



## **PUBLIC DISCLOSURE**

October 27, 2025

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

First Westroads Bank, Inc.  
RSSD# 222754

15750 West Dodge Road  
Omaha, Nebraska 68118

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

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

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

First Westroads Bank, Inc., (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

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

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered 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. In addition, available Home Mortgage Disclosure Act (HMDA) aggregate data for the most recent three years (2022, 2023, and 2024) and CRA aggregate data for the most recent three years (2021, 2022, and 2023) were referenced for additional perspective on credit demand within the bank's AA. Lending performance was assessed within the bank's only AA. Examiners reviewed the following data:

- The bank's 16-quarter average NLTD ratio,
- A statistical sample of 53 small business loans selected from a universe of 71 outstanding loans originated from January 1, 2024, to December 31, 2024; and
- A universe of 56 HMDA loans originated from January 1, 2023, to December 31, 2024.

Greater weight was placed on small business lending performance in this evaluation as commercial lending is the bank's primary business focus and comprises the largest portion of the loan portfolio.

**DESCRIPTION OF INSTITUTION**

First Westroads Bank, Inc., is a community bank headquartered in Omaha, Nebraska. The bank's characteristics include:

- The bank is a wholly-owned subsidiary of Ameriwest Corp. The holding company also controls 100.0 percent of nonbank subsidiary, MFH, LLC, which serves as a real estate holding company and owns the bank's headquarters.
- The bank has total assets of \$384.6 million as of June 30, 2025.
- In addition to its main office in Omaha, Nebraska, the bank operates one additional office also located in Omaha, Nebraska.
- The bank maintains two cash-only Automated Teller Machines, one at each office location.
- As shown in the table below, the bank's primary business focus is commercial lending.

**Table 1**

<b>Composition of Loan Portfolio as of June 30, 2025</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	48,127	19.6
Farmland	675	0.3
1- to 4-Family Residential Real Estate	31,658	12.9
Multifamily Residential Real Estate	38,817	15.8
Nonfarm Nonresidential Real Estate	91,359	37.2
Agricultural	0	0.0
Commercial and Industrial	33,600	13.7
Consumer	305	0.1
Other	1,037	0.4
Gross Loans	<b>245,578</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its November 29, 2021 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.

**DESCRIPTION OF ASSESSMENT AREA**

The bank's Douglas County Metropolitan AA consists of the entirety of Douglas County, Nebraska which is one of eight counties that comprises the Omaha, Nebraska-Iowa Metropolitan Statistical Area (Omaha, NE-IA MSA). See Appendix A for an AA map and Appendix B for additional demographic data.

- Since the prior examination, there have been no changes to the bank's AA delineation.
- The AA consists of 16 low-, 45 moderate-, 56 middle-, and 46 upper-income census tracts for a total of 163 census tracts within the AA. While the AA delineation has not changed since the previous evaluation, the AA experienced changes to the income designations for several census tracts. At the previous evaluation there were 27 low-, 38 moderate-, 52 middle-, and 39 upper-income census tracts.
- According to the June 30th, 2024 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank held a 0.84 percent market share of deposits, ranking 16 of 39 institutions operating from 175 banking offices throughout the AA.
- One interview with a member of the community within the bank's AA was conducted to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member was a representative of an organization that serves small business needs.

**Table 2**

Population Change Assessment Area: Douglas County Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Douglas County Metropolitan	537,655	584,526	8.7
Omaha, NE-IA MSA	895,919	967,604	8.0
Nebraska	1,869,365	1,961,504	4.9
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Area demographics reflect a slightly lower concentration of residents aged 65 and older at 12.6 percent of the AA's total population, compared to the statewide figure of 15.4 percent and the Omaha, NE-IA MSA figure of 13.4 percent.
- The AA population accounts for approximately 29.7 percent of residents in the state of Nebraska.

**Table 3**

Median Family Income Change Assessment Area: Douglas County Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Douglas County Metropolitan	77,891	87,064	11.8
Omaha, NE-IA MSA	80,449	87,733	9.1
Nebraska	73,448	80,125	9.1
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.			

- Of the families living in the AA, 38.9 percent were designated as LMI, which is slightly higher than the Nebraska statewide and Omaha, NE-IA MSA figures of 37.0 percent and 37.8 percent, respectively.
- The median family income (MFI) in the AA, at \$85,140, is slightly higher than the Nebraska statewide MFI, at \$80,125, and comparable to the Omaha, NE-IA MSA figure, at \$87,733.

**Table 4**

Housing Cost Burden Assessment Area: Douglas County Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Douglas County Metropolitan	77.8	33.0	41.4	66.9	36.2	17.6
Omaha, NE-IA MSA	76.0	32.1	39.7	64.5	34.0	16.7
Nebraska	73.1	27.0	37.0	61.7	28.6	16.1
Cost Burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy						

- Of the AA's total housing units, 58.0 percent are owner-occupied units, which is slightly lower than the statewide figure of 60.1 percent and the Omaha, NE-IA MSA figure of 61.4 percent.
- According to a community contact, there is a tremendous amount of housing growth in the Omaha area, but the lack of affordable housing is still a key issue.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Douglas County Metropolitan</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Douglas County Metropolitan	5.0	3.1	2.4	2.6	3.1
Omaha, NE-IA MSA	4.7	3.0	2.4	2.5	3.0
Nebraska	4.3	2.6	2.2	2.3	2.8
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- The AA's primary employment industries include government, healthcare and social assistance, retail trade, and accommodation and food services positions.
- Area unemployment figures have trended downward since their peak in 2020 at the onset of the Coronavirus Disease 2019 pandemic (pandemic), which is consistent with the figures for the state of Nebraska. However, unemployment increased in 2024.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

The bank's overall lending test performance is Satisfactory. In determining the lending test rating, equal weight was given to each of the performance criteria.

### **Net Loan-to-Deposit Ratio**

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

The bank's 16-quarter average NLTD ratio of 72.3 percent is below the four other similarly situated banks with ratios ranging from a low of 82.1 percent to a high of 101.5 percent. Performance is still considered reasonable as the bank's lower lending levels over the review period can be attributed to the decrease in loan originations through the Small Business Administration's Paycheck Protection Program during the pandemic, a rising interest rate environment, and significant competition in the area.

**Table 6**

Comparative NLTD Ratios September 30, 2021 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			16 Quarter Average
First Westroads Bank, Inc.	Omaha, NE	384,604	72.3
<b>Similarly Situated Institutions</b>			
Horizon Bank	Waverly, NE	495,433	94.2
Premier Bank NA	Omaha, NE	344,086	82.1
Enterprise Bank	Omaha, NE	534,683	101.5
United Republic Bank	Omaha, NE	207,822	93.5

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside the AA. While a majority the bank's HMDA lending by dollar amount is outside the AA, this was driven by a small number of multifamily housing loans which represented a significant portion of the bank's total HMDA reportable lending by dollar amount.

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase – Conventional	21	72.4	8,750	63.9	8	27.6	4,947	36.1
Home Improvement	0	0.0	0	0.0	1	100.0	99	100.0
Multifamily Housing	5	50.0	13,884	32.7	5	50.0	28,635	67.3
Other Purpose Closed-End	1	50.0	543	52.1	1	50.0	500	47.9
Refinancing	11	78.6	2,022	80.6	3	21.4	487	19.4
<b>Total HMDA Related</b>	<b>38</b>	<b>67.9</b>	<b>25,199</b>	<b>42.1</b>	<b>18</b>	<b>32.1</b>	<b>34,668</b>	<b>57.9</b>
Small Business	43	81.1	15,148	78.0	10	18.9	4,261	22.0
<b>Total Loans</b>	<b>81</b>	<b>74.3</b>	<b>40,347</b>	<b>50.9</b>	<b>28</b>	<b>25.7</b>	<b>38,929</b>	<b>49.1</b>

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

### Geographic Distribution of Loans

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



### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. Lending in low-income census tracts in 2024 was comparable to aggregate lending by number, below by dollar, and comparable to the percentage of owner-occupied units (demographic figure). Lending in moderate-income census tracts was below aggregate by number, above by dollar, and below the demographic figure. Lending levels in 2023 exceeded those of 2024 and helped support the overall rating.

When evaluating dispersion, a conspicuous gap or lapse was identified that includes LMI census tracts but is explained by strong competition from other financial institutions within the AA and the lack of branches near the tracts with an identified gap or lapse.

**Table 8**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Douglas County Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	13.3	5.4	195	3.1	3.2	1	4.3	5.5	289	1.5	3.2	4.1
Moderate	2	13.3	19.1	2,439	38.6	16.1	2	8.7	18.2	11,182	59.2	15.8	19.8
Middle	4	26.7	36.3	869	13.7	34.0	10	43.5	36.6	4,113	21.8	32.5	38.7
Upper	7	46.7	39.2	2,821	44.6	46.7	10	43.5	39.7	3,291	17.4	48.5	37.4
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	15	100.0	100.0	6,324	100.0	100.0	23	100.0	100.0	18,875	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.													
The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.													

### Small Business Lending

The geographic distribution of small business lending is reasonable. The bank did not originate any small business loans in low-income census tracts, which resulted in performance below the percentage of total businesses operating in those tracts (demographic figure), while lending in moderate-income census tracts was comparable to the demographic figure.

When evaluating for dispersion, a conspicuous gap or lapse was identified that includes LMI census tracts but is explained by strong competition from other financial institutions within the AA and the lack of branches near the tracts with an identified gap or lapse.

**Table 9**

Distribution of 2024 Small Business Lending By Income Level of Geography					
Assessment Area: Douglas County Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.9
Moderate	9	20.9	4,098	27.1	22.6
Middle	15	34.9	3,886	25.7	40.5
Upper	19	44.2	7,165	47.3	33.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>15,148</b>	<b>100.0</b>	<b>100.0</b>
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau; American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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

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 a reasonable distribution among individuals of different income levels and businesses of different sizes.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. Lending in 2024 to both low- and moderate-income borrowers was below the respective aggregate figures by number and dollar and the respective percentages of families by family income. The bank had consistent lending performance in 2023.

**Table 10**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Douglas County Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	10.1	0	0.0	5.5	1	4.5	8.6	169	2.2	4.4	20.5
Moderate	1	9.1	22.5	367	10.3	17.0	1	4.5	22.3	275	3.5	16.9	18.4
Middle	0	0.0	22.4	0	0.0	20.0	3	13.6	22.5	427	5.5	19.9	22.0
Upper	6	54.5	29.8	2,222	62.3	40.8	13	59.1	29.7	6,438	83.1	39.1	39.1
Unknown	4	36.4	15.1	978	27.4	16.6	4	18.2	16.9	439	5.7	19.7	0.0
Total	11	100.0	100.0	3,567	100.0	100.0	22	100.0	100.0	7,748	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.													
The bank’s HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.													

## Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with gross annual revenues of \$1 million or less was below the percentage of total businesses operating in the AA. However, additional consideration was given to lending by loan size, which showed that 53.5 percent of loans were originated in amounts of \$250,000 or less. These dollar amounts are typically associated with credit demands of small businesses and demonstrate the bank's willingness to meet the credit needs of small businesses. Additionally, while the bank is not a CRA reporter, a review of the three-year CRA aggregate data reported by CRA filers in the area for 2021, 2022, and 2023 was referenced to gauge overall credit demand in the AA. The three-year average aggregate lending to businesses with revenues of \$1 million or less was 50.7 percent by number, which reflects a lower demand for credit than depicted by the demographic figure. These additional performance context factors supported the reasonable conclusion.

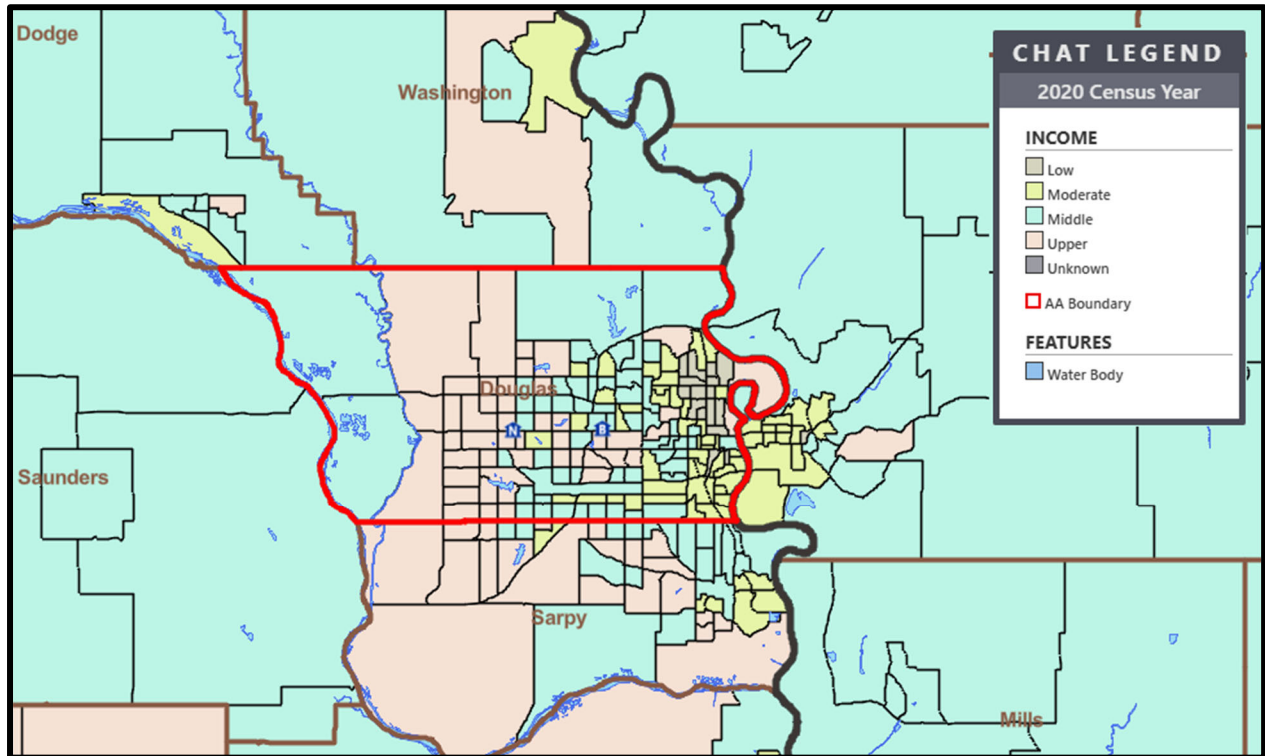
**Table 11**

Distribution of 2024 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Douglas County Metropolitan					
	Bank Loans				Total Businesses
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	15	34.9	4,441	29.3	89.2
Over \$1 Million	27	62.8	10,706	70.7	10.1
Revenue Unknown	1	2.3	1	0.0	0.7
Total	43	100.0	15,148	100.0	100.0
By Loan Size					
\$100,000 or Less	15	34.9	914	6.0	
\$100,001 - \$250,000	8	18.6	1,680	11.1	
\$250,001 - \$1 Million	20	46.5	12,554	82.9	
Total	43	100.0	15,148	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	8	53.3	457	10.3	
\$100,001 - \$250,000	3	20.0	630	14.2	
\$250,001 - \$1 Million	4	26.7	3,354	75.5	
Total	15	100.0	4,441	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.					

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – MAP OF THE ASSESSMENT AREA



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2024 Douglas County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	9.8	8,047	5.9	2,243	27.9	27,986	20.5
Moderate	45	27.6	31,122	22.8	3,946	12.7	25,109	18.4
Middle	56	34.4	49,737	36.4	2,386	4.8	30,040	22.0
Upper	46	28.2	47,628	34.9	978	2.1	53,399	39.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	163	100.0	136,534	100.0	9,553	7.0	136,534	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	16,050	5,657	4.1	35.2	8,432	52.5	1,961	12.2
Moderate	62,499	27,254	19.8	43.6	30,282	48.5	4,963	7.9
Middle	91,366	53,188	38.7	58.2	32,309	35.4	5,869	6.4
Upper	67,021	51,336	37.4	76.6	12,993	19.4	2,692	4.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	236,936	137,435	100.0	58.0	84,016	35.5	15,485	6.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	925	3.9	818	3.9	102	4.3	5	2.9
Moderate	5,307	22.6	4,686	22.4	588	24.8	33	19.3
Middle	9,517	40.5	8,387	40.0	1,058	44.7	72	42.1
Upper	7,750	33.0	7,069	33.7	620	26.2	61	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	23,499	100.0	20,960	100.0	2,368	100.0	171	100.0
Percentage of Total Businesses:				89.2		10.1		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	2.9	6	2.5	1	14.3	0	0.0
Moderate	20	8.2	20	8.4	0	0.0	0	0.0
Middle	90	36.7	90	37.8	0	0.0	0	0.0
Upper	128	52.2	122	51.3	6	85.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	245	100.0	238	100.0	7	100.0	0	0.0
Percentage of Total Farms:				97.1		2.9		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 B-2**

2023 Douglas County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	9.8	8,047	5.9	2,243	27.9	27,986	20.5
Moderate	45	27.6	31,122	22.8	3,946	12.7	25,109	18.4
Middle	56	34.4	49,737	36.4	2,386	4.8	30,040	22.0
Upper	46	28.2	47,628	34.9	978	2.1	53,399	39
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	163	100.0	136,534	100.0	9,553	7.0	136,534	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	16,050	5,657	4.1	35.2	8,432	52.5	1,961	12.2
Moderate	62,499	27,254	19.8	43.6	30,282	48.5	4,963	7.9
Middle	91,366	53,188	38.7	58.2	32,309	35.4	5,869	6.4
Upper	67,021	51,336	37.4	76.6	12,993	19.4	2,692	4.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	236,936	137,435	100.0	58.0	84,016	35.5	15,485	6.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	964	3.9	852	3.8	107	4.4	5	3.1
Moderate	5,513	22.2	4,881	21.9	601	24.6	31	19.0
Middle	9,932	40.0	8,775	39.4	1,091	44.7	66	40.5
Upper	8,452	34.0	7,750	34.8	641	26.3	61	37.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	24,861	100.0	22,258	100.0	2,440	100.0	163	100.0
Percentage of Total Businesses:				89.5		9.8		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	2.0	5	2.1	0	0.0	0	0.0
Moderate	21	8.5	20	8.3	1	14.3	0	0.0
Middle	90	36.3	90	37.3	0	0.0	0	0.0
Upper	132	53.2	126	52.3	6	85.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	248	100.0	241	100.0	7	100.0	0	0.0
Percentage of Total Farms:				97.2		2.8		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.								

## APPENDIX C – GLOSSARY

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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

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

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