Unknown	0	0.0	0.8	0	0.0	1.1	0	0.0	0.9	0	0.0	1.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	9,063	100.0	100.0	11	100.0	100.0	3,032	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	9.7	0	0.0	5.5	0	0.0	9.8	0	0.0	5.8	10.5
Moderate	1	25.0	31.5	293	19.8	20.8	1	50.0	30.0	240	42.1	20.9	32.6
Middle	1	25.0	32.0	331	22.3	24.9	1	50.0	32.7	330	57.9	25.3	29.1
Upper	2	50.0	26.4	857	57.9	48.3	0	0.0	27.1	0	0.0	47.6	27.4
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0.4
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	1,481	100.0	100.0	2	100.0	100.0	570	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.6	0	0.0	3.9	0	0.0	6.8	0	0.0	3.9	10.5
Moderate	1	100.0	19.5	80	100.0	12.8	1	100.0	22.4	150	100.0	13.6	32.6
Middle	0	0.0	26.5	0	0.0	17.2	0	0.0	28.0	0	0.0	21.1	29.1
Upper	0	0.0	47.4	0	0.0	64.9	0	0.0	41.8	0	0.0	59.9	27.4
Unknown	0	0.0	1.0	0	0.0	1.2	0	0.0	1.0	0	0.0	1.5	0.4
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	80	100.0	100.0	1	100.0	100.0	150	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	33.3	0	0.0	23.5	0	0.0	26.0	0	0.0	12.4	24.6
Moderate	0	0.0	29.7	0	0.0	22.1	0	0.0	39.1	0	0.0	38.4	29.2
Middle	0	0.0	19.4	0	0.0	24.4	0	0.0	17.2	0	0.0	28.8	23.0
Upper	0	0.0	16.4	0	0.0	29.7	0	0.0	15.4	0	0.0	17.3	20.7
Unknown	0	0.0	1.2	0	0.0	0.5	0	0.0	2.4	0	0.0	3.1	2.5
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	7	18.9	11.8	1,835	16.7	9.5	1	7.1	11.2	211	5.6	7.7	10.5
Moderate	9	24.3	29.2	2,141	19.5	21.0	5	35.7	28.6	1,203	32.1	23.3	32.6
Middle	15	40.5	30.6	5,079	46.3	25.8	5	35.7	32.1	1,489	39.7	27.6	29.1
Upper	6	16.2	27.7	1,923	17.5	42.8	3	21.4	27.3	849	22.6	40.1	27.4
Unknown	0	0.0	0.7	0	0.0	0.9	0	0.0	0.8	0	0.0	1.4	0.4
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	10,978	100.0	100.0	14	100.0	100.0	3,752	100.0	100.0	100.0

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.*
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.

Lending to Borrowers of Different Income Levels

The bank's lending has a good distribution among individuals of different income levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The distribution of 2023 loans to low-income borrowers was comparable to the aggregate lending data, as well as the demographic figure. Lending to moderate-income borrowers was significantly above the aggregate lending data and above the demographic figure.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank did not originate a home purchase loan in 2023 to a low-income borrower; however, the aggregate lending data similarly reflects a limited concentration of lending to low-income borrowers, although both sets of data were significantly below the demographic figure. Conversely, lending to moderate-income borrowers was significantly above the aggregate lending data and above the demographic figure.

Table 125

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Dallas, Texas Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.5	0	0.0	1.5	1	9.1	3.7	193	6.4	1.7	30.4
Moderate	9	30.0	17.1	2,273	25.1	10.3	3	27.3	16.6	729	24.0	10.0	20.1
Middle	10	33.3	19.4	2,733	30.2	14.9	3	27.3	18.8	883	29.1	14.5	18.5
Upper	11	36.7	35.3	4,057	44.8	51.5	4	36.4	34.3	1,227	40.5	49.6	31.1
Unknown	0	0.0	24.7	0	0.0	21.7	0	0.0	26.6	0	0.0	24.2	0.0
Total	30	100.0	100.0	9,063	100.0	100.0	11	100.0	100.0	3,032	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	13.6	0	0.0	6.6	0	0.0	12.5	0	0.0	5.4	30.4
Moderate	1	25.0	20.9	161	10.9	12.0	1	50.0	18.5	240	42.1	9.8	20.1
Middle	0	0.0	19.0	0	0.0	13.3	1	50.0	16.6	330	57.9	11.1	18.5
Upper	3	75.0	29.7	1,320	89.1	46.2	0	0.0	28.8	0	0.0	44.1	31.1
Unknown	0	0.0	16.7	0	0.0	21.9	0	0.0	23.7	0	0.0	29.5	0.0
Total	4	100.0	100.0	1,481	100.0	100.0	2	100.0	100.0	570	100.0	100.0	100.0
Home Improvement Loans													
Low	1	100.0	8.2	80	100.0	3.8	1	100.0	9.0	150	100.0	3.8	30.4
Moderate	0	0.0	12.2	0	0.0	6.2	0	0.0	16.3	0	0.0	8.9	20.1
Middle	0	0.0	16.0	0	0.0	10.0	0	0.0	16.9	0	0.0	9.8	18.5
Upper	0	0.0	59.1	0	0.0	71.1	0	0.0	49.4	0	0.0	63.1	31.1
Unknown	0	0.0	4.5	0	0.0	8.9	0	0.0	8.4	0	0.0	14.4	0.0
Total	1	100.0	100.0	80	100.0	100.0	1	100.0	100.0	150	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	2.7	5.6	80	0.7	2.3	2	14.3	6.0	343	9.1	2.5	30.4
Moderate	11	29.7	17.3	2,534	23.1	10.3	4	28.6	16.8	969	25.8	9.9	20.1
Middle	11	29.7	18.9	2,987	27.2	14.3	4	28.6	18.1	1,213	32.3	13.7	18.5
Upper	14	37.8	35.4	5,377	49.0	51.4	4	28.6	34.0	1,227	32.7	49.2	31.1
Unknown	0	0.0	22.8	0	0.0	21.7	0	0.0	25.1	0	0.0	24.8	0.0
Total	37	100.0	100.0	10,978	100.0	100.0	14	100.0	100.0	3,752	100.0	100.0	100.0

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.
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.

Community Development Lending

The bank is a leader in providing CD loans in the AA which had a positive influence on the overall AA lending test conclusion. The bank originated four CD loans totaling $25.8MM, which ranks 7th of the bank's 24 AAs by CD lending dollar volume. This volume represents a significant volume of CD lending relative to the bank's limited operational presence in the AA. Examples of CD lending in the AA include:

- The bank provided a total of $12.8MM in financing to a small business manufacturing facility that provides permanent job creation and retention for LMI individuals.
- The bank originated a $13.0MM loan for the construction of an assisted living facility located in a moderate-income area that provides permanent job creation and retention for LMI individuals.

Table 126

Community Development Loans – Dallas, Texas Metropolitan AA		
Community Development Purpose	#	(000)
Affordable Housing	0	0
Community Services	0	0
Economic Development	4	25,750
Revitalization and Stabilization	0	0
Total Loans	4	25,750

INVESTMENT TEST

The bank's performance under the investment test in the Dallas Metropolitan 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 excellent responsiveness to the credit and CD needs of its AA.

Consistent with other AAs, the bank's investments included MBS which were responsive to area affordable housing needs, as well as philanthropic donations which were diversified among community services which benefited LMI individuals and families, as well as activities that were responsive to the needs of small businesses. Examples of CD donations in the AA include:

- A total of $5M benefited the economic development needs of an area organization that provides entrepreneurship training to underserved individuals to start, scale, and sustain small businesses.
- A donation of $5M to a youth education organization that targets the underserved school districts within Dallas where a substantial population of students are eligible for free or reduced lunches under the NSLP.

Table 127

Investments, Grants, and Donations – Dallas, Texas Metropolitan AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	2	619	1	423	0	0	3	1,041
Community Services	0	0	0	0	2	7	2	7
Economic Development	0	0	1	4,000	3	10	4	4,010
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**2**	**619**	**2**	**4,423**	**5**	**17**	**9**	**5,058**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Dallas Metropolitan 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 one branch facility in the AA with a full-service ATM on the premises, located in a middle-income tract in downtown Dallas. This location is approximately one mile or less from two low- and three moderate-income tracts, providing accessibility of banking services for these areas.

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 branch facilities in the AA since the prior 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. Bank operations and product offerings in the AA generally mirror those in other markets, which are described in the Institution Retail Banking Services section of this evaluation.

Table 128

Retail Banking and Community Development Services – Dallas, Texas Metropolitan AA												
Branch Accessibility	**Location of Branches by Tract (%)**						**Percent of Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	0.0	0.0	100.0	0.0	0.0	100.0	16.6	34.6	24.8	22.3	1.7	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	17.4	33.6	26.0	21.9	1.2	100.0
Changes in Branch Location	**Number of Branches (#)**						**Net Change in Branch Locations (#)**					
	Total Branches		**Openings (#)**		**Closings (#)**		**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	1		0		0		0	0	0	0	0	0
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	0		3		2		0		5		5	

[1] *Based on 2024 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 in the AA, particularly given its single-branch office in the AA relative to its other AAs with a larger volume of branch operations. During the evaluation, four bank employees provided five CD services predominately utilizing their expertise to provide financial literacy instruction and in board service. Examples of the CD services performed in the AA include:

- A bank employee provided their financial expertise with board service for an area organization that provides resources and access to funding sources for small businesses.
- A bank employee provided their financial expertise serving on the board of an area nonprofit organization that provides an array of community services to LMI individuals, particularly youth, with trauma support programs, workforce development, and self-sufficiency care services.

AUSTIN METROPOLITAN ASSESSMENT AREA

(Limited-Scope Review)

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

The bank's Austin Metropolitan AA consists of the entirety of Travis County, which is part of the greater Austin-Round Rock-San Marcos, Texas MSA. Refer to Appendix D for additional demographic data.

- The AA delineation remains unchanged from the previous CRA evaluation.
- The AA is comprised of a total of 290 census tracts, including 24 low-, 71 moderate-, 79 middle-, 100 upper-, and 16 unknown-income census tracts. The census tract composition remains unchanged since the previous examination.
- The bank operates 1 of its 93 banking offices in the AA. The single office is located in an upper-income census tract.
- The bank operates one full-service ATM at its sole branch location.
- Based on the 2020 ACS data, the AA population was 1,290,188, which reflects a 15.0 percent increase from the 2015 ACS data.
- The AA is home to 280,144 total families. According to 2020 ACS data, 21.8 percent of families are low-, 16.5 percent are moderate-, 19.8 percent are middle-, and 41.9 percent are upper-income.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 0.1 percent, ranking 48th of 60 FDIC-insured financial institutions operating from 234 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE AUSTIN METROPOLITAN AA

The Austin Metropolitan AA 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 AA do not change the rating for the state of Texas.

Table 129

Assessment Area	Lending Test	Investment Test	Service Test
Austin Metropolitan	Consistent	Consistent	Consistent

STATE OF WYOMING / WESTERN WYOMING

CRA rating for Wyoming:	**Satisfactory**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**High Satisfactory**
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 adequate.
- The bank is a leader in making CD loans within its Western Wyoming AA.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits good responsiveness to the credit and CD needs throughout its Western Wyoming 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 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 Western Wyoming AA 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. A full-scope review was conducted for the Western Wyoming AA, which represents the bank's only AA in the state and, as such, this analysis will reflect the statewide performance evaluation for Wyoming. The evaluation of the bank's geographic and borrower distribution performance relied on the bank's home mortgage and small business lending concentrations, as small farm lending did not contain sufficient volumes to render meaningful performance conclusions. Weighting among lending products was even between home mortgage and small business lending. Additionally, only an evaluation of total home mortgage lending and home purchase lending was evaluated in the analysis of home mortgage lending performance given insufficient volumes in the sub-product lines to conduct meaningful analyses.

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

The bank's Western Wyoming AA consists of the entirety of Fremont, Lincoln, Sublette, and Teton, Wyoming Counties. Refer to Appendix C for additional demographic data.

- This AA was added in December 2022 with the Bank of Jackson Hole (BOJH), Jackson, Wyoming acquisition and not included in the 2024 CRA evaluation.
- The bank operates 8 of its 93 banking offices in the AA, including 5 offices in middle- and 3 in upper-income tracts. Within this evaluation period, the bank closed a bank office in a middle-income census tract in Jackson, Wyoming.
- The bank operates three full-service ATMs with two in middle- and one in an upper-income census tract.
- The AA is comprised of a total of 27 census tracts, including 5 moderate-, 15 middle-, and 7 upper-income census tracts. Two tracts in Sublette County were designated as underserved middle-income tracts by the FFIEC during the evaluation period.
- According to the June 30 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 28.2 percent, ranking 1st of 13 FDIC-insured financial institutions operating from 44 offices in the AA.

Table 130

Population Change Assessment Area: Western Wyoming			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Western Wyoming	91,499	90,874	(0.7)
Fremont County, WY	40,755	39,234	(3.7)
Lincoln County, WY	18,316	19,581	6.9
Sublette County, WY	10,117	8,728	(13.7)
Teton County, WY	22,311	23,331	4.6
NonMSA Wyoming	404,237	396,384	(1.9)
Wyoming	579,679	576,851	(0.5)

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census

- Western Wyoming's mixed population change results reflect the divergence between energy-dependent and tourism-based economies. Sublette County, where the largest industry is mining – specifically oil and gas extraction, which dominates employment and local economic activity – experienced the steepest population decline at 13.7 percent.
- In contrast, Teton County's tourism-based economy showed resilience with 4.6 percent growth. The tourism industry centered around Jackson Hole and Grand Teton/Yellowstone National Parks along with its recreation and service economy, proved less vulnerable to energy sector downturns that affected other parts of the AA.

Table 131

Median Family Income Change Assessment Area: Western Wyoming			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Western Wyoming	81,416	82,410	1.2
Fremont County, WY	70,683	66,615	(5.8)
Lincoln County, WY	81,428	89,792	10.3
Sublette County, WY	95,253	94,267	(1.0)
Teton County, WY	102,094	101,189	(0.9)
NonMSA Wyoming	79,576	81,346	2.2
Wyoming	79,970	81,290	1.7

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.

- Sublette County's dominant industry – involving extensive natural gas production, particularly in the Pinedale Anticline area – offers some of the highest wages and dictates much of the county's economic health.

- While Teton County MFI figures are elevated, this does not represent the typical income of a local resident. The county experiences extreme wealth disparity, with the top income earners driving the high average, while many workers struggle with the high cost of living.

Table 132

Housing Cost Burden Assessment Area: Western Wyoming						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Western Wyoming	61.5	32.0	32.	50.2	28.8	17.7
Fremont County, WY	59.6	30.5	34.3	54.7	27.6	19.6
Lincoln County, WY	67.9	5.6	26.1	39.5	30.6	11.9
Sublette County, WY	57.8	70.0	40.7	29.4	31.6	12.8
Teton County, WY	62.0	41.4	31.8	68.4	28.6	22.8
NonMSA Wyoming	67.0	21.5	35.1	51.9	26.6	16.7
Wyoming	70.0	23.5	36.7	55.7	29.8	17.6

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- The cost burden for LMI owners in Teton County, Wyoming, is the highest due to significant increases in home prices. According to FFIEC Census data in 2020, the median housing value in Teton County, Wyoming was $850,800, which is 8.4 times the 2020 MFI.
- Due to significant housing affordability challenges in Teton County, Wyoming, a substantial portion of the workforce resides in neighboring bedroom communities and counties.

Table 133

Unemployment Rates Assessment Area: Western Wyoming					
Area	2020	2021	2022	2023	2024
Western Wyoming	6.1	4.2	3.3	2.9	3.1
Fremont County, WY	6.7	5.1	4.1	3.6	3.9
Lincoln County, WY	4.6	3.6	3.1	2.8	3.0
Sublette County, WY	6.3	4.9	3.3	2.8	3.1
Teton County, WY	6.1	3.4	2.7	2.2	2.4
NonMSA Wyoming	5.7	4.4	3.4	2.9	3.2
Wyoming	5.9	4.5	3.4	2.9	3.2

Source: BLS, Local Area Unemployment Statistics

- Major industries in the AA are accommodation and food services, retail trade, construction, and health care and social services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN WYOMING AA

LENDING TEST

The bank's performance under the lending test in the State of Wyoming is rated high satisfactory, which is derived from a good lending test conclusion in the Western Wyoming AA and supported by adequate penetration noted in the geographic and borrower distribution analyses. The lending test conclusion was bolstered by the bank's leadership in originating qualified CD loans within the AA.

It is noted that in the evaluation of home mortgage lending that follows, only 2023 home purchase lending was evaluated in the sub-product evaluation given insufficient lending volume in 2024 to render meaningful performance conclusions.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The bank originated a total of 213 loans in the AA, including 106 home mortgage loans, 105 small business loans, and 2 small farm loans.

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 Lending Activity section of this report.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects an adequate distribution among the different census tracts and dispersion throughout the AA after consideration of area performance context.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As discussed in the description of the AA, there were no low-income tracts in the AA during the evaluation period. The bank did not originate a home mortgage loan in either of the AA's two moderate-income census tracts in 2024, which was significantly below both the aggregate lending data and the demographic figure; however, the bank operates six of its eight banking offices in the western-most portion of its four-county AA, including Teton (five offices) and Lincoln (one office) Counties, which are comprised of middle- and upper-income tracts and are between 65 and 80 miles, respectively, from the AA's moderate-income areas. The bank's offices in Pinedale and Duboise operate approximately 22 and 10 miles, respectively, from the nearest AA moderate-income census tracts. Given the geographic impacts of the area, the bank's lack of routine lending in these moderate-

income areas did not negatively impact the bank's performance in this evaluative component.

The bank's lending performance in 2023 was consistent with the 2024 lending distributions and contextual performance factors.

An analysis of the dispersion of loans revealed some conspicuous lending gaps and lapses that include LMI tracts; however, for the geographic factors listed above, there was no impact on the performance conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate**.** The bank did not originate a home purchase loan in a moderate-income tract in 2023, which aligns with the performance context discussion listed above in the analysis of total home mortgage lending.

Table 134

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Western Wyoming

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	11.7	0	0.0	2.8	0	0.0	12.6	0	0.0	4.1	15.0
Middle	16	53.3	55.7	8,742	34.3	44.3	9	37.5	61.0	18,170	58.0	46.6	58.5
Upper	14	46.7	32.6	16,717	65.7	52.9	15	62.5	26.5	13,179	42.0	49.2	26.4
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	30	100.0	100.0	25,459	100.0	100.0	24	100.0	100.0	31,349	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	0	0.0	6.2	0	0.0	1.3	0	0.0	8.9	0	0.0	4.3	15.0
Middle	5	38.5	48.2	2,577	31.9	30.8	7	77.8	67.1	6,469	90.9	54.4	58.5
Upper	8	61.5	45.6	5,513	68.1	67.9	2	22.2	24.0	650	9.1	41.3	26.4
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	13	100.0	100.0	8,090	100.0	100.0	9	100.0	100.0	7,119	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	0	0.0	4.9	0	0.0	1.0	0	0.0	7.1	0	0.0	4.2	15.0
Middle	2	18.2	55.9	65	4.2	36.7	2	28.6	60.7	350	27.3	45.5	58.5
Upper	9	81.8	39.2	1,465	95.8	62.4	5	71.4	32.1	930	72.7	50.3	26.4
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	11	100.0	100.0	1,530	100.0	100.0	7	100.0	100.0	1,280	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	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	2.4	10.4
Middle	0	0.0	62.5	0	0.0	59.4	1	100.0	71.4	85	100.0	45.1	41.7
Upper	0	0.0	37.5	0	0.0	40.6	0	0.0	14.3	0	0.0	52.5	47.9
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	1	100.0	100.0	85	100.0	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	0	0.0	8.6	0	0.0	1.9	0	0.0	10.6	0	0.0	3.9	15.0
Middle	24	40.7	52.4	11,419	32.0	38.0	23	48.9	62.9	25,339	62.9	47.4	58.5
Upper	35	59.3	39.0	24,248	68.0	60.0	24	51.1	26.5	14,944	37.1	48.6	26.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	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	59	100.0	100.0	35,667	100.0	100.0	47	100.0	100.0	40,283	100.0	100.0	100.0

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.*
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 bank did not originate a small business loan in a moderate-income census tract in 2024, which was significantly below both the aggregate lending data and the demographic figure; however, the same contextual performance factors discussed in the home mortgage lending evaluation related to geographic limitations in routinely penetrating the AA's moderate-income tracts is applicable to the evaluation of the bank's small business lending.

The geographic distribution of small business lending performance in 2023 was consistent with the 2024 lending distributions and contextual performance factors.

Table 135

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Western Wyoming

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	3.8	0	0.0	1.8	0	0.0	4.7	0	0.0	4.5	11.0
Middle	30	49.2	49.7	7,504	47.0	54.7	21	47.7	50.3	5,580	41.8	49.8	57.6
Upper	31	50.8	42.6	8,451	53.0	42.4	23	52.3	41.1	7,785	58.2	44.7	31.4
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	4.0	0	0.0	1.1	0	0.0	4.0	0	0.0	1.0	
Total	61	100.0	100.0	15,955	100.0	100.0	44	100.0	100.0	13,365	100.0	100.0	100.0

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

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of both home mortgage lending and small business lending reflect adequate penetration.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 loans to low-income borrowers was comparable to the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data and the demographic figure.

The distribution of home mortgage loans by borrower income in 2023 reflected performance above 2024 lending patterns and supported the overall conclusion.

Home Purchase Loans

The borrower distribution of home purchase lending is poor. The distribution of 2023 home purchase loans to low-income borrowers was above the aggregate lending data by number, significantly above aggregate by dollar, and significantly below the demographic figure. Lending to moderate-income borrowers was significantly below the aggregate lending data as well as the demographic figure. Given very low lending numbers overall to LMI individuals in 2023 and 2024, the performance is considered poor.

Table 136

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Western Wyoming

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	3.3	2.7	191	0.8	0.5	0	0.0	1.8	0	0.0	0.5	17.5
Moderate	1	3.3	11.1	194	0.8	2.8	1	4.2	13.8	252	0.8	4.5	18.1
Middle	7	23.3	16.2	1,577	6.2	5.9	2	8.3	19.3	591	1.9	9.5	23.6
Upper	18	60.0	32.2	13,237	52.0	34.9	17	70.8	46.3	14,747	47.0	62.4	40.8
Unknown	3	10.0	37.9	10,260	40.3	55.9	4	16.7	18.9	15,759	50.3	23.1	0.0
Total	30	100.0	100.0	25,459	100.0	100.0	24	100.0	100.0	31,349	100.0	100.0	100.0
Refinance Loans													
Low	1	7.7	5.3	18	0.2	0.8	0	0.0	5.5	0	0.0	2.1	17.5
Moderate	2	15.4	9.4	570	7.0	2.1	2	22.2	15.7	525	7.4	6.4	18.1
Middle	2	15.4	12.2	890	11.0	3.2	1	11.1	17.1	170	2.4	9.3	23.6
Upper	7	53.8	24.1	6,043	74.7	17.7	6	66.7	40.4	6,424	90.2	55.7	40.8
Unknown	1	7.7	48.9	569	7.0	76.3	0	0.0	21.3	0	0.0	26.5	0.0
Total	13	100.0	100.0	8,090	100.0	100.0	9	100.0	100.0	7,119	100.0	100.0	100.0
Home Improvement Loans													
Low	1	9.1	4.9	25	1.6	1.2	0	0.0	7.1	0	0.0	2.6	17.5
Moderate	1	9.1	11.2	40	2.6	2.9	0	0.0	16.1	0	0.0	7.4	18.1
Middle	2	18.2	16.1	200	13.1	6.3	2	28.6	16.1	210	16.4	7.4	23.6
Upper	6	54.5	46.9	765	50.0	38.7	4	57.1	50.9	970	75.8	71.1	40.8
Unknown	1	9.1	21.0	500	32.7	50.8	1	14.3	9.8	100	7.8	11.6	0.0
Total	11	100.0	100.0	1,530	100.0	100.0	7	100.0	100.0	1,280	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	5.1	3.8	234	0.7	0.6	1	2.2	3.6	100	0.2	1.0	17.5
Moderate	4	6.8	10.5	804	2.3	2.3	4	8.7	14.4	887	2.2	4.9	18.1
Middle	11	18.6	14.4	2,667	7.5	4.4	7	15.2	18.4	1,091	2.7	9.0	23.6
Upper	36	61.0	32.0	20,633	57.8	28.9	29	63.0	45.3	22,261	55.4	59.4	40.8
Unknown	5	8.5	39.4	11,329	31.8	63.7	5	10.9	18.3	15,859	39.5	25.7	0.0
Total	59	100.0	100.0	35,667	100.0	100.0	46	100.0	100.0	40,198	100.0	100.0	100.0

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.
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

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of 2024 lending to small businesses with gross annual revenues of $1 million or less was below the aggregate lending data and significantly below the demographic figure.

The distribution of loans originated in 2023 to small businesses was above the performance noted in 2024 lending patterns and supports the overall conclusion.

Table 137

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Western Wyoming

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	22	36.1	45.8	4,986	31.3	31.6	9	20.5	43.9	2,756	20.6	31.2	90.1
Over $1 Million	35	57.4		9,982	62.6		33	75.0		10,142	75.9		8.1
Revenue Unknown	4	6.6		987	6.2		2	4.5		467	3.5		1.8
Total	61	100.0		15,955	100.0		44	100.0		13,365	100.0		100.0
By Loan Size													
$100,000 or Less	26	42.6	94.0	1,824	11.4	46.3	11	25.0	93.8	693	5.2	48.5	
$100,001 - $250,000	15	24.6	3.3	2,619	16.4	15.5	14	31.8	3.9	2,589	19.4	18.3	
$250,001 - $1 Million	20	32.8	2.7	11,512	72.2	38.1	19	43.2	2.3	10,083	75.4	33.3	
Total	61	100.0	100.0	15,955	100.0	100.0	44	100.0	100.0	13,365	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	11	50.0		564	11.3		2	22.2		108	3.9		
$100,001 - $250,000	3	13.6		517	10.4		4	44.4		833	30.2		
$250,001 - $1 Million	8	36.4		3,905	78.3		3	33.3		1,815	65.9		
Total	22	100.0		4,986	100.0		9	100.0		2,756	100.0		

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

Community Development Lending

The bank is a leader in providing CD loans in the AA. As illustrated in the table, the bank originated 12 CD loans totaling $52.5MM in the AA, which was comprised of a variety of loans which were most responsive to the economic development needs of area small businesses, as well as supported area affordable housing needs and the community services needs of LMI individuals. Examples of CD lending include:

- The bank originated a $20MM loan to a small business that provides performant job creation for LMI individuals. The loan financed the construction of affordable workforce housing, which is particularly responsive to a significant need of a resort area with notably high-cost housing.

- The bank provided $4.5MM in financing for a small area hospitality business that provides permanent job creation and retention for LMI individuals.

Table 138

Community Development Loans – Western Wyoming AA		
Community Development Purpose	#	**(000)**
Affordable Housing	3	7,910
Community Services	1	3,500
Economic Development	8	41,092
Revitalization and Stabilization	0	0
Total Loans	**12**	**52,502**

INVESTMENT TEST

The bank's performance under the investment test in the state of Wyoming is rated high satisfactory and is supported by good performance in the Western Wyoming AA. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits good responsiveness to the credit and CD needs of its AA. Consistent with the bank's predominate investment strategies, the largest dollar composition of investments is comprised of MBS that is responsive to area affordable housing needs. The bank's philanthropic donation activities include:

- The bank made one donation of $30M to the local chapter of an organization that provides an array of services to LMI individuals and families to address affordable housing needs and homelessness.
- The bank donated a total of $21.3M to a local area organization that provides educational resources and services for economically disadvantaged children.

Table 139

Investments, Grants, and Donations – Western Wyoming AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	0	0	2	794	2	35	4	829
Community Services	0	0	0	0	9	47	9	47
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**2**	**794**	**11**	**82**	**13**	**875**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the State of Wyoming is rated outstanding and supported by excellent service test performance in the Western Wyoming AA.

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 a total of eight offices in the four-county AA, including five in middle- and three in upper-income tracts. Additionally, three full-service ATMs are situated throughout the AA with two in middle- and one in an upper-income tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The entirety of the bank's operations in Wyoming are new since the prior evaluation, as discussed in the description of the institution's operations section of this state 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. The bank's operations and product offerings in the AA generally mirror that of the overall institution, which are described in the Institution Retail Services section of this report.

Table 140

Retail Banking and Community Development Services – Western Wyoming AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	62.5	37.5	0.0	100.0	0.0	18.5	55.6	25.9	0.0	100.0
	Location of Full-Service 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	66.7	33.3	0.0	100.0	0.0	15.9	57.0	27.1	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
	8		9		1		0	0	5	3	0	8
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	6		40		2		0		48		23	

1. *Based on 2024 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 in the AA. Bank representatives performed a substantial volume of CD services in the AA relative to the bank's operational presence, as staff performed 48 qualified CD services to 23 area organizations during the two-year evaluation period. This volume of services ranked second among bank-wide AAs and was particularly responsive to area organizations that provide community services to LMI individuals and families. Examples of CD services performed in this AA include:

- Four bank representatives provided a total of five qualified services during the evaluation period providing their financial expertise on board membership or financial literacy instruction for an organization that provides an array of services in response to area affordable housing needs.
- Three bank representatives provided their financial expertise for the benefit of a rural area food bank that provides critical nutritional care for individuals facing food insecurity.

STATE OF IDAHO / BOISE, IDAHO METROPOLITAN

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate 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 adequate.
- The bank is a leader in making CD loans within the AA.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally 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 of its AA.

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Idaho was consistent with the overall scope for the institution. A full-scope review was conducted for the Boise Metropolitan AA, which represents the bank's only operational market within the state. As such, the state rating

is reflective of the bank's performance in the AA. The evaluation of the bank's geographic and borrower distribution performance relied on the bank's small business lending and home mortgage lending patterns; however, it is noted that due to extremely low lending volumes among the products evaluated, very limited information was present to decisively conclude meaningful performance. Additionally, within the evaluation of products, the bank's small business lending was only analyzed for 2023 originations and home mortgage lending for 2024 originations, given these presented the largest volumes of lending over the two years of reported data.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE STATE OF IDAHO/BOISE, IDAHO METROPOLITAN AA

The bank's only state AA, the Boise, Idaho Metropolitan AA, consists of the entirety of Ada County, which is one of the five counties that comprise the Boise City MSA. Refer to Appendix C for additional demographic data.

- This is a new AA since the previous examination, which was added with the BOJH acquisition in December 2022.
- The bank's AA is comprised of 129 census tracts, including 2 low-, 15 moderate-, 60 middle-, 51 upper- and 1 unknown-income tract(s) based on 2020 ACS data.
- The bank operates two branches in Boise with a full-service ATM on the premises at each location, with one location in a middle-income tract and the other in an upper-income tract. The bank closed a third location in November 2023.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank ranked 20th of 22 FDIC-insured depository institutions operating from 108 locations in the AA, with a total deposit market share of 0.2 percent.

Table 141

Population Change Assessment Area: Boise, Idaho Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Boise, Idaho Metropolitan	417,501	494,967	18.6
Boise City, ID MSA	651,402	764,718	17.4
Idaho	1,616,547	1,839,106	13.8
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

- The city of Boise is the largest in the state with a population of 238,443.
- The Boise, Idaho Metropolitan AA population represents 64.7 percent of the greater Boise City, Idaho MSA and 26.9 percent of the state's total population.

Table 142

Median Family Income Change Assessment Area: Boise, Idaho Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Boise, Idaho Metropolitan	76,253	86,217	13.1
Boise City, ID MSA	67,436	77,090	14.3
Idaho	62,903	70,885	12.7

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.

- The MFI in the AA reflected an increase between 2016 and 2020 at a pace slightly below that of the greater Boise City MSA and at a pace slightly above that of the state.
- The AA has 5.8 percent of families living below poverty, which is lower than both the overall greater MSA at 6.7 percent and the state at 8.1 percent.

Table 143

Housing Cost Burden Assessment Area: Boise, Idaho Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Boise, Idaho Metropolitan	80.0	59.0	41.6	64.7	40.5	17.8
Boise City, ID MSA	76.1	53.8	40.9	58.9	35.4	18.0
Idaho	75.6	44.5	40.2	59.2	34.4	18.7

Cost Burden is housing cost that equals 30 percent or more of household income
Source: HUD, 2018-2022 Comprehensive Housing Affordability Strategy

- Housing costs in the AA are disproportionally more burdensome on low-income renters across the AA, greater MSA, and statewide figures.
- The housing affordability ratio in the AA was 23.2 percent, which reflects slightly less affordable housing when compared to both the greater MSA at 24.1 percent and the statewide figure of 25.0 percent.

Table 144

Unemployment Rates Assessment Area: Boise, Idaho Metropolitan					
Area	2020	2021	2022	2023	2024
Boise, Idaho Metropolitan	5.5	3.3	2.5	2.9	3.3
Boise City, ID MSA	5.6	3.4	2.6	3.0	3.5
Idaho	5.5	3.6	2.9	3.2	3.7

Source: BLS, Local Area Unemployment Statistics

- The AA, greater MSA, and statewide unemployment figures are all very similar to one another with the trend from 2020 to 2023 showing a decrease in unemployment that is starting to shift slightly higher in 2024.
- The largest employers in the Boise area include St. Luke's Health System, Micron Technology, St. Alphonsus Health System, Albertsons, and Boise State University.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF IDAHO/BOISE, IDAHO METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the State of Idaho is rated high satisfactory, which is derived from a good lending test conclusion in the Boise Metropolitan AA. The lending test conclusion was influenced by the significant volume of CD lending in the AA, which had a favorable impact on the conclusion.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The bank originated a total of 28 loans in the Boise Metropolitan AA during the evaluation period, including 15 small business and 13 home mortgage loans. The bank did not report a small farm loan origination during the evaluation period.

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 Lending Activity section of this report.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. This conclusion was derived from adequate distribution noted among small business and home mortgage lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As discussed in the scope section of this state evaluation, only the bank's 2023 home mortgage lending was analyzed given such low lending volumes in 2024, as reflected in the table below.

The bank did not originate a home mortgage loan in 2023 in a low-income tract; however, the aggregate lending data and demographic figure reflect a very limited concentration of lending and opportunities present. Lending among moderate-income tracts was above

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

An analysis of the dispersion of lending among the various income census tracts in the AA revealed gaps in lending, particularly among LMI census tracts; however, given the very limited volume of lending in the analysis, there was no impact to the performance conclusion.

Table 145

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Boise, Idaho Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.4	0.4
Moderate	1	12.5	8.3	425	9.1	6.8	1	33.3	9.0	575	38.8	7.1	8.1
Middle	4	50.0	41.1	2,146	46.1	36.6	0	0.0	41.1	0	0.0	34.9	48.6
Upper	3	37.5	50.2	2,089	44.8	56.2	2	66.7	49.4	907	61.2	57.7	42.9
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	8	100.0	100.0	4,660	100.0	100.0	3	100.0	100.0	1,482	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	0.4
Moderate	0	0.0	8.4	0	0.0	6.9	0	0.0	8.0	0	0.0	6.7	8.1
Middle	0	0.0	51.0	0	0.0	46.5	0	0.0	48.4	0	0.0	43.4	48.6
Upper	1	100.0	40.3	350	100.0	46.2	1	100.0	43.2	230	100.0	49.7	42.9
Unknown	0	0.0	0.0	0	0.0	0.1	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	350	100.0	100.0	1	100.0	100.0	230	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.6	0	0.0	0.4	0.4
Moderate	0	0.0	7.5	0	0.0	5.5	0	0.0	7.6	0	0.0	6.2	8.1
Middle	0	0.0	47.9	0	0.0	41.7	0	0.0	48.0	0	0.0	41.7	48.6
Upper	0	0.0	44.4	0	0.0	52.7	0	0.0	43.7	0	0.0	51.6	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	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	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	5.0	0	0.0	10.5	0	0.0	10.5	0	0.0	0.4	4.1
Moderate	0	0.0	40.0	0	0.0	10.1	0	0.0	31.6	0	0.0	7.6	19.7
Middle	0	0.0	35.0	0	0.0	26.5	0	0.0	26.3	0	0.0	19.0	40.7
Upper	0	0.0	20.0	0	0.0	52.9	0	0.0	31.6	0	0.0	73.1	31.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.5
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.4	0	0.0	1.1	0	0.0	0.5	0	0.0	0.4	0.4
Moderate	1	11.1	8.2	425	8.5	7.1	1	25.0	8.6	575	33.6	7.0	8.1
Middle	4	44.4	44.1	2,146	42.8	37.2	0	0.0	43.8	0	0.0	35.2	48.6
Upper	4	44.4	47.3	2,439	48.7	54.6	3	75.0	47.1	1,137	66.4	57.4	42.9
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	5,010	100.0	100.0	4	100.0	100.0	1,712	100.0	100.0	100.0

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.*
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 evaluation of small business lending considered only 2024 lending due to limited loan origination volume in 2023.

The bank did not originate a small business loan in a low-income tract in 2024; however, the aggregate lending data and demographic figure reflect a very limited concentration of lending and opportunities present. Lending among moderate-income tracts was comparable to the aggregate lending data by number volume, significantly below by dollar volume, and comparable to the demographic figure.

An analysis of the dispersion of lending among the various income census tracts in the AA revealed gaps in lending, particularly among LMI census tracts; however, given the very limited volume of lending in the analysis, there was no impact to the performance conclusion.

Table 146

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Boise, Idaho Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.4	0	0.0	2.8	0	0.0	1.4	0	0.0	2.4	2.7
Moderate	0	0.0	10.8	0	0.0	12.2	1	11.1	10.9	25	0.7	13.0	12.6
Middle	4	66.7	44.3	1,005	58.9	42.4	5	55.6	44.3	2,125	59.5	44.2	46.4
Upper	2	33.3	43.1	700	41.1	42.3	3	33.3	42.9	1,421	39.8	40.1	38.2
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
Total	6	100.0	100.0	1,705	100.0	100.0	9	100.0	100.0	3,571	100.0	100.0	100.0

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

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses of different sizes. This performance is consistent among small business and home mortgage lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank did not originate any of its nine home mortgage loans to a LMI borrower in 2023; however, given

the extremely limited volume of lending in the analysis and the impact that the absence or inclusion of one loan may have in the determination of lending performance, the bank's pattern of lending is concluded to be adequate.

Table 147

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Boise, Idaho Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	0.8	0	0.0	2.0	0	0.0	0.7	14.4
Moderate	0	0.0	12.3	0	0.0	8.0	0	0.0	9.9	0	0.0	6.0	16.9
Middle	0	0.0	24.3	0	0.0	19.6	1	33.3	21.4	409	27.6	16.2	22.4
Upper	8	100.0	48.0	4,660	100.0	57.9	2	66.7	47.7	1,073	72.4	51.3	46.3
Unknown	0	0.0	13.3	0	0.0	13.7	0	0.0	18.9	0	0.0	25.8	0.0
Total	8	100.0	100.0	4,660	100.0	100.0	3	100.0	100.0	1,482	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.0	0	0.0	5.5	0	0.0	5.9	0	0.0	2.8	14.4
Moderate	0	0.0	19.5	0	0.0	13.5	0	0.0	15.6	0	0.0	9.6	16.9
Middle	0	0.0	23.4	0	0.0	18.4	0	0.0	22.3	0	0.0	15.3	22.4
Upper	1	100.0	39.6	350	100.0	49.6	1	100.0	39.3	230	100.0	46.2	46.3
Unknown	0	0.0	9.5	0	0.0	13.1	0	0.0	16.9	0	0.0	26.0	0.0
Total	1	100.0	100.0	350	100.0	100.0	1	100.0	100.0	230	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.9	0	0.0	3.1	0	0.0	4.8	0	0.0	2.4	14.4
Moderate	0	0.0	14.7	0	0.0	8.8	0	0.0	14.2	0	0.0	8.8	16.9
Middle	0	0.0	23.1	0	0.0	17.6	0	0.0	23.9	0	0.0	18.6	22.4
Upper	0	0.0	53.7	0	0.0	67.8	0	0.0	55.1	0	0.0	68.4	46.3
Unknown	0	0.0	2.5	0	0.0	2.7	0	0.0	2.0	0	0.0	1.8	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	4.0	0	0.0	1.7	0	0.0	3.4	0	0.0	1.2	14.4
Moderate	0	0.0	14.1	0	0.0	8.8	0	0.0	12.1	0	0.0	6.8	16.9
Middle	0	0.0	23.9	0	0.0	19.2	1	25.0	22.0	409	23.9	16.2	22.4
Upper	9	100.0	47.0	5,010	100.0	57.3	3	75.0	46.6	1,303	76.1	51.5	46.3
Unknown	0	0.0	11.0	0	0.0	13.1	0	0.0	15.8	0	0.0	24.4	0.0
Total	9	100.0	100.0	5,010	100.0	100.0	4	100.0	100.0	1,712	100.0	100.0	100.0

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.
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 adequate. The distribution of lending among small businesses was below the aggregate lending data by number volume, comparable to aggregate data by dollar volume, and significantly below the

demographic figure; however, consistent with the analysis of other lending products in this AA evaluation, given the extremely limited volume of lending in the analysis and the impact that the absence or inclusion of one loan may have in the determination of lending performance, the bank's pattern of lending is concluded to be adequate.

Table 148

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Boise, Idaho Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	33.3	53.9	710	41.6	32.5	2	22.2	52.6	1,218	34.1	29.4	92.6
Over $1 Million	4	66.7		995	58.4		6	66.7		1,588	44.5		6.2
Revenue Unknown	0	0.0		0	0.0		1	11.1		765	21.4		1.2
Total	6	100.0		1,705	100.0		9	100.0		3,571	100.0		100.0
By Loan Size													
$100,000 or Less	2	33.3	94.7	130	7.6	42.1	3	33.3	94.8	167	4.7	42.8	
$100,001 - $250,000	2	33.3	2.7	410	24.0	14.3	1	11.1	2.8	225	6.3	14.3	
$250,001 - $1 Million	2	33.3	2.6	1,165	68.3	43.6	5	55.6	2.5	3,179	89.0	42.9	
Total	6	100.0	100.0	1,705	100.0	100.0	9	100.0	100.0	3,571	100.0	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	1	50.0		210	29.6		0	0.0		0	0.0		
$250,001 - $1 Million	1	50.0		500	70.4		2	100.0		1,218	100.0		
Total	2	100.0		710	100.0		2	100.0		1,218	100.0		

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

Community Development Lending

The bank is a leader in providing CD loans in the AA. The bank originated five CD loans totaling $10.0MM in this AA, which were comprised entirely of lending which was responsive to area economic development needs. Examples of CD loans include:

- A total of $3.8MM in SBA Program 504 financing was provided to an area small manufacturing business which provides permanent job creation and retention for LMI individuals.
- A total of $3.4MM in SBA Program 504 financing was provided to an area small textiles business which provides permanent job creation and retention for LMI individuals.

Table 149

Community Development Loans – Boise, Idaho Metropolitan AA		
Community Development Purpose	#	**(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	5	10,025
Revitalization and Stabilization	0	0
Total Loans	**5**	**10,025**

INVESTMENT TEST

The bank's performance under the investment test in the state of Idaho is high satisfactory and is supported by good performance in the Boise Metropolitan AA. The bank has a significant level of qualified CD investments and grants and is occasionally 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. Consistent with the bank's predominate investment strategies, the largest dollar composition of investments is comprised of MBS that are responsive to area affordable housing needs, as well as donations which were responsive to the community services needs of LMI individuals and families. The bank's philanthropic donation activities include:

- The bank provided two donations totaling $3.6M to the local chapter of an organization that provides an array of services for the benefit of LMI individuals and families, including victims of domestic abuse, as well as housing and rental assistance.
- A donation of $2.5M was made to area agency that provides community services to LMI individuals and families in need of critical crisis care services.

Table 150

Investments, Grants, and Donations – Boise, Idaho Metropolitan AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	(000)	#	(000)	#	(000)	#	(000)
Affordable Housing	0	0	1	270	0	0	1	270
Community Services	0	0	0	0	3	6	3	6
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**1**	**270**	**3**	**6**	**4**	**276**

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the state of Idaho is outstanding and supported by excellent service test performance in the Boise Metropolitan AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates two offices in the AA, including an office in a middle- and an office in an upper-income tract, each of which contains a full-service ATM on its premises.

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 entirety of the bank's operations in Idaho are new since the prior evaluation, as discussed in the description of the institution's operations section of this state 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. The bank's operations and product offerings in the AA generally mirror that of the overall institution, which are described in the Institution Retail Services section of this report.

Table 151

Retail Banking and Community Development Services – Boise, Idaho Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	50.0	50.0	0.0	100.0	1.6	11.6	46.5	39.5	0.8	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	50.0	50.0	0.0	100.0	1.7	11.2	47.6	39.0	0.5	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		3	1	0	0	1	1	0	2		
Community Development Services	Affordable Housing		Community Services	Economic Development	Revitalization & Stabilization		Total Services		Total Organizations			
	2		10	0	0		12		3			

[1] *Based on 2024 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 in the AA when considering its operational footprint in the state. Bank representative performed 12 qualified CD services to 3 area organizations during the evaluation period. Examples of CD services include:

- Four bank representatives provided their financial expertise through board membership and/or financial literacy instruction for an organization that provides educational resources and mentoring services to at-risk youth.
- A bank representative provided their financial expertise by serving on the board in each year of the evaluation for an organization that provides an array of community services for individuals and families in need of critical crisis care services.

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination		
Financial Institution	**Products/Services Reviewed**	
NBH Bank Greenwood Village, CO	• 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		
HMDA LAR and CRA SB and SF Loans:	January 1, 2023 to December 31, 2024	
Community Development Activities:	January 1, 2023 to December 31, 2024	

List of Affiliates Considered in this Evaluation		
Affiliates	**Affiliate Relationship**	**Products Reviewed**
None	None	None

List of Assessment Areas and Type of Examination			
Assessment Area	**Type of Exam**	**Branches Visited**	**Community Contacts**
Kansas City Multistate MSA AA MSA 28140 (Kansas City, MO-KS Multistate MSA)	Full Review	None	2 Prior
Colorado MSA 19740 (Denver-Aurora-Lakewood MSA AA)	Full Review	None	2 Prior
MSA 17820 (Colorado Springs MSA AA)	Full Review	None	1 Prior
MSA 99999 (Western Colorado AA)	Full Review	None	2 Prior
MSA 24540 (Greeley MSA AA)	Limited Review	None	None
MSA 14500 (Boulder MSA AA)	Limited Review	None	None
MSA 22660 (Fort Collins MSA AA)	Limited Review	None	None
MSA 39380 (Pueblo MSA AA)	Limited Review	None	None
MSA 24300 (Grand Junction MSA AA)	Limited Review	None	None
Kansas MSA 29940 (Lawrence MSA AA)	Full Review	None	1 Prior
MSA 99999 (Franklin County AA)	Limited Review	None	None
Missouri MSA 41140 (St. Joseph Metropolitan AA)	Full Review	None	1 Prior
MSA 99999 (Northwest Missouri AA)	Full Review	None	1 Prior
MSA 99999 (North Central Missouri AA)	Limited Review	None	None
MSA 99999 (Northeast Missouri AA)	Limited Review	None	None

New Mexico			
MSA 99999 (Taos County AA)			
MSA 10740 (Albuquerque Metropolitan AA)	Full Review Limited Review	None None	1 Prior None
Texas			
MSA 19124 (Dallas Metropolitan AA)	Full Review	None	1 Prior
MSA 12420 (Austin Metropolitan AA)	Limited Review	None	None
Utah			
MSA 41620, 36260, 39340 (Salt Lake City CSA AA)	Full Review	None	1 Prior
MSA 41100 (St. George MSA AA)	Limited Review	None	None
MSA 99999 (Millard County AA)	Limited Review	None	None
Wyoming			
MSA 99999 (Western Wyoming AA)	Full Review	None	1 Prior
Idaho			
MSA 14260 (Boise Metropolitan AA)	Full Review	None	None

APPENDIX B – SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

Table B-1

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Kansas City, MO-KS Multistate	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Colorado	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Utah	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Kansas	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Missouri	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory
New Mexico	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Texas	High Satisfactory	Outstanding	Outstanding	Outstanding
Wyoming	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Idaho	High Satisfactory	High Satisfactory	Outstanding	Satisfactory

APPENDIX C – DEMOGRAPHIC INFORMATION

Table C-1

2024 Kansas City, Missouri-Kansas MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	58	9.6	32,365	6.0	8,775	27.1	111,065	20.5
Moderate	152	25.0	122,356	22.5	14,997	12.3	95,410	17.6
Middle	220	36.2	221,761	40.8	10,639	4.8	119,106	21.9
Upper	153	25.2	164,171	30.2	2,692	1.6	217,318	40.0
Unknown	24	4.0	2,246	0.4	564	25.1	0	0.0
Total AA	**607**	**100.0**	**542,899**	**100.0**	**37,667**	**6.9**	**542,899**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	70,987	23,318	4.2	32.8	36,527	51.5	11,142	15.7
Moderate	237,795	113,616	20.7	47.8	96,616	40.6	27,563	11.6
Middle	363,848	232,761	42.3	64.0	107,630	29.6	23,457	6.4
Upper	238,328	177,997	32.4	74.7	49,099	20.6	11,232	4.7
Unknown	7,265	2,008	0.4	27.6	3,787	52.1	1,470	20.2
Total AA	**918,223**	**549,700**	**100.0**	**59.9**	**293,659**	**32.0**	**74,864**	**8.2**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	5,099	5.9	4,524	5.8	542	7.8	33	4.0
Moderate	19,067	22.2	17,378	22.3	1,524	21.8	165	20.2
Middle	31,205	36.3	29,024	37.2	1,896	27.1	285	34.9
Upper	28,471	33.2	25,699	32.9	2,468	35.3	304	37.3
Unknown	2,023	2.4	1,438	1.8	556	8.0	29	3.6
Total AA	**85,865**	**100.0**	**78,063**	**100.0**	**6,986**	**100.0**	**816**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.1**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	17	1.1	16	1.0	1	2.9	0	0.0
Moderate	323	20.4	318	20.6	4	11.8	1	14.3
Middle	884	55.8	861	55.8	19	55.9	4	57.1
Upper	359	22.7	347	22.5	10	29.4	2	28.6
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	**1,584**	**100.0**	**1,543**	**100.0**	**34**	**100.0**	**7**	**100.0**
Percentage of Total Farms:				**97.4**		**2.1**		**0.4**

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 C-2

2023 Kansas City, Missouri-Kansas MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,505	5.9	4,856	5.7	607	7.9	42	5.1
Moderate	20,296	21.6	18,499	21.6	1,628	21.1	169	20.6
Middle	33,994	36.1	31,620	37.0	2,065	26.8	309	37.6
Upper	31,800	33.8	28,811	33.7	2,719	35.3	270	32.9
Unknown	2,450	2.6	1,730	2.0	689	8.9	31	3.8
Total AA	**94,045**	**100.0**	**85,516**	**100.0**	**7,708**	**100.0**	**821**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.2**		**0.9**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	17	1.0	16	1.0	1	2.9	0	0.0
Moderate	328	19.1	321	19.2	6	17.6	1	14.3
Middle	961	56.0	939	56.0	18	52.9	4	57.1
Upper	408	23.8	398	23.7	8	23.5	2	28.6
Unknown	3	0.2	2	0.1	1	2.9	0	0.0
Total AA	**1,717**	**100.0**	**1,676**	**100.0**	**34**	**100.0**	**7**	**100.0**
Percentage of Total Farms:				**97.6**		**2.0**		**0.4**

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 C-3

2024 Colorado Springs, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4	2.3	3,334	1.8	875	26.2	34,957	18.8
Moderate	48	27.4	44,074	23.7	5,829	13.2	34,861	18.8
Middle	72	41.1	77,514	41.7	4,058	5.2	40,722	21.9
Upper	49	28.0	60,481	32.6	1,266	2.1	75,172	40.5
Unknown	2	1.1	309	0.2	26	8.4	0	0.0
Total AA	**175**	**100.0**	**185,712**	**100.0**	**12,054**	**6.5**	**185,712**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	5,745	2,150	1.2	37.4	3,354	58.4	241	4.2
Moderate	80,756	35,922	20.0	44.5	38,853	48.1	5,981	7.4
Middle	119,893	77,994	43.4	65.1	35,906	29.9	5,993	5.0
Upper	82,452	63,375	35.2	76.9	14,775	17.9	4,302	5.2
Unknown	962	456	0.3	47.4	455	47.3	51	5.3
Total AA	**289,808**	**179,897**	**100.0**	**62.1**	**93,343**	**32.2**	**16,568**	**5.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	392	1.2	364	1.2	24	1.5	4	1.5
Moderate	9,485	28.6	8,733	28.0	670	41.8	82	30.0
Middle	12,450	37.6	11,928	38.2	439	27.4	83	30.4
Upper	10,590	32.0	10,043	32.1	443	27.6	104	38.1
Unknown	197	0.6	170	0.5	27	1.7	0	0.0
Total AA	**33,114**	**100.0**	**31,238**	**100.0**	**1,603**	**100.0**	**273**	**100.0**
Percentage of Total Businesses:				**94.3**		**4.8**		**0.8**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	84	21.5	80	20.9	4	50.0	0	0.0
Middle	189	48.3	188	49.1	1	12.5	0	0.0
Upper	113	28.9	110	28.7	3	37.5	0	0.0
Unknown	4	1.0	4	1.0	0	0.0	0	0.0
Total AA	**391**	**100.0**	**383**	**100.0**	**8**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.0**		**2.0**		**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 C-4

2023 Colorado Springs, Colorado MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	450	1.2	417	1.1	26	1.5	7	2.3
Moderate	10,522	27.4	9,746	26.8	686	39.6	90	29.1
Middle	14,493	37.7	13,918	38.2	486	28.0	89	28.8
Upper	12,721	33.1	12,095	33.2	504	29.1	122	39.5
Unknown	268	0.7	236	0.6	31	1.8	1	0.3
Total AA	**38,454**	**100.0**	**36,412**	**100.0**	**1,733**	**100.0**	**309**	**100.0**
Percentage of Total Businesses:				**94.7**		**4.5**		**0.8**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	96	21.1	92	20.6	4	44.4	0	0.0
Middle	220	48.4	218	48.9	2	22.2	0	0.0
Upper	133	29.2	130	29.1	3	33.3	0	0.0
Unknown	5	1.1	5	1.1	0	0.0	0	0.0
Total AA	**455**	**100.0**	**446**	**100.0**	**9**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.0**		**2.0**		**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 C-5

2024 Denver - Aurora - Centennial, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	37	5.2	30,100	4.4	5,968	19.8	138,836	20.2
Moderate	179	25.3	169,549	24.7	15,695	9.3	124,952	18.2
Middle	258	36.5	243,634	35.5	9,052	3.7	150,661	21.9
Upper	214	30.3	239,625	34.9	4,840	2.0	272,611	39.7
Unknown	19	2.7	4,152	0.6	1,042	25.1	0	0.0
Total AA	**707**	**100.0**	**687,060**	**100.0**	**36,597**	**5.3**	**687,060**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	57,872	20,206	2.8	34.9	34,769	60.1	2,897	5.0
Moderate	310,340	150,923	21.2	48.6	140,625	45.3	18,792	6.1
Middle	419,202	267,466	37.6	63.8	130,534	31.1	21,202	5.1
Upper	356,031	269,287	37.9	75.6	71,619	20.1	15,125	4.2
Unknown	13,303	3,327	0.5	25.0	8,918	67.0	1,058	8.0
Total AA	**1,156,748**	**711,209**	**100.0**	**61.5**	**386,465**	**33.4**	**59,074**	**5.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	6,523	4.2	5,819	4.1	655	6.9	49	3.4
Moderate	33,696	21.9	31,040	21.7	2,436	25.6	220	15.2
Middle	53,931	35.0	50,671	35.4	2,791	29.4	469	32.3
Upper	56,828	36.9	53,008	37.0	3,165	33.3	655	45.2
Unknown	3,148	2.0	2,635	1.8	456	4.8	57	3.9
Total AA	**154,126**	**100.0**	**143,173**	**100.0**	**9,503**	**100.0**	**1,450**	**100.0**
Percentage of Total Businesses:				**92.9**		**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	39	2.5	33	2.1	6	21.4	0	0.0
Moderate	294	18.6	286	18.4	8	28.6	0	0.0
Middle	620	39.2	616	39.6	4	14.3	0	0.0
Upper	602	38.1	593	38.2	9	32.1	0	0.0
Unknown	27	1.7	26	1.7	1	3.6	0	0.0
Total AA	**1,582**	**100.0**	**1,554**	**100.0**	**28**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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 C-6

2023 Denver - Aurora - Centennial, Colorado MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,430	4.1	6,656	4.0	715	6.5	59	3.4
Moderate	38,104	21.2	35,179	21.1	2,669	24.4	256	14.8
Middle	61,765	34.4	58,116	34.9	3,101	28.3	548	31.6
Upper	67,189	37.5	62,676	37.6	3,723	34.0	790	45.6
Unknown	4,905	2.7	4,075	2.4	750	6.8	80	4.6
Total AA	**179,393**	**100.0**	**166,702**	**100.0**	**10,958**	**100.0**	**1,733**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.1**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	43	2.4	37	2.1	6	22.2	0	0.0
Moderate	344	18.8	336	18.7	8	29.6	0	0.0
Middle	715	39.1	713	39.6	2	7.4	0	0.0
Upper	689	37.7	680	37.8	9	33.3	0	0.0
Unknown	37	2.0	35	1.9	2	7.4	0	0.0
Total AA	**1,828**	**100.0**	**1,801**	**100.0**	**27**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.5**		**1.5**		**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 C-7

2024 Western Colorado Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	1.2	757	0.6	156	20.6	27,009	19.8
Moderate	33	19.1	23,414	17.1	3,335	14.2	23,476	17.2
Middle	82	47.4	72,291	52.9	5,303	7.3	28,777	21.1
Upper	52	30.1	39,711	29.1	1,624	4.1	57,425	42.0
Unknown	4	2.3	514	0.4	100	19.5	0	0.0
Total AA	**173**	**100.0**	**136,687**	**100.0**	**10,518**	**7.7**	**136,687**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	4,417	739	0.5	16.7	797	18.0	2,881	65.2
Moderate	50,048	25,342	16.6	50.6	13,519	27.0	11,187	22.4
Middle	149,374	81,837	53.5	54.8	29,092	19.5	38,445	25.7
Upper	111,481	44,664	29.2	40.1	19,861	17.8	46,956	42.1
Unknown	1,396	424	0.3	30.4	692	49.6	280	20.1
Total AA	**316,716**	**153,006**	**100.0**	**48.3**	**63,961**	**20.2**	**99,749**	**31.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	201	0.7	179	0.7	16	0.9	6	1.4
Moderate	3,940	13.4	3,596	13.3	266	14.5	78	18.8
Middle	12,718	43.4	11,808	43.6	739	40.2	171	41.1
Upper	12,282	41.9	11,313	41.8	810	44.0	159	38.2
Unknown	168	0.6	158	0.6	8	0.4	2	0.5
Total AA	**29,309**	**100.0**	**27,054**	**100.0**	**1,839**	**100.0**	**416**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.3**		**1.4**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	7	0.5	6	0.4	1	2.9	0	0.0
Moderate	307	21.7	295	21.4	12	34.3	0	0.0
Middle	830	58.7	807	58.5	22	62.9	1	100.0
Upper	270	19.1	270	19.6	0	0.0	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	**1,415**	**100.0**	**1,379**	**100.0**	**35**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.5**		**2.5**		**0.1**

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 C-8

2023 Western Colorado Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	217	0.7	196	0.6	15	0.8	6	1.3
Moderate	4,420	13.4	4,046	13.3	283	14.2	91	20.3
Middle	14,435	43.8	13,447	44.1	806	40.4	182	40.5
Upper	13,581	41.2	12,541	41.1	873	43.8	167	37.2
Unknown	307	0.9	286	0.9	18	0.9	3	0.7
Total AA	**32,960**	**100.0**	**30,516**	**100.0**	**1,995**	**100.0**	**449**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.1**		**1.4**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	6	0.4	5	0.3	1	2.6	0	0.0
Moderate	348	21.6	334	21.3	14	36.8	0	0.0
Middle	938	58.3	915	58.2	22	57.9	1	100.0
Upper	314	19.5	313	19.9	1	2.6	0	0.0
Unknown	4	0.2	4	0.3	0	0.0	0	0.0
Total AA	**1,610**	**100.0**	**1,571**	**100.0**	**38**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.6**		**2.4**		**0.1**

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 C-9

2024 Salt Lake City CSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	17	3.1	11,759	2.0	2,936	25.0	100,099	17.4
Moderate	109	19.7	104,794	18.2	11,498	11.0	110,881	19.2
Middle	270	48.8	293,164	50.9	13,855	4.7	138,697	24.1
Upper	148	26.8	166,206	28.9	4,351	2.6	226,395	39.3
Unknown	9	1.6	149	0.0	36	24.2	0	0.0
Total AA	**553**	**100.0**	**576,072**	**100.0**	**32,676**	**5.7**	**576,072**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	22,204	3,679	0.7	16.6	16,557	74.6	1,968	8.9
Moderate	173,496	83,072	15.2	47.9	79,859	46.0	10,565	6.1
Middle	406,499	284,680	52.2	70.0	103,502	25.5	18,317	4.5
Upper	215,733	173,898	31.9	80.6	29,846	13.8	11,989	5.6
Unknown	548	6	0.0	1.1	492	89.8	50	9.1
Total AA	**818,480**	**545,335**	**100.0**	**66.6**	**230,256**	**28.1**	**42,889**	**5.2**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2,690	2.6	2,328	2.5	342	4.6	20	1.6
Moderate	16,666	16.3	14,816	15.8	1,711	23.3	139	11.0
Middle	51,175	50.1	46,714	50.0	3,909	53.1	552	43.8
Upper	30,869	30.2	29,087	31.1	1,242	16.9	540	42.9
Unknown	703	0.7	541	0.6	153	2.1	9	0.7
Total AA	**102,103**	**100.0**	**93,486**	**100.0**	**7,357**	**100.0**	**1,260**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.2**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	11	1.2	11	1.2	0	0.0	0	0.0
Moderate	91	10.0	86	9.7	5	17.9	0	0.0
Middle	497	54.5	475	53.7	22	78.6	0	0.0
Upper	312	34.2	311	35.2	1	3.6	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	**912**	**100.0**	**884**	**100.0**	**28**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.9**		**3.1**		**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 C-10

2023 Salt Lake City CSA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	3.0	11,759	2.0	2,936	25.0	103,057	17.5
Moderate	114	20.2	110,029	18.7	11,986	10.9	114,390	19.4
Middle	277	49.0	301,588	51.1	14,247	4.7	142,269	24.1
Upper	148	26.2	166,206	28.2	4,351	2.6	230,015	39.0
Unknown	9	1.6	149	0.0	36	24.2	0	0.0
Total AA	**565**	**100.0**	**589,731**	**100.0**	**33,556**	**5.7**	**589,731**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,204	3,679	0.7	16.6	16,557	74.6	1,968	8.9
Moderate	181,122	87,719	15.7	48.4	82,382	45.5	11,021	6.1
Middle	417,967	293,647	52.5	70.3	105,176	25.2	19,144	4.6
Upper	215,733	173,898	31.1	80.6	29,846	13.8	11,989	5.6
Unknown	548	6	0.0	1.1	492	89.8	50	9.1
Total AA	**837,574**	**558,949**	**100.0**	**66.7**	**234,453**	**28.0**	**44,172**	**5.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,848	2.6	2,448	2.5	378	4.8	22	1.6
Moderate	18,040	16.7	16,010	16.2	1,873	23.7	157	11.7
Middle	53,985	50.0	49,204	49.9	4,182	52.8	599	44.8
Upper	32,320	30.0	30,448	30.9	1,321	16.7	551	41.2
Unknown	697	0.6	530	0.5	159	2.0	8	0.6
Total AA	**107,890**	**100.0**	**98,640**	**100.0**	**7,913**	**100.0**	**1,337**	**100.0**
Percentage of Total Businesses:				**91.4**		**7.3**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	0.9	11	1.0	0	0.0	0	0.0
Moderate	136	11.6	131	11.6	5	13.9	0	0.0
Middle	687	58.8	658	58.1	29	80.6	0	0.0
Upper	334	28.6	332	29.3	2	5.6	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	**1,169**	**100.0**	**1,133**	**100.0**	**36**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.9**		**3.1**		**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 C-11

2024 Lawrence, Kansas MSA 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	5,162	19.6
Moderate	7	25.9	5,403	20.6	775	14.3	4,953	18.8
Middle	13	48.1	13,651	51.9	807	5.9	5,939	22.6
Upper	5	18.5	7,085	27.0	131	1.8	10,227	38.9
Unknown	2	7.4	142	0.5	65	45.8	0	0.0
Total AA	**27**	**100.0**	**26,281**	**100.0**	**1,778**	**6.8**	**26,281**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	12,581	4,364	17.9	34.7	7,406	58.9	811	6.4
Middle	24,497	13,137	54.0	53.6	10,037	41.0	1,323	5.4
Upper	12,009	6,797	27.9	56.6	4,559	38.0	653	5.4
Unknown	1,952	35	0.1	1.8	1,637	83.9	280	14.3
Total AA	**51,039**	**24,333**	**100.0**	**47.7**	**23,639**	**46.3**	**3,067**	**6.0**
	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	924	24.9	824	24.3	90	31.7	10	27.8
Middle	1,789	48.3	1,641	48.5	126	44.4	22	61.1
Upper	821	22.2	767	22.7	50	17.6	4	11.1
Unknown	170	4.6	152	4.5	18	6.3	0	0.0
Total AA	**3,704**	**100.0**	**3,384**	**100.0**	**284**	**100.0**	**36**	**100.0**
Percentage of Total Businesses:				**91.4**		**7.7**		**1.0**
	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	13.6	15	12.8	1	100.0	0	0.0
Middle	81	68.6	81	69.2	0	0.0	0	0.0
Upper	21	17.8	21	17.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**118**	**100.0**	**117**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 C-12

2023 Lawrence, Kansas MSA Demographics								
	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	1,129	26.6	1,006	25.8	111	35.0	12	31.6
Middle	1,953	46.0	1,803	46.3	129	40.7	21	55.3
Upper	964	22.7	900	23.1	59	18.6	5	13.2
Unknown	202	4.8	184	4.7	18	5.7	0	0.0
Total AA	**4,248**	**100.0**	**3,893**	**100.0**	**317**	**100.0**	**38**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.5**		**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	20	16.0	19	15.3	1	100.0	0	0.0
Middle	82	65.6	82	66.1	0	0.0	0	0.0
Upper	23	18.4	23	18.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**125**	**100.0**	**124**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 C-13

2024 St Joseph, Missouri Metropolitan Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	5.9	1,299	4.7	277	21.3	5,301	19.4
Moderate	6	17.6	3,739	13.7	660	17.7	5,173	18.9
Middle	22	64.7	18,053	65.9	1,553	8.6	5,682	20.7
Upper	4	11.8	4,300	15.7	112	2.6	11,235	41.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**34**	**100.0**	**27,391**	**100.0**	**2,602**	**9.5**	**27,391**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	2,868	784	2.7	27.3	1,340	46.7	744	25.9
Moderate	7,641	3,616	12.5	47.3	2,772	36.3	1,253	16.4
Middle	32,830	19,503	67.6	59.4	9,648	29.4	3,679	11.2
Upper	7,174	4,964	17.2	69.2	1,614	22.5	596	8.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**50,513**	**28,867**	**100.0**	**57.1**	**15,374**	**30.4**	**6,272**	**12.4**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	108	3.0	87	2.7	19	5.6	2	5.0
Moderate	321	8.9	296	9.1	25	7.4	0	0.0
Middle	2,553	70.5	2,295	70.8	225	66.8	33	82.5
Upper	637	17.6	564	17.4	68	20.2	5	12.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,619**	**100.0**	**3,242**	**100.0**	**337**	**100.0**	**40**	**100.0**
Percentage of Total Businesses:				**89.6**		**9.3**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.4	5	2.4	0	0.0	0	0.0
Middle	160	77.7	159	77.6	1	100.0	0	0.0
Upper	41	19.9	41	20.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**206**	**100.0**	**205**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.5**		**0.5**		**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 C-14

2023 St Joseph, Missouri Metropolitan Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	198	5.1	152	4.4	44	11.7	2	4.7
Moderate	317	8.2	293	8.5	24	6.4	0	0.0
Middle	2,653	69.0	2,381	69.5	236	62.9	36	83.7
Upper	678	17.6	602	17.6	71	18.9	5	11.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,846**	**100.0**	**3,428**	**100.0**	**375**	**100.0**	**43**	**100.0**
Percentage of Total Businesses:				**89.1**		**9.8**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	5	2.3	5	2.3	0	0.0	0	0.0
Middle	166	77.6	165	77.5	1	100.0	0	0.0
Upper	42	19.6	42	19.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**214**	**100.0**	**213**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.5**		**0.5**		**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 C-15

2024 Northwest Missouri 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	1,188	16.0
Moderate	0	0.0	0	0.0	0	0.0	1,017	13.7
Middle	8	72.7	4,859	65.6	538	11.1	1,705	23.0
Upper	3	27.3	2,546	34.4	125	4.9	3,495	47.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**7,405**	**100.0**	**663**	**9.0**	**7,405**	**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	10,384	5,409	65.6	52.1	2,952	28.4	2,023	19.5
Upper	5,136	2,835	34.4	55.2	1,873	36.5	428	8.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**15,520**	**8,244**	**100.0**	**53.1**	**4,825**	**31.1**	**2,451**	**15.8**
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	970	74.6	861	73.9	70	80.5	39	81.3
Upper	330	25.4	304	26.1	17	19.5	9	18.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,300**	**100.0**	**1,165**	**100.0**	**87**	**100.0**	**48**	**100.0**
Percentage of Total Businesses:				**89.6**		**6.7**		**3.7**
	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	303	79.7	300	79.6	3	100.0	0	0.0
Upper	77	20.3	77	20.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**380**	**100.0**	**377**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 C-16

2023 Northwest Missouri Demographics								
	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	1,002	73.2	891	72.6	73	78.5	38	80.9
Upper	366	26.8	337	27.4	20	21.5	9	19.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,368**	**100.0**	**1,228**	**100.0**	**93**	**100.0**	**47**	**100.0**
Percentage of Total Businesses:				**89.8**		**6.8**		**3.4**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	305	79.8	302	79.7	3	100.0	0	0.0
Upper	77	20.2	77	20.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**382**	**100.0**	**379**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 C-17

2024 Taos County, New Mexico 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	1,690	24.9
Moderate	2	20.0	1,253	18.4	299	23.9	1,259	18.5
Middle	5	50.0	3,306	48.7	483	14.6	942	13.9
Upper	2	20.0	1,568	23.1	139	8.9	2,902	42.7
Unknown	1	10.0	666	9.8	65	9.8	0	0.0
Total AA	**10**	**100.0**	**6,793**	**100.0**	**986**	**14.5**	**6,793**	**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	3,342	1,741	18.0	52.1	508	15.2	1,093	32.7
Middle	10,919	4,534	46.8	41.5	1,636	15.0	4,749	43.5
Upper	4,350	2,338	24.1	53.7	706	16.2	1,306	30.0
Unknown	2,442	1,071	11.1	43.9	58	2.4	1,313	53.8
Total AA	**21,053**	**9,684**	**100.0**	**46.0**	**2,908**	**13.8**	**8,461**	**40.2**

	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	248	19.4	226	19.1	18	26.1	4	16.7
Middle	784	61.3	730	61.6	38	55.1	16	66.7
Upper	123	9.6	111	9.4	11	15.9	1	4.2
Unknown	123	9.6	118	10.0	2	2.9	3	12.5
Total AA	**1,278**	**100.0**	**1,185**	**100.0**	**69**	**100.0**	**24**	**100.0**
Percentage of Total Businesses:				**92.7**		**5.4**		**1.9**

	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	9	23.7	9	23.7	0	0.0	0	0.0
Middle	13	34.2	13	34.2	0	0.0	0	0.0
Upper	11	28.9	11	28.9	0	0.0	0	0.0
Unknown	5	13.2	5	13.2	0	0.0	0	0.0
Total AA	**38**	**100.0**	**38**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 C-18

2023 Taos County, New Mexico Demographics								
	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	284	18.8	258	18.4	23	28.0	3	13.0
Middle	937	62.1	875	62.3	46	56.1	16	69.6
Upper	134	8.9	124	8.8	9	11.0	1	4.3
Unknown	155	10.3	148	10.5	4	4.9	3	13.0
Total AA	**1,510**	**100.0**	**1,405**	**100.0**	**82**	**100.0**	**23**	**100.0**
Percentage of Total Businesses:				**93.0**		**5.4**		**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	11	28.2	11	28.2	0	0.0	0	0.0
Middle	13	33.3	13	33.3	0	0.0	0	0.0
Upper	11	28.2	11	28.2	0	0.0	0	0.0
Unknown	4	10.3	4	10.3	0	0.0	0	0.0
Total AA	**39**	**100.0**	**39**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 C-19

2024 Dallas, Texas Metropolitan Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	107	16.6	100,878	16.6	25,240	25.0	184,466	30.4
Moderate	223	34.6	217,151	35.7	29,705	13.7	121,821	20.1
Middle	160	24.8	159,194	26.2	10,013	6.3	112,226	18.5
Upper	144	22.3	127,087	20.9	3,612	2.8	188,940	31.1
Unknown	11	1.7	3,143	0.5	454	14.4	0	0.0
Total AA	**645**	**100.0**	**607,453**	**100.0**	**69,024**	**11.4**	**607,453**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	182,361	49,784	10.5	27.3	114,522	62.8	18,055	9.9
Moderate	343,493	155,497	32.6	45.3	161,983	47.2	26,013	7.6
Middle	263,814	138,854	29.1	52.6	107,238	40.6	17,722	6.7
Upper	225,383	130,305	27.4	57.8	76,716	34.0	18,362	8.1
Unknown	12,762	1,935	0.4	15.2	9,162	71.8	1,665	13.0
Total AA	**1,027,813**	**476,375**	**100.0**	**46.3**	**469,621**	**45.7**	**81,817**	**8.0**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	13,553	9.5	12,452	9.6	1,017	9.0	84	5.4
Moderate	36,407	25.6	33,643	26.0	2,495	22.0	269	17.2
Middle	43,579	30.7	39,487	30.5	3,694	32.6	398	25.5
Upper	47,403	33.3	42,606	33.0	4,002	35.4	795	51.0
Unknown	1,215	0.9	1,091	0.8	110	1.0	14	0.9
Total AA	**142,157**	**100.0**	**129,279**	**100.0**	**11,318**	**100.0**	**1,560**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.0**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	51	6.5	51	6.6	0	0.0	0	0.0
Moderate	135	17.1	132	17.0	3	25.0	0	0.0
Middle	219	27.7	215	27.6	4	33.3	0	0.0
Upper	378	47.8	373	47.9	5	41.7	0	0.0
Unknown	7	0.9	7	0.9	0	0.0	0	0.0
Total AA	**790**	**100.0**	**778**	**100.0**	**12**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.5**		**1.5**		**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 C-20

2023 Dallas, Texas Metropolitan Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14,622	9.6	13,401	9.7	1,129	9.3	92	5.5
Moderate	38,626	25.4	35,682	25.8	2,653	21.9	291	17.4
Middle	46,538	30.6	42,197	30.5	3,933	32.4	408	24.4
Upper	50,868	33.4	45,726	33.1	4,279	35.3	863	51.6
Unknown	1,432	0.9	1,271	0.9	144	1.2	17	1.0
Total AA	**152,086**	**100.0**	**138,277**	**100.0**	**12,138**	**100.0**	**1,671**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.0**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	52	6.3	52	6.4	0	0.0	0	0.0
Moderate	140	16.9	136	16.7	4	30.8	0	0.0
Middle	235	28.3	232	28.4	3	23.1	0	0.0
Upper	397	47.9	391	47.9	6	46.2	0	0.0
Unknown	5	0.6	5	0.6	0	0.0	0	0.0
Total AA	**829**	**100.0**	**816**	**100.0**	**13**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.4**		**1.6**		**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 C-21

2024 Western Wyoming 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	3,928	17.5
Moderate	5	18.5	3,477	15.5	498	14.3	4,067	18.1
Middle	15	55.6	12,470	55.6	586	4.7	5,290	23.6
Upper	7	25.9	6,485	28.9	189	2.9	9,147	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**27**	**100.0**	**22,432**	**100.0**	**1,273**	**5.7**	**22,432**	**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	6,800	3,731	15.0	54.9	1,968	28.9	1,101	16.2
Middle	26,855	14,532	58.5	54.1	5,824	21.7	6,499	24.2
Upper	13,994	6,567	26.4	46.9	3,116	22.3	4,311	30.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**47,649**	**24,830**	**100.0**	**52.1**	**10,908**	**22.9**	**11,911**	**25.0**
	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	578	11.0	515	10.9	51	11.9	12	12.8
Middle	3,034	57.6	2,736	57.7	242	56.5	56	59.6
Upper	1,655	31.4	1,494	31.5	135	31.5	26	27.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5,267**	**100.0**	**4,745**	**100.0**	**428**	**100.0**	**94**	**100.0**
Percentage of Total Businesses:				**90.1**		**8.1**		**1.8**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	40	15.4	40	15.5	0	0.0	0	0.0
Middle	182	70.3	181	70.2	1	100.0	0	0.0
Upper	37	14.3	37	14.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**259**	**100.0**	**258**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.6**		**0.4**		**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 C-22

2023 Western Wyoming Demographics								
	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	588	10.8	523	10.6	52	11.4	13	14.6
Middle	3,159	57.8	2,846	57.9	256	56.0	57	64.0
Upper	1,718	31.4	1,550	31.5	149	32.6	19	21.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5,465**	**100.0**	**4,919**	**100.0**	**457**	**100.0**	**89**	**100.0**
Percentage of Total Businesses:				**90.0**		**8.4**		**1.6**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	42	16.0	42	16.0	0	0.0	0	0.0
Middle	184	70.0	183	69.8	1	100.0	0	0.0
Upper	37	14.1	37	14.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**263**	**100.0**	**262**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.6**		**0.4**		**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.

Table C-23

2024 Boise, Idaho Metropolitan Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	1.6	1,210	1.0	393	32.5	16,806	14.4
Moderate	15	11.6	10,896	9.4	1,518	13.9	19,621	16.9
Middle	60	46.5	55,126	47.4	2,785	5.1	26,130	22.4
Upper	51	39.5	49,108	42.2	2,056	4.2	53,858	46.3
Unknown	1	0.8	75	0.1	0	0.0	0	0.0
Total AA	**129**	**100.0**	**116,415**	**100.0**	**6,752**	**5.8**	**116,415**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	3,339	548	0.4	16.4	2,471	74.0	320	9.6
Moderate	21,278	10,177	8.1	47.8	9,980	46.9	1,121	5.3
Middle	88,749	61,329	48.6	69.1	24,164	27.2	3,256	3.7
Upper	72,754	54,051	42.9	74.3	16,034	22.0	2,669	3.7
Unknown	996	33	0.0	3.3	921	92.5	42	4.2
Total AA	**187,116**	**126,138**	**100.0**	**67.4**	**53,570**	**28.6**	**7,408**	**4.0**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	599	2.7	515	2.5	78	5.6	6	2.3
Moderate	2,825	12.6	2,559	12.3	243	17.4	23	8.8
Middle	10,384	46.4	9,663	46.6	616	44.2	105	40.1
Upper	8,546	38.2	7,961	38.4	457	32.8	128	48.9
Unknown	29	0.1	29	0.1	0	0.0	0	0.0
Total AA	**22,383**	**100.0**	**20,727**	**100.0**	**1,394**	**100.0**	**262**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.2**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	17	5.1	17	5.3	0	0.0	0	0.0
Middle	127	38.4	123	38.7	4	33.3	0	0.0
Upper	186	56.2	177	55.7	8	66.7	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**331**	**100.0**	**318**	**100.0**	**12**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.1**		**3.6**		**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 C-24

2023 Boise, Idaho Metropolitan Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	620	2.4	535	2.2	79	4.9	6	2.1
Moderate	3,192	12.3	2,896	12.0	271	16.9	25	8.8
Middle	11,959	45.9	11,155	46.2	704	43.8	100	35.2
Upper	10,243	39.3	9,538	39.5	552	34.3	153	53.9
Unknown	37	0.1	36	0.1	1	0.1	0	0.0
Total AA	**26,051**	**100.0**	**24,160**	**100.0**	**1,607**	**100.0**	**284**	**100.0**
Percentage of Total Businesses:				**92.7**		**6.2**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1	0.3	1	0.3	0	0.0	0	0.0
Moderate	19	5.2	19	5.4	0	0.0	0	0.0
Middle	138	37.6	134	38.0	4	30.8	0	0.0
Upper	209	56.9	199	56.4	9	69.2	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**367**	**100.0**	**353**	**100.0**	**13**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.2**		**3.5**		**0.3**

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 D – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Greeley, Colorado MSA
Table D-1

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Greeley, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.9	0	0.0	0.6	0	0.0	0.8	0	0.0	0.5	1.5
Moderate	4	28.6	16.0	1,698	27.2	12.6	3	25.0	14.1	741	17.5	10.9	17.5
Middle	6	42.9	38.7	2,273	36.4	36.0	6	50.0	41.0	2,150	50.7	36.9	47.2
Upper	4	28.6	44.4	2,279	36.5	50.8	3	25.0	44.1	1,348	31.8	51.6	33.9
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	14	100.0	100.0	6,250	100.0	100.0	12	100.0	100.0	4,239	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.2	0	0.0	0.7	0	0.0	1.0	0	0.0	0.6	1.5
Moderate	1	14.3	16.5	198	11.7	11.6	1	25.0	15.1	240	24.3	12.6	17.5
Middle	6	85.7	46.9	1,495	88.3	40.2	1	25.0	42.8	189	19.1	42.7	47.2
Upper	0	0.0	35.4	0	0.0	47.4	2	50.0	41.2	560	56.6	44.0	33.9
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	7	100.0	100.0	1,693	100.0	100.0	4	100.0	100.0	989	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.1	0	0.0	1.2	1	33.3	0.8	100	44.4	0.8	1.5
Moderate	0	0.0	10.2	0	0.0	8.8	1	33.3	10.9	75	33.3	9.1	17.5
Middle	1	33.3	38.6	100	38.5	36.4	1	33.3	40.7	50	22.2	39.1	47.2
Upper	2	66.7	50.1	160	61.5	53.5	0	0.0	47.6	0	0.0	51.0	33.9
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	260	100.0	100.0	3	100.0	100.0	225	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	6.7	0	0.0	13.3	0	0.0	10.0	0	0.0	0.8	18.5
Moderate	0	0.0	53.3	0	0.0	41.8	0	0.0	45.0	0	0.0	11.1	35.9
Middle	0	0.0	13.3	0	0.0	1.4	0	0.0	20.0	0	0.0	72.2	30.8
Upper	0	0.0	26.7	0	0.0	43.5	0	0.0	25.0	0	0.0	15.9	14.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.0	0	0.0	1.0	1	4.3	0.8	100	1.6	0.6	1.5
Moderate	5	19.2	15.0	1,896	22.9	13.0	6	26.1	13.8	1,091	17.9	11.1	17.5
Middle	14	53.8	40.6	3,904	47.1	35.9	10	43.5	41.5	2,872	47.2	39.9	47.2
Upper	7	26.9	43.5	2,494	30.1	50.1	6	26.1	43.9	2,028	33.3	48.5	33.9
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	26	100.0	100.0	8,294	100.0	100.0	23	100.0	100.0	6,091	100.0	100.0	100.0

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.*
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 D-2

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Greeley, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.5	0	0.0	3.1	0	0.0	2.3	0	0.0	2.7	4.4
Moderate	0	0.0	15.0	0	0.0	18.0	2	20.0	15.2	111	5.6	19.2	17.8
Middle	2	20.0	40.6	90	10.8	38.7	5	50.0	40.0	1,064	53.9	37.3	42.7
Upper	8	80.0	41.2	741	89.2	40.0	3	30.0	42.1	800	40.5	40.7	35.0
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	0.6	0	0.0	0.1	0	0.0	0.5	0	0.0	0.1	
Total	10	100.0	100.0	831	100.0	100.0	10	100.0	100.0	1,975	100.0	100.0	100.0

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

Table D-3

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Greeley, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.9	0	0.0	1.6	0	0.0	0.7	0	0.0	0.7	1.8
Moderate	0	0.0	3.5	0	0.0	2.6	0	0.0	1.9	0	0.0	0.8	8.4
Middle	2	66.7	73.0	377	71.5	75.8	3	100.0	75.1	102	100.0	80.1	67.9
Upper	1	33.3	21.2	150	28.5	19.9	0	0.0	21.2	0	0.0	18.4	21.9
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	1.4	0	0.0	0.1	0	0.0	1.2	0	0.0	0.1	
Total	3	100.0	100.0	527	100.0	100.0	3	100.0	100.0	102	100.0	100.0	100.0

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

Table D-4

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Greeley, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.8	0	0.0	1.5	1	8.3	3.5	215	5.1	1.7	19.5
Moderate	3	21.4	16.9	1,075	17.2	12.1	2	16.7	17.4	681	16.1	12.6	18.0
Middle	5	35.7	30.8	2,047	32.8	28.7	6	50.0	28.7	1,881	44.4	27.0	22.7
Upper	6	42.9	31.6	3,128	50.0	39.3	3	25.0	29.4	1,462	34.5	37.0	39.8
Unknown	0	0.0	17.9	0	0.0	18.4	0	0.0	21.0	0	0.0	21.7	0.0
Total	14	100.0	100.0	6,250	100.0	100.0	12	100.0	100.0	4,239	100.0	100.0	100.0
Refinance Loans													
Low	1	14.3	10.6	31	1.8	5.6	0	0.0	6.7	0	0.0	4.1	19.5
Moderate	2	28.6	19.3	404	23.9	12.7	0	0.0	16.8	0	0.0	11.9	18.0
Middle	2	28.6	26.3	378	22.3	22.1	2	50.0	24.1	499	50.5	20.0	22.7
Upper	2	28.6	29.5	880	52.0	29.3	2	50.0	28.2	490	49.5	31.6	39.8
Unknown	0	0.0	14.4	0	0.0	30.4	0	0.0	24.2	0	0.0	32.5	0.0
Total	7	100.0	100.0	1,693	100.0	100.0	4	100.0	100.0	989	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.0	0	0.0	3.3	0	0.0	5.5	0	0.0	3.8	19.5
Moderate	0	0.0	17.1	0	0.0	11.3	0	0.0	14.5	0	0.0	9.7	18.0
Middle	0	0.0	28.5	0	0.0	24.6	1	33.3	30.8	100	44.4	25.7	22.7
Upper	3	100.0	45.2	260	100.0	57.2	2	66.7	43.4	125	55.6	51.9	39.8
Unknown	0	0.0	4.2	0	0.0	3.6	0	0.0	5.8	0	0.0	8.9	0.0
Total	3	100.0	100.0	260	100.0	100.0	3	100.0	100.0	225	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	3.8	4.6	31	0.4	2.2	2	8.7	4.6	250	4.1	2.3	19.5
Moderate	5	19.2	17.6	1,479	17.8	12.3	4	17.4	17.4	1,164	19.1	12.5	18.0
Middle	8	30.8	30.1	2,480	29.9	27.6	9	39.1	28.0	2,480	40.7	25.6	22.7
Upper	12	46.2	33.1	4,304	51.9	38.7	8	34.8	31.1	2,197	36.1	36.7	39.8
Unknown	0	0.0	14.7	0	0.0	19.2	0	0.0	18.9	0	0.0	23.0	0.0
Total	26	100.0	100.0	8,294	100.0	100.0	23	100.0	100.0	6,091	100.0	100.0	100.0

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.*
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 D-5

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Greeley, Colorado MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	6	60.0	55.1	259	31.2	28.7	4	40.0	54.7	846	42.8	29.8	92.9
Over $1 Million	4	40.0		572	68.8		6	60.0		1,129	57.2		6.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	10	100.0		831	100.0		10	100.0		1,975	100.0		100.0
By Loan Size													
$100,000 or Less	7	70.0	93.2	304	36.6	38.2	6	60.0	93.4	313	15.8	40.1	
$100,001 - $250,000	3	30.0	3.7	527	63.4	16.9	1	10.0	3.6	247	12.5	16.8	
$250,001 - $1 Million	0	0.0	3.1	0	0.0	44.8	3	30.0	3.0	1,415	71.6	43.2	
Total	10	100.0	100.0	831	100.0	100.0	10	100.0	100.0	1,975	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	6	100.0		259	100.0		3	75.0		121	14.3		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		1	25.0		725	85.7		
Total	6	100.0		259	100.0		4	100.0		846	100.0		

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

Table D-6

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Greeley, Colorado MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	100.0	57.3	527	100.0	61.3	3	100.0	54.4	102	100.0	53.2	93.9
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		6.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	3	100.0		527	100.0		3	100.0		102	100.0		100.0
By Loan Size													
$100,000 or Less	1	33.3	80.4	77	14.6	27.5	3	100.0	80.2	102	100.0	29.9	
$100,001 - $250,000	1	33.3	12.7	150	28.5	33.5	0	0.0	13.7	0	0.0	35.6	
$250,001 - $500,000	1	33.3	6.9	300	56.9	39.0	0	0.0	6.0	0	0.0	34.5	
Total	3	100.0	100.0	527	100.0	100.0	3	100.0	100.0	102	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	33.3		77	14.6		3	100.0		102	100.0		
$100,001 - $250,000	1	33.3		150	28.5		0	0.0		0	0.0		
$250,001 - $500,000	1	33.3		300	56.9		0	0.0		0	0.0		
Total	3	100.0		527	100.0		3	100.0		102	100.0		

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

Table D-7

2024 Greeley, Colorado 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 D-8

2023 Greeley, Colorado MSA Demographics								
	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.

Fort Collins – Loveland, Colorado MSA
Table D-9

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins - Loveland, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.6	0	0.0	0.4	0.3
Moderate	2	11.1	13.4	542	6.3	11.8	0	0.0	14.3	0	0.0	12.5	14.8
Middle	12	66.7	59.8	6,415	74.9	58.1	2	66.7	62.2	1,435	65.2	60.7	64.3
Upper	4	22.2	26.5	1,608	18.8	29.9	1	33.3	22.9	767	34.8	26.4	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	8,565	100.0	100.0	3	100.0	100.0	2,202	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.3
Moderate	0	0.0	13.2	0	0.0	10.9	0	0.0	13.5	0	0.0	11.2	14.8
Middle	0	0.0	61.8	0	0.0	60.4	3	75.0	61.2	739	74.7	59.5	64.3
Upper	1	100.0	24.9	100	100.0	28.5	1	25.0	25.1	250	25.3	29.2	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
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	100	100.0	100.0	4	100.0	100.0	989	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.3
Moderate	0	0.0	12.6	0	0.0	10.4	0	0.0	15.4	0	0.0	11.7	14.8
Middle	0	0.0	62.5	0	0.0	60.8	0	0.0	59.9	0	0.0	58.8	64.3
Upper	0	0.0	24.6	0	0.0	28.5	0	0.0	24.6	0	0.0	29.4	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
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	0	0.0	100.0	0	0.0	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	6.3
Moderate	0	0.0	26.3	0	0.0	20.7	0	0.0	11.5	0	0.0	4.4	19.4
Middle	0	0.0	63.2	0	0.0	54.0	3	100.0	73.1	36,046	100.0	70.7	67.4
Upper	0	0.0	10.5	0	0.0	25.3	0	0.0	15.4	0	0.0	24.9	6.9
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	36,046	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	0.3
Moderate	2	10.0	13.1	542	6.2	12.3	0	0.0	14.1	0	0.0	11.5	14.8
Middle	13	65.0	60.8	6,495	74.3	58.2	8	80.0	61.7	38,220	97.4	61.2	64.3
Upper	5	25.0	25.8	1,708	19.5	29.4	2	20.0	23.8	1,017	2.6	26.9	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	8,745	100.0	100.0	10	100.0	100.0	39,237	100.0	100.0	100.0

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.
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 D-10

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Fort Collins - Loveland, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	0.5
Moderate	0	0.0	14.4	0	0.0	14.8	0	0.0	14.5	0	0.0	16.0	17.8
Middle	7	77.8	62.9	560	50.5	64.3	7	70.0	62.7	1,576	71.1	63.0	66.0
Upper	2	22.2	21.6	550	49.5	20.5	3	30.0	21.7	641	28.9	20.5	15.7
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	0.7	0	0.0	0.2	0	0.0	0.6	0	0.0	0.3	
Total	9	100.0	100.0	1,110	100.0	100.0	10	100.0	100.0	2,217	100.0	100.0	100.0

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

Table D-11

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Fort Collins - Loveland, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	9.4	0	0.0	2.7	0	0.0	7.5	0	0.0	2.7	9.9
Middle	1	100.0	56.5	400	100.0	73.0	1	100.0	56.5	400	100.0	59.9	65.6
Upper	0	0.0	34.1	0	0.0	24.3	0	0.0	34.7	0	0.0	37.2	23.8
Unknown	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	1.4	0	0.0	0.2	
Total	1	100.0	100.0	400	100.0	100.0	1	100.0	100.0	400	100.0	100.0	100.0

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

Table D-12

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Fort Collins - Loveland, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	5.6	3.7	206	2.4	1.7	0	0.0	3.6	0	0.0	1.9	19.2
Moderate	4	22.2	14.4	1,426	16.6	10.3	1	33.3	13.9	348	15.8	9.8	18.3
Middle	6	33.3	23.5	2,725	31.8	21.4	0	0.0	21.0	0	0.0	18.8	23.6
Upper	6	33.3	38.7	3,762	43.9	47.0	2	66.7	38.9	1,854	84.2	46.8	38.9
Unknown	1	5.6	19.7	446	5.2	19.5	0	0.0	22.6	0	0.0	22.7	0.0
Total	18	100.0	100.0	8,565	100.0	100.0	3	100.0	100.0	2,202	100.0	100.0	100.0
Refinance Loans													
Low	1	100.0	10.3	100	100.0	6.6	0	0.0	7.7	0	0.0	4.4	19.2
Moderate	0	0.0	19.6	0	0.0	13.6	2	50.0	15.9	150	15.2	10.9	18.3
Middle	0	0.0	23.7	0	0.0	21.5	0	0.0	21.4	0	0.0	17.3	23.6
Upper	0	0.0	33.0	0	0.0	41.4	2	50.0	36.7	839	84.8	42.6	38.9
Unknown	0	0.0	13.4	0	0.0	16.8	0	0.0	18.3	0	0.0	24.9	0.0
Total	1	100.0	100.0	100	100.0	100.0	4	100.0	100.0	989	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.7	0	0.0	3.8	0	0.0	5.1	0	0.0	3.0	19.2
Moderate	0	0.0	15.8	0	0.0	10.8	0	0.0	19.3	0	0.0	13.5	18.3
Middle	0	0.0	26.5	0	0.0	22.6	0	0.0	24.4	0	0.0	18.5	23.6
Upper	0	0.0	45.6	0	0.0	57.3	0	0.0	47.7	0	0.0	61.1	38.9
Unknown	0	0.0	4.3	0	0.0	5.5	0	0.0	3.5	0	0.0	4.0	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	2	10.0	5.8	306	3.5	2.6	0	0.0	5.1	0	0.0	2.5	19.2
Moderate	5	25.0	15.9	1,506	17.2	10.8	3	42.9	15.8	498	15.6	10.3	18.3
Middle	6	30.0	24.4	2,725	31.2	21.5	0	0.0	22.1	0	0.0	18.6	23.6
Upper	6	30.0	38.6	3,762	43.0	46.9	4	57.1	39.0	2,693	84.4	46.6	38.9
Unknown	1	5.0	15.3	446	5.1	18.1	0	0.0	18.1	0	0.0	22.0	0.0
Total	20	100.0	100.0	8,745	100.0	100.0	7	100.0	100.0	3,191	100.0	100.0	100.0

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.
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 D-13

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Fort Collins - Loveland, Colorado MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	5	55.6	60.0	203	18.3	37.5	3	30.0	57.6	170	7.7	37.3	93.9
Over $1 Million	4	44.4		907	81.7		7	70.0		2,047	92.3		5.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Total	9	100.0		1,110	100.0		10	100.0		2,217	100.0		100.0
By Loan Size													
$100,000 or Less	6	66.7	94.0	253	22.8	38.4	5	50.0	94.3	311	14.0	40.3	
$100,001 - $250,000	1	11.1	3.2	250	22.5	16.3	2	20.0	3.0	478	21.6	14.8	
$250,001 - $1 Million	2	22.2	2.8	607	54.7	45.3	3	30.0	2.7	1,428	64.4	44.8	
Total	9	100.0	100.0	1,110	100.0	100.0	10	100.0	100.0	2,217	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	5	100.0		203	100.0		3	100.0		170	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	5	100.0		203	100.0		3	100.0		170	100.0		

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

Table D-14

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Fort Collins - Loveland, Colorado MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	67.4	0	0.0	44.1	0	0.0	62.6	0	0.0	51.4	96.7
Over $1 Million	1	100.0		400	100.0		1	100.0		400	100.0		3.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.3
Total	1	100.0		400	100.0		1	100.0		400	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	87.0	0	0.0	24.7	0	0.0	90.5	0	0.0	34.8	
$100,001 - $250,000	0	0.0	5.8	0	0.0	20.1	0	0.0	4.8	0	0.0	20.6	
$250,001 - $500,000	1	100.0	7.2	400	100.0	55.1	1	100.0	4.8	400	100.0	44.6	
Total	1	100.0	100.0	400	100.0	100.0	1	100.0	100.0	400	100.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-15

2024 Fort Collins - Loveland, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	1.2	653	0.8	116	17.8	16,127	19.2
Moderate	16	18.6	13,425	16.0	1,046	7.8	15,377	18.3
Middle	52	60.5	54,206	64.6	2,318	4.3	19,784	23.6
Upper	16	18.6	15,637	18.6	436	2.8	32,633	38.9
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	**86**	**100.0**	**83,921**	**100.0**	**3,916**	**4.7**	**83,921**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	2,434	309	0.3	12.7	2,046	84.1	79	3.2
Moderate	25,291	13,129	14.8	51.9	10,580	41.8	1,582	6.3
Middle	94,518	57,198	64.3	60.5	29,482	31.2	7,838	8.3
Upper	22,207	18,238	20.5	82.1	3,101	14.0	868	3.9
Unknown	133	85	0.1	63.9	17	12.8	31	23.3
Total AA	**144,583**	**88,959**	**100.0**	**61.5**	**45,226**	**31.3**	**10,398**	**7.2**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	88	0.5	86	0.5	2	0.2	0	0.0
Moderate	3,455	17.8	3,217	17.7	211	21.0	27	14.9
Middle	12,813	66.0	12,044	66.1	658	65.5	111	61.3
Upper	3,044	15.7	2,867	15.7	134	13.3	43	23.8
Unknown	3	0.0	3	0.0	0	0.0	0	0.0
Total AA	**19,403**	**100.0**	**18,217**	**100.0**	**1,005**	**100.0**	**181**	**100.0**
Percentage of Total Businesses:				**93.9**		**5.2**		**0.9**
	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	0.5	0	0.0	0	0.0
Moderate	39	9.9	38	9.9	1	8.3	0	0.0
Middle	259	65.6	253	66.2	5	41.7	1	100.0
Upper	94	23.8	88	23.0	6	50.0	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
Total AA	**395**	**100.0**	**382**	**100.0**	**12**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.7**		**3.0**		**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 D-16

2023 Fort Collins - Loveland, Colorado MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	101	0.4	99	0.5	2	0.2	0	0.0
Moderate	3,736	16.6	3,496	16.5	213	19.3	27	12.6
Middle	14,758	65.6	13,903	65.7	724	65.7	131	61.2
Upper	3,886	17.3	3,667	17.3	163	14.8	56	26.2
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	**22,483**	**100.0**	**21,167**	**100.0**	**1,102**	**100.0**	**214**	**100.0**
Percentage of Total Businesses:				**94.1**		**4.9**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	40	8.6	39	8.6	1	9.1	0	0.0
Middle	298	63.9	293	64.5	4	36.4	1	100.0
Upper	125	26.8	119	26.2	6	54.5	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**466**	**100.0**	**454**	**100.0**	**11**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.4**		**2.4**		**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.

Boulder, Colorado MSA
Table D-17

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Boulder, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	1.0	0	0.0	1.7	0	0.0	1.2	1.7
Moderate	0	0.0	13.2	0	0.0	9.6	0	0.0	13.3	0	0.0	9.4	14.2
Middle	3	50.0	52.0	1,610	47.5	47.9	0	0.0	54.4	0	0.0	50.2	44.2
Upper	2	33.3	32.3	1,469	43.4	40.5	3	100.0	29.6	2,828	100.0	38.3	38.6
Unknown	1	16.7	1.1	308	9.1	1.1	0	0.0	1.0	0	0.0	0.9	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	3,387	100.0	100.0	3	100.0	100.0	2,828	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.9	0	0.0	0.6	0	0.0	1.5	0	0.0	1.1	1.7
Moderate	0	0.0	14.3	0	0.0	10.6	0	0.0	14.1	0	0.0	10.6	14.2
Middle	0	0.0	43.2	0	0.0	40.0	2	66.7	45.1	548	66.9	44.5	44.2
Upper	1	100.0	39.7	600	100.0	45.7	1	33.3	37.9	271	33.1	42.2	38.6
Unknown	0	0.0	1.8	0	0.0	3.0	0	0.0	1.4	0	0.0	1.6	1.3
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	600	100.0	100.0	3	100.0	100.0	819	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.7	0	0.0	1.1	0	0.0	0.7	1.7
Moderate	0	0.0	12.9	0	0.0	7.6	0	0.0	13.4	0	0.0	10.1	14.2
Middle	0	0.0	43.7	0	0.0	38.1	0	0.0	42.1	0	0.0	36.0	44.2
Upper	0	0.0	40.7	0	0.0	51.3	0	0.0	41.6	0	0.0	51.4	38.6
Unknown	0	0.0	1.2	0	0.0	1.2	0	0.0	1.8	0	0.0	1.8	1.3
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	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	15.0	0	0.0	14.3	0	0.0	4.5	0	0.0	4.0	6.7
Moderate	0	0.0	30.0	0	0.0	51.1	0	0.0	36.4	0	0.0	62.2	17.1
Middle	0	0.0	30.0	0	0.0	20.5	0	0.0	27.3	0	0.0	21.1	46.3
Upper	0	0.0	20.0	0	0.0	13.9	0	0.0	18.2	0	0.0	8.6	18.3
Unknown	0	0.0	5.0	0	0.0	0.2	0	0.0	13.6	0	0.0	4.2	11.6
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.3	0	0.0	2.5	0	0.0	1.5	0	0.0	1.6	1.7
Moderate	1	11.1	13.4	215	4.9	14.5	0	0.0	13.7	0	0.0	19.2	14.2
Middle	4	44.4	48.4	1,810	41.1	42.6	2	33.3	50.1	548	15.0	43.1	44.2
Upper	3	33.3	35.8	2,069	47.0	39.2	4	66.7	33.5	3,099	85.0	34.4	38.6
Unknown	1	11.1	1.2	308	7.0	1.2	0	0.0	1.2	0	0.0	1.7	1.3
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	4,402	100.0	100.0	6	100.0	100.0	3,647	100.0	100.0	100.0

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.*
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 D-18

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Boulder, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.4	0	0.0	3.0	0	0.0	1.9	0	0.0	3.1	1.9
Moderate	0	0.0	20.2	0	0.0	22.7	0	0.0	20.0	0	0.0	23.6	21.7
Middle	0	0.0	38.1	0	0.0	34.6	0	0.0	38.7	0	0.0	36.3	36.6
Upper	0	0.0	36.5	0	0.0	37.3	2	100.0	37.3	1,384	100.0	34.6	38.3
Unknown	0	0.0	2.2	0	0.0	2.3	0	0.0	1.7	0	0.0	2.2	1.4
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0.5	0	0.0	0.2	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	1,384	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 D-19

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Boulder, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
Moderate	0	0.0	19.2	0	0.0	8.5	0	0.0	23.5	0	0.0	27.5	18.0
Middle	0	0.0	45.2	0	0.0	48.4	0	0.0	43.5	0	0.0	44.1	45.8
Upper	0	0.0	35.6	0	0.0	43.1	0	0.0	32.9	0	0.0	28.4	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
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	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-20

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Boulder, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.3	0	0.0	1.7	0	0.0	4.9	0	0.0	2.4	20.5
Moderate	0	0.0	14.4	0	0.0	9.0	0	0.0	13.1	0	0.0	7.9	17.8
Middle	1	16.7	19.6	500	14.8	15.8	0	0.0	21.3	0	0.0	17.4	21.3
Upper	5	83.3	45.3	2,887	85.2	57.2	3	100.0	42.5	2,828	100.0	53.3	40.5
Unknown	0	0.0	16.4	0	0.0	16.3	0	0.0	18.2	0	0.0	18.9	0.0
Total	6	100.0	100.0	3,387	100.0	100.0	3	100.0	100.0	2,828	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	15.1	0	0.0	8.7	2	66.7	12.3	449	54.8	6.3	20.5
Moderate	0	0.0	15.0	0	0.0	8.5	0	0.0	15.7	0	0.0	9.1	17.8
Middle	0	0.0	17.0	0	0.0	11.5	1	33.3	19.7	370	45.2	15.1	21.3
Upper	1	100.0	37.2	600	100.0	45.3	0	0.0	37.9	0	0.0	48.8	40.5
Unknown	0	0.0	15.7	0	0.0	26.0	0	0.0	14.4	0	0.0	20.8	0.0
Total	1	100.0	100.0	600	100.0	100.0	3	100.0	100.0	819	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	10.4	0	0.0	4.8	0	0.0	10.7	0	0.0	5.6	20.5
Moderate	0	0.0	19.8	0	0.0	11.8	0	0.0	16.1	0	0.0	7.7	17.8
Middle	0	0.0	21.3	0	0.0	16.9	0	0.0	24.0	0	0.0	19.6	21.3
Upper	0	0.0	46.7	0	0.0	63.7	0	0.0	43.6	0	0.0	57.1	40.5
Unknown	0	0.0	1.8	0	0.0	2.8	0	0.0	5.6	0	0.0	10.1	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	7.7	0	0.0	2.9	2	33.3	7.8	449	12.3	3.5	20.5
Moderate	0	0.0	15.6	0	0.0	8.9	0	0.0	14.5	0	0.0	8.2	17.8
Middle	1	11.1	19.9	500	11.4	15.1	1	16.7	21.3	370	10.1	16.9	21.3
Upper	8	88.9	44.0	3,902	88.6	55.9	3	50.0	41.3	2,828	77.5	52.9	40.5
Unknown	0	0.0	12.8	0	0.0	17.2	0	0.0	15.1	0	0.0	18.5	0.0
Total	9	100.0	100.0	4,402	100.0	100.0	6	100.0	100.0	3,647	100.0	100.0	100.0

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.
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 D-21

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Boulder, Colorado MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	57.9	0	0.0	32.3	0	0.0	57.3	0	0.0	34.5	93.1
Over $1 Million	0	0.0		0	0.0		1	50.0		817	59.0		5.9
Revenue Unknown	0	0.0		0	0.0		1	50.0		567	41.0		1.1
Total	0	0.0		0	0.0		2	100.0		1,384	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	95.3	0	0.0	43.0	0	0.0	96.0	0	0.0	48.0	
$100,001 - $250,000	0	0.0	2.3	0	0.0	13.3	0	0.0	2.1	0	0.0	12.6	
$250,001 - $1 Million	0	0.0	2.4	0	0.0	43.6	2	100.0	2.0	1,384	100.0	39.4	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	1,384	100.0	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		0	0.0		0	0.0		
$250,001 - $1 Million	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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-22

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Boulder, Colorado MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	71.2	0	0.0	79.7	0	0.0	69.4	0	0.0	59.1	98.8
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.3
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	93.2	0	0.0	39.3	0	0.0	94.1	0	0.0	46.9	
$100,001 - $250,000	0	0.0	2.7	0	0.0	11.7	0	0.0	4.7	0	0.0	38.0	
$250,001 - $500,000	0	0.0	4.1	0	0.0	49.0	0	0.0	1.2	0	0.0	15.2	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-23

2024 Boulder, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4	5.1	1,452	2.0	98	6.7	14,995	20.5
Moderate	13	16.7	11,513	15.7	804	7.0	13,023	17.8
Middle	32	41.0	32,959	45.0	1,361	4.1	15,578	21.3
Upper	26	33.3	26,585	36.3	673	2.5	29,648	40.5
Unknown	3	3.8	735	1.0	143	19.5	0	0.0
Total AA	**78**	**100.0**	**73,244**	**100.0**	**3,079**	**4.2**	**73,244**	**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	1.7	31.6	2,702	62.3	263	6.1
Moderate	22,404	11,509	14.2	51.4	9,815	43.8	1,080	4.8
Middle	60,609	35,820	44.2	59.1	20,532	33.9	4,257	7.0
Upper	42,756	31,308	38.6	73.2	9,743	22.8	1,705	4.0
Unknown	5,305	1,054	1.3	19.9	3,512	66.2	739	13.9
Total AA	**135,409**	**81,061**	**100.0**	**59.9**	**46,304**	**34.2**	**8,044**	**5.9**
	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	1.9	36	2.8	4	1.7
Moderate	4,809	21.7	4,351	21.1	409	31.4	49	20.8
Middle	8,112	36.6	7,617	36.9	415	31.9	80	33.9
Upper	8,489	38.3	7,971	38.7	421	32.4	97	41.1
Unknown	320	1.4	294	1.4	20	1.5	6	2.5
Total AA	**22,158**	**100.0**	**20,621**	**100.0**	**1,301**	**100.0**	**236**	**100.0**
Percentage of Total Businesses:				**93.1**		**5.9**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	0.6	2	0.6	0	0.0	0	0.0
Moderate	60	18.0	59	17.9	1	33.3	0	0.0
Middle	153	45.8	150	45.5	2	66.7	1	100.0
Upper	117	35.0	117	35.5	0	0.0	0	0.0
Unknown	2	0.6	2	0.6	0	0.0	0	0.0
Total AA	**334**	**100.0**	**330**	**100.0**	**3**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**0.9**		**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 D-24

2023 Boulder, Colorado MSA Demographics								
	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	2.0	39	2.6	6	2.2
Moderate	5,200	20.3	4,702	19.7	446	30.0	52	18.9
Middle	9,956	38.8	9,321	39.1	536	36.0	99	36.0
Upper	9,541	37.2	8,978	37.6	449	30.2	114	41.5
Unknown	413	1.6	391	1.6	18	1.2	4	1.5
Total AA	**25,630**	**100.0**	**23,867**	**100.0**	**1,488**	**100.0**	**275**	**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	4	1.0	3	0.8	1	16.7	0	0.0
Moderate	63	16.1	62	16.1	1	16.7	0	0.0
Middle	175	44.8	171	44.5	3	50.0	1	100.0
Upper	146	37.3	145	37.8	1	16.7	0	0.0
Unknown	3	0.8	3	0.8	0	0.0	0	0.0
Total AA	**391**	**100.0**	**384**	**100.0**	**6**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.2**		**1.5**		**0.3**

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.

Pueblo, Colorado MSA
Table D-25

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Pueblo, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	15.4	4.8	281	8.0	3.1	0	0.0	5.3	0	0.0	3.2	4.4
Moderate	0	0.0	18.6	0	0.0	13.3	0	0.0	15.9	0	0.0	11.4	15.5
Middle	4	30.8	38.3	1,147	32.7	36.1	2	33.3	39.0	560	22.1	36.0	38.1
Upper	7	53.8	38.3	2,075	59.2	47.5	4	66.7	39.8	1,969	77.9	49.4	42.1
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	13	100.0	100.0	3,503	100.0	100.0	6	100.0	100.0	2,529	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.4	0	0.0	1.3	0	0.0	4.1	0	0.0	2.9	4.4
Moderate	0	0.0	16.0	0	0.0	5.5	0	0.0	14.8	0	0.0	10.6	15.5
Middle	0	0.0	39.8	0	0.0	71.2	0	0.0	40.1	0	0.0	39.4	38.1
Upper	1	100.0	39.8	522	100.0	22.0	1	100.0	40.9	234	100.0	46.9	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	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	522	100.0	100.0	1	100.0	100.0	234	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.1	0	0.0	2.8	0	0.0	4.3	0	0.0	2.7	4.4
Moderate	0	0.0	13.2	0	0.0	11.8	0	0.0	13.8	0	0.0	11.0	15.5
Middle	0	0.0	31.0	0	0.0	27.3	0	0.0	37.0	0	0.0	34.8	38.1
Upper	1	100.0	52.7	40	100.0	58.0	0	0.0	45.0	0	0.0	51.5	42.1
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	40	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	8.3	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	13.7
Moderate	0	0.0	58.3	0	0.0	65.0	0	0.0	60.0	0	0.0	87.0	30.3
Middle	0	0.0	8.3	0	0.0	24.9	0	0.0	10.0	0	0.0	5.8	44.4
Upper	0	0.0	25.0	0	0.0	8.6	0	0.0	30.0	0	0.0	7.2	11.4
Unknown	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	
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													**Owner Occupied Units %**
Low	2	11.8	4.4	281	6.8	2.4	0	0.0	4.6	0	0.0	2.9	4.4
Moderate	0	0.0	17.1	0	0.0	11.8	0	0.0	15.1	0	0.0	14.0	15.5
Middle	4	23.5	37.9	1,147	27.8	47.2	2	28.6	38.5	560	20.3	35.6	38.1
Upper	11	64.7	40.6	2,696	65.4	38.5	5	71.4	41.8	2,203	79.7	47.4	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	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	17	100.0	100.0	4,124	100.0	100.0	7	100.0	100.0	2,763	100.0	100.0	100.0

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.
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 D-26

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Pueblo, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.0	0	0.0	1.8	0	0.0	3.4	0	0.0	2.7	4.2
Moderate	0	0.0	20.7	0	0.0	26.1	0	0.0	20.1	0	0.0	29.3	26.5
Middle	0	0.0	32.9	0	0.0	29.1	1	50.0	31.6	59	44.7	26.6	32.9
Upper	0	0.0	43.0	0	0.0	42.8	1	50.0	44.4	73	55.3	41.1	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	132	100.0	100.0	100.0

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

Table D-27

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Pueblo, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	5.0	0	0.0	3.0	0	0.0	9.4	0	0.0	13.5	16.4
Middle	0	0.0	55.0	0	0.0	72.1	0	0.0	53.1	0	0.0	71.7	35.1
Upper	0	0.0	40.0	0	0.0	24.9	0	0.0	37.5	0	0.0	14.7	47.4
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	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-28

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Pueblo, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	15.4	4.9	251	7.2	2.4	1	16.7	4.0	188	7.4	1.9	22.4
Moderate	1	7.7	21.7	155	4.4	15.4	0	0.0	16.8	0	0.0	10.9	16.7
Middle	7	53.8	27.2	2,244	64.1	27.5	0	0.0	26.5	0	0.0	24.6	19.3
Upper	3	23.1	29.3	853	24.4	36.9	5	83.3	35.3	2,341	92.6	43.9	41.6
Unknown	0	0.0	16.9	0	0.0	17.9	0	0.0	17.5	0	0.0	18.7	0.0
Total	13	100.0	100.0	3,503	100.0	100.0	6	100.0	100.0	2,529	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	10.6	0	0.0	2.7	0	0.0	5.7	0	0.0	2.8	22.4
Moderate	0	0.0	20.8	0	0.0	7.8	0	0.0	14.0	0	0.0	9.4	16.7
Middle	0	0.0	21.3	0	0.0	10.3	1	100.0	19.6	234	100.0	16.2	19.3
Upper	1	100.0	28.1	522	100.0	15.8	0	0.0	29.0	0	0.0	31.1	41.6
Unknown	0	0.0	19.2	0	0.0	63.4	0	0.0	31.8	0	0.0	40.5	0.0
Total	1	100.0	100.0	522	100.0	100.0	1	100.0	100.0	234	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.7	0	0.0	3.1	0	0.0	6.4	0	0.0	4.2	22.4
Moderate	0	0.0	17.6	0	0.0	14.9	0	0.0	15.9	0	0.0	11.1	16.7
Middle	0	0.0	24.3	0	0.0	20.3	0	0.0	24.5	0	0.0	21.3	19.3
Upper	1	100.0	50.6	40	100.0	57.9	0	0.0	47.4	0	0.0	54.0	41.6
Unknown	0	0.0	2.8	0	0.0	3.7	0	0.0	5.8	0	0.0	9.4	0.0
Total	1	100.0	100.0	40	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	17.6	6.4	271	6.6	2.6	1	14.3	5.0	188	6.8	2.4	22.4
Moderate	2	11.8	21.2	194	4.7	12.9	0	0.0	15.6	0	0.0	10.4	16.7
Middle	7	41.2	25.5	2,244	54.4	21.2	1	14.3	24.2	234	8.5	22.0	19.3
Upper	5	29.4	32.1	1,415	34.3	30.8	5	71.4	35.7	2,341	84.7	40.9	41.6
Unknown	0	0.0	14.7	0	0.0	32.5	0	0.0	19.5	0	0.0	24.3	0.0
Total	17	100.0	100.0	4,124	100.0	100.0	7	100.0	100.0	2,763	100.0	100.0	100.0

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.
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

Table D-29

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Pueblo, Colorado MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	59.9	0	0.0	36.0	0	0.0	58.6	0	0.0	40.3	94.1
Over $1 Million	0	0.0		0	0.0		1	50.0		73	55.3		5.3
Revenue Unknown	0	0.0		0	0.0		1	50.0		59	44.7		0.6
Total	0	0.0		0	0.0		2	100.0		132	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	96.4	0	0.0	48.0	2	100.0	96.5	132	100.0	52.4	
$100,001 - $250,000	0	0.0	1.9	0	0.0	13.7	0	0.0	1.9	0	0.0	13.8	
$250,001 - $1 Million	0	0.0	1.6	0	0.0	38.3	0	0.0	1.5	0	0.0	33.8	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	132	100.0	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		0	0.0		0	0.0		
$250,001 - $1 Million	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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-30

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Pueblo, Colorado MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	55.0	0	0.0	53.4	0	0.0	53.1	0	0.0	71.8	98.2
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		0.0
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	85.0	0	0.0	22.0	0	0.0	75.0	0	0.0	16.2	
$100,001 - $250,000	0	0.0	10.0	0	0.0	34.5	0	0.0	15.6	0	0.0	35.2	
$250,001 - $500,000	0	0.0	5.0	0	0.0	43.4	0	0.0	9.4	0	0.0	48.6	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-31

2024 Pueblo, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	3	5.2	2,208	5.5	761	34.5	9,004	22.4
Moderate	14	24.1	7,186	17.9	1,571	21.9	6,708	16.7
Middle	20	34.5	14,873	37.0	1,814	12.2	7,774	19.3
Upper	18	31.0	15,960	39.7	1,097	6.9	16,741	41.6
Unknown	3	5.2	0	0.0	0	0.0	0	0.0
Total AA	**58**	**100.0**	**40,227**	**100.0**	**5,243**	**13.0**	**40,227**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	4,761	1,850	4.4	38.9	2,441	51.3	470	9.9
Moderate	15,656	6,579	15.5	42.0	7,197	46.0	1,880	12.0
Middle	27,238	16,158	38.1	59.3	9,088	33.4	1,992	7.3
Upper	23,605	17,853	42.1	75.6	4,016	17.0	1,736	7.4
Unknown	24	0	0.0	0.0	24	100.0	0	0.0
Total AA	**71,284**	**42,440**	**100.0**	**59.5**	**22,766**	**31.9**	**6,078**	**8.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	254	4.2	238	4.2	16	5.0	0	0.0
Moderate	1,596	26.5	1,453	25.6	127	39.9	16	41.0
Middle	1,985	32.9	1,885	33.3	91	28.6	9	23.1
Upper	2,168	36.0	2,073	36.6	81	25.5	14	35.9
Unknown	23	0.4	20	0.4	3	0.9	0	0.0
Total AA	**6,026**	**100.0**	**5,669**	**100.0**	**318**	**100.0**	**39**	**100.0**
Percentage of Total Businesses:				**94.1**		**5.3**		**0.6**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2	1.2	2	1.2	0	0.0	0	0.0
Moderate	28	16.4	27	16.1	1	33.3	0	0.0
Middle	60	35.1	58	34.5	2	66.7	0	0.0
Upper	81	47.4	81	48.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**171**	**100.0**	**168**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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 D-32

2023 Pueblo, Colorado MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	262	4.0	245	4.0	17	5.0	0	0.0
Moderate	1,701	26.2	1,555	25.5	129	37.9	17	41.5
Middle	2,152	33.2	2,044	33.5	98	28.8	10	24.4
Upper	2,346	36.2	2,239	36.7	93	27.4	14	34.1
Unknown	25	0.4	22	0.4	3	0.9	0	0.0
Total AA	**6,486**	**100.0**	**6,105**	**100.0**	**340**	**100.0**	**41**	**100.0**
Percentage of Total Businesses:				**94.1**		**5.2**		**0.6**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	3	1.6	3	1.6	0	0.0	0	0.0
Moderate	30	16.0	29	15.7	1	33.3	0	0.0
Middle	65	34.6	63	34.1	2	66.7	0	0.0
Upper	90	47.9	90	48.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**188**	**100.0**	**185**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.4**		**1.6**		**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.

Grand Junction, Colorado MSA
Table D-33

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Grand Junction, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	0.2
Moderate	3	75.0	33.2	610	66.4	27.3	0	0.0	30.4	0	0.0	24.7	25.3
Middle	1	25.0	44.3	308	33.6	44.1	2	100.0	47.4	956	100.0	46.8	46.6
Upper	0	0.0	22.0	0	0.0	28.2	0	0.0	21.8	0	0.0	28.2	28.0
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	918	100.0	100.0	2	100.0	100.0	956	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.2
Moderate	0	0.0	26.5	0	0.0	21.3	0	0.0	27.7	0	0.0	24.6	25.3
Middle	0	0.0	47.8	0	0.0	48.5	0	0.0	49.2	0	0.0	49.1	46.6
Upper	0	0.0	25.5	0	0.0	30.1	0	0.0	22.9	0	0.0	26.2	28.0
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	0	0.0	100.0	0	0.0	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	0.2
Moderate	0	0.0	22.1	0	0.0	17.3	0	0.0	23.1	0	0.0	17.9	25.3
Middle	0	0.0	44.1	0	0.0	41.0	0	0.0	45.1	0	0.0	43.6	46.6
Upper	0	0.0	33.8	0	0.0	41.6	0	0.0	31.8	0	0.0	38.5	28.0
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	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	1.8	9.1
Moderate	0	0.0	57.1	0	0.0	27.9	0	0.0	77.8	0	0.0	49.7	30.3
Middle	0	0.0	35.7	0	0.0	16.0	0	0.0	11.1	0	0.0	48.5	45.0
Upper	0	0.0	7.1	0	0.0	56.1	0	0.0	0.0	0	0.0	0.0	15.6
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0.2
Moderate	3	75.0	30.6	610	66.4	25.9	0	0.0	28.7	0	0.0	24.8	25.3
Middle	1	25.0	45.1	308	33.6	43.6	2	100.0	48.0	956	100.0	47.2	46.6
Upper	0	0.0	24.0	0	0.0	30.2	0	0.0	23.1	0	0.0	27.7	28.0
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	918	100.0	100.0	2	100.0	100.0	956	100.0	100.0	100.0

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.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product

Table D-34

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Grand Junction, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.3	0	0.0	0.9	0	0.0	1.2	0	0.0	1.4	2.8
Moderate	1	50.0	21.8	1,000	90.8	20.0	1	50.0	23.0	416	95.4	24.5	23.3
Middle	1	50.0	51.5	101	9.2	60.9	0	0.0	51.2	0	0.0	55.4	49.9
Upper	0	0.0	24.8	0	0.0	18.1	1	50.0	24.0	20	4.6	18.6	24.0
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	0.6	0	0.0	0.1	0	0.0	0.5	0	0.0	0.1	
Total	2	100.0	100.0	1,101	100.0	100.0	2	100.0	100.0	436	100.0	100.0	100.0

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

Table D-35

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Grand Junction, Colorado MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	3.3	0	0.0	0.5	0	0.0	1.8	0	0.0	0.3	4.9
Middle	0	0.0	78.8	0	0.0	82.2	0	0.0	75.9	0	0.0	82.5	63.1
Upper	0	0.0	17.2	0	0.0	17.2	0	0.0	21.4	0	0.0	17.1	32.0
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	0.7	0	0.0	0.1	0	0.0	0.9	0	0.0	0.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-36

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Grand Junction, Colorado MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.2	0	0.0	2.1	0	0.0	2.2	0	0.0	1.0	19.4
Moderate	0	0.0	18.7	0	0.0	13.2	0	0.0	14.9	0	0.0	9.6	18.8
Middle	1	25.0	26.9	308	33.6	23.7	0	0.0	23.6	0	0.0	19.0	22.3
Upper	3	75.0	33.0	610	66.4	42.1	2	100.0	39.1	956	100.0	48.7	39.5
Unknown	0	0.0	17.2	0	0.0	19.0	0	0.0	20.1	0	0.0	21.6	0.0
Total	4	100.0	100.0	918	100.0	100.0	2	100.0	100.0	956	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	12.0	0	0.0	7.6	0	0.0	7.5	0	0.0	4.4	19.4
Moderate	0	0.0	22.4	0	0.0	17.8	0	0.0	14.4	0	0.0	9.3	18.8
Middle	0	0.0	24.2	0	0.0	22.9	0	0.0	22.1	0	0.0	18.8	22.3
Upper	0	0.0	26.5	0	0.0	32.6	0	0.0	29.5	0	0.0	33.8	39.5
Unknown	0	0.0	14.8	0	0.0	19.1	0	0.0	26.5	0	0.0	33.7	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
Home Improvement Loans													
Low	0	0.0	8.2	0	0.0	5.0	0	0.0	4.6	0	0.0	1.8	19.4
Moderate	0	0.0	16.7	0	0.0	10.2	0	0.0	14.7	0	0.0	7.9	18.8
Middle	0	0.0	23.1	0	0.0	21.0	0	0.0	24.6	0	0.0	20.6	22.3
Upper	0	0.0	46.2	0	0.0	57.6	0	0.0	47.7	0	0.0	54.5	39.5
Unknown	0	0.0	5.9	0	0.0	6.2	0	0.0	8.4	0	0.0	15.1	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	6.6	0	0.0	3.3	0	0.0	4.3	0	0.0	2.0	19.4
Moderate	0	0.0	19.9	0	0.0	14.1	0	0.0	15.7	0	0.0	9.8	18.8
Middle	1	25.0	26.2	308	33.6	23.5	0	0.0	23.6	0	0.0	19.1	22.3
Upper	3	75.0	33.0	610	66.4	41.2	2	100.0	37.8	956	100.0	45.7	39.5
Unknown	0	0.0	14.3	0	0.0	18.0	0	0.0	18.5	0	0.0	23.4	0.0
Total	4	100.0	100.0	918	100.0	100.0	2	100.0	100.0	956	100.0	100.0	100.0

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.
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

Table D-37

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Grand Junction, Colorado MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	60.7	0	0.0	34.7	1	50.0	56.5	20	4.6	33.0	92.7
Over $1 Million	2	100.0		1,101	100.0		1	50.0		416	95.4		6.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Total	2	100.0		1,101	100.0		2	100.0		436	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	93.8	0	0.0	36.6	1	50.0	94.3	20	4.6	39.8	
$100,001 - $250,000	1	50.0	3.1	101	9.2	14.7	0	0.0	2.9	0	0.0	14.0	
$250,001 - $1 Million	1	50.0	3.1	1,000	90.8	48.7	1	50.0	2.9	416	95.4	46.3	
Total	2	100.0	100.0	1,101	100.0	100.0	2	100.0	100.0	436	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	100.0		20	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		20	100.0		

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

Table D-38

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Grand Junction, Colorado MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	80.1	0	0.0	75.7	0	0.0	67.0	0	0.0	56.7	98.4
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.6
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	86.8	0	0.0	43.3	0	0.0	83.9	0	0.0	33.9	
$100,001 - $250,000	0	0.0	8.6	0	0.0	26.1	0	0.0	8.0	0	0.0	23.1	
$250,001 - $500,000	0	0.0	4.6	0	0.0	30.7	0	0.0	8.0	0	0.0	43.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-39

2024 Grand Junction, Colorado MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	3.0	162	0.4	23	14.2	7,268	19.4
Moderate	10	30.3	10,749	28.6	1,681	15.6	7,067	18.8
Middle	14	42.4	17,083	45.5	1,294	7.6	8,360	22.3
Upper	8	24.2	9,534	25.4	199	2.1	14,833	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**33**	**100.0**	**37,528**	**100.0**	**3,197**	**8.5**	**37,528**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	784	82	0.2	10.5	603	76.9	99	12.6
Moderate	19,815	10,423	25.3	52.6	8,313	42.0	1,079	5.4
Middle	28,789	19,225	46.6	66.8	7,338	25.5	2,226	7.7
Upper	14,856	11,540	28.0	77.7	2,226	15.0	1,090	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**64,244**	**41,270**	**100.0**	**64.2**	**18,480**	**28.8**	**4,494**	**7.0**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	206	2.8	192	2.8	13	2.8	1	1.3
Moderate	1,709	23.3	1,598	23.5	94	20.5	17	21.8
Middle	3,665	49.9	3,350	49.2	276	60.3	39	50.0
Upper	1,765	24.0	1,669	24.5	75	16.4	21	26.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7,345**	**100.0**	**6,809**	**100.0**	**458**	**100.0**	**78**	**100.0**
Percentage of Total Businesses:				**92.7**		**6.2**		**1.1**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	4.9	12	5.0	0	0.0	0	0.0
Middle	154	63.1	152	63.3	2	50.0	0	0.0
Upper	78	32.0	76	31.7	2	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**244**	**100.0**	**240**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.4**		**1.6**		**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 D-40

2023 Grand Junction, Colorado MSA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	207	2.6	193	2.6	13	2.7	1	1.3
Moderate	1,981	24.5	1,865	24.8	100	20.4	16	20.5
Middle	4,030	49.7	3,686	48.9	303	62.0	41	52.6
Upper	1,884	23.3	1,791	23.8	73	14.9	20	25.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,102**	**100.0**	**7,535**	**100.0**	**489**	**100.0**	**78**	**100.0**
Percentage of Total Businesses:				**93.0**		**6.0**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	17	6.3	17	6.4	0	0.0	0	0.0
Middle	169	62.4	167	62.8	2	40.0	0	0.0
Upper	85	31.4	82	30.8	3	60.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**271**	**100.0**	**266**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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.

St. George, Utah MSA
Table D-41

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: St. George, Utah MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	9.9	0	0.0	8.4	0	0.0	8.7	0	0.0	6.9	12.3
Middle	4	57.1	51.4	3,181	44.9	48.5	2	100.0	50.2	828	100.0	47.8	68.3
Upper	3	42.9	38.7	3,900	55.1	43.1	0	0.0	41.1	0	0.0	45.2	19.4
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	7	100.0	100.0	7,081	100.0	100.0	2	100.0	100.0	828	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	0	0.0	10.8	0	0.0	8.6	0	0.0	9.1	0	0.0	6.5	12.3
Middle	1	100.0	64.1	726	100.0	59.4	0	0.0	60.6	0	0.0	56.8	68.3
Upper	0	0.0	25.0	0	0.0	32.0	1	100.0	30.3	2,000	100.0	36.8	19.4
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	726	100.0	100.0	1	100.0	100.0	2,000	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	0	0.0	9.6	0	0.0	6.5	0	0.0	11.7	0	0.0	9.5	12.3
Middle	1	100.0	60.2	200	100.0	56.5	0	0.0	59.7	0	0.0	61.1	68.3
Upper	0	0.0	30.1	0	0.0	37.1	0	0.0	28.6	0	0.0	29.4	19.4
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	200	100.0	100.0	0	0.0	100.0	0	0.0	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	10.0	0	0.0	0.6	0	0.0	14.3	0	0.0	0.6	17.3
Middle	1	100.0	60.0	18,000	100.0	69.5	0	0.0	85.7	0	0.0	99.4	77.2
Upper	0	0.0	30.0	0	0.0	29.9	0	0.0	0.0	0	0.0	0.0	5.5
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	18,000	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	0	0.0	10.0	0	0.0	8.0	0	0.0	9.1	0	0.0	6.8	12.3
Middle	7	70.0	55.6	22,107	85.0	51.8	2	66.7	54.1	828	29.3	51.3	68.3
Upper	3	30.0	34.4	3,900	15.0	40.2	1	33.3	36.8	2,000	70.7	41.9	19.4
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	26,007	100.0	100.0	3	100.0	100.0	2,828	100.0	100.0	100.0

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.
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 D-42

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: St. George, Utah MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	5.9	10.7	750	14.3	10.3	0	0.0	10.8	0	0.0	11.0	13.5
Middle	10	58.8	57.3	2,496	47.5	56.5	8	47.1	55.0	4,008	50.0	53.4	66.5
Upper	6	35.3	31.5	2,014	38.3	33.0	9	52.9	33.7	4,012	50.0	35.5	20.0
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	0.5	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
Total	17	100.0	100.0	5,260	100.0	100.0	17	100.0	100.0	8,020	100.0	100.0	100.0

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

Table D-43

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: St. George, Utah MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	19.3	0	0.0	26.9	0	0.0	7.5	0	0.0	2.9	10.9
Middle	2	66.7	63.2	200	87.3	58.1	3	100.0	79.2	153	100.0	74.3	76.5
Upper	1	33.3	17.5	29	12.7	15.1	0	0.0	13.2	0	0.0	22.7	12.6
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	229	100.0	100.0	3	100.0	100.0	153	100.0	100.0	100.0

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

Table D-44

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: St. George, Utah MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.4	0	0.0	0.9	0	0.0	3.0	0	0.0	1.4	18.1
Moderate	0	0.0	11.0	0	0.0	6.8	1	50.0	12.4	375	45.3	7.8	20.3
Middle	0	0.0	19.3	0	0.0	15.4	0	0.0	20.8	0	0.0	17.0	21.2
Upper	7	100.0	46.1	7,081	100.0	55.7	1	50.0	40.5	453	54.7	50.2	40.3
Unknown	0	0.0	21.2	0	0.0	21.2	0	0.0	23.4	0	0.0	23.5	0.0
Total	7	100.0	100.0	7,081	100.0	100.0	2	100.0	100.0	828	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.9	0	0.0	4.3	0	0.0	6.6	0	0.0	3.3	18.1
Moderate	0	0.0	15.0	0	0.0	8.8	0	0.0	14.5	0	0.0	8.7	20.3
Middle	0	0.0	21.4	0	0.0	15.2	0	0.0	21.0	0	0.0	13.4	21.2
Upper	0	0.0	41.1	0	0.0	55.1	1	100.0	37.9	2,000	100.0	49.5	40.3
Unknown	1	100.0	14.7	726	100.0	16.6	0	0.0	20.0	0	0.0	25.1	0.0
Total	1	100.0	100.0	726	100.0	100.0	1	100.0	100.0	2,000	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	2.1	0	0.0	6.7	0	0.0	4.4	18.1
Moderate	0	0.0	15.1	0	0.0	8.0	0	0.0	16.9	0	0.0	8.8	20.3
Middle	0	0.0	27.6	0	0.0	18.8	0	0.0	28.2	0	0.0	18.9	21.2
Upper	1	100.0	50.9	200	100.0	67.5	0	0.0	44.3	0	0.0	57.9	40.3
Unknown	0	0.0	2.9	0	0.0	3.6	0	0.0	4.0	0	0.0	10.0	0.0
Total	1	100.0	100.0	200	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.8	0	0.0	1.6	0	0.0	4.6	0	0.0	2.0	18.1
Moderate	0	0.0	12.8	0	0.0	7.2	1	33.3	13.6	375	13.3	8.0	20.3
Middle	0	0.0	20.9	0	0.0	15.4	0	0.0	21.9	0	0.0	16.2	21.2
Upper	8	88.9	46.5	7,281	90.9	56.9	2	66.7	40.6	2,453	86.7	51.0	40.3
Unknown	1	11.1	16.1	726	9.1	18.9	0	0.0	19.3	0	0.0	22.8	0.0
Total	9	100.0	100.0	8,007	100.0	100.0	3	100.0	100.0	2,828	100.0	100.0	100.0

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.*
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

Table D-45

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: St. George, Utah MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	23.5	49.3	1,207	22.9	26.0	9	52.9	49.3	3,985	49.7	29.8	93.4
Over $1 Million	4	23.5		1,381	26.3		6	35.3		2,126	26.5		5.1
Revenue Unknown	9	52.9		2,672	50.8		2	11.8		1,909	23.8		1.5
Total	17	100.0		5,260	100.0		17	100.0		8,020	100.0		100.0
By Loan Size													
$100,000 or Less	5	29.4	93.3	223	4.2	41.6	3	17.6	92.4	182	2.3	38.9	
$100,001 - $250,000	4	23.5	3.8	718	13.7	17.1	3	17.6	4.3	647	8.1	18.5	
$250,001 - $1 Million	8	47.1	2.9	4,319	82.1	41.3	11	64.7	3.3	7,191	89.7	42.6	
Total	17	100.0	100.0	5,260	100.0	100.0	17	100.0	100.0	8,020	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	25.0		25	2.1		2	22.2		82	2.1		
$100,001 - $250,000	1	25.0		245	20.3		2	22.2		436	10.9		
$250,001 - $1 Million	2	50.0		937	77.6		5	55.6		3,467	87.0		
Total	4	100.0		1,207	100.0		9	100.0		3,985	100.0		

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

Table D-46

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: St. George, Utah MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	33.3	57.9	75	32.8	65.9	2	66.7	66.0	131	85.6	62.2	97.5
Over $1 Million	1	33.3		125	54.6		0	0.0		0	0.0		2.5
Revenue Unknown	1	33.3		29	12.7		1	33.3		22	14.4		0.0
Total	3	100.0		229	100.0		3	100.0		153	100.0		100.0
By Loan Size													
$100,000 or Less	2	66.7	93.0	104	45.4	56.4	2	66.7	79.2	28	18.3	30.2	
$100,001 - $250,000	1	33.3	5.3	125	54.6	22.3	1	33.3	15.1	125	81.7	35.6	
$250,001 - $500,000	0	0.0	1.8	0	0.0	21.2	0	0.0	5.7	0	0.0	34.2	
Total	3	100.0	100.0	229	100.0	100.0	3	100.0	100.0	153	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		75	100.0		1	50.0		6	4.6		
$100,001 - $250,000	0	0.0		0	0.0		1	50.0		125	95.4		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		75	100.0		2	100.0		131	100.0		

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

Table D-47

2024 St. George, Utah MSA 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	8,123	18.1
Moderate	5	14.3	6,544	14.6	553	8.5	9,116	20.3
Middle	24	68.6	29,899	66.6	2,181	7.3	9,524	21.2
Upper	6	17.1	8,422	18.8	483	5.7	18,102	40.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**35**	**100.0**	**44,865**	**100.0**	**3,217**	**7.2**	**44,865**	**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	11,007	5,156	12.3	46.8	4,410	40.1	1,441	13.1
Middle	48,387	28,638	68.3	59.2	11,489	23.7	8,260	17.1
Upper	12,088	8,133	19.4	67.3	1,873	15.5	2,082	17.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**71,482**	**41,927**	**100.0**	**58.7**	**17,772**	**24.9**	**11,783**	**16.5**
	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	1,107	13.5	1,036	13.5	60	14.3	11	9.2
Middle	5,466	66.5	5,106	66.5	270	64.3	90	75.0
Upper	1,648	20.0	1,539	20.0	90	21.4	19	15.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,221**	**100.0**	**7,681**	**100.0**	**420**	**100.0**	**120**	**100.0**
Percentage of Total Businesses:				**93.4**		**5.1**		**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	13	10.9	13	11.2	0	0.0	0	0.0
Middle	91	76.5	88	75.9	3	100.0	0	0.0
Upper	15	12.6	15	12.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**119**	**100.0**	**116**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.5**		**2.5**		**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 D-48

2023 St. George, Utah MSA Demographics								
	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	1,198	13.4	1,122	13.4	65	14.0	11	8.3
Middle	5,981	66.8	5,586	66.8	297	64.1	98	74.2
Upper	1,779	19.9	1,655	19.8	101	21.8	23	17.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,958**	**100.0**	**8,363**	**100.0**	**463**	**100.0**	**132**	**100.0**
Percentage of Total Businesses:				**93.4**		**5.2**		**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	12	9.6	12	9.8	0	0.0	0	0.0
Middle	96	76.8	93	76.2	3	100.0	0	0.0
Upper	17	13.6	17	13.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**125**	**100.0**	**122**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.6**		**2.4**		**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.

Millard County, Utah
Table D-49

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Millard County, Utah

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	100.0	100.0	2,149	100.0	100.0	2	100.0	98.5	581	100.0	97.7	100.0
Upper	0	0.0	0.0	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	1.5	0	0.0	2.3	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	6	100.0	100.0	2,149	100.0	100.0	2	100.0	100.0	581	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	286	100.0	100.0	2	100.0	100.0	185	100.0	100.0	100.0
Upper	0	0.0	0.0	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	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	286	100.0	100.0	2	100.0	100.0	185	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	30	100.0	100.0	2	100.0	100.0	220	100.0	100.0	100.0
Upper	0	0.0	0.0	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	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	30	100.0	100.0	2	100.0	100.0	220	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	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	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	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	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	0.0	0	0.0	0.0	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	100.0	100.0	3,095	100.0	100.0	7	100.0	99.4	1,031	100.0	98.8	100.0
Upper	0	0.0	0.0	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	0.6	0	0.0	1.2	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	11	100.0	100.0	3,095	100.0	100.0	7	100.0	100.0	1,031	100.0	100.0	100.0

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.
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 D-50

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Millard County, Utah

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	100.0	97.0	2,342	100.0	99.7	9	100.0	97.3	1,627	100.0	99.2	100.0
Upper	0	0.0	0.0	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	0.0	0.0
Tract-Unk	0	0.0	3.0	0	0.0	0.3	0	0.0	2.7	0	0.0	0.8	
Total	9	100.0	100.0	2,342	100.0	100.0	9	100.0	100.0	1,627	100.0	100.0	100.0

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

Table D-51

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Millard County, Utah

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	100.0	100.0	959	100.0	100.0	7	100.0	98.9	2,166	100.0	99.9	100.0
Upper	0	0.0	0.0	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	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	0.1	
Total	4	100.0	100.0	959	100.0	100.0	7	100.0	100.0	2,166	100.0	100.0	100.0

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

Table D-52

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Millard County, Utah

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.6	0	0.0	3.5	0	0.0	2.9	0	0.0	1.6	18.4
Moderate	1	16.7	17.6	188	8.7	12.3	0	0.0	16.8	0	0.0	13.6	18.6
Middle	2	33.3	33.3	305	14.2	31.0	0	0.0	32.1	0	0.0	28.0	29.8
Upper	3	50.0	25.9	1,656	77.1	32.3	2	100.0	31.4	581	100.0	38.3	33.2
Unknown	0	0.0	18.5	0	0.0	20.9	0	0.0	16.8	0	0.0	18.5	0.0
Total	6	100.0	100.0	2,149	100.0	100.0	2	100.0	100.0	581	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	10.3	0	0.0	5.4	0	0.0	5.1	0	0.0	3.6	18.4
Moderate	0	0.0	13.2	0	0.0	10.5	0	0.0	14.3	0	0.0	10.3	18.6
Middle	2	100.0	38.2	286	100.0	32.1	2	100.0	28.6	185	100.0	24.1	29.8
Upper	0	0.0	30.9	0	0.0	40.4	0	0.0	35.7	0	0.0	39.5	33.2
Unknown	0	0.0	7.4	0	0.0	11.6	0	0.0	16.3	0	0.0	22.5	0.0
Total	2	100.0	100.0	286	100.0	100.0	2	100.0	100.0	185	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.1	0	0.0	4.6	0	0.0	5.9	0	0.0	3.9	18.4
Moderate	0	0.0	15.2	0	0.0	7.9	0	0.0	17.6	0	0.0	11.4	18.6
Middle	0	0.0	45.5	0	0.0	42.6	1	50.0	23.5	20	9.1	20.5	29.8
Upper	1	100.0	33.3	30	100.0	44.9	1	50.0	52.9	200	90.9	64.2	33.2
Unknown	0	0.0	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	30	100.0	100.0	2	100.0	100.0	220	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.5	0	0.0	4.3	0	0.0	4.2	0	0.0	2.5	18.4
Moderate	1	9.1	14.9	188	6.1	11.1	1	14.3	15.3	45	4.4	12.0	18.6
Middle	5	45.5	34.3	671	21.7	30.5	3	42.9	29.1	205	19.9	25.6	29.8
Upper	5	45.5	33.5	2,236	72.2	38.3	3	42.9	38.7	781	75.8	42.0	33.2
Unknown	0	0.0	10.9	0	0.0	15.9	0	0.0	12.8	0	0.0	17.8	0.0
Total	11	100.0	100.0	3,095	100.0	100.0	7	100.0	100.0	1,031	100.0	100.0	100.0

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.
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 D-53

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Millard County, Utah

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	6	66.7	40.8	1,437	61.4	36.2	7	77.8	38.9	1,424	87.5	32.5	91.6
Over $1 Million	2	22.2		750	32.0		1	11.1		50	3.1		5.1
Revenue Unknown	1	11.1		155	6.6		1	11.1		153	9.4		3.3
Total	9	100.0		2,342	100.0		9	100.0		1,627	100.0		100.0
By Loan Size													
$100,000 or Less	2	22.2	91.4	100	4.3	44.9	4	44.4	93.2	172	10.6	52.9	
$100,001 - $250,000	3	33.3	3.9	630	26.9	13.6	2	22.2	2.7	391	24.0	9.5	
$250,001 - $1 Million	4	44.4	4.6	1,612	68.8	41.6	3	33.3	4.1	1,064	65.4	37.5	
Total	9	100.0	100.0	2,342	100.0	100.0	9	100.0	100.0	1,627	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	33.3		100	7.0		3	42.9		122	8.6		
$100,001 - $250,000	1	16.7		225	15.7		1	14.3		238	16.7		
$250,001 - $1 Million	3	50.0		1,112	77.4		3	42.9		1,064	74.7		
Total	6	100.0		1,437	100.0		7	100.0		1,424	100.0		

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

Table D-54

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Millard County, Utah

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	75.0	64.4	509	53.1	42.5	6	85.7	61.7	1,666	76.9	58.5	95.7
Over $1 Million	1	25.0		450	46.9		1	14.3		500	23.1		4.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	4	100.0		959	100.0		7	100.0		2,166	100.0		100.0
By Loan Size													
$100,000 or Less	2	50.0	69.9	109	11.4	21.6	2	28.6	76.6	150	6.9	24.8	
$100,001 - $250,000	0	0.0	16.4	0	0.0	24.9	0	0.0	11.7	0	0.0	23.0	
$250,001 - $500,000	2	50.0	13.7	850	88.6	53.5	5	71.4	11.7	2,016	93.1	52.2	
Total	4	100.0	100.0	959	100.0	100.0	7	100.0	100.0	2,166	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	66.7		109	21.4		2	33.3		150	9.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	1	33.3		400	78.6		4	66.7		1,516	91.0		
Total	3	100.0		509	100.0		6	100.0		1,666	100.0		

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

Table D-55

2024 Millard County, Utah 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	639	18.4
Moderate	0	0.0	0	0.0	0	0.0	648	18.6
Middle	3	100.0	3,482	100.0	378	10.9	1,038	29.8
Upper	0	0.0	0	0.0	0	0.0	1,157	33.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**3,482**	**100.0**	**378**	**10.9**	**3,482**	**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	5,103	3,160	100.0	61.9	1,133	22.2	810	15.9
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**5,103**	**3,160**	**100.0**	**61.9**	**1,133**	**22.2**	**810**	**15.9**

	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	509	100.0	466	100.0	26	100.0	17	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**509**	**100.0**	**466**	**100.0**	**26**	**100.0**	**17**	**100.0**
Percentage of Total Businesses:				**91.6**		**5.1**		**3.3**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	116	100.0	111	100.0	5	100.0	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	**116**	**100.0**	**111**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.7**		**4.3**		**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 D-56

2023 Millard County, Utah Demographics								
	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	518	100.0	473	100.0	28	100.0	17	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**518**	**100.0**	**473**	**100.0**	**28**	**100.0**	**17**	**100.0**
Percentage of Total Businesses:				**91.3**		**5.4**		**3.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	116	100.0	111	100.0	5	100.0	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	**116**	**100.0**	**111**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.7**		**4.3**		**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.

Franklin County, Kansas AA
Table D-57

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Franklin County, Kansas

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	100.0	85.6	2,721	100.0	84.1	7	100.0	86.3	1,328	100.0	84.6	88.4
Upper	0	0.0	14.4	0	0.0	15.9	0	0.0	13.7	0	0.0	15.4	11.6
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	2,721	100.0	100.0	7	100.0	100.0	1,328	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	100.0	80.6	529	100.0	76.9	0	0.0	78.1	0	0.0	76.0	88.4
Upper	0	0.0	19.4	0	0.0	23.1	0	0.0	21.9	0	0.0	24.0	11.6
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	529	100.0	100.0	0	0.0	100.0	0	0.0	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	71.1	35	100.0	64.1	1	100.0	81.3	50	100.0	73.5	88.4
Upper	0	0.0	28.9	0	0.0	35.9	0	0.0	18.8	0	0.0	26.5	11.6
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	35	100.0	100.0	1	100.0	100.0	50	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	66.7	0	0.0	58.3	0	0.0	75.0	0	0.0	27.8	93.8
Upper	0	0.0	16.7	0	0.0	1.8	0	0.0	25.0	0	0.0	72.2	6.2
Unknown	0	0.0	16.7	0	0.0	39.9	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	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	15	100.0	83.1	3,310	100.0	80.6	9	100.0	83.9	1,434	100.0	80.0	88.4
Upper	0	0.0	16.7	0	0.0	16.3	0	0.0	16.1	0	0.0	20.0	11.6
Unknown	0	0.0	0.2	0	0.0	3.1	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	15	100.0	100.0	3,310	100.0	100.0	9	100.0	100.0	1,434	100.0	100.0	100.0

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.
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 D-58

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Franklin County, Kansas

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	82.2	540	100.0	86.9	3	100.0	82.7	908	100.0	92.3	90.6
Upper	0	0.0	16.2	0	0.0	12.9	0	0.0	17.0	0	0.0	7.7	9.4
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	1.6	0	0.0	0.2	0	0.0	0.3	0	0.0	0.0	
Total	2	100.0	100.0	540	100.0	100.0	3	100.0	100.0	908	100.0	100.0	100.0

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

Table D-59

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Franklin County, Kansas

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	90.7	0	0.0	89.2	0	0.0	93.3	0	0.0	93.9	93.9
Upper	0	0.0	9.3	0	0.0	10.8	0	0.0	6.7	0	0.0	6.1	6.1
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	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-60

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Franklin County, Kansas

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.1	0	0.0	2.3	1	14.3	3.7	68	5.1	1.8	15.7
Moderate	2	22.2	20.0	344	12.6	14.0	2	28.6	19.6	247	18.6	13.1	20.2
Middle	4	44.4	24.4	815	30.0	21.5	1	14.3	23.1	171	12.9	21.0	23.4
Upper	3	33.3	30.0	1,562	57.4	42.9	3	42.9	28.3	842	63.4	37.8	40.6
Unknown	0	0.0	21.5	0	0.0	19.3	0	0.0	25.3	0	0.0	26.3	0.0
Total	9	100.0	100.0	2,721	100.0	100.0	7	100.0	100.0	1,328	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.8	0	0.0	2.6	0	0.0	5.2	0	0.0	3.0	15.7
Moderate	2	50.0	22.6	227	42.9	15.4	0	0.0	21.3	0	0.0	13.3	20.2
Middle	1	25.0	22.6	106	20.0	17.9	0	0.0	20.6	0	0.0	16.8	23.4
Upper	1	25.0	34.7	196	37.1	42.9	0	0.0	34.8	0	0.0	43.0	40.6
Unknown	0	0.0	15.3	0	0.0	21.2	0	0.0	18.1	0	0.0	23.9	0.0
Total	4	100.0	100.0	529	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.3	0	0.0	2.0	0	0.0	0.0	0	0.0	0.0	15.7
Moderate	0	0.0	15.8	0	0.0	8.8	0	0.0	14.6	0	0.0	6.7	20.2
Middle	1	100.0	23.7	35	100.0	12.6	0	0.0	22.9	0	0.0	18.2	23.4
Upper	0	0.0	50.0	0	0.0	70.5	1	100.0	50.0	50	100.0	60.8	40.6
Unknown	0	0.0	5.3	0	0.0	6.0	0	0.0	12.5	0	0.0	14.3	0.0
Total	1	100.0	100.0	35	100.0	100.0	1	100.0	100.0	50	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	4.3	0	0.0	2.4	1	11.1	3.8	68	4.7	2.0	15.7
Moderate	4	26.7	20.1	571	17.3	14.1	2	22.2	19.5	247	17.2	12.9	20.2
Middle	6	40.0	23.8	956	28.9	20.7	1	11.1	22.3	171	11.9	19.9	23.4
Upper	5	33.3	32.9	1,783	53.9	43.2	5	55.6	32.4	948	66.1	39.9	40.6
Unknown	0	0.0	18.8	0	0.0	19.6	0	0.0	22.0	0	0.0	25.2	0.0
Total	15	100.0	100.0	3,310	100.0	100.0	9	100.0	100.0	1,434	100.0	100.0	100.0

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.*
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 D-61

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Franklin County, Kansas

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	50.0	57.3	40	7.4	29.0	2	66.7	54.8	408	44.9	32.5	89.1
Over $1 Million	1	50.0		500	92.6		1	33.3		500	55.1		8.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		2.9
Total	2	100.0		540	100.0		3	100.0		908	100.0		100.0
By Loan Size													
$100,000 or Less	1	50.0	95.2	40	7.4	38.6	0	0.0	94.5	0	0.0	37.1	
$100,001 - $250,000	0	0.0	1.6	0	0.0	5.5	2	66.7	2.7	408	44.9	12.9	
$250,001 - $1 Million	1	50.0	3.2	500	92.6	56.0	1	33.3	2.7	500	55.1	50.1	
Total	2	100.0	100.0	540	100.0	100.0	3	100.0	100.0	908	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		40	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		2	100.0		408	100.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		40	100.0		2	100.0		408	100.0		

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

Table D-62

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Franklin County, Kansas

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	27.9	0	0.0	39.7	0	0.0	22.2	0	0.0	28.7	96.3
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		3.7
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	91.1	0	0.0	52.3	
$100,001 - $250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	8.9	0	0.0	47.7	
$250,001 - $500,000	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	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-63

2024 Franklin County, Kansas 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	1,073	15.7
Moderate	0	0.0	0	0.0	0	0.0	1,379	20.2
Middle	5	83.3	6,081	89.2	495	8.1	1,594	23.4
Upper	1	16.7	734	10.8	67	9.1	2,769	40.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**6,815**	**100.0**	**562**	**8.2**	**6,815**	**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	10,140	6,589	88.4	65.0	2,501	24.7	1,050	10.4
Upper	1,131	865	11.6	76.5	235	20.8	31	2.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**11,271**	**7,454**	**100.0**	**66.1**	**2,736**	**24.3**	**1,081**	**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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	726	90.6	647	90.6	58	90.6	21	91.3
Upper	75	9.4	67	9.4	6	9.4	2	8.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**801**	**100.0**	**714**	**100.0**	**64**	**100.0**	**23**	**100.0**
Percentage of Total Businesses:				**89.1**		**8.0**		**2.9**
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	77	93.9	74	93.7	3	100.0	0	0.0
Upper	5	6.1	5	6.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**82**	**100.0**	**79**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.3**		**3.7**		**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 D-64

2023 Franklin County, Kansas Demographics								
	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	742	88.9	665	88.8	58	90.6	19	86.4
Upper	93	11.1	84	11.2	6	9.4	3	13.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**835**	**100.0**	**749**	**100.0**	**64**	**100.0**	**22**	**100.0**
Percentage of Total Businesses:				**89.7**		**7.7**		**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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	77	93.9	74	93.7	3	100.0	0	0.0
Upper	5	6.1	5	6.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**82**	**100.0**	**79**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.3**		**3.7**		**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.

Northeast Missouri AA
Table D-65

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Northeast Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	6.9	0	0.0	5.8	0	0.0	8.5	0	0.0	4.9	7.9
Middle	5	100.0	58.3	843	100.0	59.9	4	66.7	59.2	471	44.0	62.9	66.5
Upper	0	0.0	34.8	0	0.0	34.2	2	33.3	32.3	600	56.0	32.1	25.6
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	843	100.0	100.0	6	100.0	100.0	1,071	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	0	0.0	7.1	0	0.0	6.6	0	0.0	3.8	0	0.0	2.1	7.9
Middle	1	50.0	61.9	35	32.7	63.3	3	100.0	66.7	130	100.0	72.6	66.5
Upper	1	50.0	31.0	72	67.3	30.0	0	0.0	29.5	0	0.0	25.3	25.6
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	107	100.0	100.0	3	100.0	100.0	130	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	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	7.6	7.9
Middle	0	0.0	61.9	0	0.0	74.5	1	100.0	68.8	30	100.0	70.4	66.5
Upper	2	100.0	38.1	60	100.0	25.5	0	0.0	18.8	0	0.0	22.0	25.6
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	1	100.0	100.0	30	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	30.8	0	0.0	33.0	0	0.0	25.0	0	0.0	5.9	41.9
Middle	0	0.0	53.8	0	0.0	54.8	0	0.0	25.0	0	0.0	11.0	19.0
Upper	0	0.0	15.4	0	0.0	12.2	0	0.0	50.0	0	0.0	83.0	38.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
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	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	0	0.0	7.5	0	0.0	6.2	0	0.0	8.5	0	0.0	4.5	7.9
Middle	6	66.7	58.3	878	86.9	60.5	8	80.0	60.1	631	51.3	62.7	66.5
Upper	3	33.3	34.2	132	13.1	33.3	2	20.0	31.4	600	48.7	32.7	25.6
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	1,010	100.0	100.0	10	100.0	100.0	1,231	100.0	100.0	100.0

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.
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 D-66

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Northeast Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	16.3	0	0.0	29.9	1	100.0	21.3	132	100.0	32.4	25.2
Middle	1	100.0	45.3	50	100.0	46.9	0	0.0	41.4	0	0.0	45.5	45.7
Upper	0	0.0	37.1	0	0.0	22.6	0	0.0	35.7	0	0.0	21.5	28.8
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.8	0	0.0	0.2	0	0.0	1.1	0	0.0	0.3	
Total	1	100.0	100.0	50	100.0	100.0	1	100.0	100.0	132	100.0	100.0	100.0

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

Table D-67

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Northeast Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	6.8	0	0.0	1.1	2	50.0	6.4	500	62.5	18.2	9.0
Middle	0	0.0	88.6	0	0.0	91.3	2	50.0	87.2	300	37.5	80.5	86.6
Upper	0	0.0	4.5	0	0.0	7.6	0	0.0	6.4	0	0.0	1.3	4.5
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	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	800	100.0	100.0	100.0

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

Table D-68

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Northeast Missouri

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	6.5	0	0.0	3.1	0	0.0	4.3	0	0.0	2.3	16.5
Moderate	2	40.0	21.9	203	24.1	16.2	3	50.0	22.3	361	33.7	15.3	14.7
Middle	2	40.0	22.7	252	29.9	20.6	0	0.0	18.1	0	0.0	16.4	22.4
Upper	1	20.0	23.5	388	46.0	32.8	3	50.0	29.8	710	66.3	42.7	46.4
Unknown	0	0.0	25.5	0	0.0	27.4	0	0.0	25.5	0	0.0	23.3	0.0
Total	5	100.0	100.0	843	100.0	100.0	6	100.0	100.0	1,071	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.8	0	0.0	2.8	1	33.3	9.0	10	7.7	4.0	16.5
Moderate	1	50.0	16.7	35	32.7	13.3	1	33.3	19.2	100	76.9	13.9	14.7
Middle	1	50.0	26.2	72	67.3	21.7	1	33.3	16.7	20	15.4	11.5	22.4
Upper	0	0.0	38.1	0	0.0	49.7	0	0.0	24.4	0	0.0	34.5	46.4
Unknown	0	0.0	14.3	0	0.0	12.5	0	0.0	30.8	0	0.0	36.1	0.0
Total	2	100.0	100.0	107	100.0	100.0	3	100.0	100.0	130	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	14.3	0	0.0	6.8	0	0.0	0.0	0	0.0	0.0	16.5
Moderate	1	50.0	4.8	20	33.3	1.3	1	100.0	12.5	30	100.0	5.8	14.7
Middle	1	50.0	42.9	40	66.7	52.2	0	0.0	12.5	0	0.0	4.9	22.4
Upper	0	0.0	28.6	0	0.0	32.5	0	0.0	56.3	0	0.0	79.3	46.4
Unknown	0	0.0	9.5	0	0.0	7.2	0	0.0	18.8	0	0.0	9.9	0.0
Total	2	100.0	100.0	60	100.0	100.0	1	100.0	100.0	30	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.6	0	0.0	3.1	1	10.0	5.4	10	0.8	2.7	16.5
Moderate	4	44.4	20.9	258	25.5	15.7	5	50.0	21.3	491	39.9	15.0	14.7
Middle	4	44.4	24.1	364	36.0	21.7	1	10.0	17.4	20	1.6	15.1	22.4
Upper	1	11.1	26.3	388	38.4	35.2	3	30.0	30.0	710	57.7	41.4	46.4
Unknown	0	0.0	22.2	0	0.0	24.2	0	0.0	25.9	0	0.0	25.8	0.0
Total	9	100.0	100.0	1,010	100.0	100.0	10	100.0	100.0	1,231	100.0	100.0	100.0

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.
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 D-69

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Northeast Missouri

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	100.0	66.1	50	100.0	42.4	1	100.0	57.0	132	100.0	48.9	91.6
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		7.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.2
Total	1	100.0		50	100.0		1	100.0		132	100.0		100.0
By Loan Size													
$100,000 or Less	1	100.0	96.3	50	100.0	53.4	0	0.0	95.8	0	0.0	55.6	
$100,001 - $250,000	0	0.0	3.3	0	0.0	31.8	1	100.0	3.4	132	100.0	25.2	
$250,001 - $1 Million	0	0.0	0.4	0	0.0	14.8	0	0.0	0.8	0	0.0	19.2	
Total	1	100.0	100.0	50	100.0	100.0	1	100.0	100.0	132	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		50	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		1	100.0		132	100.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		50	100.0		1	100.0		132	100.0		

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

Table D-70

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Northeast Missouri

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	40.9	0	0.0	83.7	2	50.0	48.7	300	37.5	68.6	100.0
Over $1 Million	0	0.0		0	0.0		2	50.0		500	62.5		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		4	100.0		800	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	84.1	0	0.0	25.5	1	25.0	88.5	50	6.3	42.5	
$100,001 - $250,000	0	0.0	6.8	0	0.0	19.8	3	75.0	9.0	750	93.8	40.2	
$250,001 - $500,000	0	0.0	9.1	0	0.0	54.7	0	0.0	2.6	0	0.0	17.3	
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	800	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	50.0		50	16.7		
$100,001 - $250,000	0	0.0		0	0.0		1	50.0		250	83.3		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		2	100.0		300	100.0		

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

Table D-71

2024 Northeast Missouri 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	806	16.5
Moderate	1	12.5	468	9.6	94	20.1	718	14.7
Middle	4	50.0	3,114	63.6	291	9.3	1,098	22.4
Upper	2	25.0	1,311	26.8	86	6.6	2,271	46.4
Unknown	1	12.5	0	0.0	0	0.0	0	0.0
Total AA	**8**	**100.0**	**4,893**	**100.0**	**471**	**9.6**	**4,893**	**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	1,923	444	7.9	23.1	910	47.3	569	29.6
Middle	6,432	3,715	66.5	57.8	1,369	21.3	1,348	21.0
Upper	3,233	1,430	25.6	44.2	1,203	37.2	600	18.6
Unknown	7	0	0.0	0.0	7	100.0	0	0.0
Total AA	**11,595**	**5,589**	**100.0**	**48.2**	**3,489**	**30.1**	**2,517**	**21.7**

	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	217	25.2	192	24.4	22	35.5	3	30.0
Middle	393	45.7	366	46.4	21	33.9	6	60.0
Upper	248	28.8	228	28.9	19	30.6	1	10.0
Unknown	2	0.2	2	0.3	0	0.0	0	0.0
Total AA	**860**	**100.0**	**788**	**100.0**	**62**	**100.0**	**10**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.2**		**1.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	9.0	6	9.0	0	0.0	0	0.0
Middle	58	86.6	58	86.6	0	0.0	0	0.0
Upper	3	4.5	3	4.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**67**	**100.0**	**67**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 D-72

2023 Northeast Missouri Demographics								
	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	221	24.9	193	23.8	25	37.9	3	27.3
Middle	392	44.1	365	45.0	21	31.8	6	54.5
Upper	273	30.7	251	30.9	20	30.3	2	18.2
Unknown	2	0.2	2	0.2	0	0.0	0	0.0
Total AA	**888**	**100.0**	**811**	**100.0**	**66**	**100.0**	**11**	**100.0**
Percentage of Total Businesses:				**91.3**		**7.4**		**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	5	7.4	5	7.4	0	0.0	0	0.0
Middle	60	88.2	60	88.2	0	0.0	0	0.0
Upper	3	4.4	3	4.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**68**	**100.0**	**68**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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.

North-Central Missouri AA
Table D-73

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: North-Central Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	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	0	0.0	7.1	0	0.0	4.4	0	0.0	16.4	0	0.0	11.1	3.8
Middle	5	83.3	73.1	390	50.1	70.7	2	66.7	62.6	244	48.1	60.2	52.6
Upper	1	16.7	19.8	388	49.9	24.9	1	33.3	21.0	263	51.9	28.7	43.6
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	6	100.0	100.0	778	100.0	100.0	3	100.0	100.0	507	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	1	20.0	4.5	30	5.4	9.3	1	33.3	5.1	89	69.5	3.2	3.8
Middle	1	20.0	56.7	62	11.1	58.2	2	66.7	62.8	39	30.5	63.7	52.6
Upper	3	60.0	38.8	468	83.6	32.5	0	0.0	32.1	0	0.0	33.1	43.6
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	560	100.0	100.0	3	100.0	100.0	128	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	0	0.0	11.1	0	0.0	6.0	0	0.0	25.0	0	0.0	16.0	3.8
Middle	0	0.0	44.4	0	0.0	30.2	0	0.0	33.3	0	0.0	24.8	52.6
Upper	1	100.0	44.4	15	100.0	63.8	2	100.0	41.7	73	100.0	59.3	43.6
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	15	100.0	100.0	2	100.0	100.0	73	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	1	100.0	33.3	54	100.0	32.7	0	0.0	60.0	0	0.0	64.1	16.5
Middle	0	0.0	50.0	0	0.0	48.4	0	0.0	0.0	0	0.0	0.0	62.6
Upper	0	0.0	16.7	0	0.0	19.0	0	0.0	40.0	0	0.0	35.9	20.9
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	54	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	2	14.3	6.9	84	5.9	6.5	1	10.0	14.5	89	11.0	10.7	3.8
Middle	7	50.0	68.5	472	33.1	67.3	5	50.0	59.9	333	41.3	58.2	52.6
Upper	5	35.7	24.6	871	61.0	26.2	4	40.0	25.5	385	47.7	31.1	43.6
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	14	100.0	100.0	1,427	100.0	100.0	10	100.0	100.0	807	100.0	100.0	100.0

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.
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 D-74

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: North-Central Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	10.2	0	0.0	17.7	0	0.0	11.5	0	0.0	21.4	16.2
Middle	0	0.0	49.6	0	0.0	54.1	1	100.0	50.7	97	100.0	45.5	53.7
Upper	0	0.0	39.7	0	0.0	27.9	0	0.0	37.3	0	0.0	33.0	30.1
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	0.5	0	0.0	0.2	0	0.0	0.5	0	0.0	0.1	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	97	100.0	100.0	100.0

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

Table D-75

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: North-Central Missouri

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
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	0.0	0	0.0	0.0	0	0.0	1.9	0	0.0	0.2	0.9
Middle	0	0.0	28.1	0	0.0	32.8	0	0.0	28.8	0	0.0	31.3	31.2
Upper	2	100.0	70.8	145	100.0	66.4	1	100.0	69.2	125	100.0	68.4	67.9
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	1.0	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	145	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0

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

Table D-76

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: North-Central Missouri

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	9.5	0	0.0	5.5	0	0.0	7.1	0	0.0	4.3	18.3
Moderate	1	16.7	18.2	73	9.4	13.4	1	33.3	19.9	81	16.0	13.7	14.9
Middle	0	0.0	22.9	0	0.0	22.5	1	33.3	22.1	263	51.9	20.6	21.1
Upper	5	83.3	31.6	705	90.6	41.1	0	0.0	26.7	0	0.0	38.4	45.7
Unknown	0	0.0	17.8	0	0.0	17.6	1	33.3	24.2	163	32.1	23.0	0.0
Total	6	100.0	100.0	778	100.0	100.0	3	100.0	100.0	507	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	10.4	0	0.0	4.5	0	0.0	10.3	0	0.0	4.0	18.3
Moderate	1	20.0	17.9	30	5.4	14.6	1	33.3	15.4	15	11.7	9.0	14.9
Middle	1	20.0	26.9	62	11.1	28.4	1	33.3	14.1	24	18.8	18.5	21.1
Upper	3	60.0	28.4	468	83.6	28.4	1	33.3	38.5	89	69.5	42.8	45.7
Unknown	0	0.0	16.4	0	0.0	24.1	0	0.0	21.8	0	0.0	25.8	0.0
Total	5	100.0	100.0	560	100.0	100.0	3	100.0	100.0	128	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	9.8	18.3
Moderate	0	0.0	11.1	0	0.0	6.0	0	0.0	8.3	0	0.0	2.8	14.9
Middle	0	0.0	33.3	0	0.0	30.2	1	50.0	25.0	13	17.8	12.1	21.1
Upper	1	100.0	44.4	15	100.0	57.8	1	50.0	50.0	60	82.2	75.4	45.7
Unknown	0	0.0	11.1	0	0.0	6.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	15	100.0	100.0	2	100.0	100.0	73	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	7.7	9.7	20	1.5	5.3	0	0.0	8.0	0	0.0	4.3	18.3
Moderate	2	15.4	17.9	103	7.5	13.6	2	20.0	18.3	96	11.9	12.5	14.9
Middle	1	7.7	23.8	62	4.5	23.6	5	50.0	21.2	399	49.4	20.2	21.1
Upper	9	69.2	31.5	1,188	86.5	38.8	2	20.0	30.5	149	18.5	40.5	45.7
Unknown	0	0.0	17.1	0	0.0	18.8	1	10.0	22.0	163	20.2	22.5	0.0
Total	13	100.0	100.0	1,373	100.0	100.0	10	100.0	100.0	807	100.0	100.0	100.0

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.
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 D-77

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: North-Central Missouri

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	43.8	0	0.0	27.9	1	100.0	49.6	97	100.0	30.4	88.1
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		9.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		2.6
Total	0	0.0		0	0.0		1	100.0		97	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	96.4	0	0.0	56.6	1	100.0	95.0	97	100.0	33.4	
$100,001 - $250,000	0	0.0	2.7	0	0.0	23.7	0	0.0	1.8	0	0.0	12.9	
$250,001 - $1 Million	0	0.0	1.0	0	0.0	19.7	0	0.0	3.1	0	0.0	53.7	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	97	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	100.0		97	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		97	100.0		

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

Table D-78

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: North-Central Missouri

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	100.0	9.4	145	100.0	11.9	1	100.0	18.3	125	100.0	32.1	98.2
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		0.0
Total	2	100.0		145	100.0		1	100.0		125	100.0		100.0
By Loan Size													
$100,000 or Less	2	100.0	93.8	145	100.0	53.1	0	0.0	83.7	0	0.0	34.5	
$100,001 - $250,000	0	0.0	5.2	0	0.0	35.0	1	100.0	13.5	125	100.0	42.8	
$250,001 - $500,000	0	0.0	1.0	0	0.0	11.9	0	0.0	2.9	0	0.0	22.8	
Total	2	100.0	100.0	145	100.0	100.0	1	100.0	100.0	125	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	100.0		145	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		1	100.0		125	100.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	2	100.0		145	100.0		1	100.0		125	100.0		

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

Table D-79

2024 North-Central Missouri 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	1,137	18.3
Moderate	1	12.5	351	5.7	59	16.8	924	14.9
Middle	4	50.0	3,312	53.4	303	9.1	1,309	21.1
Upper	3	37.5	2,543	41.0	242	9.5	2,836	45.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8**	**100.0**	**6,206**	**100.0**	**604**	**9.7**	**6,206**	**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	967	247	3.8	25.5	474	49.0	246	25.4
Middle	6,324	3,413	52.6	54.0	1,812	28.7	1,099	17.4
Upper	4,199	2,830	43.6	67.4	649	15.5	720	17.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**11,490**	**6,490**	**100.0**	**56.5**	**2,935**	**25.5**	**2,065**	**18.0**

	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	151	16.2	118	14.4	31	35.6	2	8.3
Middle	500	53.7	450	54.9	39	44.8	11	45.8
Upper	280	30.1	252	30.7	17	19.5	11	45.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**931**	**100.0**	**820**	**100.0**	**87**	**100.0**	**24**	**100.0**
Percentage of Total Businesses:				**88.1**		**9.3**		**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	2	0.9	2	0.9	0	0.0	0	0.0
Middle	69	31.2	68	31.3	1	25.0	0	0.0
Upper	150	67.9	147	67.7	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**221**	**100.0**	**217**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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 D-80

2023 North-Central Missouri Demographics								
	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	152	15.9	117	14.0	33	36.7	2	7.7
Middle	509	53.4	458	54.7	40	44.4	11	42.3
Upper	292	30.6	262	31.3	17	18.9	13	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**953**	**100.0**	**837**	**100.0**	**90**	**100.0**	**26**	**100.0**
Percentage of Total Businesses:				**87.8**		**9.4**		**2.7**
	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	2	0.9	2	0.9	0	0.0	0	0.0
Middle	71	31.7	70	31.8	1	25.0	0	0.0
Upper	151	67.4	148	67.3	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**224**	**100.0**	**220**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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.

Albuquerque, New Mexico AA
Table D-81

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Albuquerque, New Mexico Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.0	0	0.0	1.9	0	0.0	3.6	0	0.0	2.1	3.3
Moderate	0	0.0	24.2	0	0.0	18.6	1	100.0	23.6	240	100.0	17.4	21.5
Middle	0	0.0	36.3	0	0.0	33.4	0	0.0	37.6	0	0.0	34.6	39.5
Upper	1	100.0	35.3	342	100.0	45.2	0	0.0	34.2	0	0.0	45.2	34.7
Unknown	0	0.0	1.2	0	0.0	0.9	0	0.0	1.1	0	0.0	0.7	1.0
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	342	100.0	100.0	1	100.0	100.0	240	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.0	0	0.0	2.6	0	0.0	2.4	0	0.0	1.8	3.3
Moderate	0	0.0	24.5	0	0.0	20.4	0	0.0	24.0	0	0.0	20.5	21.5
Middle	0	0.0	40.6	0	0.0	37.7	0	0.0	37.4	0	0.0	34.8	39.5
Upper	0	0.0	30.8	0	0.0	38.2	0	0.0	35.3	0	0.0	42.2	34.7
Unknown	0	0.0	1.1	0	0.0	1.0	0	0.0	0.9	0	0.0	0.8	1.0
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	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.1	0	0.0	2.2	0	0.0	1.9	0	0.0	1.7	3.3
Moderate	0	0.0	16.3	0	0.0	13.4	0	0.0	17.1	0	0.0	14.8	21.5
Middle	0	0.0	38.9	0	0.0	34.8	0	0.0	42.5	0	0.0	37.8	39.5
Upper	0	0.0	42.0	0	0.0	48.9	0	0.0	38.2	0	0.0	45.6	34.7
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	0.3	0	0.0	0.1	1.0
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	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	18.8	0	0.0	26.4	0	0.0	11.9	0	0.0	1.4	16.5
Moderate	0	0.0	20.8	0	0.0	23.7	0	0.0	35.7	0	0.0	23.5	28.2
Middle	0	0.0	35.4	0	0.0	14.9	0	0.0	33.3	0	0.0	32.4	36.1
Upper	0	0.0	25.0	0	0.0	35.0	0	0.0	16.7	0	0.0	42.2	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.4	0	0.0	0.5	2.2
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.8	0	0.0	4.6	0	0.0	3.0	0	0.0	1.9	3.3
Moderate	0	0.0	22.7	0	0.0	19.1	1	100.0	22.6	240	100.0	18.2	21.5
Middle	0	0.0	37.8	0	0.0	32.1	0	0.0	38.4	0	0.0	34.8	39.5
Upper	1	100.0	35.6	342	100.0	43.4	0	0.0	35.0	0	0.0	44.4	34.7
Unknown	0	0.0	1.1	0	0.0	0.8	0	0.0	1.0	0	0.0	0.7	1.0
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	342	100.0	100.0	1	100.0	100.0	240	100.0	100.0	100.0

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.
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 D-82

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Albuquerque, New Mexico Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	9.4	0	0.0	12.4	0	0.0	8.1	0	0.0	10.7	10.3
Moderate	4	66.7	25.5	1,000	43.5	35.3	0	0.0	25.3	0	0.0	34.8	22.7
Middle	1	16.7	32.1	550	23.9	25.1	4	80.0	32.2	1,327	63.9	27.4	36.9
Upper	0	0.0	31.6	0	0.0	26.5	0	0.0	33.1	0	0.0	26.5	29.4
Unknown	1	16.7	0.6	750	32.6	0.5	1	20.0	0.5	750	36.1	0.4	0.7
Tract-Unk	0	0.0	0.8	0	0.0	0.2	0	0.0	0.8	0	0.0	0.2	
Total	6	100.0	100.0	2,300	100.0	100.0	5	100.0	100.0	2,077	100.0	100.0	100.0

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

Table D-83

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Albuquerque, New Mexico Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	5.7	0	0.0	22.3	0	0.0	7.3	0	0.0	4.9	8.5
Moderate	0	0.0	24.5	0	0.0	15.6	0	0.0	29.3	0	0.0	72.8	20.9
Middle	0	0.0	22.6	0	0.0	26.4	0	0.0	36.6	0	0.0	14.1	39.7
Upper	0	0.0	47.2	0	0.0	35.7	0	0.0	24.4	0	0.0	6.7	29.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.4	0	0.0	1.6	1.3
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	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-84

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Albuquerque, New Mexico Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.0	0	0.0	1.7	0	0.0	2.7	0	0.0	1.2	23.2
Moderate	0	0.0	18.3	0	0.0	11.2	1	100.0	18.6	240	100.0	10.4	16.0
Middle	1	100.0	23.4	342	100.0	19.8	0	0.0	26.4	0	0.0	20.5	18.9
Upper	0	0.0	39.6	0	0.0	50.7	0	0.0	38.3	0	0.0	50.6	41.9
Unknown	0	0.0	14.8	0	0.0	16.5	0	0.0	14.0	0	0.0	17.3	0.0
Total	1	100.0	100.0	342	100.0	100.0	1	100.0	100.0	240	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.1	0	0.0	4.8	0	0.0	6.1	0	0.0	3.5	23.2
Moderate	0	0.0	22.4	0	0.0	17.2	0	0.0	18.0	0	0.0	12.3	16.0
Middle	0	0.0	25.4	0	0.0	23.5	0	0.0	21.5	0	0.0	17.0	18.9
Upper	0	0.0	31.3	0	0.0	37.8	0	0.0	33.5	0	0.0	36.8	41.9
Unknown	0	0.0	12.8	0	0.0	16.7	0	0.0	20.8	0	0.0	30.4	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
Home Improvement Loans													
Low	0	0.0	7.2	0	0.0	4.8	0	0.0	6.3	0	0.0	3.4	23.2
Moderate	0	0.0	17.0	0	0.0	12.3	0	0.0	17.5	0	0.0	12.4	16.0
Middle	0	0.0	25.3	0	0.0	20.8	0	0.0	24.8	0	0.0	20.1	18.9
Upper	0	0.0	47.7	0	0.0	58.7	0	0.0	48.0	0	0.0	60.1	41.9
Unknown	0	0.0	2.7	0	0.0	3.4	0	0.0	3.4	0	0.0	4.0	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	5.4	0	0.0	2.4	0	0.0	4.1	0	0.0	1.8	23.2
Moderate	0	0.0	18.8	0	0.0	12.2	1	100.0	18.3	240	100.0	10.9	16.0
Middle	1	100.0	24.2	342	100.0	20.5	0	0.0	25.0	0	0.0	19.7	18.9
Upper	0	0.0	38.9	0	0.0	49.0	0	0.0	38.7	0	0.0	48.2	41.9
Unknown	0	0.0	12.7	0	0.0	15.9	0	0.0	13.9	0	0.0	19.3	0.0
Total	1	100.0	100.0	342	100.0	100.0	1	100.0	100.0	240	100.0	100.0	100.0

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.*
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 D-85

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Albuquerque, New Mexico Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	33.3	54.6	640	27.8	30.6	1	20.0	53.3	39	1.9	30.2	92.9
Over $1 Million	3	50.0		910	39.6		4	80.0		2,038	98.1		6.5
Revenue Unknown	1	16.7		750	32.6		0	0.0		0	0.0		0.7
Total	6	100.0		2,300	100.0		5	100.0		2,077	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	94.8	0	0.0	40.0	1	20.0	94.8	39	1.9	43.1	
$100,001 - $250,000	2	33.3	2.6	360	15.7	13.8	0	0.0	3.1	0	0.0	16.8	
$250,001 - $1 Million	4	66.7	2.6	1,940	84.3	46.2	4	80.0	2.2	2,038	98.1	40.1	
Total	6	100.0	100.0	2,300	100.0	100.0	5	100.0	100.0	2,077	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	100.0		39	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	2	100.0		640	100.0		0	0.0		0	0.0		
Total	2	100.0		640	100.0		1	100.0		39	100.0		

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

Table D-736

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Albuquerque, New Mexico Metropolitan

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	77.4	0	0.0	45.9	0	0.0	68.3	0	0.0	79.2	97.4
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.4
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	94.3	0	0.0	38.4	0	0.0	97.6	0	0.0	55.1	
$100,001 - $250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
$250,001 - $500,000	0	0.0	5.7	0	0.0	61.6	0	0.0	2.4	0	0.0	44.9	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-747

2024 Albuquerque, New Mexico Metropolitan Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	14	8.0	8,064	5.1	2,907	36.0	37,013	23.2
Moderate	42	23.9	36,786	23.1	6,532	17.8	25,492	16.0
Middle	61	34.7	61,275	38.5	6,617	10.8	30,042	18.9
Upper	52	29.5	51,202	32.2	2,007	3.9	66,671	41.9
Unknown	7	4.0	1,891	1.2	731	38.7	0	0.0
Total AA	**176**	**100.0**	**159,218**	**100.0**	**18,794**	**11.8**	**159,218**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	20,664	5,699	3.3	27.6	12,669	61.3	2,296	11.1
Moderate	72,195	37,118	21.5	51.4	28,926	40.1	6,151	8.5
Middle	114,699	68,063	39.5	59.3	38,496	33.6	8,140	7.1
Upper	83,233	59,876	34.7	71.9	17,842	21.4	5,515	6.6
Unknown	4,320	1,773	1.0	41.0	2,066	47.8	481	11.1
Total AA	**295,111**	**172,529**	**100.0**	**58.5**	**99,999**	**33.9**	**22,583**	**7.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	3,213	10.3	2,774	9.5	410	20.3	29	14.1
Moderate	7,095	22.7	6,317	21.7	726	35.9	52	25.4
Middle	11,540	36.9	10,936	37.6	550	27.2	54	26.3
Upper	9,205	29.4	8,815	30.3	322	15.9	68	33.2
Unknown	234	0.7	219	0.8	13	0.6	2	1.0
Total AA	**31,287**	**100.0**	**29,061**	**100.0**	**2,021**	**100.0**	**205**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.5**		**0.7**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	20	8.5	19	8.3	0	0.0	1	100.0
Moderate	49	20.9	48	21.1	1	20.0	0	0.0
Middle	93	39.7	90	39.5	3	60.0	0	0.0
Upper	69	29.5	68	29.8	1	20.0	0	0.0
Unknown	3	1.3	3	1.3	0	0.0	0	0.0
Total AA	**234**	**100.0**	**228**	**100.0**	**5**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.4**		**2.1**		**0.4**

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 D-88

2023 Albuquerque, New Mexico Metropolitan Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,976	8.9	2,588	8.3	367	16.4	21	10.8
Moderate	8,113	24.2	7,181	23.1	880	39.3	52	26.8
Middle	11,842	35.3	11,195	36.0	594	26.5	53	27.3
Upper	10,255	30.6	9,807	31.6	382	17.0	66	34.0
Unknown	318	0.9	298	1.0	18	0.8	2	1.0
Total AA	**33,504**	**100.0**	**31,069**	**100.0**	**2,241**	**100.0**	**194**	**100.0**
Percentage of Total Businesses:				**92.7**		**6.7**		**0.6**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	16	6.6	15	6.4	0	0.0	1	100.0
Moderate	50	20.7	48	20.5	2	28.6	0	0.0
Middle	94	38.8	90	38.5	4	57.1	0	0.0
Upper	77	31.8	76	32.5	1	14.3	0	0.0
Unknown	5	2.1	5	2.1	0	0.0	0	0.0
Total AA	**242**	**100.0**	**234**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.7**		**2.9**		**0.4**

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.

Austin, Texas Metropolitan AA
Table D-89

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Austin, Texas Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.1	0	0.0	2.5	0	0.0	2.7	0	0.0	2.0	3.5
Moderate	1	33.3	28.5	152	13.2	20.8	0	0.0	28.8	0	0.0	20.9	19.6
Middle	1	33.3	33.6	272	23.7	27.8	2	100.0	30.7	681	100.0	25.5	31.4
Upper	1	33.3	33.4	726	63.1	47.9	0	0.0	36.9	0	0.0	50.9	44.8
Unknown	0	0.0	1.4	0	0.0	0.9	0	0.0	0.8	0	0.0	0.8	0.8
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	1,150	100.0	100.0	2	100.0	100.0	681	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.8	0	0.0	2.4	0	0.0	3.5	0	0.0	2.7	3.5
Moderate	0	0.0	20.3	0	0.0	13.2	0	0.0	20.6	0	0.0	13.2	19.6
Middle	0	0.0	32.2	0	0.0	21.4	0	0.0	31.6	0	0.0	22.1	31.4
Upper	0	0.0	42.9	0	0.0	62.0	1	100.0	43.6	730	100.0	61.1	44.8
Unknown	0	0.0	0.8	0	0.0	1.0	0	0.0	0.7	0	0.0	0.9	0.8
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	1	100.0	100.0	730	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.0	0	0.0	2.3	0	0.0	1.3	3.5
Moderate	0	0.0	13.5	0	0.0	8.0	0	0.0	13.0	0	0.0	8.0	19.6
Middle	0	0.0	28.6	0	0.0	17.0	0	0.0	29.2	0	0.0	17.9	31.4
Upper	0	0.0	55.8	0	0.0	73.6	0	0.0	55.2	0	0.0	72.5	44.8
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0.8
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	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	8.7	0	0.0	6.0	0	0.0	14.9	0	0.0	11.0	13.2
Moderate	0	0.0	29.0	0	0.0	28.4	0	0.0	32.8	0	0.0	22.5	26.2
Middle	0	0.0	30.4	0	0.0	24.5	0	0.0	25.4	0	0.0	19.2	26.0
Upper	0	0.0	23.2	0	0.0	35.0	0	0.0	17.9	0	0.0	43.4	30.4
Unknown	0	0.0	8.7	0	0.0	6.1	0	0.0	9.0	0	0.0	4.0	4.1
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	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	3.2	0	0.0	3.0	0	0.0	2.9	0	0.0	3.5	3.5
Moderate	1	33.3	26.2	152	13.2	20.6	0	0.0	26.5	0	0.0	19.8	19.6
Middle	1	33.3	33.0	272	23.7	26.2	2	66.7	30.8	681	48.3	23.8	31.4
Upper	1	33.3	36.5	726	63.1	48.7	1	33.3	39.0	730	51.7	51.6	44.8
Unknown	0	0.0	1.3	0	0.0	1.6	0	0.0	0.8	0	0.0	1.3	0.8
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	1,150	100.0	100.0	3	100.0	100.0	1,411	100.0	100.0	100.0

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.
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 D-90

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Austin, Texas Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.9	0	0.0	3.5	0	0.0	3.6	0	0.0	3.3	3.8
Moderate	0	0.0	18.0	0	0.0	18.2	1	33.3	18.4	58	43.6	18.0	17.1
Middle	0	0.0	23.9	0	0.0	21.0	0	0.0	23.4	0	0.0	21.5	24.0
Upper	4	100.0	51.1	950	100.0	53.4	2	66.7	51.6	75	56.4	53.3	52.1
Unknown	0	0.0	2.8	0	0.0	3.8	0	0.0	2.6	0	0.0	3.8	3.0
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
Total	4	100.0	100.0	950	100.0	100.0	3	100.0	100.0	133	100.0	100.0	100.0

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

Table D-91

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography
Assessment Area: Austin, Texas Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	1.3	0	0.0	0.1	3.1
Moderate	0	0.0	21.7	0	0.0	38.5	0	0.0	15.6	0	0.0	25.1	16.2
Middle	0	0.0	14.2	0	0.0	4.3	0	0.0	18.2	0	0.0	23.5	20.3
Upper	0	0.0	60.0	0	0.0	55.8	0	0.0	62.3	0	0.0	50.7	59.0
Unknown	0	0.0	0.8	0	0.0	0.3	0	0.0	1.3	0	0.0	0.4	1.4
Tract-Unk	0	0.0	2.5	0	0.0	0.9	0	0.0	1.3	0	0.0	0.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table D-92

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Austin, Texas Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.6	0	0.0	1.0	0	0.0	2.5	0	0.0	1.1	21.8
Moderate	0	0.0	10.3	0	0.0	6.1	1	50.0	11.9	289	42.4	7.0	16.5
Middle	0	0.0	18.5	0	0.0	14.0	0	0.0	18.1	0	0.0	13.6	19.8
Upper	3	100.0	43.6	1,150	100.0	55.3	1	50.0	42.7	392	57.6	54.2	41.9
Unknown	0	0.0	25.1	0	0.0	23.7	0	0.0	24.8	0	0.0	24.1	0.0
Total	3	100.0	100.0	1,150	100.0	100.0	2	100.0	100.0	681	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.6	0	0.0	3.6	0	0.0	8.3	0	0.0	3.4	21.8
Moderate	0	0.0	15.9	0	0.0	7.5	0	0.0	15.1	0	0.0	6.9	16.5
Middle	0	0.0	19.4	0	0.0	11.1	0	0.0	17.0	0	0.0	10.2	19.8
Upper	0	0.0	41.4	0	0.0	55.9	0	0.0	41.4	0	0.0	55.9	41.9
Unknown	0	0.0	14.7	0	0.0	21.9	1	100.0	18.1	730	100.0	23.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	730	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.8	0	0.0	2.3	0	0.0	5.0	0	0.0	1.9	21.8
Moderate	0	0.0	12.4	0	0.0	5.5	0	0.0	14.8	0	0.0	6.9	16.5
Middle	0	0.0	17.9	0	0.0	9.4	0	0.0	15.3	0	0.0	8.4	19.8
Upper	0	0.0	61.9	0	0.0	75.6	0	0.0	61.9	0	0.0	75.6	41.9
Unknown	0	0.0	1.9	0	0.0	7.2	0	0.0	3.0	0	0.0	7.3	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	3.6	0	0.0	1.3	0	0.0	3.7	0	0.0	1.5	21.8
Moderate	0	0.0	11.1	0	0.0	6.1	1	33.3	12.6	289	20.5	7.0	16.5
Middle	0	0.0	18.4	0	0.0	13.3	0	0.0	17.7	0	0.0	12.9	19.8
Upper	3	100.0	44.5	1,150	100.0	55.8	1	33.3	43.4	392	27.8	54.9	41.9
Unknown	0	0.0	22.5	0	0.0	23.6	1	33.3	22.6	730	51.7	23.7	0.0
Total	3	100.0	100.0	1,150	100.0	100.0	3	100.0	100.0	1,411	100.0	100.0	100.0

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.
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 D-93

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Austin, Texas Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	75.0	51.7	900	94.7	33.0	1	33.3	51.3	25	18.8	33.3	92.2
Over $1 Million	1	25.0		50	5.3		2	66.7		108	81.2		6.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.5
Total	4	100.0		950	100.0		3	100.0		133	100.0		100.0
By Loan Size													
$100,000 or Less	2	50.0	94.9	100	10.5	44.7	3	100.0	95.3	133	100.0	47.8	
$100,001 - $250,000	0	0.0	2.8	0	0.0	15.2	0	0.0	2.7	0	0.0	15.2	
$250,001 - $1 Million	2	50.0	2.3	850	89.5	40.2	0	0.0	2.0	0	0.0	36.9	
Total	4	100.0	100.0	950	100.0	100.0	3	100.0	100.0	133	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	33.3		50	5.6		1	100.0		25	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	2	66.7		850	94.4		0	0.0		0	0.0		
Total	3	100.0		900	100.0		1	100.0		25	100.0		

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

Table D-94

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms
Assessment Area: Austin, Texas Metropolitan

	Bank And Aggregate Loans By Year												Total Farms %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	72.5	0	0.0	77.7	0	0.0	69.5	0	0.0	63.3	99.2
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.8
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	94.2	0	0.0	42.0	0	0.0	92.9	0	0.0	44.8	
$100,001 - $250,000	0	0.0	3.3	0	0.0	26.8	0	0.0	3.9	0	0.0	19.8	
$250,001 - $500,000	0	0.0	2.5	0	0.0	31.2	0	0.0	3.2	0	0.0	35.4	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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		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: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-95

2024 Austin, Texas Metropolitan Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	24	8.3	19,369	6.9	4,920	25.4	61,099	21.8
Moderate	71	24.5	65,662	23.4	7,808	11.9	46,187	16.5
Middle	79	27.2	82,682	29.5	4,538	5.5	55,489	19.8
Upper	100	34.5	109,098	38.9	2,833	2.6	117,369	41.9
Unknown	16	5.5	3,333	1.2	868	26.0	0	0.0
Total AA	**290**	**100.0**	**280,144**	**100.0**	**20,967**	**7.5**	**280,144**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	41,780	9,027	3.5	21.6	28,895	69.2	3,858	9.2
Moderate	128,416	51,113	19.6	39.8	69,417	54.1	7,886	6.1
Middle	158,994	81,671	31.4	51.4	65,874	41.4	11,449	7.2
Upper	188,951	116,616	44.8	61.7	58,501	31.0	13,834	7.3
Unknown	11,984	2,028	0.8	16.9	8,389	70.0	1,567	13.1
Total AA	**530,125**	**260,455**	**100.0**	**49.1**	**231,076**	**43.6**	**38,594**	**7.3**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2,720	3.8	2,473	3.7	220	4.9	27	2.5
Moderate	12,292	17.1	11,230	17.0	950	21.0	112	10.2
Middle	17,191	24.0	15,859	24.0	1,137	25.1	195	17.8
Upper	37,404	52.1	34,645	52.4	2,035	44.9	724	66.2
Unknown	2,145	3.0	1,922	2.9	187	4.1	36	3.3
Total AA	**71,752**	**100.0**	**66,129**	**100.0**	**4,529**	**100.0**	**1,094**	**100.0**
Percentage of Total Businesses:				**92.2**		**6.3**		**1.5**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	20	3.1	19	2.9	1	20.0	0	0.0
Moderate	106	16.2	104	16.0	2	40.0	0	0.0
Middle	133	20.3	133	20.5	0	0.0	0	0.0
Upper	386	59.0	385	59.3	1	20.0	0	0.0
Unknown	9	1.4	8	1.2	1	20.0	0	0.0
Total AA	**654**	**100.0**	**649**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 D-96

2023 Austin, Texas Metropolitan Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,997	3.8	2,725	3.7	244	4.8	28	2.4
Moderate	13,309	16.7	12,180	16.6	1,005	19.8	124	10.4
Middle	18,575	23.4	17,172	23.4	1,199	23.6	204	17.1
Upper	41,627	52.3	38,491	52.5	2,353	46.3	783	65.7
Unknown	3,027	3.8	2,697	3.7	278	5.5	52	4.4
Total AA	**79,535**	**100.0**	**73,265**	**100.0**	**5,079**	**100.0**	**1,191**	**100.0**
Percentage of Total Businesses:				**92.1**		**6.4**		**1.5**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	23	3.3	22	3.2	1	20.0	0	0.0
Moderate	116	16.5	114	16.3	2	40.0	0	0.0
Middle	142	20.2	142	20.3	0	0.0	0	0.0
Upper	408	58.0	407	58.3	1	20.0	0	0.0
Unknown	14	2.0	13	1.9	1	20.0	0	0.0
Total AA	**703**	**100.0**	**698**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**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 E – 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.