



PUBLIC DISCLOSURE

September 15, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FirstBank
RSSD# 288853

12345 West Colfax Avenue
Lakewood, Colorado 80215

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

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: Outstanding

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

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

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

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are 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 Lakewood, Colorado. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of FirstBank Holding Company, a one-bank holding company also headquartered in Lakewood.
- The bank has total assets of \$26.8 billion (B) as of June 30, 2025.
- The bank operates a total of 99 full-service banking offices and 100 full-service automated teller machines (ATMs) throughout its three-state operational footprint as of December 31, 2024. The bank operates 82 offices throughout Colorado and 13 offices in Arizona. Since the prior evaluation (effective March 2025), the bank exited its banking presence in California when it sold its four branches to California Bank & Trust. For the purposes of this evaluation, the bank’s four branches in California will be included in the evaluation and referenced as applicable.
- As shown in the table below, the bank’s primary business focus is residential real estate and commercial lending.

Table 1

Composition of Loan Portfolio as of June 30, 2025		
Loan Type	\$(000)	%
Construction and Land Development	1,023,328	6.4
Farmland	0	0.0
1- to 4-Family Residential Real Estate	8,078,274	50.7
Multifamily Residential Real Estate	1,434,465	9.0
Nonfarm Nonresidential Real Estate	4,028,086	25.3
Agricultural	0	0.0
Commercial and Industrial	398,519	2.5
Consumer	73,857	0.5
Other	889,822	5.6
Gross Loans	15,926,351	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its October 16, 2023 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's six AAs, with full-scope reviews performed on the Denver-Boulder-Greeley, Colorado Combined Statistical Area (CSA), the Phoenix, Arizona Metropolitan Statistical Area (MSA), and the Coachella Valley, California Metropolitan AA. The Colorado Springs, Colorado MSA AA, Fort Collins, Colorado MSA AA, and Mountain AA received limited-scope reviews. The following data was reviewed as part of the evaluation:

- 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 loans reported on its 2023 and 2024 CRA LARs;
- CD loans originated from January 1, 2023 through December 31, 2024;
- Qualified investments that were made from January 1, 2023 through 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 through December 31, 2024.

For this evaluation, significantly more weight was placed on the bank's performance in Colorado when determining the overall institution rating conclusion, based on the bank's relative branch, deposit, and loan presence within this state. Home mortgage lending generally carried more weight in the analysis based on the higher volume of loans compared to the bank's small business lending. In addition, more 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 within the AAs, while demographic data was incorporated into the analysis to a lesser extent to understand available opportunities present throughout the bank's various markets. Home mortgage loans with a purpose of "other" reported on the bank's HMDA LAR were evaluated individually as part of the geographic or borrower distribution analyses for the Denver-Boulder-Greeley, Colorado CSA AA only, although this lending data is included in the lending tables and totals throughout this evaluation.

Table 2 illustrates the bank's presence in each AA, including the type of performance review analysis in this evaluation for each AA (full-scope or limited-scope), the numbers of retail branch 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.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. # ⁴	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
Colorado		82	88.8	100.0	92.2	100.0	12.2	2 of 125
Denver-Boulder-Greeley CSA	Full	62	60.7	68.4	75.0	81.4	14.0	3 of 79
Fort Collins MSA	Limited	4	6.1	6.9	4.2	4.5	9.8	5 of 26
Colorado Springs MSA	Limited	6	4.4	4.9	3.7	4.0	8.5	4 of 41
Mountain	Limited	10	17.6	19.8	9.3	10.1	23.8	2 of 17
State of Arizona		13	8.5	100.0	4.7	100.0	0.5	17 of 64
Phoenix MSA	Full	13	8.5	100.0	4.7	100.0	0.7	14 of 60
State of California		4	2.8	100.0	3.1	100.0	0.04	94 of 181
Coachella Valley Metropolitan	Full	4	2.8	100.0	3.1	100.0	1.8	12 of 30

^{1.} Based on the bank's HMDA and small business loans used in the analysis.
^{2.} Based on the June 30, 2024 FDIC's Deposit Market Share Report.
^{3.} Based on the bank's ranking among FDIC-insured financial institutions in each AA.
^{4.} Based on the bank's office locations as of December 31, 2024.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the states of Colorado, Arizona, and California and respective AAs within each state. Lending data for AAs that received a limited-scope review are located in Appendix E.

LENDING TEST

The bank's overall lending test performance is high satisfactory. The lending test rating for the state of Colorado was high satisfactory, which was bolstered by the bank's leadership in its CD lending. The lending test ratings in the states of Arizona and California were each rated low satisfactory.

Lending Activity

This performance criterion evaluates the bank’s lending volume considering the bank’s resources and business strategy and other information from the performance context. The bank’s overall lending activities reflect good responsiveness to AA credit needs. Lending volume was significant in the state of Colorado, while activity in the states of Arizona and California was lower based on a smaller geographic footprint and a significantly lower number of branch offices in each respective state.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2023 and 2024			
	#	#%	\$(000)	\$%
Home Improvement	1,870	27.0	223,963	8.5
Home Purchase	2,710	39.2	1,461,167	55.7
Multi-Family Housing	83	1.2	418,165	16.0
Refinancing	1,184	17.1	387,870	14.8
Other Purpose Closed-End	671	9.7	56,039	2.1
Other Purpose LOC	401	5.8	74,018	2.8
Total HMDA related	6,919	64.0	2,621,222	81.7
Total Small Business related	3,900	36.0	586,338	18.3
TOTAL LOANS	10,819	100.0	3,207,560	100.0

The bank offers a number of flexible programs throughout its AAs, including government guaranteed loans and affordable housing program loans. Loans originated through these programs aid a significant number of borrowers who might not otherwise qualify for credit. The numerous program initiatives are largely driven by the Community Reinvestment & Involvement Oversight Committee (CRIOC) that manages the bank’s CRA strategic focus. The CRIOC is comprised of individuals from various business lines within the bank and includes members of the bank’s directorate and senior leadership. Flexible lending programs include the following:

- The bank provides Federal Housing Administration (FHA) purchase and refinance loans across all markets. During the evaluation period, the bank originated 14 FHA loans for \$4.8 million (MM).
- The bank also participates in the U.S. Small Business Administration’s (SBA) 7(a) and 504 loan programs to provide support for small business borrowers. From 2023 through 2024, the bank originated 46 SBA 504 loans for \$39.7MM and 6 SBA 7(a) loans for \$8.9MM.
- The bank offers two affordable mortgage programs that offer reduced fees and lower costs for LMI borrowers seeking permanent financing on a primary residence. During the examination period, the bank originated approximately 142 loans totaling \$43.7MM in affordable housing loans.

- The bank works closely with several affordable housing agencies, certified development financial institutions (CDFIs), and land trusts by participating in various loan and down payment assistance programs that support LMI borrowers. The programs and accomplishments noted below represent a partial listing of the bank's numerous innovative and flexible lending programs.
 - Boulder's Permanently Affordable Homeworks Program (Boulder, Colorado) – Homes under this program are sold at below market-rate prices to eligible LMI borrowers through a managed deed restricted program. The bank originated 8 mortgage loans under this program in 2023 and 2024 for \$1.5MM.
 - Marshall Fire Discount Rate/Fee Program – In response to the aftermath of the Marshall Fire in the Boulder MSA AA in which more than 1,000 homes in the Louisville and Superior-area were destroyed (December 2021), the bank provided below market rate and reduced fee construction loans to affected individuals. Approximately 12 loans totaling \$8.3MM were originated under this bank program.
 - Colorado Community Land Trust (CCLT) – CCLT provides affordable homes for moderate-income borrowers located in the Denver metropolitan area whereby the borrower owns the home while CCLT owns the land. Between 2023 and 2024, the bank originated 22 loans under this program for \$5.3MM.
 - Providing Access to Homeownership (PATH) – This internally developed program in partnership with a local CDFI provides down payment and closing cost assistance in the amount of \$15,000 to first-time LMI borrowers in the bank's Colorado and Arizona markets. In 2023 and 2024 in its Colorado markets, the program resulted in \$1.2MM in grants distributed and, as a result, 113 mortgage originations for \$32.6MM. Within its Arizona market, four mortgage loans were originated totaling \$2MM with \$60,000 in downpayment assistance provided.
 - Elevation Community Land Trust (ECLT) – Using a similar model as CCLT, ECLT created its program in 2020. In 2023 and 2024, the bank originated 27 ECLT loans for \$5.2MM across its Colorado markets.
 - Rocky Mountain Community Land Trust (RMCLT) – Serving the Colorado Springs metropolitan area, RMCLT provides down payment assistance to eligible LMI borrowers who in turn agree to resell the home to another eligible buyer. RMCLT retains the ground lease. From 2023 to 2024, the bank originated 6 loans under the program for \$1.1MM.
 - Trellis Down Payment Assistance Program (Arizona) – The bank has been a partner since 2015 with Trellis, an Arizona-based non-profit organization focused on homeownership. In 2023 and 2024, the bank originated 19 down payment assistance loans to LMI borrowers for \$190,000.

- In 2023 and 2024, the bank purchased 66 loans from Habitat for Humanity’s Colorado affiliates totaling \$15.1MM. These purchases provide the organization with additional liquidity to build more homes for LMI families as well as funding for down payment assistance programs and interest free loans.

In addition to the various activities noted above, the bank operates a Multicultural Banking Center that serves as a hub for all of its branch locations to ensure that customers have access to banking services in their preferred language. The bank currently employs 45 Spanish-speaking loan officers or support-staff, as well as additional lending staff that are proficient in at least one of 13 different languages spoken in various parts of Europe, Africa, and Asia.

Assessment Area Concentration

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

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	1,862	99.6	222,310	99.3	8	0.4	1,653	0.7
Home Purchase - Conventional	2,654	98.4	1,425,370	97.9	42	1.6	30,968	2.1
Home Purchase - FHA	14	100.0	4,829	100.0	0	0.0	0	0.0
Multi-Family Housing	82	98.8	416,115	99.5	1	1.2	2,050	0.5
Other Purpose Closed-End	663	98.8	51,356	91.6	8	1.2	4,683	8.4
Other Purpose LOC	400	99.8	73,968	99.9	1	0.2	50	0.1
Refinancing	1,179	99.6	385,263	99.3	5	0.4	2,607	0.7
Total HMDA related	6,854	99.1	2,579,211	98.4	65	0.9	42,011	1.6
Small Business	3,756	96.3	542,346	92.5	144	3.7	43,992	7.5
TOTAL LOANS	10,610	98.1	3,121,557	97.3	209	1.9	86,003	2.7

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

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion is consistent with the geographic distribution performance noted in the states of Colorado, Arizona, and California.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The conclusion is derived from adequate distribution noted in the state of Colorado, which, as discussed, carries the greatest conclusive weight among the three states. The borrower distribution of lending in the states of Arizona and California was each rated good, respectively.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank is a leader in making CD loans when considering the bank's capacity, AA needs, and the availability of such opportunities. The bank is a leader in the state of Colorado with a significant level of CD lending, while the states of Arizona and California each reflect adequate levels of CD lending, respectively.

The bank is responsive in providing financing that addresses needs across all CD categories and continues to be particularly responsive in originating loans that support affordable housing initiatives, as illustrated in Table 5. This trend is consistent in the state of Colorado AAs where the substantial majority of bank-wide CD lending occurred, at 92.1 percent by number and 95.0 percent by dollar volume. Affordable housing loans have a positive impact in high-cost housing areas that are especially prevalent throughout the state of Colorado and also provide tangible benefits to a significant number of LMI individuals and families.

Table 5 illustrates the volume of bank-wide CD loans by number and dollar volume based on their CD purpose. Additional details of specific CD performance results are further discussed in the analysis of each state and AA evaluation. Examples of responsive CD lending activities among all AAs include:

- The bank provided \$52.4MM in financing while utilizing a low-income housing tax credit (LIHTC) project for the construction of a large multifamily housing campus comprised entirely of income-restricted units.
- The bank provided \$18.0MM in financing in conjunction with the SBA 504 loan program to a newly formed business entity for the purchase and acquisition of an existing business operation. The proceeds of the financing allowed for the retention of more than 100 jobs, the majority of which are held by residents that earn less than 80 percent Area Median Income (AMI). The impact of the transaction is responsive to the economic development needs of the area.

- The bank provided \$2.5MM in financing to an area non-profit organization that operates exclusively to provide an array of community services to LMI individuals and families, including food banks, affordable housing access, and emergency homeless shelters.

Table 5

Community Development Loans – All		
Community Development Purpose	#	\$(000)
Affordable Housing	130	645,005
Community Services	94	49,614
Economic Development	118	273,864
Revitalization and Stabilization	12	91,805
Outside Activities	0	0
Total Loans	354	1,060,287

INVESTMENT TEST

This performance criterion evaluates the bank’s level of qualified grants, donations, or in-kind contributions of property that have a primary purpose of community development. The bank’s overall performance under the investment test is outstanding, with outstanding performance across all three states. The bank has an excellent 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 excellent 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 a variety of private bonds, school bonds to districts where greater than 50.0 percent of students qualified for the free and reduced lunch program, tax credits for low-income housing, investments in affordable housing equity funds, and investment funding for small business investment companies (SBICs). Examples of responsive CD investments include:

- The bank invested in 12 LIHTC projects totaling \$37.3MM which support the creation and improvement of affordable housing throughout the bank’s Colorado AAs. Each project is comprised of multifamily housing properties which contain income-restrictions for occupancy to address affordable housing shortages for LMI individuals and families.
- During the current-review period, the bank invested in 16 bonds totaling \$102.2MM which were comprised of underlying mortgages originated through a state-sponsored affordable housing program, or municipal bonds for the benefit of schools that contain a majority student population eligible for free or reduced lunches.

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	47	202,939	16	98,645	99	768	162	302,352
Community Services	31	104,472	2	9,000	744	40,599	777	154,071
Economic Development	5	12,773	1	1,939	38	173	44	14,885
Revitalization and Stabilization	4	6,175	0	0	6	56	10	6,231
Outside Activities	0	0	0	0	0	0	0	0
Total	87	326,358	19	109,584	887	41,595	993	477,538
^{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 donated a total of \$36.2MM to an educational endowment which was established exclusively for the provision of educational needs-based scholarships for youth from financially disadvantaged backgrounds.
- In each year of the evaluation, the bank participated in a statewide charitable day of giving in which the bank provided a total of \$494 thousand (M) to the managing foundation which distributes the funds to various non-profit organizations. The benefactors of the raised funds include a diverse mixture of organizations that provide an array of community services to LMI individuals and families, among other needs-based charitable organizations.

SERVICE TEST

The bank’s overall performance under the service test is outstanding, which is consistent performance across each of the three states included in this evaluation.

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/closings 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 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 percentage of census tracts by income level throughout the bank’s AAs. Several of the bank’s branches located in middle- and upper-income geographies are in close proximity to LMI tracts, further supporting the accessibility of the bank’s branch and ATM network to all tract income levels. Additionally, in January 2023, the bank partnered with ATM network vendor, MoneyPass, to expand ATM accessibility for its customer base across the vendor’s 40,000 nationwide, surcharge-free ATMs. The addition of the vendor partnership resulted in a notable improvement in ATM accessibility among LMI tracts across each of its six AAs.

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 three full-service branches in the state of Colorado (Boulder, Frisco, and Lakewood) and a full-service branch in Scottsdale, Arizona. The closures impacted three middle- and one upper-income census tract(s).

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 business hours and drive-through services are relatively consistent across all six bank AAs, with lobbies generally open eight hours a day, Monday through Friday, along with Saturday morning lobby and drive-through hours in its Colorado operations. Since the prior evaluation, the bank discontinued its Saturday morning operations in its Arizona and California markets.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.0	13.1	46.5	36.4	1.0	100.0	5.3	25.2	35.9	31.4	2.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
3.6	11.6	45.5	38.4	0.9	100.0	4.6	25.8	37.6	31.2	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
	99		0	4			0	0	(3)	(1)	0	(4)
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	86	405		37		8		536		245		
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. The bank is a leader in providing CD services, which is derived from an excellent level of CD services provided in all of the AAs in each state. As noted in Table 7, bank representatives provided a significant volume of services which were most responsive to area organizations that provide community services to LMI individuals and families, as well as organizations that are responsive to area affordable housing needs. Examples of CD services include:

- Twelve bank representatives provided 19 qualified CD services during the review period by serving on an advisory committee that facilitates the awarding of need-based scholarships to youth attending college, of which the recipients are predominantly comprised of financially disadvantaged students.
- Over the two-year evaluation period, 65 bank representatives performed 75 qualified CD services teaching financial literacy and work readiness sessions in schools that contain a majority of student population eligible for free or reduced lunches.

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.

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB primary supervisory authority over insured depository institutions and their affiliates with total assets of more than \$10B when assessing compliance with the requirements of federal consumer compliance laws. The Reserve Bank, however, retains authority to enforce compliance with the bank's CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Reserve Bank did not cite violations involving discriminatory or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this report, the Reserve Bank is unaware of any violations of Regulation B, *Equal Credit Opportunity Act*, or any Unfair or Deceptive Acts or Practices identified by the CFPB.

STATE OF COLORADO

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes extensive 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 AA.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent 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 LMI 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 Colorado was consistent with the overall scope for the institution. A full-scope review was conducted for the Denver-Boulder-Greeley CSA AA, and the overall state rating was based on the bank's performance in this AA.

Limited-scope reviews were conducted for the Colorado Springs MSA, Fort Collins MSA, and Mountain AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. A total of 9,584 loans were reviewed in the state of Colorado, including 6,204 home mortgage and 3,380 small business loans. More weight was placed on the bank's home mortgage lending in the state of Colorado, followed by small business lending, based on the lending volume for each respective product.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates four of its six AAs and operates 82 of its 99 branches and 83 of 100 full-service ATMs in the state of Colorado. 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 the Denver-Boulder-Greeley CSA AA are provided in analysis that follows.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN COLORADO

LENDING TEST

The bank's performance under the lending test in the state of Colorado is high satisfactory. The ratings for all limited-scope AAs were consistent with the overall state rating.

Lending Activity

The bank's overall lending activities in the state of Colorado reflect good responsiveness to AA credit needs. The bank makes extensive use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state mirror those outlined in the overall 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 based on an adequate distribution in the Denver-Boulder-Greeley CSA AA.

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 based on the distribution in the Denver-Boulder-Greeley CSA AA.

Community Development Lending

The bank is a leader in making CD loans within the state of Colorado. Table 8 illustrates the bank’s total qualified CD lending, including an itemization by qualified purpose. As the table indicates, the bank provided financing which was most responsive to area affordable housing needs. Further, as discussed in the overall Institution Lending Activity section, the bank participates in numerous programs which are designed to facilitate home ownership for LMI individuals. The bank also proactively engages in financing large-scale affordable housing projects throughout its statewide footprint, which include a significant number of areas that are comprised of high-cost housing. The balance of CD lending was also responsive to the economic development or revitalization and stabilization needs of the bank’s statewide AAs, as well as the needs of organizations that provide community services to LMI individuals and families.

Table 8

Community Development Loans – Colorado		
Community Development Purpose	#	\$(000)
Affordable Housing	125	623,815
Community Services	86	47,833
Economic Development	105	245,981
Revitalization and Stabilization	11	89,405
Outside Activities	0	0
Total Loans	327	1,007,033

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of Colorado is outstanding. The bank has an excellent level of qualified CD investments and grants within Colorado and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs. The bank’s investment vehicles were predominately comprised of bonds and LIHTC projects which were responsive to area affordable housing needs, as well as investments which benefit schools that contain majority student populations eligible for free or reduced lunches. Additionally, and as illustrated in Table 9, the bank’s philanthropic donations further represent a significant impact on area CD

needs and were most supportive of organizations that provide community services to LMI individuals and families.

Table 9

Investments, Grants, and Donations – Colorado								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	45	200,894	16	98,645	85	483	146	300,022
Community Services	12	70,160	1	5,000	651	39,042	664	114,202
Economic Development	5	12,773	1	1,939	33	140	39	14,852
Revitalization and Stabilization	4	6,175	0	0	6	56	10	6,231
Outside Activities	0	0	0	0	0	0	0	0
Total	66	290,001	18	105,584	775	39,720	859	435,306

^{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.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within the state of Colorado are accessible to the bank’s various geographies and to individuals of different income levels in each AA. The bank operates 13 of its 82 Colorado branches and 14 of its 86 full-service ATMs in LMI census tracts. Additionally, a number of bank delivery systems not located within LMI census tracts operate in close proximity to such areas, ensuring available accessibility for individuals seeking banking services. Furthermore, while not an evaluative component within the service test, 14 of the bank’s Colorado branches are designated as “Multicultural Banking Centers”, which are specialized branches that provide a full suite of financial services, including traditional banking and loan activities, to customers in their preferred languages.

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. During the evaluation period, the bank closed three full-service branches in Colorado, including offices in Lakewood and Boulder (Denver-Boulder-Greeley CSA AA, respectively) and in Frisco (Mountain AA). These offices were each located in middle-income 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

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

Table 10

Retail Banking and Community Development Services – State of Colorado												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	2.4	13.4	46.3	36.6	1.2	100.0	4.3	23.3	38.9	31.3	2.2	100.0
Changes in Branch Location	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.2	11.7	45.7	38.3	1.1	100.0	4.0	24.2	40.2	30.7	1.0	100.0
Community Development Services	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	82		0	3			0	0	(3)	0	0	(3)
Affordable Housing		Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
73		357	33	8		471	209					

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. Bank officers and staff provided 471 CD services to 209 organizations throughout its Colorado AAs. Many of these activities included serving on boards of directors (boards) of affordable housing and community service organizations, as well as financial literacy instruction for youth from schools that contain a majority student population as eligible for free or reduced lunches.

**DENVER-BOULDER-GREELEY CSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DENVER-BOULDER-GREELEY CSA AA

The bank's Denver-Boulder-Greeley, Colorado CSA AA consists of 12 counties in their entirety (Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park) that encompass the Denver-Aurora-Lakewood, Colorado MSA, the Boulder, Colorado MSA, which is comprised of Boulder County in its entirety, and the Greeley, Colorado MSA, which is comprised of Weld County in its entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There were no changes to the AA since the prior evaluation.
- The AA is comprised of 868 census tracts, including 45 low-, 211 moderate-, 320 middle-, 269 upper-, and 23 unknown-income census tracts.
- The bank operates 62 offices in the AA, including 2 in low-, 7 in moderate-, 29 in middle-, 23 in upper-, and 1 in an unknown-income tract(s). Additionally, 63 full-service ATMs are dispersed throughout the AA, including 10 units within LMI census tracts.
- As of June 30, 2024, the bank held a 14.0 percent market share of deposits in the AA, ranking 3rd out of 79 FDIC-insured financial institutions operating from 746 banking offices in the AA.
- Two community contacts recently conducted as part of the CRA evaluations of other 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 a community and small business development organization, as well as an affordable housing agency, respectively.

Table 11

Population Change			
Assessment Area: Denver-Boulder-Greeley CSA			
Area	2015 Population	2020 Population	Percent Change
Denver-Boulder-Greeley CSA	3,284,952	3,623,560	10.3
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Boulder County, CO	310,032	330,758	6.7
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
Weld County, CO	270,948	328,981	21.4
Greeley, CO MSA	270,948	328,981	21.4
Colorado	5,278,906	5,773,714	9.4

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

- Significant population growth occurred throughout the AA in the period between 2011-2015 and 2016-2020, as illustrated in Table 11, with the highest levels in Broomfield, Douglas, and Weld Counties.
- Approximately 62.8 percent of the overall statewide population is contained within the Denver-Boulder-Greeley CSA AA.
- A majority of the AA population resides within Adams, Arapahoe, Denver, and Jefferson Counties, which includes 2,473,074 residents, or 68.3 percent of the AA population and 42.8 percent of the state population. The AA is diverse and is also comprised of the sparsely populated counties of Clear Creek, Elbert, Gilpin, and Park, which are rural in nature and located on the outer fringes of the CSA.

Table 12

Median Family Income Change			
Assessment Area: Denver-Boulder-Greeley CSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Denver-Boulder-Greeley CSA	87,809	102,312	16.5
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Boulder County, CO	105,899	118,307	11.7
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
Weld County, CO	76,980	85,167	10.6
Greeley, CO MSA	76,980	85,167	10.6
Colorado	81,753	92,752	13.5
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The change in AA median family incomes (MFI) between 2011-2015 and 2016-2020 data outpaced the entire state and reflected positive growth throughout all of the AA counties. The highest growth rates occurred in Gilpin, Denver, and Broomfield Counties, with increases exceeding 20 percent.
- Based on 2016-2020 data, the percentage of AA families living below the poverty level was 5.4 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 represented the lowest, at 1.2 percent.

Table 13

Housing Cost Burden Assessment Area: Denver-Boulder-Greeley CSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-income	Moderate-income	All Renters	Low-income	Moderate-income	All Owners
Denver-Boulder-Greeley CSA	81.8	56.0	47.2	66.1	42.1	21.3
Adams County, CO	84.4	50.3	52.0	65.4	39.7	24.4
Arapahoe County, CO	86.8	57.1	50.8	70.0	41.3	21.7
Boulder County, CO	83.0	63.5	52.4	64.6	43.9	20.4
Broomfield County, CO	86.3	76.1	42.8	62.3	35.8	16.3
Clear Creek County, CO	71.1	38.9	50.0	40.2	47.3	22.2
Denver County, CO	76.7	52.7	42.3	68.1	39.1	22.7
Douglas County, CO	90.2	75.7	44.4	71.2	55.0	18.6
Elbert County, CO	60.4	26.0	31.2	69.8	39.6	23.8
Gilpin County, CO	81.5	36.0	49.2	79.7	43.8	24.3
Jefferson County, CO	84.2	58.4	48.2	61.5	40.9	19.1
Park County, CO	64.4	50.0	45.7	46.0	30.8	19.1
Weld County, CO	76.5	45.3	46.2	65.8	46.4	23.2
Greeley, CO MSA	76.5	45.3	46.2	65.8	46.4	23.2
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

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

- Housing affordability was constrained, yet similar, 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 ratio¹ in the AA was low, at 20.0 percent, although it was consistent with the state of Colorado figure of 20.3 percent. Housing affordability ratios within the 12 AA counties ranged from 16.2 percent in Boulder County to 24.6 percent in Douglas County.
- The median housing value in the AA counties ranged from a low of \$326,100 in Weld County to a high of \$539,100 in Boulder County, compared to the state of Colorado figure of \$369,900.
- Both community members made observations pertaining to the need for more affordable housing stock, particularly in LMI areas, as well as the high cost of living contributing to population leaving the Denver area to find more affordable housing.

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

Table 14

Unemployment Rates					
Assessment Area: Denver-Boulder-Greeley CSA					
Area	2020	2021	2022	2023	2024
Denver-Boulder-Greeley CSA	6.8	5.4	3.0	3.3	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
Boulder County, CO	6.0	4.6	2.7	3.2	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
Weld County, CO	6.5	5.8	3.3	3.5	4.5
Greeley, CO MSA	6.5	5.8	3.3	3.5	4.5
Colorado	6.8	5.5	3.1	3.3	4.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- As of 2024, unemployment rates within the AA remained relatively aligned with the statewide figure for Colorado, trending similarly between 2020 and 2024.
- The AA labor force participation rate, according to 2016-2020 American Community Survey (ACS) data, was 70.6 percent, which is above the Colorado statewide figure of 68.2 percent.
- The largest public-sector employers in the AA include the State of Colorado (59,200), U.S. Government (45,200), University of Colorado System (37,000), Denver Public Schools (15,000), and the City & County of Denver (12,700).
- The largest private-sector employers in the AA include UC Health (13,190), Amazon (12,360), HealthONE Corporation (12,160), Intermountain Healthcare (10,000), and Lockheed Martin Corporation (9,320).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER-Boulder-Greeley CSA AA

LENDING TEST

The bank’s performance under the lending test in the Denver-Boulder-Greeley CSA 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.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 4,525 home mortgage and 2,479 small business loans originated between January 1, 2023 and December 31, 2024.

The bank makes extensive 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 section description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. This conclusion is consistent among the two products evaluated.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As illustrated in Table 15, the distribution of 2024 home mortgage loans among low-income tracts was comparable to the aggregate lending data, as well as comparable to the demographic figure which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income tracts was comparable to the aggregate lending data by number volume, above by dollar volume, and was comparable to the demographic figure.

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

An analysis of the dispersion of loans was conducted and revealed some gaps in lending, specifically in rural southwestern and southeastern portions of the AA; however, these gaps were determined to be largely influenced by geographic challenges relative to branch accessibility and, as such, did not impact the conclusion of performance. The factors impacting the dispersion of home mortgage lending are applicable throughout the remaining home mortgage sub-product analysis.

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 also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of home purchase loans in 2023 reflected performance which was consistent with 2024 lending performance.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2024 home refinance loans among low-income tracts was comparable to the aggregate lending data, as well as 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 refinance loans in 2023 reflected performance which was consistent with 2024 lending performance.

Home Improvement Loans

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

The geographic distribution of home improvement loans in 2023 reflected performance which was consistent with 2024 lending performance.

Multifamily Loans

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

The geographic distribution of multifamily home loans in 2023 reflected performance which was above 2024 lending performance and supported the overall conclusion.

Other Purpose LOC

The geographic distribution of other purpose LOC lending is poor. The bank did not originate an other-purpose LOC loan in a low-income tract in 2024. Further, the bank's lending among moderate-income tracts was below the aggregate lending data and demographic figure.

The geographic distribution of other purpose LOC lending in 2023 reflected performance which was consistent with 2024 lending performance.

Other Purpose Closed/Exempt

The geographic distribution of other purpose closed/exempt lending is adequate. The distribution of 2024 other purpose closed/exempt home 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 by number volume, significantly above by dollar volume, and comparable to the demographic figure.

The geographic distribution of other purpose closed/exempt home loans in 2023 reflected performance which was consistent with 2024 lending performance.

Table 15 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Denver-Boulder-Greeley CSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	47	6.4	2.5	14,936	4.3	1.7	33	3.8	2.4	10,588	2.4	1.6	2.6
Moderate	171	23.5	21.8	50,770	14.6	16.7	184	21.4	20.3	63,539	14.7	15.2	20.2
Middle	237	32.5	37.8	103,683	29.9	35.8	292	34.0	38.7	123,037	28.4	36.7	39.1
Upper	271	37.2	37.4	174,501	50.3	45.2	340	39.6	38.1	231,532	53.4	45.9	37.6
Unknown	3	0.4	0.5	3,031	0.9	0.6	9	1.0	0.4	4,889	1.1	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	729	100.0	100.0	346,921	100.0	100.0	858	100.0	100.0	433,585	100.0	100.0	100.0
Refinance Loans													
Low	10	2.5	2.4	1,642	1.6	1.3	15	3.5	2.3	4,514	3.0	1.7	2.6
Moderate	56	14.2	21.4	11,559	11.5	16.3	73	16.9	20.6	16,370	11.0	16.2	20.2
Middle	133	33.8	38.1	33,520	33.2	40.3	140	32.4	38.1	53,008	35.5	36.3	39.1
Upper	193	49.0	37.7	51,755	51.3	41.7	200	46.3	38.6	72,796	48.8	45.1	37.6
Unknown	2	0.5	0.5	2,360	2.3	0.5	4	0.9	0.4	2,444	1.6	0.7	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	394	100.0	100.0	100,836	100.0	100.0	432	100.0	100.0	149,132	100.0	100.0	100.0
Home Improvement Loans													
Low	14	1.9	1.7	886	1.2	1.3	8	1.4	1.7	492	0.7	1.2	2.6
Moderate	106	14.1	15.6	8,195	10.8	11.2	72	12.8	16.1	5,995	8.7	11.7	20.2
Middle	275	36.7	38.5	21,378	28.1	34.0	243	43.1	38.0	24,176	35.1	33.7	39.1
Upper	354	47.2	43.7	45,626	59.9	52.9	238	42.2	43.8	35,451	51.5	52.4	37.6
Unknown	1	0.1	0.5	50	0.1	0.6	3	0.5	0.5	2,776	4.0	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	750	100.0	100.0	76,135	100.0	100.0	564	100.0	100.0	68,890	100.0	100.0	100.0
Multifamily Loans													
Low	4	25.0	14.2	57,732	35.0	9.2	3	10.0	9.8	1,554	1.2	7.2	8.3
Moderate	7	43.8	31.2	79,864	48.4	28.5	17	56.7	40.0	115,625	87.1	38.4	33.4
Middle	0	0.0	35.2	0	0.0	43.1	4	13.3	26.1	7,293	5.5	40.7	34.9
Upper	5	31.3	17.4	27,350	16.6	15.0	5	16.7	19.6	7,700	5.8	10.6	20.0
Unknown	0	0.0	2.0	0	0.0	4.2	1	3.3	4.5	590	0.4	3.2	3.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	164,946	100.0	100.0	30	100.0	100.0	132,762	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	84	3.6	2.4	75,696	10.3	2.2	63	2.8	2.3	17,339	2.1	2.1	2.6
Moderate	408	17.7	20.6	155,170	21.1	17.3	398	17.9	19.8	205,000	25.0	17.3	20.2
Middle	775	33.6	37.9	172,574	23.4	36.8	821	37.0	38.4	219,094	26.7	36.8	39.1
Upper	1,029	44.6	38.6	327,411	44.4	42.8	917	41.3	39.0	367,075	44.8	43.0	37.6
Unknown	11	0.5	0.4	5,954	0.8	0.9	19	0.9	0.4	11,367	1.4	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	2,307	100.0	100.0	736,805	100.0	100.0	2,218	100.0	100.0	819,875	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.

Table 15 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Denver-Boulder-Greeley CSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	3	1.8	1.7	250	0.8	1.2	0	0.0	2.0	0	0.0	1.4	2.6
Moderate	17	10.2	16.6	2,436	8.1	11.9	11	9.2	18.2	1,030	5.3	13.5	20.2
Middle	45	27.1	38.2	6,235	20.6	33.2	47	39.2	37.7	5,388	27.8	33.3	39.1
Upper	98	59.0	43.2	20,889	69.1	53.1	61	50.8	41.7	12,645	65.3	50.2	37.6
Unknown	3	1.8	0.3	428	1.4	0.6	1	0.8	0.4	300	1.5	1.6	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	166	100.0	100.0	30,238	100.0	100.0	120	100.0	100.0	19,363	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	6	2.4	1.7	250	1.4	1.1	4	1.9	1.5	191	1.2	0.8	2.6
Moderate	51	20.2	18.9	2,346	13.2	10.5	41	19.2	17.4	2,441	15.1	9.8	20.2
Middle	85	33.7	38.6	7,758	43.8	30.9	95	44.4	38.9	6,192	38.4	31.8	39.1
Upper	108	42.9	40.4	7,290	41.1	56.2	73	34.1	41.7	6,951	43.1	55.5	37.6
Unknown	2	0.8	0.4	85	0.5	1.3	1	0.5	0.5	368	2.3	2.1	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	252	100.0	100.0	17,729	100.0	100.0	214	100.0	100.0	16,143	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	7.1	0	0.0	2.7	0	0.0	6.5	0	0.0	3.3	2.6
Moderate	0	0.0	33.2	0	0.0	23.8	0	0.0	31.5	0	0.0	21.6	20.2
Middle	0	0.0	30.1	0	0.0	24.9	0	0.0	39.1	0	0.0	44.5	39.1
Upper	0	0.0	29.6	0	0.0	48.6	0	0.0	21.7	0	0.0	29.5	37.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	1.0	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	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
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is adequate. As illustrated in Table 16, the distribution of 2024 small business loans was comparable to the aggregate lending data in low- and moderate-income census tracts as well as comparable to the percentage of AA businesses in each census tract income level (demographic figure).

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

An analysis of the dispersion of small business loans was conducted and revealed some gaps in lending, specifically in rural southwestern and southeastern portions of the bank's

AA; however, these gaps were determined to be largely influenced by geographic challenges relative to branch accessibility and, as such, did not impact the conclusion of performance.

Table 16

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography Assessment Area: Denver-Boulder-Greeley CSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	69	5.0	4.4	12,039	6.9	4.2	40	3.7	7,142	4.4	4.0
Moderate	308	22.2	23.1	45,046	25.8	26.6	230	21.0	43,348	26.7	21.6
Middle	473	34.2	34.1	49,670	28.4	32.9	405	37.0	48,000	29.5	35.7
Upper	490	35.4	36.1	59,551	34.1	33.4	390	35.6	57,718	35.5	36.9
Unknown	45	3.2	1.8	8,554	4.9	2.8	29	2.7	6,268	3.9	1.8
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	1,385	100.0	100.0	174,860	100.0	100.0	1,094	100.0	162,476	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. *Aggregate data is not currently available.

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

The bank’s lending has an adequate distribution among individuals of different income levels and businesses of different sizes. This conclusion is consistent among the two products evaluated.

Home Mortgage Lending

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

The borrower distribution of 2023 home mortgage loans reflected consistent performance with 2024 lending performance.

Home Purchase Loans

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

The borrower distribution of 2023 home purchase loans reflected consistent performance with 2024 lending performance.

Home Refinance Loans

The borrower distribution of home refinance lending is poor. The distribution of 2024 home refinance lending among low-income borrowers was below the aggregate lending data and was significantly below the demographic figure. Lending among moderate-income borrowers also reflected penetration below the aggregate lending data and was below the demographic figure.

The borrower distribution of 2023 home refinance loans was above the performance of 2024 lending; however, the larger volume of lending in 2024 was the conclusive weighting factor for overall performance.

Home Improvement Loans

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

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

Other Purpose LOC

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

The borrower distribution of 2023 other purpose LOC loans reflected consistent performance with 2024 lending performance.

Other Purpose Closed/Exempt

The borrower distribution of other purpose closed/exempt home loans is adequate. The distribution of 2024 other purpose closed/exempt home loans was significantly above the aggregate lending data and was comparable to the demographic figure. Lending among moderate-income borrowers was comparable to the aggregate lending data, as well as the demographic figure.

The borrower distribution of 2023 other purpose closed/exempt home loans reflected consistent performance with 2024 lending performance.

Table 17 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Denver-Boulder-Greeley CSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank			Agg			Bank			Agg			
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	75	10.3	3.6	18,773	5.4	1.5	75	8.7	4.1	19,942	4.6	1.9	20.2
Moderate	102	14.0	16.7	31,623	9.1	11.1	121	14.1	16.4	36,545	8.4	10.7	18.1
Middle	125	17.1	25.4	44,716	12.9	22.3	140	16.3	24.2	51,674	11.9	21.2	21.9
Upper	300	41.2	36.3	185,375	53.4	46.8	366	42.7	34.6	242,328	55.9	44.3	39.8
Unknown	127	17.4	18.0	66,434	19.1	18.3	156	18.2	20.7	83,096	19.2	21.9	0.0
Total	729	100.0	100.0	346,921	100.0	100.0	858	100.0	100.0	433,585	100.0	100.0	100.0
Refinance Loans													
Low	32	8.1	11.6	2,804	2.8	5.2	25	5.8	9.4	3,449	2.3	4.9	20.2
Moderate	67	17.0	20.3	8,599	8.5	10.7	48	11.1	17.7	7,126	4.8	11.7	18.1
Middle	66	16.8	22.2	10,979	10.9	13.9	99	22.9	20.8	18,562	12.4	16.8	21.9
Upper	165	41.9	31.7	50,047	49.6	29.1	179	41.4	31.6	74,817	50.2	39.0	39.8
Unknown	64	16.2	14.2	28,407	28.2	41.1	81	18.8	20.5	45,178	30.3	27.5	0.0
Total	394	100.0	100.0	100,836	100.0	100.0	432	100.0	100.0	149,132	100.0	100.0	100.0
Home Improvement Loans													
Low	54	7.2	6.7	2,546	3.3	3.6	53	9.4	7.6	3,354	4.9	4.8	20.2
Moderate	138	18.4	18.4	7,880	10.4	11.5	96	17.0	17.6	6,131	8.9	11.0	18.1
Middle	171	22.8	25.5	12,286	16.1	20.6	142	25.2	26.0	12,036	17.5	20.6	21.9
Upper	322	42.9	45.8	42,564	55.9	60.3	219	38.8	43.8	36,560	53.1	56.5	39.8
Unknown	65	8.7	3.6	10,859	14.3	4.0	54	9.6	5.0	10,809	15.7	7.1	0.0
Total	750	100.0	100.0	76,135	100.0	100.0	564	100.0	100.0	68,890	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	204	8.9	5.7	26,379	4.6	2.3	198	9.0	6.1	28,871	4.2	2.7	20.2
Moderate	395	17.2	17.8	54,259	9.5	11.0	336	15.4	17.2	53,772	7.8	11.0	18.1
Middle	470	20.5	25.0	76,093	13.3	20.8	471	21.5	23.9	91,417	13.3	20.3	21.9
Upper	944	41.2	36.9	304,413	53.2	44.8	871	39.8	35.0	370,068	53.9	44.0	39.8
Unknown	278	12.1	14.5	110,715	19.4	21.1	312	14.3	17.8	142,985	20.8	22.1	0.0
Total	2,291	100.0	100.0	571,859	100.0	100.0	2,188	100.0	100.0	687,113	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.													

Table 17 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Denver-Boulder-Greeley CSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	12	7.2	8.1	954	3.2	4.7	8	6.7	9.1	432	2.2	5.8	20.2
Moderate	25	15.1	20.0	2,330	7.7	12.2	23	19.2	20.3	1,965	10.1	12.8	18.1
Middle	30	18.1	26.4	3,404	11.3	20.9	32	26.7	27.5	3,835	19.8	22.0	21.9
Upper	87	52.4	40.5	19,329	63.9	56.4	49	40.8	38.8	10,813	55.8	54.3	39.8
Unknown	12	7.2	4.9	4,221	14.0	5.8	8	6.7	4.3	2,318	12.0	5.1	0.0
Total	166	100.0	100.0	30,238	100.0	100.0	120	100.0	100.0	19,363	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	31	12.3	9.6	1,302	7.3	3.7	37	17.3	9.4	1,694	10.5	4.7	20.2
Moderate	63	25.0	21.1	3,827	21.6	10.3	48	22.4	22.5	2,005	12.4	11.6	18.1
Middle	78	31.0	27.1	4,708	26.6	14.1	58	27.1	25.4	5,310	32.9	15.4	21.9
Upper	70	27.8	35.8	7,098	40.0	54.7	58	27.1	35.1	5,550	34.4	55.1	39.8
Unknown	10	4.0	6.3	794	4.5	17.2	13	6.1	7.5	1,584	9.8	13.2	0.0
Total	252	100.0	100.0	17,729	100.0	100.0	214	100.0	100.0	16,143	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.5	0	0.0	1.1	0	0.0	0.0	0	0.0	0.0	20.2
Moderate	0	0.0	0.5	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	18.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.5	0	0.0	0.3	0	0.0	2.2	0	0.0	3.1	39.8
Unknown	0	0.0	97.4	0	0.0	97.8	0	0.0	97.8	0	0.0	96.9	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													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of 2024 loans to businesses with revenues of \$1MM or less (small businesses) reflected a concentration of lending that was comparable to the aggregate lending data but was below the percentage of total small businesses (demographic figure).

The distribution of 2023 lending to small businesses reflected performance which was consistent with 2024 lending conclusions.

Table 18

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Denver-Boulder-Greeley CSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023					2024*					
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	904	65.3	48.2	73,877	42.2	23.6	681	62.2	67,561	41.6	92.9
Over \$1 Million	367	26.5		82,952	47.4		312	28.5	75,153	46.3	6.1
Revenue Unknown	114	8.2		18,031	10.3		101	9.2	19,762	12.2	1.0
Total	1,385	100.0		174,860	100.0		1,094	100.0	162,476	100.0	100.0
By Loan Size											
\$100,000 or Less	1,010	72.9	90.3	18,608	10.6	41.7	747	68.3	15,534	9.6	
\$100,001 - \$250,000	148	10.7	5.4	27,580	15.8	17.6	125	11.4	22,816	14.0	
\$250,001 - \$1 Million	227	16.4	4.3	128,672	73.6	40.7	222	20.3	124,126	76.4	
Total	1,385	100.0	100.0	174,860	100.0	100.0	1,094	100.0	162,476	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	758	83.8		7,461	10.1		543	79.7	6,332	9.4	
\$100,001 - \$250,000	46	5.1		8,717	11.8		45	6.6	8,215	12.2	
\$250,001 - \$1 Million	100	11.1		57,699	78.1		93	13.7	53,014	78.5	
Total	904	100.0		73,877	100.0		681	100.0	67,561	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. *Aggregate data is not currently available.											

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 236 CD loans totaling \$748.5MM within this AA. As Table 19 illustrates, a substantial portion of the bank’s qualified CD loans was responsive to area affordable housing needs, followed by activities that were responsive to economic development needs. As discussed previously, the bank proactively participates in numerous partnerships and initiatives to address affordable housing needs within the AA, which continues to experience housing cost burden as referenced by community member perspectives utilized in this analysis. These loans, in conjunction with the bank’s numerous flexible and innovative lending programs, were a primary consideration in assessing the bank’s leadership position related to CD lending efforts within the AA.

The following are specific examples of CD loans that were responsive to AA needs:

- The bank provided \$52.4MM in financing to a low-income housing tax credit (LIHTC) project for the construction of a large multifamily housing campus comprised entirely of income-restricted units.

- The bank provided a total of \$31.5MM in financing to an area food bank within the state. The proceeds support the ongoing cash flow needs of the organization, as well as the expansion of a distribution facility to further impact the mission of the organization to alleviate hunger.

Table 19

Community Development Loans – Denver-Boulder-Greeley CSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	99	487,625
Community Services	62	41,757
Economic Development	65	131,078
Revitalization and Stabilization	10	88,008
Total Loans	236	748,469

INVESTMENT TEST

The bank’s performance under the investment test in the Denver-Boulder-Greeley CSA 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. The bank utilizes a variety of investment instruments in this AA that support numerous CD initiatives. The following are examples of qualified AA investment activities:

- The bank invested \$2.6MM in a housing fund for the construction of a multifamily complex comprised of a mixture of Section 8 housing vouchers through the Department of Housing and Urban Development (HUD), as well as set-side units for families earning at, or below, 100 percent of area median incomes.
- The bank invested \$1.9MM during the evaluation period into a SBIC fund which is used to provide start-up and ongoing capital injection needs for qualifying small businesses. The current-period investment is in addition to an additional investment that remains in the bank’s investment portfolio totaling \$7.2MM from prior evaluation periods, further supporting the bank’s investment in statewide economic development needs.

Table 20

Investments, Grants, and Donations – Denver-Boulder-Greeley CSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	7	25,880	4	14,684	40	150	51	40,714
Community Services	11	61,467	1	5,000	357	37,333	369	103,800
Economic Development	3	11,523	1	1,939	20	48	24	13,510
Revitalization and Stabilization	4	6,175	0	0	5	55	9	6,230
Total	25	105,044	6	21,623	422	37,586	453	164,253
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

In addition to its qualified investments in the AA, the bank also made a substantial 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 donated a total of \$36.2MM to an educational endowment which was established exclusively for the provision of educational needs-based scholarships for youth from financially disadvantaged backgrounds.
- The bank donated \$50M toward a construction campaign for a revitalization project located in a LMI area within Denver and part of the City’s Master Plan for redevelopment and revitalization of the specified area.

SERVICE TEST

The bank’s performance under the service test in the Denver-Boulder-Greeley CSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates 9 of its 62 AA branches in LMI tracts, including 2 in low- and 7 in moderate-income tracts, to accompany 29 in middle-, 23 in upper-, and 1 in an unknown-income tract(s). Additionally, the bank’s full-service ATM network consists of 3 units in low-, 7 in moderate-, 31 in middle-, 23 in upper-, and 1 in an unknown-income tract(s). The distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI 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. Since

the prior evaluation, the bank closed two branches in the AA, both of which were located in middle-income tracts in the cities of Lakewood and Boulder.

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. Branch hours do not vary and generally range from 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. on Saturday.

Table 21

Retail Banking and Community Development Services – Denver-Boulder-Greeley CSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.2	11.3	46.8	37.1	1.6	100.0	5.2	24.3	36.9	31.0	2.6	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
4.2	9.7	45.8	38.9	1.4	100.0	4.7	25.4	37.6	31.0	1.3	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches		Openings (#)	Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	62		0	2		0	0	(2)	0	0	(2)	
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	38	246	20	8	312	141						

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. During the evaluation period, bank representatives provided 312 CD services to 141 total organizations. Examples of services provided by bank employees include:

- During the evaluation period, 65 bank representatives provided 71 qualified CD services teaching financial literacy and work readiness sessions in schools that contain a majority student population eligible for free or reduced lunches.
- Three bank representatives provided five qualified CD services serving in various board membership capacities for an organization that provides community services to individuals and families experiencing domestic violence, homelessness, and abuse.

OTHER COLORADO METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

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

The bank delineates the entirety of Larimer County as its AA, which comprises the Fort Collins-Loveland, Colorado MSA. Refer to Appendix C for a map of the AA and Appendix E for lending performance information.

- The AA is comprised of 86 census tracts in total, including 1 low-, 16 moderate-, 52 middle-, 16 upper-, and 1 unknown-income census tract(s).
- There were no changes to the bank's delineation of the AA since the prior evaluation.
- Based on 2020 ACS data, the AA population was 359,066.
- The AA is comprised of 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.
- The bank operates four full-service branches in the AA, with one located in a moderate-income census tract and three in middle-income census tracts. Each branch contains a full-service ATM on its premises. There were no changes to the branch structure in the AA since the prior evaluation.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 9.8 percent market share of deposits, ranking 5th of 26 financial institutions operating from 89 banking offices in the AA.

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

The bank delineates the entireties of Teller and El Paso Counties, which combine to comprise the Colorado Springs, Colorado MSA, as this AA. Refer to Appendix C for a map of the AA and Appendix E for lending performance information.

- The AA is comprised of 175 census tracts in total, including 4 low-, 48 moderate-, 72 middle-, 49 upper-, and 2 unknown-income census tracts.
- There were no changes to the bank's delineation of the AA since the prior evaluation.
- Based on 2020 ACS data, the AA population was 359,066.
- The AA is comprised of 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.

- The bank operates six banking offices within the AA, including two in moderate, three in middle-, and one in an upper-income census tract(s). Each branch contains a full-service ATM on its premises.
- There were no changes to the branch structure in the AA since the prior evaluation.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held an 8.5 percent market share of deposits, ranking 4th of 41 financial institutions operating from 129 banking offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO LIMITED SCOPE METROPOLITAN AAs

The 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 did not change the rating for the overall state of Colorado.

Table 22

Assessment Area	Lending Test	Investment Test	Service Test
Fort Collins MSA	Below	Consistent	Consistent
Colorado Springs MSA	Below	Consistent	Consistent

**MOUNTAIN ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MOUNTAIN AA

The AA is comprised of Eagle, Garfield, Grand, Lake, Pitkin, and Summit Counties in their entireties. Refer to Appendix C for a map of the AA and Appendix E for lending performance information.

- The AA is comprised of 55 census tracts: 1 low-, 1 moderate-, 17 middle-, and 36 upper-income census tracts based on the most recent 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 188,982, which reflects a 6.3 percent increase from the 2015 ACS data.
- The AA is home to 43,123 total families. According to 2020 ACS data, 12.2 percent of families are low-, 12.7 percent are moderate-, 21.8 percent are middle-, and 53.3 percent are upper-income.
- The bank operates 10 full-service branches in the AA, with one branch located in a moderate-, four in middle-, and six in upper-income census tracts. Each branch contains a full-service ATM on its premises, and the AA also has one cash dispensing-only standalone ATM in an upper-income tract. The bank closed one branch in a middle-income census tract since the prior CRA evaluation.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 23.8 percent market share of deposits in the AA, ranking 2nd of 17 financial institutions operating from 86 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MOUNTAIN AA

The Mountain 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 did not change the overall rating for the state of Colorado.

Table 23

Assessment Area	Lending Test	Investment Test	Service Test
Mountain	Consistent	Consistent	Consistent

**STATE OF ARIZONA/
PHOENIX MSA ASSESSMENT AREA**

CRA rating for Arizona:	Satisfactory
The Lending Test is rated:	Low 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, and businesses of different sizes is good.
- The bank makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent 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 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 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 Arizona was consistent with the overall scope for the institution. A full-scope review was conducted for the Phoenix MSA AA, which

represents the bank's only delineated AA in the state of Arizona. The overall state rating was based solely on the bank's performance in this AA and, as such, the statewide performance will be discussed concurrently with the bank's performance in the Phoenix MSA AA.

A total of 738 loans were reviewed in the state of Arizona, including 482 home mortgage and 256 small business loans originated between January 1, 2023 and December 31, 2024. More weight was applied to the bank's home mortgage lending based on higher lending volume.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

The bank delineates one of its six AAs and operates 13 of its 99 branches in the state of Arizona. 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 the Phoenix MSA AA are provided in the analysis that follows.

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

The bank's Phoenix MSA AA consists of Maricopa and Pinal Counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The AA remains unchanged since the prior evaluation.
- The AA is comprised of a total of 1,104 census tracts, including 68 low-, 294 moderate-, 362 middle-, 354 upper-, and 26 unknown-income census tracts.
- The bank operates 13 branches in the AA, including 1 in low-, 2 in moderate-, 5 in middle-, and 5 in upper-income census tracts. Full-service ATMs are operated on each branch premises.
- As of June 30, 2024, the bank held a 0.7 percent market share of deposits in the AA, ranking 14th out of 60 FDIC-insured financial institutions operating from 675 banking offices in the AA.
- Two community contacts recently conducted as part of the CRA evaluations of other 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 a community development financial institution and economic development division within the local government.

Table 24

Population Change			
Assessment Area: Phoenix MSA			
Area	2015 Population	2020 Population	Percent Change
Phoenix MSA	4,407,915	4,845,832	9.9
Maricopa County, AZ	4,018,143	4,420,568	10.0
Pinal County, AZ	389,772	425,264	9.1
Arizona	6,641,928	7,151,502	7.7
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			

- Growth within the AA between 2011-2015 and 2016-2020 ACS data outpaced the overall state of Arizona figure.
- The Phoenix MSA includes 67.8 percent of the overall statewide population, while within the AA, Maricopa County contains 91.2 percent of the MSA’s population.

Table 25

Median Family Income Change			
Assessment Area: Phoenix MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Phoenix MSA	69,582	78,930	13.4
Maricopa County, AZ	70,745	80,161	13.3
Pinal County, AZ	60,487	69,494	14.9
Arizona	64,986	73,456	13.0
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- MFIs in the AA reflected an increase in the period between the 2015 and 2020 figures and at a pace which reflected consistency with the overall statewide MFI growth.
- The percentage of AA families living below the poverty level, at 9.1 percent, was slightly below the statewide figure of 10.1 percent.

Table 26

Housing Cost Burden						
Assessment Area: Phoenix MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-income	Moderate-income	All Renters	Low-income	Moderate-income	All Owners
Phoenix MSA	80.1	56.6	43.6	62.5	37.1	19.8
Maricopa County, AZ	81.1	57.7	44.0	63.8	37.7	19.8
Pinal County, AZ	64.5	39.5	36.9	53.4	32.7	19.4
Arizona	78.5	54.7	43.0	60.0	36.2	19.7

Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA contains a generally similar housing cost burden to the overall statewide figure; however, Pinal County reflects more affordability for renters, including LMI individuals, relative to Maricopa County and relative to statewide affordability figures.
- Additionally, the affordability ratio² of 24.8 percent further demonstrates a lower level of home affordability within the overall AA.
- Both community member perspectives referenced the lack of affordable housing within the AA, including one member that indicated the availability of affordable housing has not kept pace with population migrations.

Table 27

Unemployment Rates					
Assessment Area: Phoenix MSA					
Area	2020	2021	2022	2023	2024
Phoenix MSA	7.3	4.6	3.3	3.2	3.2
Maricopa County, AZ	7.2	4.6	3.3	3.2	3.1
Pinal County, AZ	7.5	4.9	3.7	3.7	3.8
Arizona	7.8	5.0	3.8	3.7	3.6

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The MSA has maintained a lower unemployment rate than the overall statewide figure in year-over-year data. Within the MSA, Pinal County reflects a generally similar figure as the statewide level, while Maricopa County trends at a lower level of unemployment relative to the statewide level.
- The labor force participation rate in the AA was 63.3 percent, which is above the Arizona statewide figure of 60.1 percent.
- Top employers in Phoenix and greater Arizona include Banner Health, Honeywell Aerospace, Intel Corporation, Wells Fargo, American Express, and Phoenix Children’s Hospital.

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.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHOENIX MSA
AA**

LENDING TEST

The bank's performance under the lending test in the state of Arizona is low satisfactory, which is derived from adequate lending test performance in the Phoenix MSA AA.

In the analysis of home mortgage lending, multifamily, other purpose LOC, and other purpose closed/exempt loans were not analyzed due to insufficient loan volumes to render a meaningful conclusion.

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. A description of flexible lending products is discussed in the overall Institution section description.

Geographic Distribution of Loans

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

Home Mortgage Lending

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

The geographic distribution of 2023 home mortgage lending reflected consistent performance with the conclusion of 2024 lending.

An analysis of the dispersion of lending throughout the expansive AA reflected gaps or lapses in lending that included LMI census tracts; however, the gaps in lending included LMI areas in the southwestern and southeastern portions of the expansive AA that were as far as 85 miles from the nearest banking office. Within the bank's strategic operating area (the greater Phoenix area), the dispersion of home mortgage loans did not reveal

notable gaps or lapses that would impact the performance conclusion. This contextual performance also is applicable to the mortgage subproducts listed below.

Home Purchase Loans

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

The geographic distribution of 2023 home purchase lending reflected consistent performance with the conclusion of 2024 lending.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2024 home refinance loans in 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 by number volume, below by dollar volume, and was comparable to the demographic figure.

The geographic distribution of 2023 home refinance lending reflected consistent performance with the conclusion of 2024 lending.

Home Improvement Loans

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

The geographic distribution of 2023 home improvement lending reflected consistent performance with the conclusion of 2024 lending.

Table 28 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Phoenix MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	2.0	0	0.0	1.3	3	2.4	1.9	912	1.5	1.2	2.6
Moderate	16	17.4	19.2	4,242	10.8	14.0	29	23.2	19.9	8,335	13.6	14.4	21.7
Middle	40	43.5	43.2	12,703	32.4	37.8	39	31.2	42.0	13,301	21.7	36.6	36.8
Upper	36	39.1	35.5	22,288	56.8	46.8	54	43.2	36.1	38,816	63.3	47.7	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	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	92	100.0	100.0	39,233	100.0	100.0	125	100.0	100.0	61,364	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.3	0	0.0	1.0	0	0.0	2.2	0	0.0	1.6	2.6
Moderate	6	18.2	19.5	1,360	12.4	11.4	8	17.4	18.9	2,202	8.7	14.5	21.7
Middle	9	27.3	39.4	1,050	9.6	33.6	8	17.4	39.1	2,188	8.7	34.2	36.8
Upper	18	54.5	38.5	8,546	78.0	54.0	30	65.2	39.7	20,852	82.6	49.6	38.8
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	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	33	100.0	100.0	10,956	100.0	100.0	46	100.0	100.0	25,242	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.1	1	2.0	1.8	527	5.3	1.2	2.6
Moderate	10	16.4	14.3	349	4.8	10.4	9	18.4	15.1	512	5.2	10.8	21.7
Middle	22	36.1	36.1	1,416	19.5	28.8	18	36.7	36.9	1,684	17.1	29.2	36.8
Upper	28	45.9	48.0	5,454	75.0	59.7	21	42.9	46.1	7,131	72.4	58.7	38.8
Unknown	1	1.6	0.1	50	0.7	0.1	0	0.0	0.1	0	0.0	0.1	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	61	100.0	100.0	7,269	100.0	100.0	49	100.0	100.0	9,854	100.0	100.0	100.0
Multifamily Loans													
													Multi-family Units %
Low	0	0.0	17.2	0	0.0	10.1	0	0.0	15.1	0	0.0	6.5	9.9
Moderate	7	77.8	39.8	27,080	91.8	31.3	5	71.4	39.4	18,323	78.4	33.5	36.4
Middle	2	22.2	24.2	2,415	8.2	28.1	2	28.6	26.6	5,059	21.6	25.1	29.9
Upper	0	0.0	17.6	0	0.0	29.4	0	0.0	18.3	0	0.0	34.6	22.9
Unknown	0	0.0	1.2	0	0.0	1.1	0	0.0	0.5	0	0.0	0.3	0.9
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	29,495	100.0	100.0	7	100.0	100.0	23,382	100.0	100.0	100.0
Total Home Mortgage Loans													
													Owner Occupied Units %
Low	1	0.4	1.9	40	0.0	1.8	4	1.5	1.9	1,439	1.1	1.6	2.6
Moderate	44	19.7	18.4	33,249	36.9	14.3	58	22.4	18.8	30,203	24.1	15.5	21.7
Middle	83	37.2	41.4	18,948	21.0	35.8	76	29.3	40.7	22,687	18.1	34.9	36.8
Upper	94	42.2	38.2	37,862	42.0	48.1	121	46.7	38.5	70,976	56.6	47.9	38.8
Unknown	1	0.4	0.1	50	0.1	0.1	0	0.0	0.1	0	0.0	0.1	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	223	100.0	100.0	90,149	100.0	100.0	259	100.0	100.0	125,305	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.

Table 28 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Phoenix MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.0	0	0.0	0.7	0	0.0	1.2	0	0.0	0.8	2.6
Moderate	0	0.0	13.0	0	0.0	8.4	1	7.1	14.5	200	4.5	10.0	21.7
Middle	2	40.0	36.1	950	47.7	26.9	3	21.4	38.2	300	6.7	29.8	36.8
Upper	3	60.0	49.9	1,040	52.3	64.0	10	71.4	46.0	3,949	88.8	59.3	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	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	5	100.0	100.0	1,990	100.0	100.0	14	100.0	100.0	4,449	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	4.3	1.6	40	3.3	1.0	0	0.0	1.3	0	0.0	0.9	2.6
Moderate	5	21.7	15.4	218	18.1	7.7	6	33.3	15.6	631	62.2	9.5	21.7
Middle	8	34.8	39.3	414	34.3	24.2	6	33.3	41.0	155	15.3	26.1	36.8
Upper	9	39.1	43.7	534	44.3	67.1	6	33.3	42.0	228	22.5	63.4	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	1,206	100.0	100.0	18	100.0	100.0	1,014	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.7	0	0.0	2.3	0	0.0	1.4	0	0.0	0.5	2.6
Moderate	0	0.0	26.9	0	0.0	23.1	0	0.0	22.2	0	0.0	14.8	21.7
Middle	0	0.0	46.2	0	0.0	40.8	0	0.0	55.6	0	0.0	46.4	36.8
Upper	0	0.0	24.2	0	0.0	33.7	0	0.0	20.8	0	0.0	38.4	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	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

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.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of 2024 small business loans among low-income tracts was comparable to the aggregate lending data by number volume, below by dollar volume, and was comparable to the demographic figure of the percentage of AA businesses in each census tract income level. Small business lending among moderate-income tracts was comparable to the aggregate lending data, as well as the demographic figure.

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

An analysis of the dispersion of lending throughout the expansive AA reflected gaps or lapses in lending that included LMI census tracts; however, the gaps in lending included LMI areas in the southwestern and southeastern portions of the expansive AA that were

as far as 85 miles from the nearest banking office. Within the bank’s strategic operating area (the greater Phoenix area), the dispersion of small business loans did not reveal notable gaps or lapses that would impact the performance conclusion.

Table 29

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Phoenix MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	6	4.4	4.6	767	2.8	8.9	2	1.7	288	1.3	3.7
Moderate	30	21.9	21.8	7,836	28.6	28.4	18	15.1	4,225	18.6	19.3
Middle	29	21.2	28.0	6,653	24.3	24.0	21	17.6	4,363	19.2	30.5
Upper	71	51.8	45.0	11,823	43.2	37.9	78	65.5	13,899	61.0	46.0
Unknown	1	0.7	0.4	287	1.0	0.6	0	0.0	0	0.0	0.6
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	137	100.0	100.0	27,366	100.0	100.0	119	100.0	22,775	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. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans reflects good penetration, while lending to small businesses reflects adequate penetration.

Home Mortgage Lending

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

The borrower distribution of 2023 home mortgage loans reflected lending penetration which was collectively below the 2024 lending performance. Specifically, lending penetration was comparable to the aggregate lending data among low-income borrowers, while moderate-income borrower penetration was below 2024 lending patterns.

Home Purchase Loans

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

The borrower distribution of 2023 home purchase loans reflected lending performance which was below 2024 lending performance.

Home Refinance Loans

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

The borrower distribution of 2023 home refinance loans was below the performance of 2024 lending. Lending was consistent with 2024 lending patterns among low-income borrower penetrations; however, lending among moderate-income borrowers was below the performance of 2024 lending.

Table 30 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	4	4.3	2.7	989	2.5	1.2	10	8.0	2.4	2,988	4.9	1.1	20.6
Moderate	5	5.4	14.5	1,419	3.6	9.7	18	14.4	14.7	5,175	8.4	9.9	18.3
Middle	9	9.8	23.1	2,475	6.3	19.5	17	13.6	22.1	7,108	11.6	18.6	20.3
Upper	30	32.6	37.3	18,397	46.9	47.1	40	32.0	35.6	22,966	37.4	45.3	40.9
Unknown	44	47.8	22.5	15,953	40.7	22.5	40	32.0	25.3	23,127	37.7	25.1	0.0
Total	92	100.0	100.0	39,233	100.0	100.0	125	100.0	100.0	61,364	100.0	100.0	100.0
Refinance Loans													
Low	3	9.1	10.2	320	2.9	3.2	3	6.5	7.2	149	0.6	3.6	20.6
Moderate	2	6.1	20.1	75	0.7	7.8	7	15.2	16.5	1,139	4.5	10.5	18.3
Middle	4	12.1	21.1	490	4.5	9.5	4	8.7	18.3	596	2.4	14.1	20.3
Upper	14	42.4	32.7	4,926	45.0	20.9	11	23.9	32.9	4,941	19.6	40.4	40.9
Unknown	10	30.3	15.9	5,145	47.0	58.6	21	45.7	25.0	18,417	73.0	31.4	0.0
Total	33	100.0	100.0	10,956	100.0	100.0	46	100.0	100.0	25,242	100.0	100.0	100.0
Home Improvement Loans													
Low	5	8.2	6.3	54	0.7	3.8	4	8.2	6.8	268	2.7	3.6	20.6
Moderate	8	13.1	17.0	320	4.4	10.7	8	16.3	17.5	922	9.4	10.9	18.3
Middle	9	14.8	25.1	912	12.5	19.7	3	6.1	23.2	216	2.2	17.1	20.3
Upper	21	34.4	46.4	2,710	37.3	59.5	18	36.7	46.6	3,141	31.9	58.2	40.9
Unknown	18	29.5	5.1	3,273	45.0	6.4	16	32.7	5.9	5,307	53.9	10.3	0.0
Total	61	100.0	100.0	7,269	100.0	100.0	49	100.0	100.0	9,854	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	17	7.9	4.5	1,513	2.5	1.8	23	9.1	4.3	3,606	3.5	1.8	20.6
Moderate	21	9.8	15.8	2,829	4.7	9.3	40	15.9	15.7	7,845	7.7	10.0	18.3
Middle	27	12.6	23.0	4,172	6.9	17.2	27	10.7	21.6	8,184	8.0	17.6	20.3
Upper	73	34.1	37.8	27,448	45.3	42.1	77	30.6	36.4	31,787	31.2	45.1	40.9
Unknown	76	35.5	18.9	24,692	40.7	29.6	85	33.7	22.1	50,501	49.5	25.5	0.0
Total	214	100.0	100.0	60,654	100.0	100.0	252	100.0	100.0	101,923	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.													

Table 30 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Phoenix MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank			Agg			Bank			Agg			
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	5.1	0	0.0	4.1	0	0.0	6.0	0	0.0	3.8	20.6
Moderate	1	20.0	15.2	800	40.2	9.2	0	0.0	16.9	0	0.0	10.3	18.3
Middle	0	0.0	22.2	0	0.0	15.6	1	7.1	24.5	200	4.5	18.7	20.3
Upper	3	60.0	43.8	1,040	52.3	57.8	5	35.7	42.2	599	13.5	56.4	40.9
Unknown	1	20.0	13.6	150	7.5	13.3	8	57.1	10.5	3,650	82.0	10.8	0.0
Total	5	100.0	100.0	1,990	100.0	100.0	14	100.0	100.0	4,449	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	5	21.7	7.8	150	12.4	4.4	6	33.3	7.7	201	19.8	4.0	20.6
Moderate	5	21.7	19.3	215	17.8	9.6	7	38.9	21.1	609	60.1	11.8	18.3
Middle	5	21.7	26.2	295	24.5	14.1	2	11.1	24.8	64	6.3	14.4	20.3
Upper	5	21.7	39.5	375	31.1	60.2	3	16.7	38.0	140	13.8	55.8	40.9
Unknown	3	13.0	7.2	171	14.2	11.8	0	0.0	8.5	0	0.0	14.0	0.0
Total	23	100.0	100.0	1,206	100.0	100.0	18	100.0	100.0	1,014	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.4	0	0.0	0.1	0	0.0	2.1	0	0.0	0.9	20.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	3.5	0	0.0	4.8	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	5.6	0	0.0	22.1	40.9
Unknown	0	0.0	99.6	0	0.0	99.9	0	0.0	88.9	0	0.0	72.1	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

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.

Small Business Lending

The borrower distribution of small business lending is adequate. The borrower distribution of lending among small businesses was comparable to the aggregate lending data but was below the demographic figure of the percentage of businesses with \$1MM or less in annual revenue.

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

Table 31

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Phoenix MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023					2024*					
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	60	43.8	51.1	9,797	35.8	23.5	69	58.0	7,333	32.2	93.6
Over \$1 Million	57	41.6		11,469	41.9		37	31.1	10,338	45.4	5.1
Revenue Unknown	20	14.6		6,100	22.3		13	10.9	5,104	22.4	1.2
Total	137	100.0		27,366	100.0		119	100.0	22,775	100.0	100.0
By Loan Size											
\$100,000 or Less	81	59.1	91.6	2,985	10.9	39.9	65	54.6	2,074	9.1	
\$100,001 - \$250,000	23	16.8	4.5	4,404	16.1	14.6	28	23.5	6,288	27.6	
\$250,001 - \$1 Million	33	24.1	3.9	19,977	73.0	45.4	26	21.8	14,413	63.3	
Total	137	100.0	100.0	27,366	100.0	100.0	119	100.0	22,775	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	39	65.0		1,002	10.2		53	76.8	1,373	18.7	
\$100,001 - \$250,000	9	15.0		1,629	16.6		7	10.1	1,545	21.1	
\$250,001 - \$1 Million	12	20.0		7,166	73.1		9	13.0	4,415	60.2	
Total	60	100.0		9,797	100.0		69	100.0	7,333	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Community Development Lending

The bank provides an adequate level of CD loans. As illustrated in Table 32, the bank originated 14 CD loans totaling \$37MM in this AA, which were primarily a mixture of loans most responsive to area economic developments. CD lending was also responsive to affordable housing and the community services needs of LMI individuals. Examples of CD lending include:

- The bank provided \$18.3MM in financing for the construction of a large, multifamily housing project that was built for the purpose of providing affordable housing for area workforce.
- The bank originated a \$1.1MM commercial loan under the SBA 7(a) loan program for the purchase of an existing educational organization. The proceeds of the loan retained existing, and created new jobs, of which the majority of wage-earners were LMI.

Table 32

Community Development Loans – Phoenix MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	3	18,710
Community Services	1	25
Economic Development	10	18,268
Revitalization and Stabilization	0	0
Total Loans	14	37,003

INVESTMENT TEST

The bank’s performance under the investment test in the state of Arizona is outstanding based on excellent performance in the Phoenix MSA AA. 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. A significant number of the bank’s investments by number and dollar volume were made to organizations that provide community services to LMI individuals and families. The following are examples of AA investment activities:

- The bank maintains 13 of its 14 qualified investments totaling \$20.3MM in Phoenix area schools that contain a majority student population as eligible for free or reduced lunches.
- The bank continues to hold a \$1MM investment in an equity-equivalent (EQ2) bond which benefits an area fund that distributes financial downpayment assistance to LMI individuals to support home ownership.

Table 33

Investments, Grants, and Donations – Phoenix MSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	1	1,000	0	0	7	256	8	1,256
Community Services	13	20,274	0	0	53	1,454	66	21,728
Economic Development	0	0	0	0	4	32	4	32
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	14	21,274	0	0	64	1,742	78	23,016

^{1.} Book Value of Investment
^{2.} Original Market Value of Investment

The bank's philanthropic giving is consistent with the overall level of investment in the AA, as the bank provided 64 donations totaling \$1.7MM during the evaluation period. Examples of responsive donations include:

- A total of \$1.1MM was donated to a foundation established to provide scholarships to children from low-income families to attend any educational institution that provides the greatest opportunity for learning and success based on the child's needs.
- The bank provided \$240M in contribution funds to an area organization that provides down payment assistance to low-income homebuyers.

SERVICE TEST

The bank's performance under the service test in Arizona is outstanding, based on excellent performance in the Phoenix MSA AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates 13 branches in the AA, including 1 in a low-, 2 in moderate-, 5 in middle-, and 5 in upper-income tracts. Each branch contains a full-service ATM on premises. The distribution of branches and ATMs throughout the AA compares similarly to the concentration of LMI 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. Since the prior evaluation, the bank closed one branch in an upper-income tract in the city of Scottsdale.

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. Full-service hours of operations remain as Monday through Friday, 9:00 a.m. to 5:00 p.m. throughout its AA; however, it is noted that since the prior evaluation (July 2024), the bank discontinued its Saturday morning operations across all of its AA branches.

Table 34

Retail Banking and Community Development Services – Phoenix MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	7.7	15.4	38.5	38.5	0.0	100.0	6.2	26.6	32.8	32.1	2.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
7.1	14.3	35.7	42.9	0.0	100.0	5.2	26.8	35.2	32.5	0.4	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	13		0	1			0	0	0	(1)	0	(1)
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization	Total Services		Total Organizations			
	11	30		0		0	41		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 provided 41 CD services to 20 organizations during the evaluation period. Examples of such services provided by bank employees include:

- Two bank representatives provided three CD services in board membership capacities for an area community services organization that provides clothing and household items to individuals and families in need.
- A bank representative serves on the board of an area housing agency that provides an array of services to LMI and homeless individuals, as well as identifying solutions to provide affordable housing in the area.

**STATE OF CALIFORNIA/
COACHELLA VALLEY METROPOLITAN ASSESSMENT AREA**

CRA rating for California:	Satisfactory
The Lending Test is rated:	Low 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, and businesses of different sizes is good.
- The bank makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent 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 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 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 California was consistent with the overall scope for the institution. A full-scope review was conducted for the Coachella Valley

Metropolitan AA, the bank's only delineated AA in the state of California. The overall state rating was based solely on the bank's performance in this AA. Therefore, the statewide performance will be discussed concurrently with the bank's performance in the Coachella Valley Metropolitan AA.

The evaluation of lending in the state/AA analysis included a total of 288 loans, including 168 home mortgage and 120 small business loans originated between January 1, 2023 and December 31, 2024. The weighting of performance based on loans was consistent with overall institution, which weighed home mortgage lending greater than small business lending based on origination volumes and strategic focus.

DESCRIPTION OF THE INSTITUTIONS OPERATIONS IN CALIFORNIA

The bank delineated one of its six AAs in the state of California to account for its four-branch operations in the Coachella Valley area. During the evaluation period (March 2025), the bank exited the California market with the sale of its California branch network to another financial institution. For purposes of this evaluation, the bank's loan and deposit products and services offered in the state mirrored 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 the Coachella Valley Metropolitan AA during the evaluation period are provided in the analysis that follows.

DESCRIPTION OF THE INSTITUTIONS OPERATIONS IN COACHELLA VALLEY METROPOLITAN AA

The bank's Coachella Valley Metropolitan AA consists of 119 of 518 census tracts in Riverside County, California, which is one of two counties that combine to form the Riverside-San Bernardino-Ontario, California MSA. The bank delineated a smaller portion of Riverside County, as the Coachella Valley is a geographically isolated group of communities surrounded almost entirely by three mountain ranges and the Salton Sea to the south within the central portion of Riverside County. The area is unique given its topographical makeup, mountainous terrain, and uninhabitable desert land. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There were no changes made to the AA following the prior evaluation and prior to the exiting of the bank's California operations.
- The AA's composition included 119 census tracts, including 9 low-, 36 moderate-, 41 middle-, 31 upper-, and 2 unknown-income census tracts.
- The bank's operations in the AA consisted of four full-service branches, including two in moderate-, one in a middle-, and one in an upper-income tract(s). The bank operates full-service ATMs on each branch premises.

- As of June 30, 2024, the bank held a 1.8 percent market share of deposits in the AA, ranking 12th out of 30 FDIC-insured financial institutions with 255 banking offices operating in the AA.
- Two community contacts recently conducted as part of the CRA evaluations of other 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. One community member represented a local housing agency, while the other community member represented an economic development organization.

Table 35

Population Change			
Assessment Area: Coachella Valley Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Coachella Valley Metropolitan	2,298,032	2,418,185	5.2
Riverside-San Bernardino-Ontario, CA MSA	4,392,801	4,599,839	4.7
California	38,421,464	39,538,223	2.9

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

- The population of the AA reflected growth that outpaced the overall state level between 2015 and 2020 and by 2020, represented 18.2 percent of the overall population of Riverside County, as well as 9.6 percent of the total MSA population.

Table 36

Median Family Income Change			
Assessment Area: Coachella Valley Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Coachella Valley Metropolitan	69,638	81,271	16.7
Riverside-San Bernardino-Ontario, CA MSA	67,201	76,686	14.1
California	77,267	89,798	16.2

*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.

- MFI growth in the AA generally aligned with the overall statewide figure, as illustrated in the table above, and was slightly higher than the overall MSA figure.
- The AA contains a higher percentage of families living below the poverty level, at 11.9 percent, compared to MSA and state of California statistics, at 10.5 percent and 9.0 percent, respectively.

Table 37

Housing Cost Burden						
Assessment Area: Coachella Valley Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-income	Moderate-income	All Renters	Low-income	Moderate-income	All Owners
Coachella Valley Metropolitan	82.6	69.5	53.1	69.7	52.6	31.0
Riverside-San Bernardino-Ontario, CA MSA	83.3	66.2	52.4	68.4	51.0	29.8
California	81.1	56.6	49.5	67.3	47.9	29.1

Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA contains home affordability challenges, particularly for LMI renters and LMI homeowners, which aligns with statewide affordability figures. This is corroborated with a 17.4 percent affordability ratio³ which is below the MSA ratio of 19.0 and above the statewide figure of 14.6 percent.
- The community member with expertise in area housing conditions further echoed that housing continues to be a concern in the area with housing prices that have more than doubled in the area since the pandemic and contrasting with incomes that are not growing at an equal pace.

Table 38

Unemployment Rates					
Assessment Area: Coachella Valley Metropolitan					
Area	2020	2021	2022	2023	2024
Coachella Valley Metropolitan	10.2	7.4	4.3	4.8	5.3
Riverside-San Bernardino-Ontario, CA MSA	9.9	7.4	4.2	4.7	5.2
California	10.1	7.3	4.3	4.7	5.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA trended similarly to the overall MSA and the statewide figures and were nearly identical to the rates in year-over-year data.
- Major employers within the Coachella Valley/Riverside area include the County of Riverside (25,366), Amazon (14,317), March Air Reserve Base (9,600), Nestle UA (8,874), and the University of California, Riverside (8,623).

³ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COACHELLA VALLEY METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the state of California is low satisfactory based on an adequate lending test performance in the Coachella Valley Metropolitan AA.

In the analysis of home mortgage lending, home refinance, multifamily, other purpose LOC, and other purpose closed/exempt loans were not analyzed due to insufficient loan volumes to render a meaningful conclusion.

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. A description of flexible lending products is discussed in the overall Institution section description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. This conclusion is consistent among both products evaluated in this analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2024 home mortgage lending among low-income tracts was significantly above the aggregate lending data and was comparable to the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income tracts is comparable to the aggregate lending data by number volume, below by dollar volume, and was below the demographic figure.

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

An analysis of the dispersion of lending throughout the AA reflected gaps or lapses in lending that included LMI census tracts; however, there was no impact on the conclusion of performance in the AA given competitive and geographic contextual factors present in the AA. These factors are applicable to the discussion of home purchase lending that follows.

Home Purchase Loans

The geographic distribution of home purchase lending is good. The geographic distribution of 2024 home purchase 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 by number volume, below by dollar volume, and was comparable to the demographic figure.

The geographic distribution of 2023 home purchase loans reflected performance that was consistent with that of 2024 lending patterns.

Table 39 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Coachella Valley Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	2.4	2.9	2,014	7.8	2.2	3	8.8	2.7	675	3.1	2.0	5.1
Moderate	13	31.0	22.9	3,854	14.9	17.3	7	20.6	23.2	1,470	6.7	18.1	29.2
Middle	12	28.6	33.9	3,506	13.5	29.9	6	17.6	36.5	2,438	11.2	32.3	36.9
Upper	16	38.1	39.1	16,512	63.8	49.3	18	52.9	36.8	17,253	79.0	46.6	27.5
Unknown	0	0.0	1.1	0	0.0	1.2	0	0.0	0.8	0	0.0	1.0	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	42	100.0	100.0	25,886	100.0	100.0	34	100.0	100.0	21,836	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.6	0	0.0	0.8	1	8.3	3.1	356	5.8	2.2	5.1
Moderate	0	0.0	21.8	0	0.0	24.3	2	16.7	24.3	648	10.6	18.5	29.2
Middle	4	44.4	38.2	1,321	28.2	37.1	5	41.7	37.8	1,755	28.6	33.0	36.9
Upper	5	55.6	36.1	3,356	71.8	37.0	4	33.3	33.3	3,370	55.0	43.6	27.5
Unknown	0	0.0	1.2	0	0.0	0.7	0	0.0	1.5	0	0.0	2.7	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	4,677	100.0	100.0	12	100.0	100.0	6,129	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	1.3	0	0.0	0.9	5.1
Moderate	3	12.5	18.3	137	4.5	12.8	2	10.5	22.8	170	8.4	19.4	29.2
Middle	7	29.2	35.4	477	15.8	29.7	10	52.6	40.1	992	49.3	35.2	36.9
Upper	12	50.0	43.8	2,182	72.3	55.2	7	36.8	34.8	850	42.2	44.0	27.5
Unknown	2	8.3	1.4	220	7.3	1.7	0	0.0	1.0	0	0.0	0.6	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	24	100.0	100.0	3,016	100.0	100.0	19	100.0	100.0	2,012	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	10.0	0	0.0	3.3	0	0.0	0.0	0	0.0	0.0	5.5
Moderate	0	0.0	36.7	0	0.0	18.1	0	0.0	48.5	0	0.0	15.9	37.1
Middle	0	0.0	30.0	0	0.0	9.4	0	0.0	36.4	0	0.0	5.7	33.4
Upper	0	0.0	20.0	0	0.0	68.5	2	100.0	15.2	2,244	100.0	78.5	21.6
Unknown	0	0.0	3.3	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	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	2	100.0	100.0	2,244	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	2.4	2.7	2,034	5.9	1.9	5	6.0	2.6	1,055	3.0	1.8	5.1
Moderate	18	21.4	21.7	4,156	12.1	18.6	14	16.7	23.2	2,436	7.0	17.6	29.2
Middle	24	28.6	34.8	5,329	15.5	29.9	28	33.3	37.2	5,559	16.0	29.7	36.9
Upper	38	45.2	39.6	22,575	65.8	48.6	37	44.0	36.0	25,644	73.9	49.6	27.5
Unknown	2	2.4	1.2	220	0.6	1.0	0	0.0	1.0	0	0.0	1.3	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	84	100.0	100.0	34,314	100.0	100.0	84	100.0	100.0	34,694	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.													

Table 39 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Coachella Valley Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.5	0	0.0	0.5	0	0.0	1.7	0	0.0	0.8	5.1
Moderate	0	0.0	15.9	0	0.0	12.0	0	0.0	20.3	0	0.0	16.5	29.2
Middle	0	0.0	38.0	0	0.0	29.6	2	50.0	37.9	125	17.2	24.8	36.9
Upper	2	100.0	43.9	175	100.0	57.3	2	50.0	39.0	600	82.8	56.8	27.5
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	1.1	0	0.0	1.0	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	2	100.0	100.0	175	100.0	100.0	4	100.0	100.0	725	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	14.3	2.3	20	3.6	2.3	1	7.7	2.0	24	1.4	0.4	5.1
Moderate	2	28.6	16.3	165	29.5	6.5	3	23.1	18.8	148	8.5	7.4	29.2
Middle	1	14.3	34.0	25	4.5	19.7	5	38.5	38.8	249	14.2	21.2	36.9
Upper	3	42.9	46.6	350	62.5	70.5	4	30.8	39.8	1,327	75.9	68.9	27.5
Unknown	0	0.0	0.7	0	0.0	1.0	0	0.0	0.7	0	0.0	2.0	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	7	100.0	100.0	560	100.0	100.0	13	100.0	100.0	1,748	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	8.3	0	0.0	2.9	0	0.0	15.4	0	0.0	3.3	5.1
Moderate	0	0.0	16.0	0	0.0	6.6	0	0.0	23.1	0	0.0	5.4	29.2
Middle	0	0.0	14.6	0	0.0	6.9	0	0.0	38.5	0	0.0	76.8	36.9
Upper	0	0.0	57.6	0	0.0	80.2	0	0.0	15.4	0	0.0	14.5	27.5
Unknown	0	0.0	3.5	0	0.0	3.4	0	0.0	7.7	0	0.0	0.0	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
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of 2024 small business loans in low-income tracts was comparable to the aggregate lending data by number volume, below by dollar volume, and was comparable to the demographic figure of the percentage of AA businesses in each census tract income level. Lending among moderate-income tracts was comparable to the aggregate lending data by number volume, significantly above by dollar volume, and was comparable to the demographic figure.

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

An analysis of the dispersion of lending throughout the AA reflected gaps or lapses in lending that included LMI census tracts; however, there was no impact on the conclusion of performance in the AA given competitive and geographic contextual factors present in the AA.

Table 40

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Coachella Valley Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	3	4.3	6.0	31	0.4	4.8	1	2.0	25	0.3	2.4
Moderate	20	29.0	27.0	3,043	35.3	15.3	12	23.5	3,432	39.3	27.1
Middle	17	24.6	39.3	839	9.7	44.1	15	29.4	1,363	15.6	34.4
Upper	27	39.1	26.2	4,406	51.1	34.7	22	43.1	3,887	44.5	34.8
Unknown	2	2.9	1.6	300	3.5	1.1	1	2.0	25	0.3	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	69	100.0	100.0	8,619	100.0	100.0	51	100.0	8,732	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. *Aggregate data is not currently available.

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

The bank’s lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans reflects good penetration, while lending to small businesses reflects adequate penetration.

Home Mortgage Lending

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

The borrower distribution of home mortgage loans in 2023 reflected performance that was above 2024 lending patterns, with loan concentrations that were significantly above the aggregate lending data with regard to penetration among LMI borrowers. Performance in 2023 boosted the overall rating conclusion.

Home Purchase Loans

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

The borrower distribution of 2023 home purchase lending was above the performance of 2024 lending patterns, with concentrations of lending to LMI borrowers that were significantly above the aggregate lending data. Performance in 2023 boosted the overall rating conclusion.

Table 41 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Coachella Valley Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	4.8	1.2	333	1.3	0.6	1	2.9	1.7	300	1.4	1.2	26.5
Moderate	6	14.3	5.6	924	3.6	2.6	1	2.9	5.7	155	0.7	2.6	18.3
Middle	3	7.1	15.2	1,067	4.1	10.2	2	5.9	16.0	300	1.4	11.0	18.1
Upper	16	38.1	55.3	14,574	56.3	62.3	19	55.9	55.6	14,982	68.6	64.5	37.1
Unknown	15	35.7	22.8	8,988	34.7	24.3	11	32.4	21.0	6,099	27.9	20.7	0.0
Total	42	100.0	100.0	25,886	100.0	100.0	34	100.0	100.0	21,836	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.6	0	0.0	1.5	0	0.0	7.1	0	0.0	4.1	26.5
Moderate	2	22.2	11.4	228	4.9	3.1	0	0.0	10.4	0	0.0	5.3	18.3
Middle	1	11.1	15.2	409	8.7	4.6	1	8.3	14.9	315	5.1	8.8	18.1
Upper	3	33.3	37.6	1,755	37.5	20.3	6	50.0	42.4	2,300	37.5	47.0	37.1
Unknown	3	33.3	30.2	2,285	48.9	70.6	5	41.7	25.2	3,514	57.3	34.9	0.0
Total	9	100.0	100.0	4,677	100.0	100.0	12	100.0	100.0	6,129	100.0	100.0	100.0
Home Improvement Loans													
Low	2	8.3	3.2	120	4.0	2.6	0	0.0	5.3	0	0.0	4.2	26.5
Moderate	3	12.5	7.9	155	5.1	4.1	1	5.3	10.5	100	5.0	5.5	18.3
Middle	1	4.2	19.5	70	2.3	10.9	4	21.1	18.8	275	13.7	12.6	18.1
Upper	12	50.0	53.7	2,019	66.9	61.8	7	36.8	53.5	1,052	52.3	62.6	37.1
Unknown	6	25.0	15.7	652	21.6	20.5	7	36.8	11.8	585	29.1	15.2	0.0
Total	24	100.0	100.0	3,016	100.0	100.0	19	100.0	100.0	2,012	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	4.8	2.5	453	1.3	1.0	3	3.7	3.6	344	1.1	2.0	26.5
Moderate	14	16.7	7.1	1,502	4.4	2.7	2	2.4	7.6	255	0.8	3.4	18.3
Middle	6	7.1	15.3	1,571	4.6	8.3	12	14.6	16.2	1,132	3.5	10.3	18.1
Upper	34	40.5	50.5	18,663	54.4	48.6	38	46.3	51.9	19,175	59.1	60.6	37.1
Unknown	26	31.0	24.7	12,125	35.3	39.4	27	32.9	20.7	11,544	35.6	23.7	0.0
Total	84	100.0	100.0	34,314	100.0	100.0	82	100.0	100.0	32,450	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.													

Table 41 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Coachella Valley Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$(000)	%	%	#	%	#	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	5.7	0	0.0	6.3	0	0.0	5.1	0	0.0	4.7	26.5
Moderate	1	50.0	8.9	75	42.9	3.8	0	0.0	10.4	0	0.0	6.3	18.3
Middle	0	0.0	13.8	0	0.0	7.0	0	0.0	21.4	0	0.0	10.9	18.1
Upper	0	0.0	51.2	0	0.0	56.9	2	50.0	51.7	250	34.5	63.1	37.1
Unknown	1	50.0	20.4	100	57.1	26.1	2	50.0	11.4	475	65.5	15.0	0.0
Total	2	100.0	100.0	175	100.0	100.0	4	100.0	100.0	725	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.2	0	0.0	0.8	2	15.4	5.4	44	2.5	2.0	26.5
Moderate	2	28.6	11.4	120	21.4	2.6	0	0.0	12.2	0	0.0	3.3	18.3
Middle	1	14.3	15.2	25	4.5	5.3	5	38.5	17.3	242	13.8	4.4	18.1
Upper	3	42.9	44.3	315	56.3	39.9	4	30.8	53.9	591	33.8	78.5	37.1
Unknown	1	14.3	24.9	100	17.9	51.3	2	15.4	11.2	871	49.8	11.8	0.0
Total	7	100.0	100.0	560	100.0	100.0	13	100.0	100.0	1,748	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.1
Upper	0	0.0	0.7	0	0.0	0.4	0	0.0	7.7	0	0.0	45.9	37.1
Unknown	0	0.0	99.3	0	0.0	99.6	0	0.0	92.3	0	0.0	54.1	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
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.													

Small Business Lending

The borrower distribution of small business lending is adequate. The borrower distribution of 2024 loans to small businesses was comparable to the aggregate lending data and was below the demographic figure of the percentage of businesses with annual revenues of \$1MM or less.

The borrower distribution of 2023 loans to small businesses reflected consistent performance with that of 2024 lending patterns.

Table 42

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Coachella Valley Metropolitan											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	#%	\$(000)	%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	40	58.0	64.7	2,748	31.9	32.6	26	51.0	2,456	28.1	94.0
Over \$1 Million	20	29.0		4,191	48.6		17	33.3	3,740	42.8	5.5
Revenue Unknown	9	13.0		1,680	19.5		8	15.7	2,536	29.0	0.5
Total	69	100.0		8,619	100.0		51	100.0	8,732	100.0	100.0
By Loan Size											
\$100,000 or Less	43	62.3	97.2	538	6.2	69.0	30	58.8	726	8.3	
\$100,001 - \$250,000	18	26.1	1.6	3,656	42.4	8.3	12	23.5	2,521	28.9	
\$250,001 - \$1 Million	8	11.6	1.2	4,425	51.3	22.7	9	17.6	5,485	62.8	
Total	69	100.0	100.0	8,619	100.0	100.0	51	100.0	8,732	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	33	82.5		224	8.2		20	76.9	86	3.5	
\$100,001 - \$250,000	4	10.0		724	26.3		2	7.7	370	15.1	
\$250,001 - \$1 Million	3	7.5		1,800	65.5		4	15.4	2,000	81.4	
Total	40	100.0		2,748	100.0		26	100.0	2,456	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. *Aggregate data is not currently available.											

Community Development Lending

The bank provides an adequate level of CD loans. As illustrated in the table below, the bank originated 13 CD loans totaling \$16.3MM which contained a mixture of responsive lending to area CD needs. Examples of CD lending in the AA include:

- The bank originated a \$2.4MM loan that was responsive to the revitalization and stabilization needs of a low-income area surrounded by a number of moderate-income tracts. The proceeds of the financing were used for the creation of affordable housing in the area and aligns with a local government plan for the revitalization of the area.
- The bank originated a \$75M line of credit to a not-for-profit that provides meals to food-insecure individuals within the AA.

Table 43

Community Development Loans – Coachella Valley Metropolitan AA		
Community Development Purpose	#	\$(000)
Affordable Housing	2	2,480
Community Services	7	1,756
Economic Development	3	9,615
Revitalization and Stabilization	1	2,400
Total Loans	13	16,251

INVESTMENT TEST

The bank’s performance under the investment test in the state of California is outstanding based on excellent performance in the Coachella Valley Metropolitan AA. 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. A majority of the bank’s investments by number and dollar volume were responsive to the community services needs of LMI individuals. Examples of responsive CD investments include:

- During the evaluation, the bank invested \$4MM in a school bond for the benefit of educational facilities that contain a majority student population as eligible for free or reduced lunches.
- The bank’s remaining qualified CD investments are comprised of bonds held in its portfolio totaling \$15.1MM that also benefit students from schools with a majority population as eligible for free or reduced lunches.

Table 44

Investments, Grants, and Donations – Coachella Valley Metropolitan AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	1	1,045	0	0	7	29	8	1,074
Community Services	6	14,038	1	4,000	40	58	47	18,096
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	7	15,083	1	4,000	48	88	56	19,171
^{1.} Book Value of Investment ^{2.} Original Market Value of Investment								

Additionally, the bank’s philanthropic giving is consistent with the overall level of investment in the AA, as the bank provided 48 donations totaling \$88M during the evaluation period. Examples of responsive donations include:

- The bank donated a total of \$11M to an area housing organization that serves low-income individuals and families in need of affordable housing.
- The bank donated a total of \$15M to the local chapter of a nonprofit organization that specializes in providing access to, constructing, and rehabilitating housing to be affordable for LMI individuals and families.

SERVICE TEST

The bank's performance under the service test in the state of California is outstanding based on excellent performance in the Coachella Valley Metropolitan AA.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates three full-service branches in middle-income tracts and the remaining in an upper-income tract. It is noted that three of the four branches are adjacent to moderate-income tracts and reinforce accessibility of banking services.

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. Prior to the bank exiting its California operations in March 2025, there were no branch openings or closures 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. Full-service hours of operations remain as Monday through Friday, 9:00 a.m. to 5:00 p.m. throughout the AA; however, it is noted that since the prior evaluation (July 2024), the bank discontinued its Saturday morning operations across all of its AA branches.

Table 45

Retail Banking and Community Development Services – Coachella Valley Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	75.0	25.0	0.0	100.0	7.6	30.3	34.5	26.1	1.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	75.0	25.0	0.0	100.0	6.1	33.0	35.0	24.3	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
	4		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	2	18	4	0	24	16						

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 16 organizations throughout the AA, providing 24 services. Examples of CD services provided by bank employees include:

- A bank representative served in each year of the evaluation period in a board membership position for an area organization that provides community services to LMI individuals and families, including combating food insecurity and homelessness.
- A bank employee served on the board of the local chapter of a national organization that provides community services targeted to children from LMI homes, including educational resources and mentoring.

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination			
<u>Financial Institution</u> FirstBank Lakewood, Colorado		<u>Products/Services Reviewed</u> <ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business (SB) Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 	
<u>Time Period</u> <p><u>HMDA LAR and CRA SB and SF Loans:</u> January 1, 2023 to December 31, 2024</p> <p><u>Community Development Activities:</u> January 1, 2023 to December 31, 2024</p>			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
Reisher Family Foundation	Financial Holding Company	Investments	
FirstBank Holding Company	Financial Holding Company	None	
1031 Corporation	Sub of Holding Company	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Colorado</u> Denver-Boulder-Greeley CSA Fort Collins MSA Colorado Springs MSA Mountain	Full Review Limited Review Limited Review Limited Review	None None None None	2 Prior None None None
<u>Arizona</u> Phoenix MSA	Full Review	None	2 Prior
<u>California</u> Coachella Valley Metropolitan	Full Review	None	2 Prior

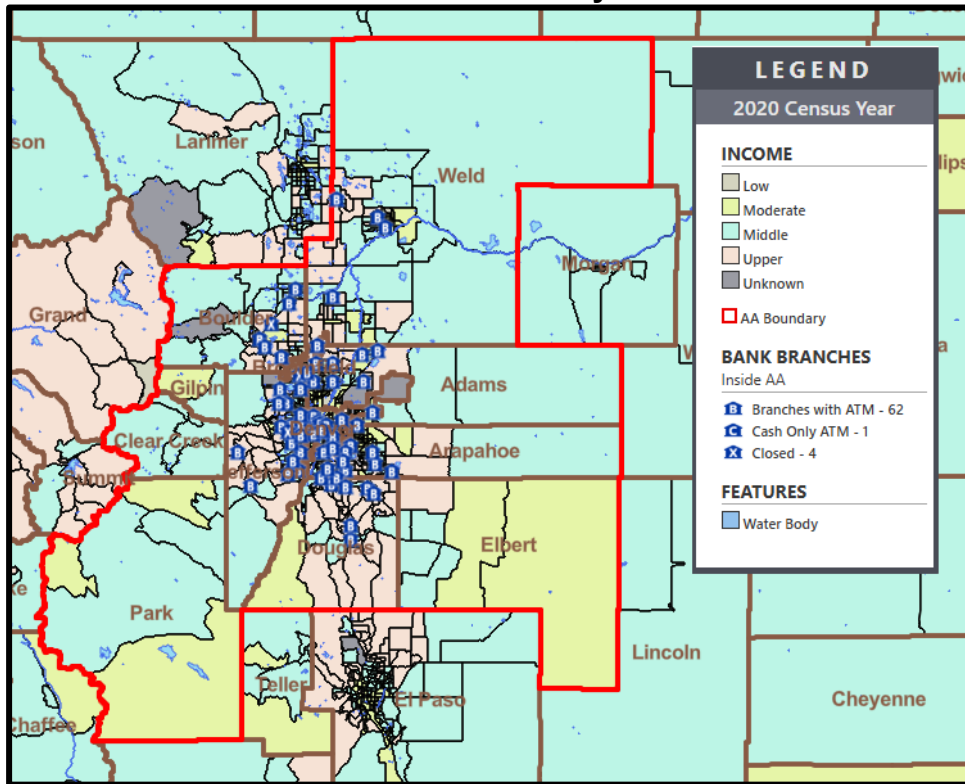
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

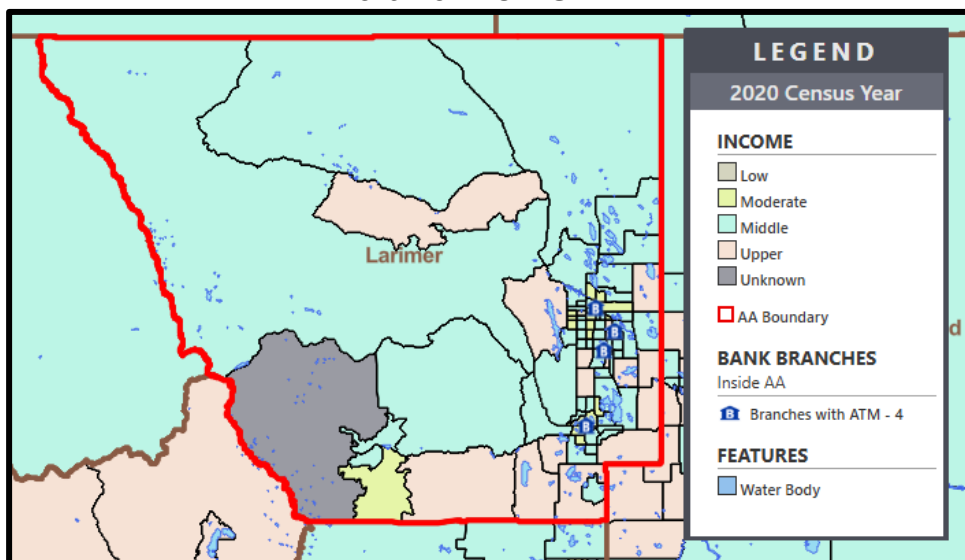
State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Arizona	Low Satisfactory	Outstanding	Outstanding	Satisfactory
California	Low Satisfactory	Outstanding	Outstanding	Satisfactory

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

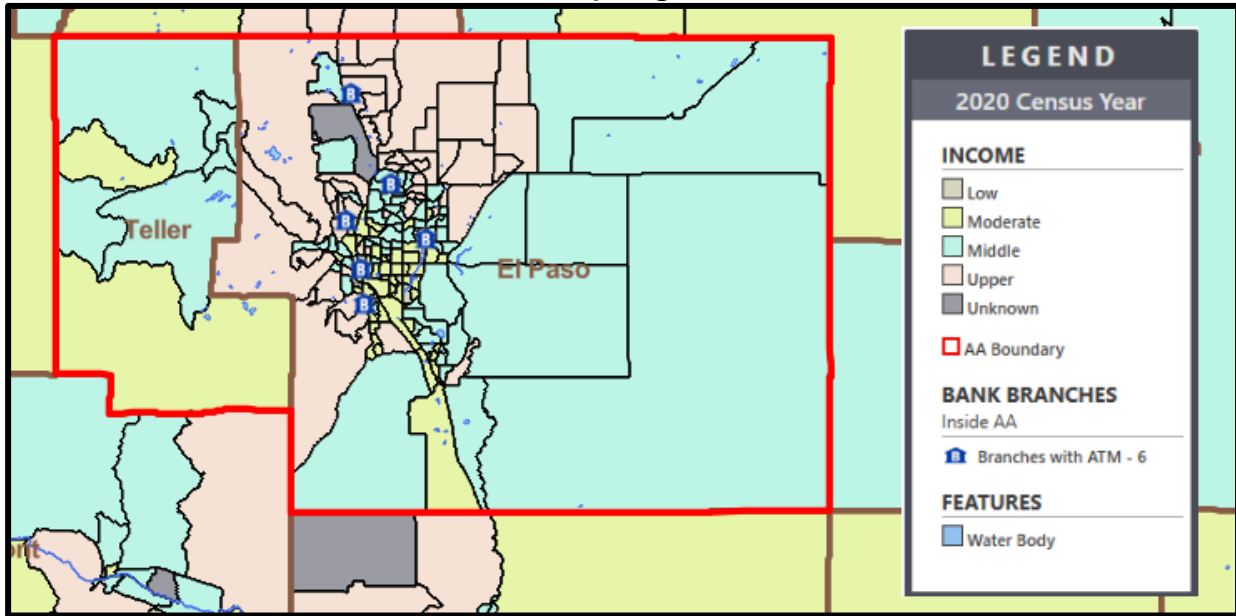
Map C-1
Denver-Boulder-Greeley CSA AA



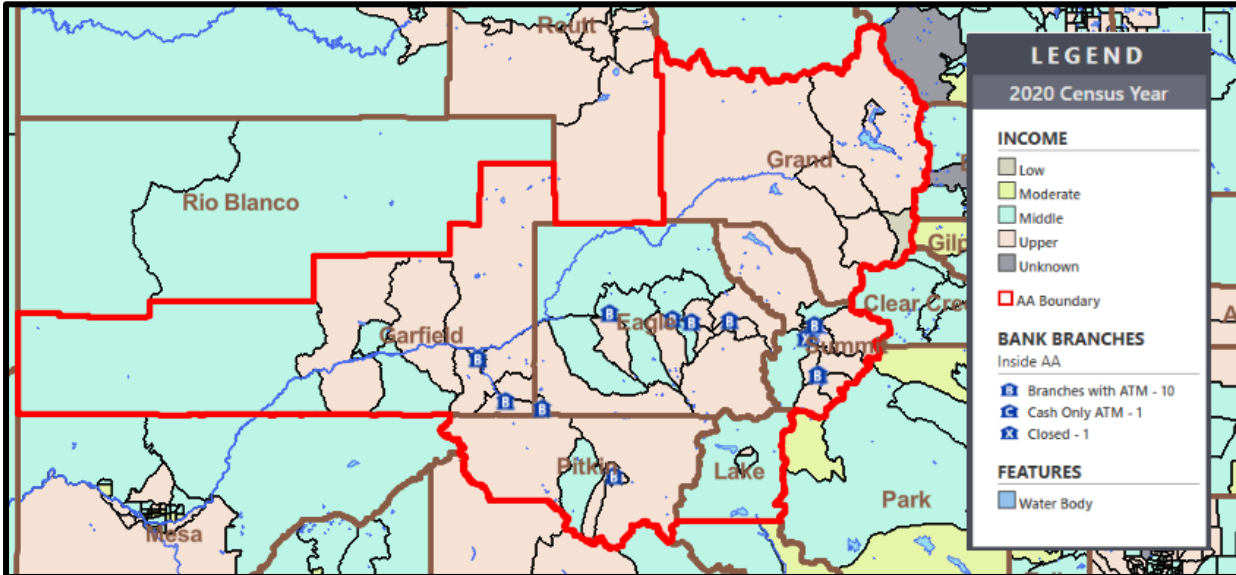
Map C-2
Fort Collins MSA AA



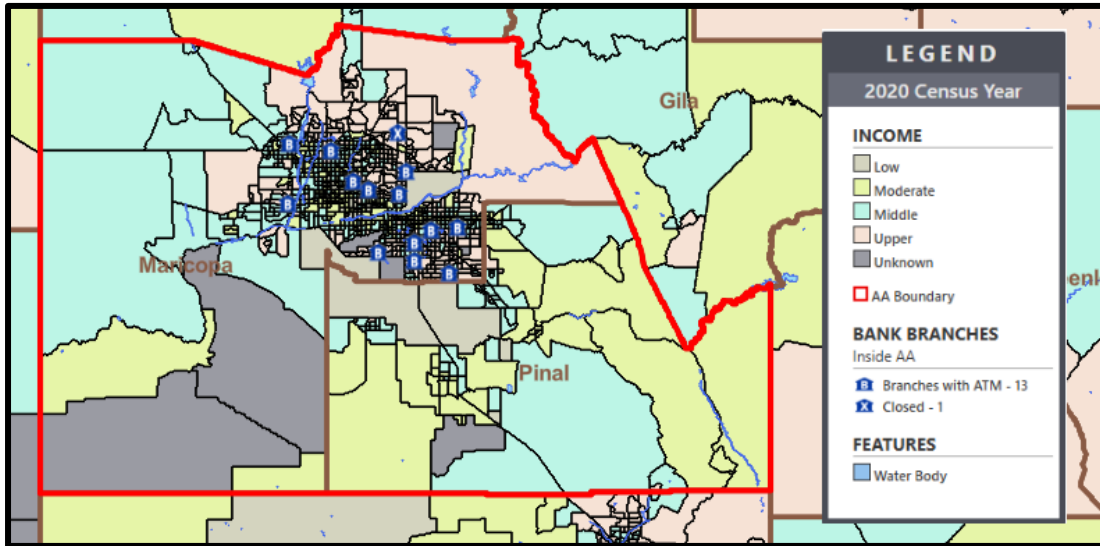
Map C-3
Colorado Springs MSA AA



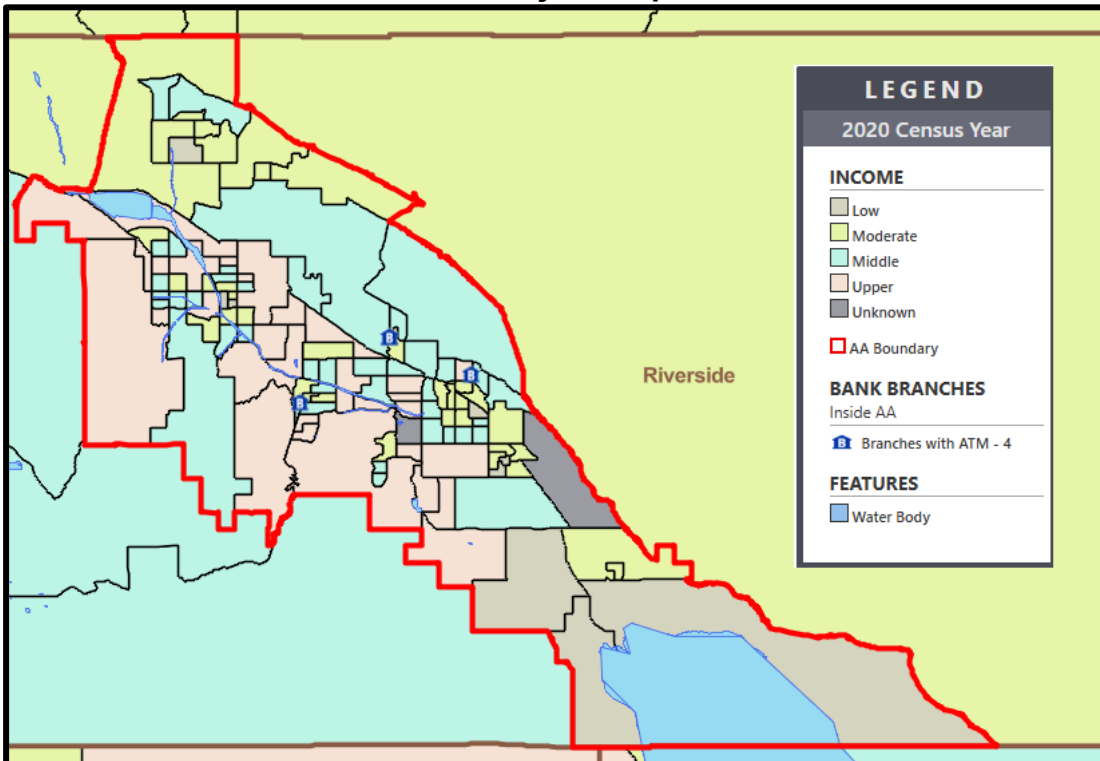
Map C-4
Mountain AA



Map C-5
Phoenix MSA AA



Map C-6
Coachella Valley Metropolitan AA



APPENDIX D – DEMOGRAPHIC INFORMATION

Table D-1

2024 Denver-Boulder-Greeley CSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.2	33,783	4.0	6,697	19.8	168,456	20.2
Moderate	211	24.3	196,830	23.6	18,713	9.5	151,493	18.1
Middle	320	36.9	310,312	37.1	12,159	3.9	183,305	21.9
Upper	269	31.0	289,612	34.7	6,053	2.1	332,170	39.8
Unknown	23	2.6	4,887	0.6	1,185	24.2	0	0.0
Total AA	868	100.0	835,424	100.0	44,807	5.4	835,424	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	66,304	22,690	2.6	34.2	40,161	60.6	3,453	5.2
Moderate	357,581	175,732	20.2	49.1	160,873	45.0	20,976	5.9
Middle	526,652	339,150	39.1	64.4	160,130	30.4	27,372	5.2
Upper	429,049	326,366	37.6	76.1	85,165	19.8	17,518	4.1
Unknown	18,615	4,381	0.5	23.5	12,437	66.8	1,797	9.7
Total AA	1,398,201	868,319	100.0	62.1	458,766	32.8	71,116	5.1
Total Businesses by Tract	Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,485	4.0	6,684	3.8	741	6.4	60	3.3
Moderate	40,645	21.6	37,378	21.4	2,983	25.9	284	15.6
Middle	67,183	35.7	63,084	36.1	3,483	30.2	616	33.8
Upper	69,529	36.9	64,889	37.1	3,839	33.3	801	43.9
Unknown	3,471	1.8	2,931	1.7	477	4.1	63	3.5
Total AA	188,313	100.0	174,966	100.0	11,523	100.0	1,824	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	53	2.1	46	1.8	7	9.9	0	0.0
Moderate	409	15.9	396	15.8	13	18.3	0	0.0
Middle	1,219	47.4	1,183	47.3	35	49.3	1	100.0
Upper	863	33.5	848	33.9	15	21.1	0	0.0
Unknown	29	1.1	28	1.1	1	1.4	0	0.0
Total AA	2,573	100.0	2,501	100.0	71	100.0	1	100.0
Percentage of Total Farms:				97.2		2.8		0.0
<small>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.</small>								

Table D-2

2023 Denver-Boulder-Greeley CSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	45	5.2	33,783	4.0	6,697	19.8	168,456	20.2
Moderate	211	24.3	196,830	23.6	18,713	9.5	151,493	18.1
Middle	320	36.9	310,312	37.1	12,159	3.9	183,305	21.9
Upper	269	31.0	289,612	34.7	6,053	2.1	332,170	39.8
Unknown	23	2.6	4,887	0.6	1,185	24.2	0	0.0
Total AA	868	100.0	835,424	100.0	44,807	5.4	835,424	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	66,304	22,690	2.6	34.2	40,161	60.6	3,453	5.2
Moderate	357,581	175,732	20.2	49.1	160,873	45.0	20,976	5.9
Middle	526,652	339,150	39.1	64.4	160,130	30.4	27,372	5.2
Upper	429,049	326,366	37.6	76.1	85,165	19.8	17,518	4.1
Unknown	18,615	4,381	0.5	23.5	12,437	66.8	1,797	9.7
Total AA	1,398,201	868,319	100.0	62.1	458,766	32.8	71,116	5.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8,508	3.9	7,633	3.8	803	6.1	72	3.4
Moderate	45,692	20.9	42,102	20.7	3,267	24.7	323	15.0
Middle	77,480	35.4	72,842	35.8	3,927	29.7	711	33.1
Upper	81,643	37.3	76,236	37.5	4,448	33.7	959	44.6
Unknown	5,321	2.4	4,468	2.2	769	5.8	84	3.9
Total AA	218,644	100.0	203,281	100.0	13,214	100.0	2,149	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	58	2.0	50	1.8	8	10.5	0	0.0
Moderate	465	15.8	452	15.8	13	17.1	0	0.0
Middle	1,365	46.5	1,326	46.4	38	50.0	1	100.0
Upper	1,006	34.3	991	34.7	15	19.7	0	0.0
Unknown	40	1.4	38	1.3	2	2.6	0	0.0
Total AA	2,934	100.0	2,857	100.0	76	100.0	1	100.0
Percentage of Total Farms:				97.4		2.6		0.0
Source: 2023 FFIEC Census Data 2023 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

2024 Phoenix MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	68	6.2	55,575	4.8	17,579	31.6	237,588	20.6
Moderate	294	26.6	281,382	24.4	43,459	15.4	210,743	18.3
Middle	362	32.8	404,720	35.1	28,593	7.1	233,930	20.3
Upper	354	32.1	408,984	35.4	14,387	3.5	471,624	40.9
Unknown	26	2.4	3,224	0.3	764	23.7	0	0.0
Total AA	1,104	100.0	1,153,885	100.0	104,782	9.1	1,153,885	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	100,529	28,941	2.6	28.8	61,379	61.1	10,209	10.2
Moderate	528,802	243,525	21.7	46.1	223,447	42.3	61,830	11.7
Middle	683,450	413,162	36.8	60.5	200,910	29.4	69,378	10.2
Upper	623,707	435,736	38.8	69.9	131,919	21.2	56,052	9.0
Unknown	7,325	2,046	0.2	27.9	4,154	56.7	1,125	15.4
Total AA	1,943,813	1,123,410	100.0	57.8	621,809	32.0	198,594	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	9,190	3.7	8,181	3.5	930	7.2	79	2.5
Moderate	48,367	19.3	44,195	18.8	3,664	28.5	508	16.3
Middle	76,530	30.5	72,505	30.8	3,244	25.3	781	25.1
Upper	115,469	46.0	108,980	46.3	4,758	37.1	1,731	55.6
Unknown	1,575	0.6	1,322	0.6	241	1.9	12	0.4
Total AA	251,131	100.0	235,183	100.0	12,837	100.0	3,111	100.0
Percentage of Total Businesses:				93.6		5.1		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	40	2.0	36	1.8	4	4.5	0	0.0
Moderate	346	16.9	323	16.5	23	26.1	0	0.0
Middle	663	32.4	633	32.3	30	34.1	0	0.0
Upper	984	48.1	953	48.7	31	35.2	0	0.0
Unknown	13	0.6	13	0.7	0	0.0	0	0.0
Total AA	2,046	100.0	1,958	100.0	88	100.0	0	0.0
Percentage of Total Farms:				95.7		4.3		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-4

2023 Phoenix MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	68	6.2	55,575	4.8	17,579	31.6	237,588	20.6
Moderate	294	26.6	281,382	24.4	43,459	15.4	210,743	18.3
Middle	362	32.8	404,720	35.1	28,593	7.1	233,930	20.3
Upper	354	32.1	408,984	35.4	14,387	3.5	471,624	40.9
Unknown	26	2.4	3,224	0.3	764	23.7	0	0.0
Total AA	1,104	100.0	1,153,885	100.0	104,782	9.1	1,153,885	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	100,529	28,941	2.6	28.8	61,379	61.1	10,209	10.2
Moderate	528,802	243,525	21.7	46.1	223,447	42.3	61,830	11.7
Middle	683,450	413,162	36.8	60.5	200,910	29.4	69,378	10.2
Upper	623,707	435,736	38.8	69.9	131,919	21.2	56,052	9.0
Unknown	7,325	2,046	0.2	27.9	4,154	56.7	1,125	15.4
Total AA	1,943,813	1,123,410	100.0	57.8	621,809	32.0	198,594	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	9,266	3.6	8,208	3.4	982	7.2	76	2.4
Moderate	48,783	18.9	44,420	18.4	3,859	28.4	504	15.9
Middle	78,463	30.4	74,206	30.8	3,470	25.5	787	24.9
Upper	119,485	46.4	112,707	46.8	4,997	36.8	1,781	56.3
Unknown	1,764	0.7	1,466	0.6	283	2.1	15	0.5
Total AA	257,761	100.0	241,007	100.0	13,591	100.0	3,163	100.0
Percentage of Total Businesses:				93.5		5.3		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	37	1.7	34	1.7	3	3.1	0	0.0
Moderate	349	16.4	322	15.8	27	28.1	0	0.0
Middle	681	32.0	651	32.0	30	31.3	0	0.0
Upper	1,047	49.1	1,011	49.7	36	37.5	0	0.0
Unknown	17	0.8	17	0.8	0	0.0	0	0.0
Total AA	2,131	100.0	2,035	100.0	96	100.0	0	0.0
Percentage of Total Farms:				95.5		4.5		0.0
Source: 2023 FFIEC Census Data 2023 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-5

2024 Coachella Valley Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	7.6	5,877	5.7	1,616	27.5	27,362	26.5
Moderate	36	30.3	33,630	32.5	5,339	15.9	18,901	18.3
Middle	41	34.5	36,490	35.3	3,733	10.2	18,769	18.1
Upper	31	26.1	25,827	25.0	1,403	5.4	38,407	37.1
Unknown	2	1.7	1,615	1.6	248	15.4	0	0.0
Total AA	119	100.0	103,439	100.0	12,339	11.9	103,439	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,564	6,336	5.1	50.4	4,867	38.7	1,361	10.8
Moderate	74,592	36,437	29.2	48.8	23,927	32.1	14,228	19.1
Middle	85,000	46,034	36.9	54.2	17,958	21.1	21,008	24.7
Upper	73,897	34,336	27.5	46.5	9,994	13.5	29,567	40.0
Unknown	4,055	1,613	1.3	39.8	1,197	29.5	1,245	30.7
Total AA	250,108	124,756	100.0	49.9	57,943	23.2	67,409	27.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	433	2.4	407	2.4	22	2.2	4	4.3
Moderate	4,953	27.1	4,677	27.2	249	24.9	27	29.0
Middle	6,306	34.4	5,944	34.5	338	33.7	24	25.8
Upper	6,372	34.8	5,963	34.6	374	37.3	35	37.6
Unknown	245	1.3	223	1.3	19	1.9	3	3.2
Total AA	18,309	100.0	17,214	100.0	1,002	100.0	93	100.0
Percentage of Total Businesses:			94.0		5.5		0.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	19	11.4	16	10.5	3	23.1	0	0.0
Moderate	38	22.9	35	22.9	3	23.1	0	0.0
Middle	41	24.7	41	26.8	0	0.0	0	0.0
Upper	56	33.7	53	34.6	3	23.1	0	0.0
Unknown	12	7.2	8	5.2	4	30.8	0	0.0
Total AA	166	100.0	153	100.0	13	100.0	0	0.0
Percentage of Total Farms:			92.2		7.8		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-6

2023 Coachella Valley Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	7.6	5,877	5.7	1,616	27.5	27,362	26.5
Moderate	36	30.3	33,630	32.5	5,339	15.9	18,901	18.3
Middle	41	34.5	36,490	35.3	3,733	10.2	18,769	18.1
Upper	31	26.1	25,827	25.0	1,403	5.4	38,407	37.1
Unknown	2	1.7	1,615	1.6	248	15.4	0	0.0
Total AA	119	100.0	103,439	100.0	12,339	11.9	103,439	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,564	6,336	5.1	50.4	4,867	38.7	1,361	10.8
Moderate	74,592	36,437	29.2	48.8	23,927	32.1	14,228	19.1
Middle	85,000	46,034	36.9	54.2	17,958	21.1	21,008	24.7
Upper	73,897	34,336	27.5	46.5	9,994	13.5	29,567	40.0
Unknown	4,055	1,613	1.3	39.8	1,197	29.5	1,245	30.7
Total AA	250,108	124,756	100.0	49.9	57,943	23.2	67,409	27.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	505	2.6	473	2.6	28	2.6	4	3.7
Moderate	5,319	27.0	5,022	27.1	265	24.9	32	29.6
Middle	6,664	33.8	6,289	34.0	348	32.7	27	25.0
Upper	6,869	34.9	6,426	34.7	401	37.7	42	38.9
Unknown	337	1.7	311	1.7	23	2.2	3	2.8
Total AA	19,694	100.0	18,521	100.0	1,065	100.0	108	100.0
Percentage of Total Businesses:				94.0		5.4		0.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	36	17.1	29	15.3	6	31.6	1	50.0
Moderate	44	21.0	41	21.7	3	15.8	0	0.0
Middle	55	26.2	54	28.6	0	0.0	1	50.0
Upper	62	29.5	57	30.2	5	26.3	0	0.0
Unknown	13	6.2	8	4.2	5	26.3	0	0.0
Total AA	210	100.0	189	100.0	19	100.0	2	100.0
Percentage of Total Farms:				90.0		9.0		1.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

**Fort Collins MSA AA
Table E-1 (1 of 2)**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Fort Collins MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	1.1	0.2	286	0.6	0.2	0	0.0	0.6	0	0.0	0.4	0.3
Moderate	12	13.2	13.4	3,098	6.7	11.8	6	5.9	14.2	2,007	4.3	12.4	14.8
Middle	59	64.8	59.8	34,289	73.8	58.1	65	63.7	62.2	25,561	55.0	60.7	64.3
Upper	19	20.9	26.5	8,803	18.9	29.9	31	30.4	23.0	18,883	40.7	26.5	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	91	100.0	100.0	46,476	100.0	100.0	102	100.0	100.0	46,451	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	5	11.1	13.2	616	8.8	10.9	6	9.8	13.5	1,316	6.5	11.2	14.8
Middle	30	66.7	61.8	4,425	62.9	60.4	39	63.9	61.2	13,489	66.9	59.4	64.3
Upper	10	22.2	24.9	1,989	28.3	28.5	16	26.2	25.2	5,343	26.5	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	45	100.0	100.0	7,030	100.0	100.0	61	100.0	100.0	20,148	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	10	17.5	12.6	680	13.3	10.4	9	15.0	15.4	584	11.8	11.7	14.8
Middle	28	49.1	62.5	2,911	56.9	60.8	36	60.0	59.9	3,037	61.2	58.8	64.3
Upper	19	33.3	24.6	1,526	29.8	28.5	15	25.0	24.6	1,345	27.1	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	57	100.0	100.0	5,117	100.0	100.0	60	100.0	100.0	4,966	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	6.3
Moderate	1	50.0	26.3	150	19.2	20.7	0	0.0	11.5	0	0.0	4.4	19.4
Middle	1	50.0	63.2	630	80.8	54.0	1	50.0	73.1	801	31.8	70.7	67.4
Upper	0	0.0	10.5	0	0.0	25.3	1	50.0	15.4	1,718	68.2	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	2	100.0	100.0	780	100.0	100.0	2	100.0	100.0	2,519	100.0	100.0	100.0
Total Home Mortgage Loans													
													Owner Occupied Units %
Low	1	0.4	0.2	286	0.4	0.2	0	0.0	0.4	0	0.0	0.3	0.3
Moderate	33	13.8	13.1	4,794	7.3	12.3	25	9.5	14.1	4,530	5.7	11.5	14.8
Middle	144	60.0	60.8	46,362	71.0	58.2	162	61.8	61.7	45,011	56.5	61.3	64.3
Upper	62	25.8	25.8	13,852	21.2	29.3	75	28.6	23.8	30,130	37.8	27.0	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	240	100.0	100.0	65,294	100.0	100.0	262	100.0	100.0	79,671	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.

Table E-1 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Fort Collins MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	0.3
Moderate	3	16.7	12.5	210	5.8	9.9	1	5.6	13.1	100	2.4	11.7	14.8
Middle	10	55.6	62.9	2,325	64.8	61.4	10	55.6	59.4	1,553	36.5	55.2	64.3
Upper	5	27.8	24.5	1,055	29.4	28.7	7	38.9	27.2	2,598	61.1	33.0	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	3,590	100.0	100.0	18	100.0	100.0	4,251	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.3	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	0.3
Moderate	2	7.4	11.1	40	1.7	9.7	3	15.8	14.6	523	39.1	16.1	14.8
Middle	16	59.3	62.0	1,782	77.4	56.9	11	57.9	64.8	570	42.7	62.2	64.3
Upper	9	33.3	26.6	479	20.8	32.0	5	26.3	20.6	243	18.2	21.7	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	27	100.0	100.0	2,301	100.0	100.0	19	100.0	100.0	1,336	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	5.9	14.8
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	75.0	0	0.0	89.6	64.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	4.5	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
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 E-2

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Fort Collins MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.5	0	0.0	0.2	0	0.0	0	0.0	0.5
Moderate	34	23.4	13.9	5,642	22.8	15.9	22	17.5	3,095	14.4	17.8
Middle	87	60.0	62.0	17,735	71.7	65.8	84	66.7	16,605	77.3	66.0
Upper	24	16.6	23.6	1,350	5.5	18.2	20	15.9	1,781	8.3	15.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	145	100.0	100.0	24,727	100.0	100.0	126	100.0	21,481	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. *Aggregate data is not currently available.

Table E-3 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Fort Collins MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	4	4.4	3.7	1,095	2.4	1.7	8	7.8	3.6	3,546	7.6	1.9	19.2
Moderate	11	12.1	14.4	3,164	6.8	10.3	15	14.7	13.9	5,113	11.0	9.8	18.3
Middle	9	9.9	23.5	2,670	5.7	21.4	11	10.8	21.0	4,097	8.8	18.8	23.6
Upper	46	50.5	38.7	26,105	56.2	47.0	43	42.2	38.9	23,197	49.9	46.9	38.9
Unknown	21	23.1	19.7	13,442	28.9	19.5	25	24.5	22.6	10,498	22.6	22.7	0.0
Total	91	100.0	100.0	46,476	100.0	100.0	102	100.0	100.0	46,451	100.0	100.0	100.0
Refinance Loans													
Low	5	11.1	10.3	463	6.6	6.6	4	6.6	7.7	673	3.3	4.4	19.2
Moderate	11	24.4	19.5	1,139	16.2	13.6	7	11.5	15.9	876	4.3	10.8	18.3
Middle	9	20.0	23.7	1,073	15.3	21.5	5	8.2	21.4	1,015	5.0	17.2	23.6
Upper	14	31.1	33.0	2,893	41.2	41.4	35	57.4	36.7	12,950	64.3	42.6	38.9
Unknown	6	13.3	13.4	1,462	20.8	16.9	10	16.4	18.3	4,634	23.0	24.9	0.0
Total	45	100.0	100.0	7,030	100.0	100.0	61	100.0	100.0	20,148	100.0	100.0	100.0
Home Improvement Loans													
Low	9	15.8	7.7	385	7.5	3.8	3	5.0	5.1	175	3.5	3.0	19.2
Moderate	5	8.8	15.8	205	4.0	10.8	17	28.3	19.3	982	19.8	13.5	18.3
Middle	7	12.3	26.5	387	7.6	22.6	11	18.3	24.4	933	18.8	18.5	23.6
Upper	29	50.9	45.6	3,259	63.7	57.3	21	35.0	47.7	1,980	39.9	61.1	38.9
Unknown	7	12.3	4.3	881	17.2	5.5	8	13.3	3.5	896	18.0	4.0	0.0
Total	57	100.0	100.0	5,117	100.0	100.0	60	100.0	100.0	4,966	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	21	8.8	5.8	2,042	3.2	2.6	16	6.2	5.1	4,414	5.7	2.5	19.2
Moderate	35	14.7	15.9	5,288	8.2	10.8	44	16.9	15.8	7,097	9.2	10.3	18.3
Middle	38	16.0	24.4	5,048	7.8	21.5	35	13.5	22.1	6,588	8.5	18.6	23.6
Upper	107	45.0	38.5	35,591	55.2	46.9	120	46.2	39.0	42,714	55.4	46.6	38.9
Unknown	37	15.5	15.3	16,545	25.6	18.1	45	17.3	18.1	16,339	21.2	22.0	0.0
Total	238	100.0	100.0	64,514	100.0	100.0	260	100.0	100.0	77,152	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.													

Table E-3 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Fort Collins MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank			Agg			Bank			Agg			
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	9.2	0	0.0	6.5	0	0.0	8.1	0	0.0	7.0	19.2
Moderate	3	16.7	18.8	620	17.3	12.8	1	5.6	21.3	24	0.6	13.6	18.3
Middle	5	27.8	27.7	475	13.2	24.7	4	22.2	26.2	330	7.8	21.1	23.6
Upper	8	44.4	38.6	1,845	51.4	50.7	12	66.7	40.1	3,654	86.0	54.2	38.9
Unknown	2	11.1	5.6	650	18.1	5.2	1	5.6	4.3	243	5.7	4.0	0.0
Total	18	100.0	100.0	3,590	100.0	100.0	18	100.0	100.0	4,251	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	3	11.1	8.9	99	4.3	6.3	1	5.3	8.3	20	1.5	4.6	19.2
Moderate	5	18.5	19.3	160	7.0	11.8	4	21.1	26.7	102	7.6	18.1	18.3
Middle	8	29.6	27.9	443	19.3	17.8	4	21.1	30.5	213	15.9	24.1	23.6
Upper	10	37.0	37.4	1,489	64.7	55.8	9	47.4	30.5	933	69.8	47.4	38.9
Unknown	1	3.7	6.6	110	4.8	8.3	1	5.3	4.1	68	5.1	5.9	0.0
Total	27	100.0	100.0	2,301	100.0	100.0	19	100.0	100.0	1,336	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.2
Moderate	0	0.0	12.5	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	38.9
Unknown	0	0.0	87.5	0	0.0	98.8	0	0.0	100.0	0	0.0	100.0	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													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table E-4

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Fort Collins MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	87	60.0	44.4	12,046	48.7	19.1	81	64.3	10,576	49.2	93.9
Over \$1 Million	40	27.6		10,601	42.9		32	25.4	8,296	38.6	5.2
Revenue Unknown	18	12.4		2,080	8.4		13	10.3	2,609	12.1	0.9
Total	145	100.0		24,727	100.0		126	100.0	21,481	100.0	100.0
By Loan Size											
\$100,000 or Less	89	61.4	94.9	1,883	7.6	64.3	83	65.9	2,024	9.4	
\$100,001 - \$250,000	28	19.3	3.2	5,850	23.7	12.1	14	11.1	2,747	12.8	
\$250,001 - \$1 Million	28	19.3	1.9	16,994	68.7	23.6	29	23.0	16,710	77.8	
Total	145	100.0	100.0	24,727	100.0	100.0	126	100.0	21,481	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	62	71.3		963	8.0		58	71.6	794	7.5	
\$100,001 - \$250,000	9	10.3		1,926	16.0		6	7.4	1,100	10.4	
\$250,001 - \$1 Million	16	18.4		9,157	76.0		17	21.0	8,682	82.1	
Total	87	100.0		12,046	100.0		81	100.0	10,576	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. *Aggregate data is not currently available.											

Table E-5

2024 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	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 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 E-6

2023 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	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	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
<p>Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>								

Colorado Springs MSA AA

Table E-7 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Colorado Springs MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	1.5	1.7	216	1.0	1.1	1	1.4	1.5	340	1.3	1.0	1.2
Moderate	18	26.9	19.0	4,448	20.5	14.8	28	38.4	18.0	8,057	31.6	13.6	20.0
Middle	27	40.3	41.3	7,405	34.1	38.1	24	32.9	40.7	7,742	30.3	37.6	43.4
Upper	21	31.3	37.9	9,641	44.4	46.0	20	27.4	39.7	9,384	36.8	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	67	100.0	100.0	21,710	100.0	100.0	73	100.0	100.0	25,523	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.5	0	0.0	1.0	2	8.3	1.3	365	4.4	0.9	1.2
Moderate	1	5.6	21.5	20	0.4	15.9	7	29.2	19.8	2,873	34.7	15.7	20.0
Middle	6	33.3	42.6	1,672	35.3	36.7	4	16.7	42.4	430	5.2	39.6	43.4
Upper	11	61.1	34.3	3,040	64.2	46.2	9	37.5	36.3	3,374	40.7	43.5	35.2
Unknown	0	0.0	0.2	0	0.0	0.2	2	8.3	0.2	1,249	15.1	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	18	100.0	100.0	4,732	100.0	100.0	24	100.0	100.0	8,291	100.0	100.0	100.0
Home Improvement Loans													
Low	1	1.8	1.4	9	0.2	0.8	0	0.0	1.2	0	0.0	0.7	1.2
Moderate	12	21.8	16.7	961	20.1	13.9	4	14.8	18.0	457	13.7	14.1	20.0
Middle	18	32.7	42.7	1,290	27.0	38.4	8	29.6	40.5	1,207	36.1	35.3	43.4
Upper	24	43.6	38.9	2,515	52.7	46.6	15	55.6	40.2	1,675	50.2	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	55	100.0	100.0	4,775	100.0	100.0	27	100.0	100.0	3,339	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	1.4	0	0.0	0.1	1	16.7	3.8	30	0.6	5.6	4.3
Moderate	3	75.0	43.1	22,500	98.3	53.3	3	50.0	39.7	3,509	65.1	24.3	45.1
Middle	1	25.0	36.1	388	1.7	10.3	2	33.3	41.0	1,850	34.3	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	4	100.0	100.0	22,888	100.0	100.0	6	100.0	100.0	5,389	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	1.2	1.6	225	0.4	1.0	4	2.7	1.4	735	1.7	1.3	1.2
Moderate	36	20.8	19.0	28,010	49.6	16.3	46	31.3	18.4	15,119	34.8	14.7	20.0
Middle	65	37.6	41.7	11,521	20.4	37.0	47	32.0	41.0	11,625	26.8	37.1	43.4
Upper	70	40.5	37.5	16,671	29.5	45.6	48	32.7	39.0	14,709	33.9	46.5	35.2
Unknown	0	0.0	0.1	0	0.0	0.1	2	1.4	0.2	1,249	2.9	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	173	100.0	100.0	56,427	100.0	100.0	147	100.0	100.0	43,437	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.

Table E-7 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Colorado Springs MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	1.5	0	0.0	0.9	0	0.0	1.4	0	0.0	0.8	1.2
Moderate	0	0.0	17.9	0	0.0	14.2	0	0.0	17.0	0	0.0	13.0	20.0
Middle	1	10.0	42.4	50	4.3	38.9	1	100.0	39.8	45	100.0	35.1	43.4
Upper	9	90.0	38.1	1,100	95.7	45.8	0	0.0	41.6	0	0.0	50.9	35.2
Unknown	0	0.0	0.2	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	1,150	100.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	1.5	0	0.0	1.9	1.2
Moderate	2	10.5	13.8	81	6.9	10.7	4	25.0	16.0	223	26.2	11.8	20.0
Middle	12	63.2	42.7	716	61.1	38.2	8	50.0	40.7	351	41.3	36.7	43.4
Upper	5	26.3	42.9	375	32.0	49.6	4	25.0	41.8	276	32.5	49.6	35.2
Unknown	0	0.0	0.4	0	0.0	1.4	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	19	100.0	100.0	1,172	100.0	100.0	16	100.0	100.0	850	100.0	100.0	100.0
Purpose Not Applicable													
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	37.5	0	0.0	30.0	0	0.0	34.5	0	0.0	22.0	20.0
Middle	0	0.0	52.1	0	0.0	57.4	0	0.0	48.3	0	0.0	50.9	43.4
Upper	0	0.0	10.4	0	0.0	12.6	0	0.0	17.2	0	0.0	27.1	35.2
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
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 E-8

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Colorado Springs MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	2	1.5	2.7	250	1.1	1.2	1	1.1	250	1.9	1.2
Moderate	40	29.6	25.9	10,383	45.9	29.5	40	43.5	6,988	52.0	28.6
Middle	46	34.1	37.2	2,578	11.4	31.6	24	26.1	4,927	36.7	37.6
Upper	47	34.8	34.1	9,421	41.6	37.6	27	29.3	1,271	9.5	32.0
Unknown	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
Total	135	100.0	100.0	22,632	100.0	100.0	92	100.0	13,436	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. *Aggregate data is not currently available.

Table E-9 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Colorado Springs MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	9	13.4	2.5	1,788	8.2	1.1	5	6.8	1.9	917	3.6	0.8	18.8
Moderate	10	14.9	16.0	2,263	10.4	11.4	7	9.6	13.5	1,804	7.1	9.3	18.8
Middle	13	19.4	27.4	4,613	21.2	24.3	12	16.4	24.2	4,408	17.3	21.1	21.9
Upper	23	34.3	35.4	9,578	44.1	43.8	26	35.6	38.5	10,951	42.9	46.1	40.5
Unknown	12	17.9	18.8	3,468	16.0	19.4	23	31.5	22.0	7,443	29.2	22.6	0.0
Total	67	100.0	100.0	21,710	100.0	100.0	73	100.0	100.0	25,523	100.0	100.0	100.0
Refinance Loans													
Low	1	5.6	9.8	35	0.7	5.1	3	12.5	5.0	739	8.9	2.5	18.8
Moderate	2	11.1	19.4	664	14.0	13.6	1	4.2	11.9	15	0.2	6.9	18.8
Middle	6	33.3	24.3	1,183	25.0	21.2	5	20.8	17.0	941	11.3	12.8	21.9
Upper	8	44.4	29.1	2,415	51.0	33.1	8	33.3	27.0	2,794	33.7	26.8	40.5
Unknown	1	5.6	17.4	435	9.2	27.1	7	29.2	39.1	3,802	45.9	51.1	0.0
Total	18	100.0	100.0	4,732	100.0	100.0	24	100.0	100.0	8,291	100.0	100.0	100.0
Home Improvement Loans													
Low	5	9.1	6.7	174	3.6	4.0	4	14.8	6.2	281	8.4	3.1	18.8
Moderate	7	12.7	17.5	486	10.2	12.1	2	7.4	17.4	106	3.2	11.8	18.8
Middle	14	25.5	26.7	731	15.3	23.5	4	14.8	25.4	235	7.0	20.9	21.9
Upper	21	38.2	46.2	2,224	46.6	55.7	15	55.6	48.6	1,676	50.2	59.4	40.5
Unknown	8	14.5	2.9	1,160	24.3	4.7	2	7.4	2.4	1,041	31.2	4.8	0.0
Total	55	100.0	100.0	4,775	100.0	100.0	27	100.0	100.0	3,339	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	9.5	4.4	2,082	6.2	1.8	15	10.6	3.4	2,107	5.5	1.3	18.8
Moderate	28	16.6	17.0	3,873	11.5	11.8	14	9.9	14.0	2,096	5.5	8.9	18.8
Middle	40	23.7	26.9	6,986	20.8	23.9	25	17.7	22.9	5,784	15.2	19.3	21.9
Upper	62	36.7	36.4	15,035	44.8	43.0	55	39.0	37.1	15,775	41.5	42.4	40.5
Unknown	23	13.6	15.3	5,563	16.6	19.5	32	22.7	22.6	12,286	32.3	28.1	0.0
Total	169	100.0	100.0	33,539	100.0	100.0	141	100.0	100.0	38,048	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.													

Table E-9 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Colorado Springs MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	7.4	0	0.0	5.2	0	0.0	7.4	0	0.0	4.5	18.8
Moderate	2	20.0	20.4	150	13.0	14.5	0	0.0	18.1	0	0.0	12.1	18.8
Middle	3	30.0	28.7	300	26.1	25.4	1	100.0	27.1	45	100.0	22.5	21.9
Upper	3	30.0	41.2	200	17.4	52.1	0	0.0	44.6	0	0.0	57.7	40.5
Unknown	2	20.0	2.3	500	43.5	2.7	0	0.0	2.8	0	0.0	3.2	0.0
Total	10	100.0	100.0	1,150	100.0	100.0	1	100.0	100.0	45	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	5.3	5.9	85	7.3	3.3	3	18.8	5.8	170	20.0	3.9	18.8
Moderate	7	36.8	18.8	310	26.5	13.5	4	25.0	22.4	171	20.1	16.3	18.8
Middle	4	21.1	24.7	159	13.6	20.2	3	18.8	27.1	155	18.2	23.2	21.9
Upper	7	36.8	44.8	618	52.7	52.0	6	37.5	38.4	354	41.6	47.2	40.5
Unknown	0	0.0	5.9	0	0.0	11.1	0	0.0	6.2	0	0.0	9.4	0.0
Total	19	100.0	100.0	1,172	100.0	100.0	16	100.0	100.0	850	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	3.4	0	0.0	6.7	18.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	96.6	0	0.0	93.3	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
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 E-10

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Colorado Springs MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023					2024*					
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	88	65.2	36.6	10,373	45.8	14.9	61	66.3	6,970	51.9	94.3
Over \$1 Million	36	26.7		8,813	38.9		23	25.0	5,738	42.7	4.8
Revenue Unknown	11	8.1		3,446	15.2		8	8.7	728	5.4	0.8
Total	135	100.0		22,632	100.0		92	100.0	13,436	100.0	100.0
By Loan Size											
\$100,000 or Less	88	65.2	88.1	1,380	6.1	41.4	60	65.2	784	5.8	
\$100,001 - \$250,000	17	12.6	7.3	3,563	15.7	16.0	10	10.9	1,873	13.9	
\$250,001 - \$1 Million	30	22.2	4.6	17,689	78.2	42.7	22	23.9	10,779	80.2	
Total	135	100.0	100.0	22,632	100.0	100.0	92	100.0	13,436	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	68	77.3		471	4.5		46	75.4	278	4.0	
\$100,001 - \$250,000	5	5.7		995	9.6		3	4.9	448	6.4	
\$250,001 - \$1 Million	15	17.0		8,907	85.9		12	19.7	6,244	89.6	
Total	88	100.0		10,373	100.0		61	100.0	6,970	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-11

2024 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	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 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 E-12

2023 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	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	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 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Mountain AA

Table E-13 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Mountain													
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	1.4	4.1	729	0.5	3.3	7	2.9	5.0	3,707	1.8	23.9	0.5
Moderate	11	5.1	1.0	4,693	3.1	1.2	17	7.1	1.7	13,747	6.6	1.6	0.8
Middle	78	36.4	35.6	59,769	38.9	29.5	69	28.6	32.6	56,182	27.1	20.9	37.1
Upper	122	57.0	58.9	88,577	57.6	65.9	148	61.4	60.6	133,810	64.5	53.7	61.6
Unknown	0	0.0	0.4	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	214	100.0	100.0	153,768	100.0	100.0	241	100.0	100.0	207,446	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	1.0	0	0.0	2.8	0	0.0	2.6	0.5
Moderate	2	5.0	0.9	410	2.9	0.3	0	0.0	0.6	0	0.0	0.5	0.8
Middle	15	37.5	32.0	5,437	37.9	21.9	18	27.7	32.3	11,148	33.0	28.7	37.1
Upper	23	57.5	65.1	8,487	59.2	76.8	47	72.3	64.1	22,608	67.0	68.2	61.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	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	40	100.0	100.0	14,334	100.0	100.0	65	100.0	100.0	33,756	100.0	100.0	100.0
Home Improvement Loans													
Low	1	1.0	0.7	50	0.4	0.5	1	1.1	1.1	30	0.1	0.8	0.5
Moderate	6	5.9	1.5	1,005	7.1	1.1	1	1.1	0.9	45	0.2	0.5	0.8
Middle	24	23.8	30.6	3,220	22.8	30.5	26	27.4	33.2	2,901	12.7	26.7	37.1
Upper	70	69.3	67.2	9,850	69.7	67.9	67	70.5	64.9	19,836	87.0	71.9	61.6
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	101	100.0	100.0	14,125	100.0	100.0	95	100.0	100.0	22,812	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	5.0	0	0.0	2.4	3.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.0	0	0.0	1.8	4.7
Middle	0	0.0	55.6	0	0.0	57.7	2	66.7	30.0	2,910	10.9	36.0	31.4
Upper	1	100.0	44.4	5,000	100.0	42.3	1	33.3	60.0	23,800	89.1	59.7	60.4
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	5,000	100.0	100.0	3	100.0	100.0	26,710	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	1.0	3.2	779	0.4	2.5	8	1.8	3.8	3,737	1.3	17.4	0.5
Moderate	22	5.4	1.0	6,403	3.3	0.9	21	4.7	1.4	14,032	4.7	1.3	0.8
Middle	132	32.4	34.1	71,177	36.4	27.1	132	29.3	33.0	75,584	25.4	22.7	37.1
Upper	249	61.2	61.5	117,097	59.9	69.5	289	64.2	61.7	204,431	68.7	58.6	61.6
Unknown	0	0.0	0.2	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	407	100.0	100.0	195,456	100.0	100.0	450	100.0	100.0	297,784	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.

Table E-13 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Mountain													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	3.0	0	0.0	1.8	0	0.0	0.9	0	0.0	0.9	0.5
Moderate	1	5.3	0.3	100	2.7	0.1	2	8.7	1.8	200	4.7	1.2	0.8
Middle	7	36.8	34.4	870	23.2	27.6	6	26.1	35.3	815	19.2	27.2	37.1
Upper	11	57.9	62.3	2,787	74.2	70.5	15	65.2	61.9	3,220	76.0	70.7	61.6
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	19	100.0	100.0	3,757	100.0	100.0	23	100.0	100.0	4,235	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.3	0	0.0	0.2	0	0.0	1.9	0	0.0	0.7	0.5
Moderate	2	6.3	1.3	195	4.4	0.3	1	4.3	1.0	40	1.4	1.2	0.8
Middle	8	25.0	26.9	1,881	42.1	15.7	11	47.8	40.4	1,628	57.6	15.3	37.1
Upper	22	68.8	70.5	2,396	53.6	83.7	11	47.8	56.7	1,157	41.0	82.8	61.6
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	32	100.0	100.0	4,472	100.0	100.0	23	100.0	100.0	2,825	100.0	100.0	100.0
Purpose Not Applicable													
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	4.5	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	0.8
Middle	0	0.0	31.8	0	0.0	17.6	0	0.0	33.3	0	0.0	30.3	37.1
Upper	0	0.0	63.6	0	0.0	81.6	0	0.0	66.7	0	0.0	69.7	61.6
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
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 E-14

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Mountain											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	1.7	0	0.0	2.8	1	0.5	503	1.6	1.1
Moderate	3	1.4	1.7	1,223	5.0	0.3	6	3.1	1,454	4.8	2.1
Middle	82	39.0	35.2	9,407	38.1	34.8	79	40.9	12,556	41.1	27.2
Upper	125	59.5	49.1	14,031	56.9	60.5	107	55.4	16,068	52.5	69.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	12.2	0	0.0	1.6	0	0.0	0	0.0	0.0
Total	210	100.0	100.0	24,661	100.0	100.0	193	100.0	30,581	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. *Aggregate data is not currently available.

Table E-15 (1 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Mountain													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	3	1.4	0.8	333	0.2	0.3	1	0.4	1.4	142	0.1	0.4	12.2
Moderate	9	4.2	4.5	2,953	1.9	1.2	15	6.2	5.2	3,831	1.8	1.2	12.7
Middle	17	7.9	11.3	5,987	3.9	4.1	11	4.6	11.3	3,824	1.8	3.5	21.8
Upper	134	62.6	66.0	87,093	56.6	65.1	138	57.3	64.9	107,349	51.7	50.5	53.3
Unknown	51	23.8	17.4	57,402	37.3	29.3	76	31.5	17.3	92,300	44.5	44.4	0.0
Total	214	100.0	100.0	153,768	100.0	100.0	241	100.0	100.0	207,446	100.0	100.0	100.0
Refinance Loans													
Low	1	2.5	3.4	250	1.7	0.8	1	1.5	3.0	59	0.2	1.4	12.2
Moderate	1	2.5	6.1	40	0.3	1.4	4	6.2	7.0	477	1.4	1.9	12.7
Middle	4	10.0	14.0	688	4.8	4.3	5	7.7	11.5	1,756	5.2	4.1	21.8
Upper	25	62.5	54.5	9,168	64.0	42.0	37	56.9	58.1	16,614	49.2	57.1	53.3
Unknown	9	22.5	21.9	4,188	29.2	51.6	18	27.7	20.4	14,850	44.0	35.5	0.0
Total	40	100.0	100.0	14,334	100.0	100.0	65	100.0	100.0	33,756	100.0	100.0	100.0
Home Improvement Loans													
Low	4	4.0	2.3	255	1.8	6.2	2	2.1	1.6	100	0.4	1.3	12.2
Moderate	7	6.9	6.1	685	4.8	2.2	4	4.2	7.0	140	0.6	3.3	12.7
Middle	14	13.9	14.3	975	6.9	4.9	9	9.5	14.8	842	3.7	7.9	21.8
Upper	64	63.4	70.0	9,921	70.2	69.9	56	58.9	65.7	9,253	40.6	67.7	53.3
Unknown	12	11.9	7.2	2,289	16.2	16.7	24	25.3	10.9	12,477	54.7	19.8	0.0
Total	101	100.0	100.0	14,125	100.0	100.0	95	100.0	100.0	22,812	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	2.0	1.6	838	0.4	0.8	4	0.9	1.8	301	0.1	0.7	12.2
Moderate	26	6.4	5.1	4,278	2.2	1.2	32	7.2	6.2	5,385	2.0	1.5	12.7
Middle	47	11.6	12.2	9,342	4.9	3.8	31	6.9	12.0	6,955	2.6	3.7	21.8
Upper	251	61.8	64.0	111,604	58.6	57.7	257	57.5	63.2	137,411	50.7	52.3	53.3
Unknown	74	18.2	17.2	64,394	33.8	36.5	123	27.5	16.7	121,022	44.6	41.9	0.0
Total	406	100.0	100.0	190,456	100.0	100.0	447	100.0	100.0	271,074	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.													

Table E-15 (2 of 2)

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Mountain													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank			Agg			Bank			Agg			
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.8	0	0.0	4.3	0	0.0	2.7	0	0.0	1.2	12.2
Moderate	6	31.6	6.8	460	12.2	1.4	6	26.1	11.8	815	19.2	5.1	12.7
Middle	1	5.3	13.9	150	4.0	3.1	2	8.7	16.6	130	3.1	7.0	21.8
Upper	11	57.9	67.7	2,747	73.1	53.3	11	47.8	62.2	1,920	45.3	78.4	53.3
Unknown	1	5.3	9.8	400	10.6	38.0	4	17.4	6.6	1,370	32.3	8.2	0.0
Total	19	100.0	100.0	3,757	100.0	100.0	23	100.0	100.0	4,235	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.5	0	0.0	1.2	0	0.0	1.9	0	0.0	2.2	12.2
Moderate	3	9.4	4.4	140	3.1	0.2	3	13.0	7.2	122	4.3	1.4	12.7
Middle	11	34.4	11.5	1,542	34.5	0.8	4	17.4	14.9	403	14.3	1.5	21.8
Upper	17	53.1	57.3	2,675	59.8	36.0	15	65.2	64.4	2,275	80.5	45.6	53.3
Unknown	1	3.1	23.3	115	2.6	61.9	1	4.3	11.5	25	0.9	49.3	0.0
Total	32	100.0	100.0	4,472	100.0	100.0	23	100.0	100.0	2,825	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	12.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	12.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	53.3
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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.													

Table E-16

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Mountain											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	126	60.0	44.8	6,965	28.2	23.0	111	57.5	10,974	35.9	91.3
Over \$1 Million	68	32.4		15,350	62.2		59	30.6	16,812	55.0	7.4
Revenue Unknown	16	7.6		2,346	9.5		23	11.9	2,795	9.1	1.3
Total	210	100.0		24,661	100.0		193	100.0	30,581	100.0	100.0
By Loan Size											
\$100,000 or Less	153	72.9	90.0	4,014	16.3	54.8	121	62.7	3,056	10.0	
\$100,001 - \$250,000	29	13.8	7.4	5,843	23.7	23.3	31	16.1	5,975	19.5	
\$250,001 - \$1 Million	28	13.3	2.6	14,804	60.0	22.0	41	21.2	21,550	70.5	
Total	210	100.0	100.0	24,661	100.0	100.0	193	100.0	30,581	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	107	84.9		1,774	25.5		81	73.0	1,415	12.9	
\$100,001 - \$250,000	11	8.7		2,074	29.8		14	12.6	2,541	23.2	
\$250,001 - \$1 Million	8	6.3		3,117	44.8		16	14.4	7,018	64.0	
Total	126	100.0		6,965	100.0		111	100.0	10,974	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>											
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>											

Table E-17

2024 Mountain AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.8	208	0.5	0	0.0	5,259	12.2
Moderate	1	1.8	711	1.6	100	14.1	5,477	12.7
Middle	17	30.9	15,985	37.1	771	4.8	9,407	21.8
Upper	36	65.5	26,219	60.8	1,007	3.8	22,980	53.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	55	100.0	43,123	100.0	1,878	4.4	43,123	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,196	232	0.5	7.3	391	12.2	2,573	80.5
Moderate	2,326	398	0.8	17.1	787	33.8	1,141	49.1
Middle	38,924	17,642	37.1	45.3	7,549	19.4	13,733	35.3
Upper	78,156	29,256	61.6	37.4	12,621	16.1	36,279	46.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	122,602	47,528	100.0	38.8	21,348	17.4	53,726	43.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	119	1.1	107	1.1	9	1.1	3	2.1
Moderate	222	2.1	192	1.9	28	3.5	2	1.4
Middle	2,936	27.2	2,670	27.1	234	29.4	32	22.4
Upper	7,533	69.7	6,901	69.9	526	66.0	106	74.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10,810	100.0	9,870	100.0	797	100.0	143	100.0
Percentage of Total Businesses:			91.3		7.4		1.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	1.5	4	1.5	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	93	35.4	89	34.4	3	100.0	1	100.0
Upper	166	63.1	166	64.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	263	100.0	259	100.0	3	100.0	1	100.0
Percentage of Total Farms:			98.5		1.1		0.4	
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 E-18

2023 Mountain AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.8	208	0.5	0	0.0	5,259	12.2
Moderate	1	1.8	711	1.6	100	14.1	5,477	12.7
Middle	17	30.9	15,985	37.1	771	4.8	9,407	21.8
Upper	36	65.5	26,219	60.8	1,007	3.8	22,980	53.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	55	100.0	43,123	100.0	1,878	4.4	43,123	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,196	232	0.5	7.3	391	12.2	2,573	80.5
Moderate	2,326	398	0.8	17.1	787	33.8	1,141	49.1
Middle	38,924	17,642	37.1	45.3	7,549	19.4	13,733	35.3
Upper	78,156	29,256	61.6	37.4	12,621	16.1	36,279	46.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	122,602	47,528	100.0	38.8	21,348	17.4	53,726	43.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	128	1.0	117	1.0	8	0.9	3	1.9
Moderate	232	1.9	202	1.8	27	3.1	3	1.9
Middle	3,503	28.3	3,200	28.2	268	30.5	35	22.6
Upper	8,507	68.8	7,817	69.0	576	65.5	114	73.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,370	100.0	11,336	100.0	879	100.0	155	100.0
Percentage of Total Businesses:				91.6		7.1		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	1.0	3	1.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	109	36.1	106	35.6	2	66.7	1	100.0
Upper	190	62.9	189	63.4	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	302	100.0	298	100.0	3	100.0	1	100.0
Percentage of Total Farms:				98.7		1.0		0.3
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX F – GLOSSARY

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

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1MM 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 2.5MM 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 \$1MM 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.